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Conflict Minerals Reporting Template (CMRT)

English

Revision 6.1
 April 28, 2021

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Umbragroup S.p.A.
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	65667
Company Unique ID Authority:	
Address:	Via Valter Baldaccini 1 Foligno 06034 PG
Contact Name (*):	Bryan Colurciello
Email - Contact (*):	BColurciello@umbragroup.com
Phone - Contact (*):	0742348618
Authorizer (*):	Alessio Nicoli
Title - Authorizer:	Supply Chain Operations & Quality Manager
Email - Authorizer (*):	Anicoli@umbragroup.com
Phone - Authorizer:	0742348644
Effective Date (*):	14-Sep-2021

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)	Answer	Comments
Tantalum (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum (*)	Unknown	
Tin (*)	Unknown	
Gold (*)	Unknown	
Tungsten (*)	Unknown	

5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold (*)	No	
Tungsten (*)	No	

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum (*)	100%	
Tin (*)	100%	
Gold (*)	100%	
Tungsten (*)	100%	

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold (*)	No	
Tungsten (*)	No	



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8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold (*)	No	
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note - If yes, the user shall specify the URL in the comment field.) (*)	Yes	www.umbragroup.com
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g.,	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	Yes	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	