



CONFLICT MINERALS

**Dodd-Frank Wall Street Reform and Consumer Protection
Regulation (EU) 2017/821 of the European Parliament and of
the Council of 17 May 2017**

The 2010 Dodd-Frank Act has imposed that the U.S. Securities and Exchange Commission issue an Act requiring companies to disclose the possible supply of metals such as gold, tantalum, tin and tungsten from Central Africa (Democratic Republic of Congo and neighboring countries) in order to dissuade industries from purchasing materials that have been mined in violent conditions and armed conflicts.

In May 2017, the European Parliament and the Council of the European Union issued Regulation (EU) 2017/821 laying down diligence requirements in the supply chain for Union importers of Tin, Tantalum and Tungsten, their ores, and gold, originating in conflict zones or at high risk.

With the reference with above, we declare that:

Only one derivate of the conflict minerals is necessary to the functionality and production of ITALFIL S.p.A. products: Tungsten, which is added as Ferro-Alloy (Fe-W) during the steel manufacturing process;

Tungsten is intentionally added as Ferro-Alloy (Fe-W) during the fabrication of:

- 650: Tungsten is intentionally added during the fabrication of 1.2606 as Ferro-Alloy (Fe-W) to become a chemistry component in the range of 1.20-1.35% of mass. Tungsten is necessary in order to increase mechanical properties of the weld deposit at high temperature, corrosion resistance and hardness.
- RC9: Tungsten is intentionally added during the fabrication of 1.3343 as Ferro-Alloy (Fe-W) to become a chemistry component in the range of 6.00-6.30% of mass. Tungsten is necessary in order to increase mechanical properties of the weld deposit at high temperature, corrosion resistance and hardness.
- M7: Tungsten is intentionally added during the fabrication of 1.3348 as Ferro-Alloy (Fe-W) to become a chemistry component in the range of 1.50-2.00% of mass. Tungsten is necessary in order to increase mechanical properties of the weld deposit at high temperature, corrosion resistance and hardness.
- 2567: Tungsten is intentionally added during the fabrication of 1.2567 as Ferro-Alloy (Fe-W) to become a chemistry component in the range of 4.00-4.50% of mass. Tungsten is necessary in order to increase mechanical properties of the weld deposit at high temperature, corrosion resistance and hardness.

ITALFIL S.p.A. does not purchase any derivate of conflict minerals, but only the wire rods \varnothing 5.50 mm from the steel mills. However, in accordance with ITALFIL S.p.A's Internal Policy on the Principles of Social Responsibility, Human Rights and Discrimination, ITALFIL S.p.A. is committed to:

- not intentionally purchase and use the specified metals from mines in the "Conflict Region" or otherwise not certified as "Conflict Free"
- require their suppliers to undertake an appropriate evaluation process with their supply chains in order to ensure that the specified metals come only from:

- mines and smelters outside the "Conflict Region"
- mines and smelters that have been certified by an independent third party as "Conflict Free", if located within the "Conflict Region"

In addition, the activity of our suppliers, as well as the activity of their production chain, is periodically monitored through the appropriate CMRT (Conflict Minerals Report Template) questionnaire.

On the bases of the above said, we can assert that none of the above mentioned "Conflict Minerals" involved in the production of the wire rods used by ITALFIL S.p.A. for the production of welding consumables, are supplied directly or indirectly from the so-called conflict areas

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ITALFIL S.p.A.
Via dell'Industria, 21 - 35010 Gazzo (PD)
Quality System Manager
Product Approvals & EPC Manager
Per. Ind. Dalla Vecchia Andrea

