Conflict Minerals Reporting Template (CMRT)

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Revision 6.5
April 25, 2025

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 (*):	Fima s.r.l
Declaration Scope or Class (*):	A. Company
Description of Scope:	Manufacture of single, double-faced, multilayer, flex, rigid-flex PCB.
Company Unique ID:	IT00284160249
Company Unique ID Authority:	IT00284160249
Address:	Viale del Lavoro, 20 - 36100 VICENZA (VI) - ITALY
Contact Name (*):	Alfonso Posenato
Email – Contact (*):	aposenato@fimaweb.com
Phone – Contact (*):	0039 0444 570277
Authorizer (*):	Alfonso Posenato
Title - Authorizer:	CEO
Email - Authorizer (*):	aposenato@fimaweb.com
Phone - Authorizer:	0039 0444 570277
Effective Date (*):	**10-Oct-2025**

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	No	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

2) Does any 3TG remain in the product(s)? (*)	**Answer**	**Comments**
Tantalum		
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		
Tin (*)	No	To the extent identified and reported by Element Solutions' downstream suppliers, tin material originates from certified conflict-free sources or RMI-compliant or active smelters who source from certified conflict-free areas.
Gold (*)	No	To the extent identified and reported by Element Solutions' downstream suppliers, gold material originates from certified conflict-free sources or RMI, LBMA, RJC-compliant, or active smelters who source from certified conflict-free areas. Please refer to the RMI Cross-recognition policy for additional information: https://www.responsiblemineralsinitiative.org/gold-refiners-list/conformant-gold-refiners/ https://www.responsiblemineralsinitiative.org/media/docs/RMI_LBMA_RJC_Cross%20Recognition%20Policy_Updated%20July%202021.pdf
Tungsten (*)	No	To the extent identified and reported by Element Solutions' downstream suppliers, tungsten material originates from certified conflict-free sources or RMI-compliant or active smelters who source from certified conflict-free areas.

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	**Answer**	**Comments**
Tantalum		
Tin (*)	No	To the extent identified and reported by Element Solutions' downstream suppliers, tin material originates from certified conflict-free sources or RMI-compliant or active smelters who source from certified conflict-free areas.
Gold (*)	No	To the extent identified and reported by Element Solutions' downstream suppliers, gold material originates from certified conflict-free sources or RMI, LBMA, RJC-compliant, or active smelters who source from certified conflict-free areas. Please refer to the RMI Cross-recognition policy for additional information: https://www.responsiblemineralsinitiative.org/gold-refiners-list/conformant-gold-refiners/ https://www.responsiblemineralsinitiative.org/media/docs/RMI_LBMA_RJC_Cross%20Recognition%20Policy_Updated%20July%202021.pdf
Tungsten (*)	No	To the extent identified and reported by Element Solutions' downstream suppliers, tungsten material originates from certified conflict-free sources or RMI-compliant or active smelters who source from certified conflict-free areas.

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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		
Tin (*)	No	
Gold (*)	Yes	Recicled and investment gold
Tungsten (*)	No	

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

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	**Answer**	**Comments**
Tantalum		
Tin (*)	Yes	To the extent identified and reported by Element Solutions' downstream suppliers of tin.
Gold (*)	Yes	To the extent identified and reported by Element Solutions' downstream suppliers of gold.
Tungsten (*)	Yes	To the extent identified and reported by Element Solutions' downstream suppliers of tungsten.

8) Has all applicable smelter information received by your company been reported in this declaration? (*)	**Answer**	**Comments**
Tantalum		
Tin (*)	Yes	
Gold (*)	Yes	
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	https://www.chimet.com/en/company/sustainability https://www.elementsolutionsinc.com/sustainability/resources/policies
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? (*)	No	
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., C	LBMA responsivle sourcing, LPPM responsible sourcing, RJC COP RJC COC
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	Through our Consultants Team Program according the International Regulation
H. Is your company required to file an annual conflict minerals disclosure? (*)	Yes, with the EU	and with the SEC

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