EUROPEAN
COMMISSION

Brussels, 5.3.2014
SWD(2014) 53 final

PART 7/7

COMMISSION STAFF WORKING DOCUMENT

IMPACT ASSESSMENT

PART 7 (Fifth part of Annex III to the Impact Assessment)

Accompanying the document

Proposal for a Regulation of the European Parliament and of the Council

setting up a Union system for supply chain due diligence self-certification of responsible importers of tin, tantalum and tungsten, their ores, and gold originating in conflict-affected and high-risk areas

{COM(2014) 111 final}
{SWD(2014) 52 final}

ANNEX III (Cont.)

5.16 Annex 14: Industry and main economic activities according to the ISIC code (iPCMP user survey, Q04) – Respondents' specifications on the option "other"

Q04: "What industry are you from and what are your main economic activities?" – Specifications on the option "Other"
3471 - PLATING & POLISHING
Accessories for pick up trucks made in mainly aluminium.
Airgas is a leading distributor of industrial gases, hardgoods and safety supplies.
Aluminum die casting/foundry
Authorized Distributor of Electronic Components
Auto parts
Autolamp
Automobile Components
Automotive
Automotive
Automotive (Friction Materials)
Automotive air conditioners and engine cooling systems
Automotive antennas and antenna cable assemblies
Automotive fasteners
automotive frames
Automotive Industry
Automotive parts supplier
Automotive Supplier
automotive supplies
automotive Tier I stamping
Automotive, Wire Harenesses
Automotive/Aerospace
automotive/aerospace components
Autoparts manufactuer and seller (seals & gaskets)
Chemical Distribution
XXX is a foundry and machining facility, mainly focusing on iron parts for auto and industry, including caliper bracket, caliper housing, exhaust manifold, etc
Coils slitted and cut to length
Complete windscreen wiper systems
Consulting firm that supports manufacturers of all types of products
Design, manufactoring and construction of air-intake systems for gasturbines according customer specifications
distributor of electro-mechanical parts and components
Distributor of Industrial Hose, Fittings and Accessories
Distributor of Wire & Cable
Distributors of nautical components.
XXX manufacturing Corp. make gasket (Rubber, metal gasket)
Electrical safety devices for vehicles
electrical sales
electronic components for the automotive industry
Engine Components Industrie for Diesel Engines on Ships, Locomotives and Gensets

Q04: "What industry are you from and what are your main economic activities?" – Specifications on the option "Other"
fabrication of polyurethane foam and fiberglass insulation
Fasteners, Distribution
Forging
Foundry
Framing and stamping
Gray and Ductile Iron Foundry
HPDC aluminum alloy parts for automotive industry
Hydrostatic transmission supplier to outdoor power equipment manufacturers.
Industrial Plastic Distribution & Fabrication
Injection molder
Investment Casting - Low Alloy/Stainless Steel/Brass/Aluminum
Iron Foundry
Labels
Lubricants
Manufacture and distribution of basic metal fasteners and attaching equipment
Manufacture engine cooling devices such as radiators, charge air coolers, oil coolers and condensers.
Manufacture of automotive components (brakes).
Manufacture of automotive parts
manufacture of gaskets, seals
Manufacture of lead acid batteries.
MANUFACTURE OF PRESSURE SENSITIVE LABELS MADE FROM PAPER OR FILM (VINYL, POLYPROPYLENE, POLYESTER)
Manufacture of springs and metal product
Manufacture of truck, automobile, marine, and industrial internal combustion engines.
Manufacturer of Automobile components
Manufacturing - assembly of automotive systems
Manufacturing and distribution of tire valves.
manufacturing car part (stamping)
manufacturing in third party to machining parts
Manufacturing of Aircraft
Manufacturing of automotive parts
Manufacturing of mechanical assemblies for automotive industry (OEM's). Conflict minerals (only Tin) in our products are only present in 3 antifriction bushings purchased to 1 European company.
Metallic components for automotive industry - Brake Rotors
Mfg of Paint
Nameplates
Paint and coatings
Painting parts
paper making
PCB
Printing folding cartons
produce automobile parts, like rubber parts, rubber metal parts, and interior parts
producing and manufactoring of screws, studs, bolts in steel material
Rubber
rubber parts
Sealing Bearing and Engineered Solutions
Sensors & Controls
solders, brazes, materials for electronics packaging
stainless steel product
Steel distribution

Q04: "What industry are you from and what are your main economic activities?" – Specifications on the option "Other"
Steel Plate Distribution
Supply for the automotiove parts and power tool parts and others
tanning and finishing leather for use in automotive industry
Transportation Logistics
We have two units on the same site: - Machining brake system parts - Polymers processing
WE PRODUCE AND DELIVER CORRUGATED BOXES
we produce wire harnesses for automotive
wholesale distribution
Zinc alloy die-casting

5.17 Annex 15: SEC issuers' reporting on Conflict Minerals as a whole company or as a legal entity (iPCMP user survey, Q06) – Respondents' Comments

Q06: "If you are an SEC issuer (non-filer), are you preparing a Conflict Minerals Report for your company as a whole or as a legal entity?" – Comments
As requested by customer
Company in XXX XXX GROUP
Company sats they will not prepare an SECOND report.
N/A
N/A
Not a filer
Not an SEC filer
not determined as of this date
only local
Our firm falls out of scope, but we will be supporting filers
Our subsidiary, a legal entity headquartered in the US, will report to our non-USA parent. The parent is the SEC issuer and will manage CM policy and file form SD.
subsidiary plant
We are a subsidiary of a fortune 500 company
WITH MXXX WXXX
would like to understand significance of difference.

5.18 Annex 16: Reasons of SEC non-filers for preparing a Conflict Minerals Report (iPCMP user survey, Q07) – Specifications on option "Other"

Q07: "If you are not an SEC issuer (non-filer), why are you preparing a Conflict Minerals Report?" – Comments on option "Other"
also compliance with company's own responsible sourcing policies and procedures
Customer asked me to do so.
In support of our OE customers.
Our company is owned by a SEC-listed group
the SEC issuer without English capability
We are a XXX supplier
we re not preparing a conflict minerals report. We are only responding to customer inquiries
XXX and XXX request
XXX has requested us to answer questions in respect to Conflict Minerals Report
XXX questionary
XXX request

XXX requesting, we don't sell precious metals we are a supplier of maintenance parts for their buildings
XXX understands that this action will provide a combat to eliminate all conflits (ethnic, social,...) in Countries or Regions) affected for this problem.
XXX, XXX, XXX, XXX for the noment

5.19 Annex 17: Position in the supply chain (iPCMP user survey, Q08) – Specifications on option "Other"

Q08: "What is your position in the supply chain?" – Comments on option "Other"
Authorized Distributor of Electronic Components
component manufacturer
Design, manufactoring and construction of air-intake systems for gasturbines according customer specifications
Distributor
Distributor
Distributor
In case of Rubber gasket we have tier2 position.
Mainly Tier 1 but also Tier 2 in some cases
manufacture of Bearings, sleeves and circles
Metal Service Centre
NONE
Steel Plate Distributor
Tier 1, 2, and 3 on some programs
Tier 1, Tier 2, and Tier 3
Tier 2 as well as trader
tube mfg
we are a supplier of maintenance parts for XXX' buildings
We are both an OEM and a Tier 1 supplier
We delivered direcly to ORM's
we make rubber parts for the auto industry
We produce wire harnesses for seats, automatic gear, start&stop
We provide color and additive concentrates to end-product manufacturers as well as Tier providers.
We provide metal fasteners world wide to the furnature, mattress and automotive industries.
We supply completed units which are added to a vehical
We supply materials for the manufacture of electronic components/sub-assemblies/assemblies
We support multiple levels in the supply chain
we use a small amount of tin-based additives. No tin metal or alloys

5.20 Annex 18: Number of active suppliers (iPCMP user survey, Q09) – Respondents' comments

Q09: "How many active suppliers has your company got?" – Comments
For our subdivision Electronics, for global company don't know
globally; idetntified to be potentially affected by CM
Guess
Inclusive of all subsidiaries and affiliated companies globally
In this context as well as in context of question 3 this is our product line only. Globally our company employs more than 10 000 staff, but for that I could not estimate the amount of suppliers.
Is there something to win?
Less than 20
only one effected by Conflict metals law
Supplier for raw materials
These suppliers are for materials containing conflict minerals
Too many for 1 person to realistically chase.
unknown at this time

5.21 Annex 19: Metals used in products and/or manufacturing processes (iPCMP user survey, Q10) – Respondents' comments

Q10: "Which of the following metals do you use in your products and/or manufacturing processes?" – Comments
34CrNiMo6. 30CrNiMo8, 42CrMo4 are the basic material.
Al
All are possible content because of broad range of inventory offered
all product produced by our company are made of stainless steel
Aluminum
Always tin in solder in electronics, also the other substances but less. E.g there are capacitors with tantalum, printed circuit boards with gold layer etc
Anyone
At this time, I have found that one of the catalyst is Tin which per Supplier, some of the Tin is incorporated in product
comercial assembly, any othe above mentioned metals would be contained within XXX or XXX products that we buy in.
Conflict minerals (only Tin) in our products are only present in 3 antifriction bushings purchased to 1 European company.
copper\ Iron \ Steel \ Zine-alloy
Currently unknown. Possibly tin
electronic parts
ferrum, silicon, copper, etc
Gold plating in Printed Circuits Boards (PCB)
Impurities in aluminum alloys
legacy of iron
less than 1000 lbs per year
limited applications with tin; electronics with tungsten and gold;
Low quantities used for soldering contacts.
Metals are not used as component parts, Rubber bonded to metal inserts are mild steel, domestically produced. No conflict materials are used.
Minor quatities
n/a
n/a
No

Q10: "Which of the following metals do you use in your products and/or manufacturing processes?" – Comments
No
0
No
No above metal was used in our parts
NO METALS IN CORRUGATED BOXES
No of them are in our Products
None in the products. The […] question was about the use of Tin / Gold / Tungsten in our manufacturing equipment: Strictly speaking it is safe to assume that tin and gold are used in at least some of our electronic equipment for soldering / connectors ... like computer / telephones / ... Also we use tungsten carbide as any steel machining company probably would use. We checked with the company requesting information and were allowed to sign off that these products are not used in our manufacturing. […]
no related material
No use
No,we do not have above metals.
NON
None
None
None
NONE
None
None
None
None
None
None
None
None
None
NONE
None
None
None
None
None
None
None
None
NONE
NONE in ours, investigating our suppliers
none listed above
None of the above
None of the above
None of the above
None of the above
None of the above
None of the above mentioned
None of them
none of them
None of these
none of these

Q10: "Which of the following metals do you use in your products and/or manufacturing processes?" – Comments
None of these minerals in our direct manufacturing processes.
None of those
NONE USED
None!
none, we don't produce or sell the above metals
Our products do not contain conflict materials.
Our products do not use above material.
we trade none of these materials
None. Tin is present as impurity into Zn alloys, less than 0.003%
None; aluminum & stainless steel only
not as raw material but as part of a semifinished product.
Only for two parts. Clip (tin plated) & switch contact (gold plated) sourced in Peru & Canada
Only in select products for strength
only small percentages in brass and alloys of zinc and copper
Our best estimate is that we would have tantalum, tin and gold. We are unsure about tungsten at this point.
Our brake system unit have been worked whit grey Casting iron, but we have not been used any of the metal above
purchased electrical components (connected to our parts) contain minor quantities of these metals.
Steel
Steel, Alum. or Stainlesteel
still awaiting supplier responses... electrical compoents
The majority of our manufacturing sites do not use raw metals. But components, coatings, etc. that go into/onto our products may contain these metals.
The Sn it is a residual element which is coming from remelted scraps used by suppliers to cast Al alloy ingots.
This is an estimate, as we have not received all of our supplier reports at this time.
This is our current belief, but will be validated through our due diligence process.
Tin (Sn%) 0.2 %Max
Tin (Sn) is used to manufacture the Pb alloy that will be used on positive and negative grid the lead acid battery.
Tin is present in steel, but I don't believe it is added.
trace amounts in metal stampings and coatings.
trace amounts in product only
under study
Unknown
Used as single element, alloying element and/or plating element
Very minimal qunatities of tin are used in some of our products
we are not a manufacturer
we are not producer
We are still trying to get information from our suppliers.
We are unknown at this time.
We do not purchase any of these items, tho our suppliers may.
we do not use any of these metals
We make gaket of aluminum.
We solder connections in the electronic controllers of the attaching machines we sell.
We use none. Some suppliers use trace amounts for their manufacturing process.
we use Zinc

5.22 Annex 20: Departments responsible for Conflict Minerals Reporting (iPCMP user survey, Q11) – Specifications on option "Other / Cross-functional team"

Q11: "Which department is responsible for Conflict Minerals Reporting at your company?" – Comments on the option "Other / Cross functional team"

also Laboratories
Business Operation System Department
Cross-functional steering committee with Legal/Compliance and Supply Chain
Engineering - Material compliance Purchasing - Strategy + affected commodities
Environmental Compliance
Executive, Purchasing, IT
Finance, Purchasing and Legal
GENERAL MANAGER
HR & Ecology department
Including Finance
Ink room
ISO/ Quality
Management Planning Team
Manufacturing Dept
Marketing
marketing department
Marketing Department
N/A, as we do not use the Minerals in question
none, we don't produce or sell the above metals
not determined as of this date
Owner
Parent company will coordinate subsidiary company responses and take responsibility for reporting jointly with the applicable US subsidiary functional groups.
Procurement/Quality/EH&S
Product management, procurement, legal, sales
Quality
Quality and Purchasing is working together.
Quality Engineering
R&D has the lead.
R&D Team
Regulatory Affairs
Sales
Sales
Sales
Sales
Sales
Sales
sales and marketing
Sales and Marketing for customer liaison
Sales Department
sales/customer service
Supply Base
Undecided at this point.
under study
we don't have a department that handles that.

5.23 Annex 21: Main products allocated to HS Codes on a 2-digit and 4-digit level (iPCMP user survey, Q12)

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
mfg paint	28-38	32xx
Metal stamping and assembly.	28-38	3212
Color and additive masterbatch for the thermoplastics industry.	28-38	3811
thermoplastic color and additive concentrates	28-38	3811
Closed Die Forging of Critical Rotating Disc	28-38	3818
Custom stamped and machined parts from thermosets, thermoplastics, films, and fibre with in-house tooling.	39-40	39xx
Plastic	39-40	39xx
vacuum formed plastic products	39-40	39xx
Industrial Plastics	39-40	39xx
plastic products with 2nd finishing.	39-40	39xx
Vinyl compounds	39-40	3904/ 3905
Chemical - phenolic resins	39-40	3909
polyurethane foam, fiberglass insulation, and sponge rubber	39-40	3909
vinyl caps and plugs, extruded tubing	39-40	3917
Rubber and Plastic	39-40	39xx/ 40xx
Rubber & Plastics	39-40	39xx/ 40xx
rubber&plastic	39-40	39xx/ 40xx
Rubber products	39-40	40xx
Automotive foam and rubber parts	39-40	40xx
Rubber products	39-40	40xx
Rubber	39-40	40xx
Molded rubber.	39-40	40xx
Automotive rubber parts (not tires); Automtive fluid carrying components (fuel/brake lines, cooling components, etc)	39-40	40xx
EPDM rubber	39-40	4002
Gaskets, shims, washers	39-40	4016
Seals	39-40	4016
cattle leather	41-43	4104
copper tubing	44-49	4416
Paper	44-49	48xx
CORRUGATED BOXES	44-49	4819
Paper cartons	44-49	4819
Rolled fabrics and industrial goods.	50-63	50xx/ 51xx/ 52xx/ 58xx
bowden cables	50-63	56xx
Mechanical Cable Systems	50-63	5607
Tubing	50-63	5909/ 7304/

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
		8307
Apparel	50-63	61xx/ 62xx
RUBBER BOOTS AND BELLOWS	64-67	6402
Friction Material	68-71	6813
foundation brakes for the light vehicle automotive industry (disc brakes, drum brakes, brake pads)	68-71	6813
Weld studs and stud welding equipment	68-71	7117
Steel Coils	72-83	7213/ 7221/ 7227
Steel coils	72-83	7213/ 7221/ 7227
Metal fabrication and spray in bed liners in trucks.	72-83	72xx-83xx
metal powder	72-83	72xx-83xx
Powdered Metal	72-83	72xx-83xx
IRON AND STEEL CASTINGS	72-83	72xx
Tinplate Steel	72-83	72xx
Stampings	72-83	7204
automotive components, metal stampings	72-83	7204
stamping car part	72-83	7204
Large stampings and fascias	72-83	7204
Carbon and alloy steel bars	72-83	7207
Carbon & Alloy Steel Plate	72-83	7207
engineered metals and alloys	72-83	7217
Low carbon steel	72-83	7217
stainless steel product used for EGR	72-83	7218
Gray and Ductile Iron Castings	72-83	73xx
Gray and Ductile Iron castings	72-83	73xx
Axles, pins, and gears	72-83	7319/ 8483
Iron and Aluminum castings	72-83	7325
Gas line structures	72-83	7305
RIGGING HARDWARE AND WIRE ROPE	72-83	7312
Screws, Studs, Bolts	72-83	7318
helical springs and wire forms	72-83	7320
Springs	72-83	7320
Compression Springs	72-83	7320
Manufacture of springs and metal product	72-83	7320
heating and air conditioning of buildings	72-83	7322
Seat heaters, seat climate systems, electronics, wire harnesses	72-83	7322

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
Iron castings	72-83	7325
bronze manufacturing	72-83	7403
Aluminum alloy parts	72-83	7601
HPDC aluminum alloy parts	72-83	7605
rivets and cold formed parts	72-83	7616
zinc component parts	72-83	79xx
Zinc alloy die cast for: Buildings, Automotive, Electronics	72-83	7901
Turning parts from steel.	72-83	8104
AGRICULTURE	72-83	8201
Hardware	72-83	8302
steel hardware	72-83	8302
Brackets and clamps, heavy truck industry	72-83	8302
structural components and assemblies for the automotive industry	72-83	8302
Brackets & springs	72-83	8302
Laminated lock \ warded lock\ Combo lock \ python lock\ flush handle	72-83	8310
Complex machined metal parts for the Aerospace and Oil/Gas & Energy Production industries.	84-85	84xx/ 85xx
components and systems for Automotive, Transports, Aerospace, Electrical machinery and production machinery	84-85	84xx/ 85xx
Fuel handling systems	84-85	8401
Internal combustion engines	84-85	8408
Engine sensor	84-85	8409
Engine Bearing & Bushing Manufacturing	84-85	8409
engine parts in motor vehicle made of steel	84-85	8409
Industrial & Hydraulic Hose, Fittings & Accessories	84-85	8410
Hydraulic rotary actuators	84-85	8410
hydraulic and electric components	84-85	8410
Hydraulic pump	84-85	8413
louvers, dampers, fans, blowers	84-85	8414
Automotive air conditioners and engine cooling systems	84-85	8415
automotive & HD heating/cooling	84-85	8415
HVAC equipment	84-85	8415
HVAC system	84-85	8415
Furnace parts	84-85	8416
Heat Exchangers	84-85	8419
Heat exchangers	84-85	8419
air filtration	84-85	8421
Accessories for pick up trucks	84-85	8431
Castings	84-85	8454
Castings	84-85	8454
Injection molded plastic	84-85	8480

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
Injection molded plastic parts	84-85	8480
Metal injection molding parts,powder metallurgy parts,self lubricating bearing,connecting rod for auto seat etc.	84-85	8480
valves for venting systems of automotive fuel systems	84-85	8481
Valves	84-85	8481
Custom unground ball bearings and assemblies	84-85	8482
Camshaft Casting Rough Part & Finish Part	84-85	8483
off highway gear components	84-85	8483
Torque Converter, Engine Pulleys	84-85	8483
Crank Assy	84-85	8483
Bearings, Hydraulics, Cutting Tools, Specialty Steels	84-85	8483
Sheet Metal forming	84-85	8483
Cast crankshafts	84-85	8483
Cranckshaft	84-85	8483
bearings, sleeves, circles, gear and gear box	84-85	8483
gears for transmissions	84-85	8483
Shafts	84-85	8483
Gears	84-85	8483
shaft seals and gaskets	84-85	8483
Gasket for vehicle.	84-85	8484
gaskets, seals	84-85	8484
GASKET MADE OF VARIOUS MATERIALS; EVERYTHING FROM PAPER TO COPPER	84-85	8484
electrical and process instruments	84-85	85xx
Coils, inductors, chokes, transformers	84-85	85xx
ELECTRICAL COMPONENTS	84-85	85xx
Electronic components	84-85	85xx
Components for communication industry	84-85	85xx
electric motors	84-85	8501
electric motors	84-85	8501
Diesel Generator sets, bow and stern thrusters, winches and in general supplies for marine industry at boatyards level.	84-85	8503
rare earth magnet	84-85	8505
Lead Acid Batteries to automotive vehicles.	84-85	8507
Complete windscreen wiper systems (electric motor, linkages, arms)	84-85	8512
Safety devices for vehicles such as radar, vision and night vision cameras, systems to control airbags etc	84-85	8530
LED lighting,heat sink	84-85	8531
Fire and Gas Detection control systems, Hazardous Area control systems, and Gas Turbine Controls, and Engineering expertises in the form of consultancy.	84-85	8531
PCB (printed circuit boards)	84-85	8534
electrical fuses	84-85	8535
Membrane Switch	84-85	8535

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
Electromechanical Components, specifically switches	84-85	8536
ROTARY SWITCHES AND RELAYS	84-85	8538
Manufacturer of electromechanical products including rotary switches, rocker switches, relays and mechanical assemblies	84-85	8538
Auto Lamp	84-85	8539
Lithography equipment for the seminconductor manufacturing industry	84-85	8541
Solders and brazes for electronics packaging	84-85	8542
Wiring harnesses	84-85	8544
Wires and cables	84-85	8544
Wire, Cable, Cable assemblies and wiring harnesses	84-85	8544
Wire Harness Assemblies, interior lighting(underhood, ash, curtesy)	84-85	8544
Park Brake Cable Assembly	86-89	8607
Brake system unit: hidraulic brake cylinders; Polymer unit: rubber and plastic parts	86-89	8607
Vehicle	86-89	87xx
Vehicles	86-89	87xx
Automotive industry	86-89	8703
Injection molded and assembled plastic components for the Automotive industry	86-89	8703
Automotive	86-89	8703
Automotive vehicles	86-89	8703
Automotive	86-89	8703
Automotive	86-89	8703
Automotive	86-89	8703
Automotive	86-89	8703
Automotive	86-89	8703
Automotive	86-89	8703
Chassis-Finish Goods.	86-89	8706
SUSPENSION AND STEERING	86-89	8708
Automotive Interiors component - Seat, Door panel, Headliners, floor console, Instrument panel	86-89	8708
Automotive Electronics	86-89	8708
Autoparts	86-89	8708
Motor vehicles, power equipment and engine manufacturing, distribution and support.	86-89	8708
electronic components for the automotive industry	86-89	8708
produce automobile parts, like rubber parts, rubber metal parts, and interior parts	86-89	8708
Automotive Parts	86-89	8708
automotive components	86-89	8708
cars and car components	86-89	8708
Suspensions	86-89	8708
Automotive components (stampings, welded assemblies and mechanical components)	86-89	8708
Automotive replacement water pumps	86-89	8708
Automotive equipment	86-89	8708

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
Automotive Electronics, such as AFS, PEPS, etc.	86-89	8708
decorate part including exterior beltline, door fram, A/B / C pillar etc.	86-89	8708
automotive parts; power tool parts; gas-fired accessories; textile machinery	86-89	8708
automotive filter and engine components, coolers; off-road power systems; cooling systems; diesel engine applications;	86-89	8708
Automotive components, Power Tools, Industrial equipment, Hydraulics	86-89	8708
Automotive components	86-89	8708
Automotive drive train	86-89	8708
batteries for vehicles	86-89	8708
automotive and construction component	86-89	8708
automotive parts - starter & alternator motors, audio & video products	86-89	8708
Various automobile parts	86-89	8708
Automotive Fuel Delivery Modules	86-89	8708
Automotice electronics	86-89	8708
Coatins for automotive	86-89	8708
Automotive shifters, smart actuator pumps, and electronics.	86-89	8708
electronics for vehicles	86-89	8708
Automotive Wire Harnesses and Components	86-89	8708
Automotive Electronics	86-89	8708
automotive plastic moldings	86-89	8708
automotive components for service	86-89	8708
Automotive sound proofing	86-89	8708
Manufacturing of Electronic control Unit of Automotive Engine,Automotive Heated Seat and Vent Module	86-89	8708
injection products for automobile	86-89	8708
Automotive gas springs, dampers, link rods and vacuum actuators	86-89	8708
Automotive sensors for wheel speed system, transmission, steering system anf fuel cards.	86-89	8708
bumper assemblies	86-89	8708
INTERIOR AND EXTERIOR AUTOMOTIVE LIGHTING	86-89	8708
plastic parts (automotive)	86-89	8708
Automobile Lighting	86-89	8708
Brake Rotors	86-89	8714
Aircraft	86-89	88xx
Automotive and Heavy Duty Filters	90-97	9002
including caliper bracket, caliper housing, rotor, knuckle, exhaust manifold, etc	90-97	9017
Electrical test equipment	90-97	9024
test & measurement instrumentation	90-97	9024
Nameplates	90-97	94xx
residential furnishings	90-97	9404
Fasteners	90-97	9607
Fasteners	90-97	9607

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
Fasteners	90-97	9607
All-Metal Fasteners	90-97	9607
Fasteners	90-97	9607
Automotive fasteners	90-97	9607
metal fasteners	90-97	9607
pins and shaft rods	90-97	9615
Energy Management	98-99	98xx
Construction Equipment Components.	98-99	98xx
The company's wide range of products and services are used in areas such as cooling food, air conditioning, heating buildings, controlling electric motors and powering mobile machinery. The company is also active in the field of solar and wind power as well as district heating and cooling infrastructure that targets entire cities and urban communities.	98-99	98xx
Low and medium voltage electrical equipment and related components, software and services	98-99	9820
Transportation Logistics	98-99	9852
Authorized Distribution of Electronic Components: Resistors, Capacitors, Interconnect, Electro-mechanical, EMC and Switches	98-99	9950
trading- no production	98-99	9960
Acoustic and emission products	Not allocatable unabiguously	
Air Induction Assemblies and Interior Assemblies	Not allocatable unabiguously	
Alloy components	Not allocatable unabiguously	
Antenna's	Not allocatable unabiguously	
bearings, joints, retaining rings, disc springs, rod ends, keys, clevises, washers, knurled washers, linear guideways, axial joints, angular joints, nuts	Not allocatable unabiguously	
board level electronic components	Not allocatable unabiguously	
Compessor Wheel for Turbor Charger	Not allocatable unabiguously	
Construction equipment / attachments	Not allocatable unabiguously	
Cover assembly,tube,guide rod,	Not allocatable unabiguously	
Die casting of aluminum parts	Not allocatable unabiguously	
Diesel engines	Not allocatable unabiguously	
Diesel fuel system valves, sensors, and fillers.	Not allocatable unabiguously	
DRIVETRAIN / AEROSPACE / POWDERED METROLOGY	Not allocatable unabiguously	
E-coat	Not allocatable unabiguously	
Electrical Contacts	Not allocatable unabiguously	
EPP product	Not allocatable unabiguously	
GASKETS, SEALS -PE FOAMS PARTS	Not allocatable unabiguously	
GOLD BONDING WIRE	Not allocatable unabiguously	
HEAVY MACHINERY	Not allocatable unabiguously	
High Pressure Diesel Fuel Lines	Not allocatable unabiguously	
Hydrostatic transmissions	Not allocatable unabiguously	

Q12: "What is your main product category?" – Response Text	HS Code (2-digit)	HS Code (4-digit)
Industrial gases, welding hardgoods and safety products.	Not allocatable unabiguously	
instrument clusters	Not allocatable unabiguously	
Interiors & Power Supply	Not allocatable unabiguously	
Mechanical Face Seal Kits	Not allocatable unabiguously	
mechanical pumps, valves and seals for O&G, Power/Energy, Chemical and GI.	Not allocatable unabiguously	
NAICS CODE 32112	Not allocatable unabiguously	
piston rings	Not allocatable unabiguously	
Plastic injection molded components	Not allocatable unabiguously	
Plastuc Raw Material	Not allocatable unabiguously	
Platic tubes for wire hardness protection and fluid transfer	Not allocatable unabiguously	
Polymeric materials	Not allocatable unabiguously	
Powertrain components	Not allocatable unabiguously	
Process equipment, heat exchangers, centrifuges, pumps and valves for pharma and food.	Not allocatable unabiguously	
Protective caps/plugs.	Not allocatable unabiguously	
Resin	Not allocatable unabiguously	
Sensors	Not allocatable unabiguously	
Sensors and sensor assemblies	Not allocatable unabiguously	
Sheet metal products	Not allocatable unabiguously	
Soft ferrite components and assemblies	Not allocatable unabiguously	
special lubricants	Not allocatable unabiguously	
stamped and plated components	Not allocatable unabiguously	
the air-intake housing are produced in carbon-black steel or Stainless-steel	Not allocatable unabiguously	
thrusters for maritime marked	Not allocatable unabiguously	
Too Many - We deal with all industries.	Not allocatable unabiguously	
truck accessories	Not allocatable unabiguously	
Turbocharger; center housing.	Not allocatable unabiguously	
Turbo-chargers components, lever assy and arm&valve assy.	Not allocatable unabiguously	

5.24 Annex 22: Estimated effort for Conflict Minerals Reporting (iPCMP user survey, Q13) – Respondents' comments

Q13: "What is the estimated effort for Conflict Minerals Reporting at your company for the following areas?" – Comments
?
167
72
a very rough estimation
Almost- no cost.

Q13: "What is the estimated effort for Conflict Minerals Reporting at your company for the following areas?" – Comments
Anyone
As these material are neither in our products or in our raw material / processes per se, we approach this with minimum effort. However, as our customer explicitly demands a report we do report "No use"
Because we do not deal in minerals we are not spending any resources on it.
cannot understand what effort the question is asking for
Cost information has not all been identified at this time.
Currently unknown
do not have information available
Do not know at this point.
Due to the fact, that no Conflict Minerals are used in our production process, it is not possible to answer this question properly.
Essentially zero
estimation of 3rd party audit costs not possible at this point in time
Handled by headquaters in Japan mostly, so I do not know. But for now just 3, 6 and 7
Have not calculated costs
I am not able to judge, since report to SEC will be prepared on company level - it will include our two other divisions
Intra-Group reporting effort cost are guesstimates.
i-Point premier licensing
Just Time
N/A
Never been reported.
No assessment at this point.
No budget allocated
no comments
No conflict minerals used
no costs have been estimated
No estimates available.
No extra costs involved. Done by manager as requested.
No idea, but some people work a lot with this
No information available
NO METALS IN CORRUGATED BOXES
None
None
None as we do not use the Materilas specified in point 10
nor calculated yet
not determined as of this date
Not estimated yet.
Our company was agree whit conflict materials, before this rules.
rest to be determined
TBD
The cost of for Conflict Minerals Reporting is exceedingly high
The Sn content is limited by the standard EN 1676:2010
The time involved has been ridiculous in comparison to the actual success that could have been achieved through other means...
there is no activities because no conflict minerals used.
This is a new area. We will be working to improve our efforts.
Too early to tell, but significant
too soon to estimate ongoing costs per year.
total estimated project costs $1.7M, with about $200,000 annual ongoing costs per year
Uncertain at this point.

Q13: "What is the estimated effort for Conflict Minerals Reporting at your company for the following areas?" – Comments
unknown
unknown
Unknown.
Unsure of impact at this time.
Very limited since we do not use 3T&G
We are still trying to understand the activity in details.
we are unusure of these costs at this time.
We have not estimated a cost of implementation
we rapresent italian and european producers with an international experience. we can ensure that all our suppliers/producers respect all the law according to this issue

5.25 Annex 23: Expected positive social impact of a Conflict Minerals due diligence scheme: Clustered free text answers (iPCMP user survey, Q15)

Q15a: "What positive social impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
Political and social stability
• Avoid war • Better conditions • Blurring conflicts of any nature and improve living standards for poor countries • bring about life changes for people • change goverment • Decrease of violence • Decreased activity • establishing rules to protect people insecurity • Ethnic-Social Equilibrium and better income distribution of the regions free of conflicts. • for communities in order to preserve life • happy to have products without materials which are prohibited/made from inappropriate practices • help to protect chils affected for this situations • Improved human conditions in treatment and pay. • improved working practices, including less child labor and improved mine conditions • inhibition of inhuman mining • it may discourge some traficing by terrorist group/rebels • It may help to reduce issues like child labour, minimization of armed groups. • Less interest in using people as half slaves, more focus on sustainable incomes. • limited probability of reduced violence • long term positive effect • long-term stabilisation of conflict areas • Lower the bussiness for the mines and smelters funding war in the area, translating into less conflict in the area. • May have a positive social affect in affected affected areas.. • May put pressure on these countries to stop current human rights violations. • Potential reduction of human right abuses and related issues • preventing expliotation of a large class of people • Puts additional pressure on conflict regions to change • reduce the use of forced labor in the conflict minerals areas • Reduces corruptiomn • Reduction in exploitive labor. • Reduction in forced mining to aid militias • Reduction of business = improve political possibilities. • reduction of extortion, brybery, corruption; more safe working conditions • Regulate current human condition for those people. • Respect and guarantee human rights • Responsible sources of minerals should strengthen - leading to more responsibel employment etc. • Since there is less support of military groups there will be less armed conflicts • social change • state sponsored operations will decrease • stop of human rights abuse • Working together to reduce conflict
International awareness, transparency and progress
• Awareness • Awareness about Conflict Minerals • Awareness of the situation to the world

Q15a: "What positive social impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
• Awareness of where conflict materials are supplied from and a effort to eliminate them in our processes.
• Bring more light to the cause
• Companies will begin to form means of tracing supply chains that in the future will benefit such communities
• Encouraging companys to reduce the use of conflice minerals spontaneously
• improve the society's awareness
• increases awareness of issues
• International Pressure and risk, will cause some dealers to stop dealing with it.
• more awareness
• more emphysis on minerals used in products
• More focus on the problem
• pressure on governments to regulate
• raises awareness of issues
• security, transparency
• traceability schemes will legitamize miners
• We need more diligence in use of IT Sistems
Environment
• Avoid environment contamination
• Environment
• Environmental factors
• It good for environment.
• Suppliers will be helping DRC from exploiting their natural resources.
Defunding the warlords
• It should help with the defunding of the military groups in the Congo and surrounding areas
• May help defund the warlords
• Reduce funding
• Reduces the flow of money from mines to the armed groups

5.26 Annex 24: Expected negative social impact of a Conflict Minerals due diligence scheme: Clustered free text answers (iPCMP user survey, Q15)

Q15b: "What negative social impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
Impoverishment/Unemployment
• a lot of workless people • Additional impoverished local communities due to smelters ceasing operations in the DRC and surrounding countries. • hurts locals for lack of business • I THINK IT WILL JUST PUSH THE OPERATIONS FURTHER UNDERGROUND AND WILL MAKE IT HARDER FOR THE HONEST WORKING PERSON TO EARN AN HONEST LIVING • It will cause unintended consequences to the country that will hurt the citizens financially • Less money going into already poor countries. • loss of business means loss of a lot of money and jobs. this again has a negative effect on the population living in these areas • Loss of jobs due to major companies banning minerals from the DRC • potential shutting out of the market of smal operators- unemployment • the human population in these areas will be poorer and poorer. • unemployment rates will rise, reason for conflicts will be increased short term • Will negatively affect an already damaged economy.
No significant or further negative effects
• having a bad effect on human health. • It doesn't mean that the same groups will not find other income sources. As this law is treating one of the effects, not the real cause, the armed groups will find another way to get income and probably create new problems in the regions. • it has been reported from an OECD meeting that school enrollment is down for local communities • Metals will be sold to customers who don't care. Less opportunities for locals to get an income can fuel the conflicts. • Militant groups are likely to continue to be in power (moving away from CFS sourced mines and tapping new mines). The CFS program is unlikely to work; as there is no way to regulate what the smelters purchase. • one more rule forced by government that does not contribute to the bottom line. • people will always make money and do what they need to do to survive. • rebels will take over any successful operation • Seeking other means • This legislation will not stop any mining in the DRC or adjoining countries. It is political kowtowing, nothing more. • Trade will do at risk and secret - less fear of hurting people (nothing to lose) • Won't stop conflict mining activities completely
Embargo/Reduced economic activity
• Causing a de facto embargo that is likely harming the country more than it is helping it. • Decrease of orders of conflict minerals in the affected area • defacto embargo of area • I believe that many companies are essentially going to source from other areas thus negatively impacting legitimate local operators and their communities • it will create an embargo on the involved countries • It will drive down the amount small operation can sell there material • Local operators not involved in conflict will be affected nagatively as potential customers go elsewhere. • Loss of business • Reduce economic activity in the regions, despite however small that might already be in the areas. • They will find other ways, but the people in general will suffer from the economic loss.
Increased bureaucracy and effort

Q15b: "What negative social impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
• A great deal of reporting time is being spent raising overhead cost for US copanies. • administration, • cost factors for small tier suppliers • high cost for certification, maybe the fair companies will be not able to undergo certification • It will have a dramatic cost, as a whole, to manufacturing in the US in order to implement the necessary controls and maintain • managing/ time input necessary • May cause an increase of minerals costs • These initiatives are costly and add more layers of govt. mandated compliance. • too much burocracy • will cost money & manpower that solves nothing.
More corruption
• black market operations will increase to fill void • cause more conflicts for suppliers using these minerals in order to find alternate products • Conflict will be driven by other more socially damaging activities such as drug exportation/manufacture. • Creation of even more oppresive, under-ground, lucrative ways for marketing forbidden minerals • Less possibilities to have corruption financing the conflict will ultimately trigger the involved corrupt communities to find other ways of fueling the conflict • May drive even more corruption as the illegal operators seek new ways to smuggle their goods • Possibly little to no impact that may drive greater demand from wrong places • pressure will continue to increase on the innocents as the bad actors develop new means of exploitation to maintain their power • topic turns over to get more criminalizes
Violence increase/escalation
• Barriers imposed by the minority which holds the 'power' currently in the regions can cause major conflicts to prevent this action. • Potential arm movement. • Unlikely to improve the situation and likely will escalate the violence beyond current areas.

5.27 Annex 25: Expected positive economic impact of a Conflict Minerals due diligence scheme: Clustered free text answers (iPCMP user survey, Q17)

Q17a: "What positive economic impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
Increased trade and market fairness
• a more stable political surrounding will attract more investors • Blurring conflicts of any nature and improve living standards for poor countries • Due diligence will keep the need to stop buying conflict minerals fresh in people's minds. This means there will not be a market for these minerals. • Fair trade of conflict minerals • Finance to the groups performing non- humanaterian activities will be stopped. • Improve customer satisfaction • Improved economics with global trade allowed • increase in economic rewards • invest in safer equipment/practices • It may slow the supply of the conflict materials initially • Less money for the warlords • More regulations • Needs of the market • Positive impact for responsible business • possibly drive up vlaue of a scarce commodity • possibly for a living wage in the conflict areas or at least stop endentured service • Reduces corruption • restricting number of players • save economic loss due to abuse of conflic minerals • Source minerals to more economic areas. • stop for money supporting war
Improvements in local income distribution and social/political development
• Better income distribution and financial development of the regions free of conflicts. • Better salary conditions and align companies to current business regulations • DRC will be benefited. • Due diligence will generate some local financial infusion • Hopefully ease tensions and fighting in the affected areas • less forced labor for local peoples; • local operators will be encouraged to operate in a more acceptable manner. • long term positive impact when (if) conflicts are resolved • May have a positive social affect in affected areas • Oppression always runs out of effect when subjects learn about alternatives. Payment will be more to local benefit. • people can generate legal income • reduce the use of forced labor in the conflict minerals areas • social change, business direction change • To be possible that the communities can grow in freedom
No significant or further negative effects
• I don't known.but I think so. • I don't really see an positive economic impact. • No positive impact • None • Requires additonal resources to do the research • the price for small operation will be drive far from market value, causin a loss
Benefit for conflict-free mines and operaters
• Better prices • good mines should prosper

Q17a: "What positive economic impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
• If the conflicted mines and smelters go out of bussiness, more sales will come to conflict free mines/smelter. • It good for the supply chain.

5.28 Annex 26: Expected negative economic impact of a Conflict Minerals due diligence scheme: Clustered free text answers (iPCMP user survey, Q17)

Q17b: "What negative economic impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
Economic loss for local operators and society
• Companies may avoid purchasing materials from the DRC region so they don't have to go through the hassle of determining whether or not the materials are "conflict free". • Companies walking away from sourcing in the affected region • Could decrease jobs in the area • Decrease of orders of conflict minerals in the affected area • Decreased business in region • decreased demand for conflict minerals mined in DRCAC • due to burdensome compliance rules some might avoid doing business with any operators of the DRC which again leads to a big economic loss in these areas • embargo • even though it is blood money, the communities in those regions will see even less money • Export taxes paid for mineral sales collected by exporting countries will not be available once more illegal activites are taken up to fund conflict. • For conflict-affected areas, economy can get poorer as sales of minerals will drop off according to this activity • FOR THOSE WHO ARE ALREADY IN A DESPERATE SITUATION, i AM NOT SURE THIS IS GOING TO MAKE IT ANY EASIER. • high probability of reduced income for local operators as major corporations reduce or eliminate purchases • I am concerned that it may adversely affect legitimate income for the area. • I think many legitimate operators will be forced out of business as companies move to sources away from the conflict area • initially local operators will lose out • it will create an embargo on the involved countries • It will hurt the economy in these areas • Legislation will drive elimination of purchases from the region - Purchases from good/bad entities • Legitimate mines sales will drop generating additional finalcial problems to the region. • Less money for the legitimate miners and their families • Less money going into already poor countries. • Loss of business • Loss of jobs in affected countries • lower prices for goods without traceability, people will remain impoverised and unrest will increase • Mines may become unused and, therefore, communities may be economically crippled. • More companies will require sourcing of conflict minerals outside the DRC which will significantly depress all areas within the DRC. • no income for the working mining for them if nobody will purchase • people could loose access to income due to administration, registration etc. • People not knowing about the Conflict Minerals issues will probably avoid buying products from that area just by the name "DRC" even if the company producing has no relationship with the anti-government society. • People will be out of work • potential unemployment for artisanal miners

Q17b: "What negative economic impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
• Recession because of conflicts (deaths, destruction,...) • reduce work available in these areas • reduced ability to make profits from conflict areas; • Revenue at mines will decline, locals will lose employment, gangs will still rule. • short term negative economic impact on the people in those regions • Short term this will have a negative impact on their operations • short term: household incomes will decrease due to loss of employment • Slower economic growth for the high risk areas, as mining operations slow down • some people will lost their job, families will lost income, • The small local operators will likely be negatively impacted. The conflict parties will be affected also. This may not serve to alter their activities. • They will loose out - fewer customers = lesser margins • until civility is restored, the local operators continue to consolidate and the population in general will not enjoy any of the benefits the natural resources may have been able to provide • Will reduce companies willingness to work with legitimate ore/minerals providers in the affected/at risk countries
Cost or price increase
• $$ • change supply chains,m increase costs; gives advantage to companies of those countries that do not care about Due Dilligence on CM • Cost increases that will ultimately be passed on to customer causing great impact on the econony. • Cost to much $$$$ • Cost up • For companies, they might not be able to reduce cost by procuring the minerals at a higher price from somewhere else not DRC. • high costs involved • higher operating costs for complying companies • I think this politically motivated effort is only going to increase cost for the private sector, and increase government environmental costs. This effort will not benefit the DRC in any way or prevent any mining in such regions. • prices will increase • will this benefit to people subject to current exploited people ? Will minerals market suffer increase in pricing?
No significant or further negative effects
• Another regulatiom that will not have it'ss ittended effects. • At first due to finding alternate sources, but level off in the end. • CANNOT EVALUATE • Conflicts will keep going on till the UN gets tough and clamps down on these people and that will never happen • I don't known.but I think so. • It will generate another layewr of useless information. • Law Suits for get quick rich Lawyers and Organizagions • No impact • No negative impact
Increased illegal trade and corruption
• I THINK IT WILL JUST PUSH THE OPERATIONS FURTHER UNDERGROUND AND WILL MAKE IT HARDER FOR THE HONEST WORKING PERSON TO EARN AN HONEST LIVING • It is our opinion, the materials will be laundered through other areas and will eventually make it into the supply chain. • More crime and corruption • Only special person will be rich. • possibly increase illegal trading & mining

Q17b: "What negative economic impact of a Conflict Minerals due diligence scheme do you expect for local operators and communities as well as for the underlying conflicts themselves?" – Respondents' clustered answers
• rare earth metals are worth a lot of money. They will find a way to sell them regardless of what the law says
Other
• As mentioned above • Infra structures need to be developed enabling fair sharing by local population. • same as # 15. • same as above