

# GRUPPO LUCEFIN

09/18/2025

## The Lucefin Group includes the following companies

TRAFILIX S.p.A.  
Esine production unit  
Esine (BS)

TRAFILIX S.p.A.  
Berzo production unit  
Berzo Inferiore (BS)

TRAFILIX S.p.A.  
Distribution center  
Cividate Camuno (BS)

TRAFIL CZECH S.r.o. Kladno, CZ

ACCIAI BRIANZA S.p.A. Desio (MB)

ACCIAI BRIANZA S.p.A.  
commercial division:  
TRA.ME.T. Orbassano (TO)

CO.MET. ACCIAI s.r.l. Brescia

CO.MET. ACCIAI s.r.l.  
commercial division:  
SIDERCONERO Osimo Stazione (AN)

COSMO ACCIAI s.r.l. Spilamberto (MO)

NUOVA BASSANI s.r.l. Forlì (FC)

SIDERMARCA s.r.l. Ponzano Veneto (TV)

KSM STAHL GmbH Empfingen, D

## SUBJECT: DECLARATION OF COMPLIANCE WITH CONFLICT MINERALS REGULATIONS (REGULATIONS TO COUNTER THE IMPORT OF CERTAIN MINERALS FROM CONFLICT OR HIGH-RISK AREAS)

In June 2010, U.S. President Obama signed the Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which contains a section that for the first time regulates the issue of "conflict materials." The Act requires disclosure of whether materials are produced from conflict minerals (tantalum, tin, tungsten, and gold, also known as "3TG") from the Democratic Republic of Congo (DRC) or from countries with which it shares internationally recognized borders-Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

EU Regulation 2017/821 establishes supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold, originating in conflict or high-risk areas, which apply from January 1, 2021.

The companies belonging to the Lucefin Group (hereafter "the Companies") are not configured as an importer of the above minerals.

As downstream users, the Companies require their raw material suppliers to comply with regulations and are committed to monitoring and acting responsibly in the procurement of these raw materials to prevent conflict minerals from entering their supply chain and global markets, through appropriate control measures introduced in their supply chain.

Therefore, we declare that the raw materials used do not originate from conflict or high-risk areas, in compliance with EU Regulation 2017/821 and Section 1502 of the Dodd-Frank Act.

The Lucefin Group undertakes to monitor the periodic review of the list of high-risk areas.

On request, the Companies can issue the CMRT report (Conflict Minerals Reporting Template).

Should the Lucefin Group's position change in the future, the documents will be updated.

Legal Representative pro tempore