



Cobalt Reporting Template (CRT)

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English

Revision 2.2
October 28, 2020

[Link to Terms & Conditions](#)

The purpose of this document is to collect sourcing information on cobalt.

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

Company Information

Company Name (*):	Acciaiere Valbruna SpA
Declaration Scope or Class (*):	B. Product (or List of Products)
Go to Product List tab to enter products this declaration applies to	
Click here to enter the products this declaration applies to	
Company Unique ID:	IT02866820240
Company Unique ID Authority:	VAT
Address:	Via A. Volta 4, 39100 Bolzano (Italy)
Contact Name (*):	ROBERTO BERTIN
Email - Contact (*):	info@valbruna.it
Phone - Contact (*):	switchboard +39-0444-968-211
Authorizer (*):	MASSIMO AMENDUNI GRESELE
Title - Authorizer:	Managing Director
Email - Authorizer (*):	info@valbruna.it
Phone - Authorizer:	switchboard +39-0444-968-211
Effective Date (*):	1-Jun-2021

Answer the following questions 1 - 6 based on the declaration scope indicated above

Question	Answer	Comments
1) Is any of the cobalt intentionally added or used in the product(s) or in the production process? (*)	Cobalt(*) Yes	Cobalt is added in just one single Fe-Base Superalloy exhibiting Co up to 0.20% max of mass
2) Do any of the smelters in your supply chain source the cobalt from a Conflict-Affected and High-Risk area? (OECD Due Diligence Guidance, see definitions tab) (*)	Cobalt(*) No	
3) Does 100 percent of the cobalt originate from recycled or scrap sources? (*)	Cobalt(*) No	The Cobalt is not obtained from mineral but is a component of a Co-Mo alloy with prevalence of Moly and obtained by scrap melting (recycled feed) by a Refiner not Located in DR Congo or in any other adjoining Country
4) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Cobalt(*) 100%	
5) Have you identified all of the smelters supplying the cobalt to your supply chain? (*)	Cobalt(*) No	Co is supplied by a trading company as Co-Mo Alloy and purchased from a Refiner and not from a Smelter smelting metal from its ore
6) Has all applicable smelter information received by your company been reported in this declaration? (*)	Cobalt(*) No	Co is supplied by a trading company as Co-Mo Alloy and purchased from a Refiner and not from a Smelter smelting metal from its ore

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a publicly available cobalt sourcing policy? (*)	yes	Valbruna does not purchase any Cobalt directly from the smelters but has established a strict purchasing policy that provides methods to determine sourcing of Co-Mo Alloy and to insure that it is DR Congo conflict-free: Co-Mo Alloy is purchased from traders sourcing the alloy from refiners processing recycled feed (scrap). Valbruna requires to the Co-Mo traders to supply material NOT having origin in the DR Congo or adjoining countries.
B. Does your policy cover, at a minimum, all risks in the OECD Due Diligence Guidance Annex II Model Policy, as well as the worst forms of child labor? (*)	Yes	See answer to question A
C. Have you implemented due diligence measures for cobalt in the declaration scope indicated above? (*)	Yes	See answer to question A
D. Do you require suppliers to exercise due diligence over the cobalt supply chain in accordance with the OECD Due Diligence Guidance? (*)	Yes	See answer to question A
E. Do you require your direct suppliers to source cobalt from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	No	
F. Do you require suppliers' due diligence practices to cover, at a minimum, all risks in the OECD Due Diligence Guidance Annex II Model Policy, as well as the worst forms of child labor? (*)	No	
G. Does your company conduct cobalt supply chain survey(s) of your relevant supplier(s)? (*)	Yes, Using Other Format (Describe)	Valbruna requires to Co-Mo traders formal declarations about the origin of the Co-Mo alloys manufactured from scrap processing. Declarations are available for customers audit at the Valbruna's HQ in Vicenza-Italy.
H. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
I. Does your review process include corrective action management? (*)	Yes	

#RIFI



Completion required only if reporting level "Product (or List of Products)" selected on the 'Declaration' worksheet.

[Click here to return to Declaration tab](#)

Manufacturer's Product Number (*)	Manufacturer's Product Name	Comments
ID Grade Code: 9105	AN5 (1.4980; UNS S66286; X6CrNiTiMoVB25-15-2; EZ6NCT25)	Cobalt is intentionally added during the fabrication of AN5 (9015) as an alloy (Co-Mo) to become a chemistry component as 0,20% max of mass. Cobalt is necessary in order to increase mechanical properties of finished products at high temperatures (measured by Stress Rupture Test) for applications such as fastener or special bolting.

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