

# GRUPPO LUCEFIN

## POSITION OF THE LUCEFIN GROUP ON THE CONFLICT MATERIALS

ESINE, 26 NOVEMBER 2015

The Lucefin Group  
includes  
the following  
companies:

ACCIAI BRIANZA Desio (MB)

TRAFILIX Esine (BS)

TRE VALLI ACCIAI Berzo Inferiore (BS)

CO.MET. ACCIAI Brescia

TRAFITEC S. Colombano al Lambro (MI)

COSMO ACCIAI Spilamberto (MO)

TRAFIL CZECH Kladno, CZ

NUOVA BASSANI Forlì (FC)

SIDERCONERO Osimo Stazione (AN)

SIDERMARCA Ponzano Veneto (TV)

TRA.ME.T. Orbassano (TO)

KSM STAHL Empfingen, D

Dear Valued Customer,

The Lucefin Group is very seriously concerned that profits from metals mining ("conflict materials") may be fuelling human rights atrocities in the Eastern Region of the Democratic Republic of Congo (DRC).

In July 2010 the United States President Obama signed a law, the Dodd-Frank Wall Street Reform and Customer Protection Act (Wall Street Reform Act), which contained a section that regulates "conflict materials" for the first time.

This law requires companies like the Lucefin Group to disclose whether products were produced with conflict minerals sourced from the Democratic Republic of Congo (DRC) or from countries with which shares internationally acknowledged borders: Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, Zambia.

This legislation is new and its implementing regulations apply to Tin, tantalum, Tungsten, and Gold plus other materials as dictated by the Department of State. These regulations have become effective on April 17, 2011.

The Lucefin Group will be compliant(\*) with this act and other regulations concerning the sourcing of our raw materials from conflict areas.

*(\*)The present declaration is not applicable to tool steel as it is; in this case, a specific request will be forwarded to the steel supplier.*

LUCEFIN S.P.A.  
