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Conflict Minerals Reporting Template (CMRT)

English

Revision 5.12
 April 26, 2019

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 (*):	Sidenor Aceros Especiales
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	53423
Company Unique ID Authority:	ipoint Conflict Mineral Platform
Address:	Bº Ugarte s/n 48970 Basauri (Spain)
Contact Name (*):	Joseba Molinero
Email - Contact (*):	joseba.molinero@sidenor.com
Phone - Contact (*):	+34944871500
Authorizer (*):	Jose Cruz Zirion Sanz
Title - Authorizer:	Purchase Manager
Email - Authorizer (*):	jose.zirion@sidenor.com
Phone - Authorizer (*):	+34944871500
Effective Date (*):	9-Jul-2019

Answer the following questions 1 - 7 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	Our products do not contain any of the metals listed as they are not needed for their functionality
Tin	No	Our products do not contain any of the metals listed as they are not needed for their functionality
Gold	No	Our products do not contain any of the metals listed as they are not needed for their functionality
Tungsten	No	Our products do not contain any of the metals listed as they are not needed for their functionality

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

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		
Gold		
Tungsten		

4) 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		
Gold		
Tungsten		

5) What percentage of relevant suppliers have provided a response to your supply chain survey?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

6) Have you identified all of the smelters supplying the 3TG to your supply chain?	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		



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

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten		

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a conflict minerals sourcing policy?	Yes	
B. Is your conflict minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.)	Yes	www.siferor.com
C. Do you require your direct suppliers to be DRC conflict-free?	Yes	
D. 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	
E. Have you implemented due diligence measures for conflict-free sourcing?	Yes	
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?	No	
G. Do you review due diligence information received from your suppliers against your company's expectations?	No	
H. Does your review process include corrective action management?	Yes	
I. Is your company required to file an annual conflict minerals disclosure with the SEC?	No	