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## Conflict Minerals Reporting Template (CMRT)

Revision 6.31  
May 26, 2023

[Link to Terms & Conditions](#)

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

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

### Company Information

Company Name (*):	LU-VE Group
Declaration Scope or Class (*):	C. User defined [Specify in "Description of scope"]
Description of Scope: (*)	Cooling System manufactured in: LU-VE S.p.A.; Sest S.p.A.; Air Hex Alonte S.p.A.; Heat Transfer System SRO; Fincoil Oy; Sest LU-VE Polska; LU-VE Sweden AB; Refrion S.r.l.
Company Unique ID:	
Company Unique ID Authority:	
Address:	Via Caduti della Liberazione, 53 21040 Uboldo - Varese - Italy
Contact Name (*):	Luca Dalla Sega
Email - Contact (*):	<a href="mailto:regulatory@luvegroup.com">regulatory@luvegroup.com</a>
Phone - Contact (*):	+39 0437-966311
Authorizer (*):	Michele Faggioli
Title - Authorizer:	Chief Operating Officer
Email - Authorizer (*):	<a href="mailto:regulatory@luvegroup.com">regulatory@luvegroup.com</a>
Phone - Authorizer:	
Effective Date (*):	15-Nov-2023

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 (*)	Yes	
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten (*)	Yes	

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 (*)	Greater than 50%	The number of relevant suppliers has been increased and we are committed to increasing the response rate over time through continuous dialogue with suppliers
Tin (*)	Greater than 50%	The number of relevant suppliers has been increased and we are committed to increasing the response rate over time through continuous dialogue with suppliers
Gold (*)	Greater than 50%	The number of relevant suppliers has been increased and we are committed to increasing the response rate over time through continuous dialogue with suppliers
Tungsten (*)	Greater than 50%	The number of relevant suppliers has been increased and we are committed to increasing the response rate over time through continuous dialogue with suppliers

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
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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 (*)	Yes	
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? (*)	No	The Policy is in draft and is undergoing the approval processes
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.) (*)	No	The Policy will be published as soon as it is approved
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	We refer to the RMAP program of Responsible Mineral Initiative
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	LJI-VE Group adopts a formalized procedure within the quality management system
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., C	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	We refer to the RMAP (RMI program)
G. Does your review process include corrective action management? (*)	Yes	In accordance with the OECD guide LJI-VE as a downstream company contacts its first level suppliers to exercise "leverage for upper supply chain"
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	The company is required to prepare the non-financial statement, which discloses its annual conflict minerals information.