



Conflict Free Mineral Policy

The Conflict Minerals Reporting Template (CMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized.

The CMRT is an important tool for companies and their suppliers in scope of conflict mineral regulations such as Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the European Union (EU)'s Non-Financial Reporting Directive and other conflict minerals laws. Under these regulations, conflict minerals include tin, tungsten, tantalum and gold (3TGs), originating in the Democratic Republic of the Congo (DRC) or any of the "Covered Countries" under these regulations. Covered countries are defined in Section 1502 as having an internationally recognized border with DRC and include Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

Globetronics supports the initiatives to stop human rights violations and environmental damage in the conflicted and covered countries. This is aligned with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. As part of our supporting efforts, we require of Conflict Mineral Reporting Template (CMRT) that rely internationally recognized validation schemes to ensure that procurement is not obtained from the covered countries; this was done upon customer requests previously and currently we require all our new Direct Material suppliers to have a CMRT declaration.

Globetronics fully understands the importance of this issue as part of the ESG and Sustainability agenda to move toward a conflict free supply chain. We therefore encourage all our suppliers to support us in these efforts.