Conflict Minerals Reporting Template (CMRT)

An initiative of the EICC and GeSI

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Burada Dil Tercihini Belirleyin:

English

Revision 5.10
December 1, 2017

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 (*):	OPTOPLEX CORPORATION
Declaration Scope or Class (*):	A. Company
Description of Scope:	
Company Unique ID:	
Company Unique ID Authority:	
Address:	48500 Kato Road, Fremont, CA 94538, USA
Contact Name (*):	Kevin Zhu
Email – Contact (*):	kevinzhu@optoplex.com
Phone – Contact (*):	(510) 490-9930 x 223
Authorizer (*):	James Pang
Title - Authorizer:	COO
Email - Authorizer (*):	jamespang@optoplex.com
Phone - Authorizer (*):	(510) 490-9930 x217
Effective Date (*):	15-Aug-2018

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	
Tin	No	
Gold (*)	Yes	
Tungsten	No	

2) Does any 3TG remain in the product(s)? (*)

	Answer	Comments
Tantalum		
Tin		
Gold (*)	Yes	
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 (*)	No	
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 (*)	No	
Tungsten		

5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)

	Answer	Comments
Tantalum		
Tin		
Gold (*)	100%	
Tungsten		

6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)

	Answer	Comments
Tantalum		
Tin		
Gold (*)	Yes	
Tungsten		

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Selecione Preferência de idioma Aqui:
Wählen sie hier die Sprache:
Seleccione el lenguaje de preferencia aqui:
Selezionare la lingua di preferenza qui:
Burada Dil Tercihini Belirleyin:

English

Revision 5.10
December 1, 2017

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.

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

	Answer	Comments
Tantalum		
Tin		
Gold (*)	Yes	
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.optoplex.com/CFSI_CMRT_Optoplex.pdf
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)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
H. Does your review process include corrective action management? (*)	Yes	Document Review only
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	

Smelter Identification Number Input Column	Metal (*)	Smelter Look-up (*)	Smelter Name (1)	Smelter Country (*)	Smelter Identification	Source of Smelter Identification Number	Smelter Street	Smelter City	Smelter Facility Location: State / Province
	Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	Shandong Zhaojin Gold & Silver Refinery Co. Ltd	CHINA	CID001622	CFSI		Zhaoyuan	Shandong

To ensure all required fields have been populated before submitting to your customers review form for any line items highlighted in red

Required fields remaining to be completed

0

Click here to return to Declaration tab

Required Fields	Answer provided	Notes	Hyperlink to source
Company Name (*):	OPTOPLEX CORPORATION	Complete	
Declaration Scope or Class (*):	A. Company	Complete	
Description of scope		Complete	
Contact Name (*):	Kevin Zhu	Complete	
Email – Contact (*):	kevinzhu@optoplex.com	Complete	
Phone – Contact (*):	(510) 490-9930 x 223	Complete	
Authorizer (*):	James Pang	Complete	
Email - Authorizer (*):	jamespang@optoplex.com	Complete	
Phone - Authorizer (*):	(510) 490-9930 x217	Complete	
Effective Date (*):	15-Aug-2018	Complete	
1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)			
Tantalum	No	Complete	
Tin	No	Complete	
Gold (*)	Yes	Complete	
Tungsten	No	Complete	
2) Does any 3TG remain in the product(s)? (*)			
Tantalum		Complete	
Tin		Complete	
Gold (*)	Yes	Complete	
Tungsten		Complete	
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)			
Tantalum		Complete	
Tin		Complete	
Gold (*)	No	Complete	
Tungsten		Complete	
4) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)			
Tantalum		Complete	
Tin		Complete	
Gold (*)	No	Complete	
Tungsten		Complete	
5) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)			
Tantalum		Complete	
Tin		Complete	
Gold (*)	100%	Complete	
Tungsten		Complete	
6) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)			
Tantalum		Complete	
Tin		Complete	
Gold (*)	Yes	Complete	
Tungsten		Complete	
7) Has all applicable smelter information received by your company been reported in this declaration? (*)			
Tantalum		Complete	
Tin		Complete	
Gold (*)	Yes	Complete	
Tungsten		Complete	
Question			
A. Have you established a conflict minerals sourcing policy? (*)	Yes	Complete	
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	Complete	
The URL in the comment field	www.optoplex.com/CFSI_CMRT_Optoplex.pdf	Complete	
C. Do you require your direct suppliers to be DRC conflict-free? (*)	Yes	Complete	
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	Complete	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	Complete	
F. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g., CMRT)	Complete	
G. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	Complete	
H. Does your review process include corrective action management? (*)	Yes	Complete	
I. Is your company required to file an annual conflict minerals disclosure with the SEC? (*)	No	Complete	
Product List		Complete	
Smelter List – Tantalum		Not Required	
Smelter List – Tin		Not Required	
Smelter List - Gold		Complete	
Smelter List – Tungsten		Not Required	
All rows with "Smelter not listed" selected, have a name and country listed		n/a	

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REVISION HISTORY

A change in the first digit of the revision number (e.g., 1.0 to 2.0) signifies a set of major improvements have occurred which will likely include different data reporting requirements. Changes to the first or second decimal place (e.g., "2.01" to "2.02") indicate only minor changes have been made to the template which are not expected to result in substantial changes to the data being reported. The addition of a letter (e.g., "a", or "b", or "c") following the revision number indicate that only the standard smelter list has been updated from the prior version.

REVISION	ORDINATOR	RELEASE DATE	DESCRIPTION OF FUNCTIONAL CHANGE	UPDATE TO SMELTER LIST
1	Jared Connors, Intel	July 19th, 2011	New Release	
2	Jared Connors, Intel	Aug 29th, 2012	Major update to functionality including: addition of the known smelter list, addition of declaration-scope including product tab, and added and modified multiple questions and / or their responses	New.
2.01	Jared Connors, Intel	Dec 21st, 2012	List of changes to the template functionality.	(smelter list entries)
2.02	Jared Connors, Intel	March 29th, 2013	(list of changes)	(smelter list entries)
2.03	Akinaza Yamakawa, JEITA John Pyler, BlackBerry	July 12th, 2013	(list of changes)	(smelter list entries)
2.03a	John Pyler, BlackBerry	July 25th, 2013	No functional change.	(smelter list entries)
3.00	Akinaza Yamakawa, JEITA, and John Pyler, BlackBerry, under the direction of the CFSI Due Diligence Workgroup	April 8th, 2014	Major update to synchronize the CFSI CMRT with the data fields in the newly published IPC-1755 Standard. Changes include:	(smelter list entries)
3.01	Akinaza Yamakawa, JEITA, and John Pyler, BlackBerry, under the direction of the CFSI Due Diligence Workgroup	May 30th, 2014	(list of changes)	(smelter list entries)
3.02	John Pyler, BlackBerry, under the direction of the CFSI Due Diligence Data Collection	Nov 7th, 2014	1. Revisions to the German language translation throughout. 2. Correction of the Japanese language translation for Question 4 on the Declaration worksheet.	This version incorporates numerous changes to the smelter list as reflected in the Standard Smelter List version Number 7, 2014. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org.
4.0	CFSI Due Diligence Data Collection Workgroup	Apr 30th, 2015	Replaced the Standard Smelter Names tab with the Smelter Reference List tab, displaying common alternate names for smelters as well as location information. Major update to synchronize the CFSI CMRT with the data fields in the newly revised IPC-1755 Standard. Changes include:	This version incorporates numerous changes to a smelter list as reflected in the Standard Smelter List as of April 17, 2015. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org.
4.01	CFSI Due Diligence Data Collection	June 12th, 2015	Minor revisions to correct reported issues including those related to error checking on the "Checker" and "Smelter List" tabs.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of June 12, 2015. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org.
4.01a	CFSI Due Diligence Data Collection	August 6th, 2015	No functional change. Element OID corrected to read CE501303.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of August 6, 2015. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org.
4.01b	CFSI Due Diligence Data Collection	November 16th, 2015	No functional change.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of November 6, 2015. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org.
4.10	CFSI CMRT Team	May 12, 2017	(list of changes)	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of March 23, 2016. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org.
4.20	CFSI CMRT Team	November 30, 2016	(list of changes)	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of October 6, 2016. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org/conflict-free-smelter-program/exports/cmrt-export/.
5.0	CFSI CMRT Team	May 12, 2017	(list of changes)	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of March 17, 2017. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org/conflict-free-smelter-program/exports/cmrt-export/.
5.01	CFSI CMRT Team	June 21, 2017	Corrections to checker errors.	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of March 17, 2017. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org/conflict-free-smelter-program/exports/cmrt-export/.
5.10	CFSI CMRT Team	December 1, 2017	1. Corrections to all bugs and errors. 2. Enhancements which do not conflict with IPC-1755. 3. Updates to ISO short names for countries, states / provinces. 4. Updates to the Smelter Reference List and Standard Smelter List. 4. Change to .xlsx format	This version incorporates a few changes to the smelter list as reflected in the Standard Smelter List as of September 29, 2017. The latest version of the Standard Smelter List is available at: http://www.conflictfreesourcing.org/conflict-free-smelter-program/exports/cmrt-export/.

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Introduction

This Conflict Minerals Reporting Template (Template) is a free, standardized reporting template created by the Electronic Industry Citizenship Coalition® (EICC®) and the Global e-Sustainability Initiative (GeSI). The Template facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized and supports compliance to legislation*. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the Conflict-Free Smelter Program**.

The CMRT was designed for downstream companies to disclose information about their supply chains up to but not including the smelter. If you are a 3TG smelter or refiner, in accordance with the CFSP protocols, we recommend you enter your own name in the smelter list tab.

When filling out the form, none of the cell entries should start will "=" or "#."

* In 2010, the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act was passed concerning "conflict minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC published final rules associated with the disclosure of the source of conflict minerals by U.S. publicly traded companies (see the rules at http://www.sec.gov/rules/final/2012/34-67716.pdf). The rules reference the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, (http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf), which guides suppliers to establish policies, due diligence frameworks and management systems.
** See information on the Conflict-Free Sourcing Initiative (www.conflictfreesourcing.org).

Instructions for completing Company Information questions (rows 8 - 22).
Provide comments in ENGLISH only

Note: Entries with (*) are mandatory fields.

1. Insert your company's Legal Name. Please do not use abbreviations. In this field you have the option to add other commercial names, DBAs, etc.

2. Select your company's Declaration Scope. The options for scope are:

A. Company-wide
B. Product (or List of Products)
C. User-Defined

For "Company-wide", the declaration encompasses the entirety of a company's products or product substances produced by the parent company. Therefore if the user is reporting 3TG data at the company level, they will be reporting conflict minerals data on all products they manufacture.

For Scope selection of Product (or List of Products), a link to the worksheet tab for Product List will be displayed. If this scope is chosen, it is mandatory to list the Manufacturer's Product Number of the products covered under the Scope of this Declaration in Column B of the Product List worksheet. It is optional to list the Manufacturer's Product Name in Column C of the Product List worksheet.

For Scope selection of "User Defined", it is mandatory that the user describes the scope to which the 3TG disclosure is applicable. The scope of this class shall be defined in a text field by the supplier and should be easily understood by customers or the receivers of the document. As an example, companies may provide a link to clarifying information.

This field is mandatory.

3. Insert your company's unique identifier number or code (DUNS number, VAT number, customer-specific identifier, etc.)

4. Insert the source for the unique identifier number or code ("DUNS", "VAT", "Customer", etc).

5. Insert your full company address (street, city, state, country, postal code). This field is optional.

6. Insert the name of the person to contact regarding the contents of the declaration information. This field is mandatory.

7. Insert the email address of the contact person. If an email address is not available, state ''not available'' or ''n/a.'' A blank field may cause an error in form implementation. This field is mandatory.

8. Insert the telephone number for the contact. This field is mandatory.

9. Insert the name of the person who is responsible for the contents of the declaration information. The authorizer may be a different individual than the contact person. It is not correct to use the words ''same'' or similar identification to provide the name of the authorizer. This field is mandatory.

10. Insert the title for the Authorizing person. This field is optional.

11. Insert the email address of the Authorizing person. If an email address is not available, state ''not available'' or ''n/a.'' A blank field may cause an error in form implementation. This field is mandatory.

12. Insert the telephone number for the Authorizing person. This field is mandatory.

13. Please enter the Date of Completion for this form using the format DD-MMM-YYYY. This field is mandatory.

14. As an example, the user may save the file name as: companyname-date.xls (date as YYYY-MM-DD).

Instructions for completing the seven Due Diligence Questions (rows 24 - 65).
Provide answers in ENGLISH only

These seven questions define the usage, origination and sourcing identification for each of the metals. The questions are designed to collect information about the use of 3TG in the company's product(s) to allow for the determination of regulatory applicability. Responses to these questions shall represent the 'Declaration Scope' selected in the company information section. The responses to the questions in this section can be used to determine applicability and completeness of 3TG reporting.

For each of the seven required questions, provide an answer for each metal using the pull down menu selections. The questions in this section must be completed for all 3TG. If the response for a given metal to questions 1 is positive, then the subsequent questions shall be completed for that metal and the following due diligence questions (A to I) shall be completed about the company's overall due diligence program.

1. This is the first of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements. This question relies upon the guidance provided by the SEC in the final rules regarding the determination if a 3TG is "necessary to the functionality or production" of a product. The SEC guidance is based upon the presumption that a company in the supply chain for a product would not intentionally add a 3TG to that product or any of a product's sub-components if that 3TG was not necessary to the product's generally expected function, use, or purpose. Similarly, the guidance presumes that a 3TG would not be necessary to the production of a product unless it was intentionally included in the production process of that product. The response to this question serves to exclude any trace-level contaminants or naturally-occurring by-products such as tin in steel. This question shall be answered for each 3TG.

This question asks if any conflict minerals are used as raw material, component or additive in a product that you manufacture or contract to manufacture (including raw material and components). Impurities from raw materials, components, additives, abrasives, and cutting tools are outside the scope of the survey.

This question shall be answered for each 3TG. Valid responses to this question are either "yes" or "no". This question is mandatory.

Some companies may require substantiation for a "No" answer that should be entered into the Comment Field.

2. This question shall be answered for each 3TG for each the answer to question 1 is "yes." This is the second of two questions for which the response is used to determine whether the 3TG is within the scope of conflict minerals reporting requirements as described in the SECs final rules regarding the determination if a 3TG is necessary to the functionality or production of a product. This question is dependent upon the question and response to Question 1. This question is intended to identify 3TGs which are intentionally added or included in the manufacturing process of a product where some amount of the 3TG remains in the finished product. This includes 3TGs which may not have been intended to become part of the final product and may not be necessary to the functionality of the product but are only present as residuals of the manufacturing process. In many cases, the manufacturer may have attempted to remove or facilitate consumption of the 3TG during the manufacturing process, however, some amount of the 3TG remains. Should the 3TG, which is added or included during the manufacturing process, be completely removed such that none of the 3TG remains upon the completion of that process, the response to this question would be no.

This question shall be answered for each 3TG. Valid answers to this question are either "yes" or "no". This question is mandatory.

3. This is a declaration that any portion of the 3TGs contained in a product or multiple products originates from the DRC or an adjoining country (covered countries). The answer to this question should be "yes" if any smelter in the supply chain sources from the covered countries, even if those smelters are on the CFSI compliant smelter and refiner list. For more information, see CFSI's due diligence guidance on conflict minerals here: http://www.conflictfreesourcing.org/additional-training-and-resources/guidance-documents/.

The answer to this question shall be "yes", "no", or "unknown". Substantiate a "Yes" answer in the comments section.

This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.

4. This is a declaration that identifies whether 3TGs contained in the product(s) necessary to the functionality of that product(s) originate from recycled or scrap sources.

The answer to this question shall be "yes", "no", or "unknown". This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.

A "Yes" answer means that 100% of the 3TG comes from recycled or scrap sources. A "No" answer means that some of the 3TG does not come from recycled or scrap sources. An "Unknown" answer means that the user does not know whether or not 100% of the 3TG comes from recycled or scrap sources.

5. This is a question to determine whether a company has received conflict minerals disclosures from all direct suppliers reasonably believed to be providing 3TGs contained in the products covered by the scope of this declaration. Permissible responses to this question are:

- 100%
- Greater than 90%
- Greater than 75%
- Greater than 50%
- 50% or less
- None

This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.

6. This question verifies if the supplier has reason to believe they have identified all of the smelters providing 3TGs in the products covered by this declaration. The answer to this question shall be "Yes" or "No", along with a comment in certain cases, e.g. list of smelters.

This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.

7. This question verifies that all of the smelters identified to be providing any of the 3TGs contained in the products covered by the scope of this declaration have been reported in this declaration. The answer to this question shall be "yes" or "no" along with a comment in certain cases, e.g. list of smelters. This question is mandatory for a specific metal if the response to Question 1 and 2 is "Yes" for that metal.

Provide comments in the Comment sections as required to clarify your responses.

Instructions for completing Questions A. – I. (rows 69 - 85). Questions A. through I. are mandatory if the both of responses to Question 1 and 2 are "Yes" for any metal.
Provide answers in ENGLISH only

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas (OECD Guidance) defines "Due Diligence" as "an on-going, proactive and reactive process through which companies can ensure that they respect human rights and do not contribute to conflict".   Due diligence should be an integral part of your company's overall conflict free sourcing strategy.   Questions A. thru I. are designed to assess your company's conflict-free minerals sourcing due diligence activities. Responses to these questions shall represent the full scope of your company's activities and shall not be limited to the 'Declaration Scope' selected in the company information section.

A. This is a declaration to disclose whether a company has a conflict minerals sourcing policy. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field.

This question is mandatory.

B. This is a declaration to disclose whether a company's conflict minerals sourcing policy is available on the company website. The answer to this question shall be "yes" or "no." If "Yes" the user shall specify the URL in a question comment field.

This question is mandatory.

C. This is a question to determine whether a company requires their direct suppliers to be DRC conflict free. The answer to this question shall be "yes" or "no." See Definitions worksheet for definition of "DRC conflict-free". Comments shall be captured in a question comment field.

This question is mandatory.

D. This is a declaration to determine whether a company requires their direct suppliers to source 3TG from validated, conflict free smelters. The answer to this question shall be "yes" or "no." Comments should be captured in a question comment field.

This question is mandatory.

E. Please answer "yes" or "no" to disclose whether your company has implemented conflict minerals sourcing due diligence measures. This declaration is not intended to provide the details of a company's due diligence measures - just that a company has implemented due diligence measures. The aspects of acceptable due diligence measures shall be determined by the requestor and supplier.

Examples of due diligence measures may include: communicating and incorporating into contracts (where possible) your expectations to suppliers on conflict-free mineral supply chain; identifying and assessing risks in the supply chain; designing and implementing a strategy to respond to identified risks; verifying your direct supplier's compliance to its DRC conflict-free policy, etc. These due diligence measure examples are consistent with the guidelines included in the internationally recognized OECD Guidance.

This question is mandatory.

F. This is a question to disclose whether a company requests their supplier to fill out a conflict minerals declaration. Acceptable answers are listed below, in certain cases further explanation may be required, i.e., to provide the format used for collecting information. If the answer is "Yes," using other format the user shall provide a comment in a question comment field. Permissible responses to this question are:

- Yes, in conformance with IPC-1755 [e.g., CMRT]
- Yes, using other format (describe)
- No

This question is mandatory.

G. Please answer "Yes" or "No". In the comments section, you can provide additional information on your approach. Examples could be:

 "3rd party audit" - on-site audits of your suppliers conducted by independent third parties.
 "Documentation review only" - a reviewof supplier submitted records and documentation conducted by independent third parties and, or your company personnel.
 "Internal audit" - on-site audits of your suppliers conducted by your company personnel.

This question is mandatory.

H. This is a question to disclose whether a company's review process includes corrective action management. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field.

This question is mandatory.

I. This is a question to disclose whether a company is subject to the SEC rule. The answer to this question shall be "yes" or "no." Comments shall be captured in a question comment field. This question is mandatory. For more information please refer to www.sec.gov.

Note: Columns with (*) are mandatory fields

This template allows for smelter identification using the Smelter Look-up. Columns B, and C must be completed in order from left to right to utilize the Smelter Look-up feature.
Use a separate line for each metal/smelter/country combination.

1. Smelter Identification Input Column - If you know the Smelter Identification Number, input the number in Column A (columns B, C, E, F, G, I, and J will auto-populate). Column A does not autopopulate.

2. Metal (*)   -   Use the pull down menu to select the metal for which you are entering smelter information. This field is mandatory.

3. Smelter Look-up (*) - Select from dropdown. This is the list of known smelters as of template release date. If smelter is not listed select 'Smelter Not Listed'. This will allow you to enter the name of the smelter in Column D. If you do not know the name or location of the smelter, select 'Smelter Not Yet Identified.' For this option, columns D and E will autopopulate to say, 'unknown.' This field is mandatory.

4. Smelter Name (1)- Fill in smelter name if you selected "Smelter Not Listed" in column C. This field will auto-populate when a smelter name in selected in Column C. This field is mandatory.

5. Smelter Country (*) – This field will auto-populate when a smelter name is selected in column C. If you selected "Smelter Not Listed" in column C, use the pull down menu to select the country location of the smelter. This field is mandatory.

6. Smelter Identification - This is a unique identifier assigned to a smelter or refiner according to an established smelter and refinery identification system. It is expected that multiple names or aliases could be used to describe a single smelter or refiner and therefore multiple names or aliases could be associated to a single 'Smelter ID'.

7. Source of Smelter Identification Number - This is the source of the Smelter Identification Number entered in Column F. If a smelter name was selected in Column C using the dropdown box, this field will auto-populate.

8. Smelter Street - Provide the street name on which the smelter is located. This field is optional.

9. Smelter City – Provide the city name of where the smelter is located. This field is optional.

10.. Smelter Location: State/Province, if applicable – Provide the state or province where the smelter is located. This field is optional.

11. Smelter Contact Name – The Conflict Minerals Reporting Template (CMRT) is circulated among companies in the requesting company's supply chain to ensure compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the U.S. Securities and Exchange Commission Final Rule on conflict minerals.

If the template is circulated in a country where laws protecting personal information exist, sharing personal contact information in the CMRT may violate related regulations. Therefore, it is recommended that the requesting company take precautions such as obtaining the contact person's permission to share the information with other companies in the supply chain when completing "Smelter Contact Name" and the "Smelter Contact Email" columns.

If you have permission to share this information, please fill in the name of the Smelter Facility Contact person who you worked with.

12. Smelter Contact Email – Fill in the email address of the Smelter Facility contact person who was identified as the Smelter Contact Name. Example: John.Smith@SmelterXXX.com. Please review the instructions for Smelter Contact Name before completing this field.

13. Name of Mine(s) - This field allows a company to define the actual mines being used by the smelter. Please enter the actual mine names if known. If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the name of the mine and answer "Yes" in Column P.

"RCOI confirmed as per CFSI" may be an acceptable answer to this question.

14. Location (Country) of Mine(s) - This is a free form text field that allows a company to define the location of the mines being used by the smelter. Please enter the country of the mine(s). If the country of origin is not known, enter "Unknown". If 100% of the smelter's feedstock originates from recycled or scrap sources, enter "Recycled" or "Scrap" in place of the country of origin. This field is optional.

"RCOI confirmed as per CFSI" may be an acceptable answer to this question.

15. Indicates whether the smelter solely obtains inputs for its smelting process(es) from recycled or scrap sources. This question is optional. Permissible responses to this question are:

- Yes
- No
- Unknown

16. Comments – free form text field to enter any comments concerning the smelter. Example: smelter is being acquired by Company YYY

The Checker worksheet is used to verify if all the required information in the Template has been completed. It is updated real-time and can be reviewed at any time while using the Template. It is used to verify completion.

To use this sheet, verify if all required fields have been completed (completed fields will be highlighted in green). If not, look for the red field(s) and review the "Notes" in Column C for required actions. You may use the URL in Column D to directly access the field for completion.

The Conflict-Free Smelter Program ("Program") Compliant Smelter List (the "List") and Program templates and tools, including, without limitation, the Conflict Minerals Reporting Template (collectively "Tools"), including, without limitation, all information provided therein, are provided for informational purposes only and are current as of the date set forth therein. Any inaccuracy or omission in the List or any Tool is not the responsibility of the Electronic Industry Citizenship Coalition, Incorporated, a Delaware non-stock corporation ("EICC"), or of the Global e-Sustainability Initiative, a Belgian international not-for-profit association ("GeSI"). Determination of whether and/or how to use all or any portion of the List or any Tool is to be made in the User's sole and absolute discretion. Prior to using the List or any Tool, you should review it with your own legal counsel. No part of the List or any Tool constitutes legal advice. Use of the List or any Tool is voluntary.

To the fullest extent permitted by applicable laws, EICC and GeSI renounce any liability for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of the User's use of the List or any Tool, whether arising in tort, contract, statute, or otherwise, even if shown that they were advised of the possibility of such damages.

In consideration for access and use of the List and/or any Tool, THE USER hereby agrees to and does (a) release and forever discharge EICC and GeSI, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, from any and all claims, actions, losses, suits, damages, judgments, levies, and executions, which the User has ever had, has, or ever can, shall, or may have or claim to have against EICC and/or GeSI, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, resulting from or arising out of the List or any Tool or use thereof, and agrees to (b) indemnify, defend and hold harmless EICC and GeSI, as well as their respective officers, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns, from any and all claims, actions, losses, suits, damages, judgments, levies, and executions resulting from or arising out of the USER'S use of the List or any Tool.

If any part of any provision of these Terms and Conditions shall be invalid or unenforceable under applicable law, said part shall be deemed ineffective to the extent of such invalidity or unenforceability only, without in any way affecting the remaining parts of said provision or the remaining provisions of these Terms and Conditions.

By accessing and using the List or any Tool, and in consideration thereof, the User agrees to the foregoing.

Revision 5.10 December 1, 2017

ITEM	DEFINITION
3TG	Tantalum, tin, tungsten, gold
Authorizer	This field identifies the person responsible for the content of the declaration. The authorizer may be a different individual from the contact person. It is not correct to use the words ''same'' or similar identification to provide the name of the authorizer.
CFSP Compliant Smelter List	The Conflict- Free Smelter Program (CFSP) Compliant Smelter List is a published list of smelters and refiners that have undergone assessment through the CFSP, a program of the Conflict-Free Sourcing Initiative (CFSI) or industry equivalent program (such as Responsible Jewellery Council or London Bullion Market Association) and have been validated to be in compliance with the protocols. If a smelter or refiner is not on the list, it has either not completed a CFSP assessment or is not in compliance with the CFSP protocol. A list of smelters and refiners which have been validated to be compliant to the CFSP can be found at www.conflictfreesourcing.org.
Conflict-Free Smelter Program (CFSP)	The Conflict-Free Smelter Program (CFSP) is a program developed by the EICC and GeSI to enhance company capability to verify the responsible sourcing of metals. Further details of the CFSP can be found here: http://www.conflictfreesourcing.org/conflict-free-smelter-program/.
Conflict-Free Sourcing Initiative	Founded in 2008 by members of the Electronic Industry Citizenship Coalition and the Global e-Sustainability Initiative, the Conflict-Free Sourcing Initiative has grown into one of the most utilized and respected resources for companies addressing conflict minerals issues in their supply chains. Over 150 companies from seven different industries participate in the CFSI today, contributing to a range of tools and resources including the Conflict-Free Smelter Program, the Conflict Minerals Reporting Template, Reasonable Country of Origin Inquiry data and a range of guidance documents on conflict minerals sourcing. The CFSI also runs regular workshops on conflict minerals issues and contributes to policy development and debates with leading civil society organizations and governments. Additional information is available at http://www.conflictfreesourcing.org.
Conflict Mineral	As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4): CONFLICT MINERAL.—The term ''conflict mineral'' means— (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. (available at http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)
Covered Country(ies)	Covered Country(ies) as defined by the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These countries include the Democratic Republic of the Congo and the nine countries with which it shares an internationally recognized border: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia.
Declaration Scope or Class	For the purposes of this template, "scope" describes the applicability of the information provided by the reporting company. The scope may encompass the entirety of a company's services and/or products, or at a company's discretion, the template may be used to report on a specific product (or products), or, be 'User defined'. The 'User defined' scope selection or class may be used to describe any subset of a company's operation or product portfolio.
Dodd-Frank	2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 ("Dodd-Frank") (http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)
DRC	Democratic Republic of Congo
DRC conflict-free	Products that do not contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Source: 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)
EICC	Electronic Industry Citizenship Coalition (www.eicc.info)
GeSI	Global e-Sustainability Initiative (www.gesi.org)
Gold (Au) refiner (smelter)	A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations. Refer to the CFSP audit protocol for this metal for a complete description: http://www.conflictfreesourcing.org/audit-protocols-procedures/.
Independent Third-Party Audit Firm	With respect to smelter audits, an "Independent Third-Party Audit Firm" is a private sector organization competent in evaluating the smelter or refiner's materials traceability against the standards of the CFSP or equivalent audit protocols. To maintain neutrality and impartiality, such organization and its audit team members must have no conflicts of interest with the auditee.
Intentionally added	Intentionally added is commonly known as the deliberate use of a substance, or in this case metal, in the formulation of a product where continued presence is desired to provide a specific characteristic, appearance or quality. While the SEC does not define the phrase "intentionally added" in the final rule*, the rule's preamble states: "[W]e agree that being intentionally added, rather than being a naturally-occurring by-product, is a significant factor in determining whether a conflict mineral is ''necessary to the functionality or production'' of a product. This is true regardless of who intentionally added the conflict mineral to the product so long as it is contained in the product. [D]etermining whether a conflict mineral is considered ''necessary'' to a product should not depend on whether the conflict mineral is added directly to the product by the issuer or whether it is added to a component of the product that the issuer receives from a third party. Instead, the issuer should 'report on the totality of the product and work with suppliers to comply with the requirements.' Therefore, in determining whether a conflict mineral is ''necessary'' to a product, an issuer must consider any conflict mineral contained in its product, even if that conflict mineral is only in the product because it was included
IPC	IPC (www.IPC.org) is a global industry association based in Bannockburn, Ill., dedicated to the competitive excellence and financial success of its 3,400 member companies which represent all facets of the electronics industry, including design, printed board manufacturing, electronics assembly and test. As a member-driven organization and leading source for industry standards, training, market research and public policy advocacy, IPC supports programs to meet the needs of an estimated $2.0 trillion global electronics industry. IPC maintains additional offices in Taos, N.M.; Washington, D.C.; Stockholm, Sweden; Moscow, Russia; Bangalore, India; Bangkok, Thailand; and Shanghai, Shenzhen, Chengdu, Suzhou and Beijing, China.
IPC-1755 Conflict Minerals Data Exchange Standard	This IPC standard establishes the requirements for exchanging conflict minerals data between suppliers and their customers. To meet the needs of a broad range of users, this standard provides flexibility in the scope of the products covered within a single declaration. This standard is not a compliance guide.
Necessary for the Functionality of a Product	The SEC does not provide a formal definition of this phrase in the final rule*, however it provides some guidance: A conflict mineral will be considered to be necessary to its functionality of a product if it meets the following: 1) is intentionally added to the product or any component of the product and is not a naturally-occurring byproduct; 2) is necessary to the product's generally expected function, use or purpose; and 3) is incorporated for the purpose of ornamentation, decoration, or embellishment, whether the primary purpose of the product is ornamentation or decoration. NOTE: The conflict mineral must be contained in the product to be applicable. *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)
Necessary for the Production of a Product	The SEC does not provide a formal definition of this phrase in the final rule*; however, it provides some guidance: A conflict mineral will be considered to be necessary to the production of a product when: 1) it is intentionally included in the product's production process, other than if it is included in a tool, machine, or equipment used to produce the product (such as computers or power lines); 2) it is included in the product (MUST be contained in the product to be applicable); and 3) it is necessary to the product. *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)
OECD	Organisation for Economic Co-operation and Development
Product	A company's Product or Finished good is a material or item which has completed the final stage of manufacturing and/or processing and is available for distribution or sale to customers.
Recycled or Scrap Sources	Recycled or scrap sources are recycled metals, that are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold. Minerals partially processed, unprocessed or byproducts from other ores are not included in the definition of recycled metal.
SEC	U.S. Securities and Exchange Commission (www.sec.gov)
Smelter	A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. The terms "smelter" and "refiner" are used interchangeably throughout various publications.
Smelter Identification Number	A unique identification number the CFSI assigns to companies that have been reported by members of the supply chain as smelters or refiners, whether or not they have been verified to meet the characteristics of smelters or refiners as defined in the CFSP audit protocols.
Tantalum (Ta) smelter	A tantalum smelter (also known as a processor) is defined as a company that converts Ta-containing ores, concentrates, slags or secondary materials into tantalum intermediate products or other tantalum containing products for direct sales or further processing into Ta-containing products, such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bars, etc. Refer to the CFSP audit protocol for this metal for a complete description at: http://www.conflictfreesourcing.org/audit-protocols-procedures/.
Tin (Sn) smelter	Primary [tin] smelters are companies with one or more facilities treating tin containing ore concentrates in order to produce tin metal. Secondary [tin] smelters are companies with one or more facilities that treat secondary materials by reduction for the production of crude or higher grade tin or tin product such as solder. A smelter as referred to within this audit protocol may operate as either one or both types of business operation. Refer to the CFSP audit protocol for this metal for a complete description: http://www.conflictfreesourcing.org/audit-protocols-procedures/.
Tungsten (W) smelter	A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder). Refer to the CFSP audit protocol for this metal for a complete description: http://www.conflictfreesourcing.org/audit-protocols-procedures/.