

The Disclosure for Conflict Minerals

As a corporate citizen of the world, DT Research, Inc. (together with its consolidated subsidiaries, “DT Research”) supports the work of the Responsible Minerals Initiative (the “RMI”). We commit to eliminate any use of conflict minerals that are mined in areas experiencing armed conflict or under conditions that violate human rights, specifically the minerals of tantalum, tin, and tungsten; and gold (collectively, “3TGs”) extracted from the Democratic Republic of the Congo and neighboring countries (the “covered countries”).

Conflict-free Sourcing Policy

DT research, Inc. actively responds to the global boycott for conflict minerals and promises not to use 3TGs mined through persecuting human rights or coercion by force, especially these minerals from the covered countries.

To avoid conflict minerals used in the raw materials of DT Research, we request the supplier to carry out the policy for non-use of conflict minerals and not to purchase conflict minerals from the region of armed conflict and high risk. We also let our suppliers to request their upstream suppliers carrying out this policy.

Reasonable Country of Origin Inquiry (the “RCOI”)

Realizing our duties towards the society as a responsible member of the electronics manufacturer community, we do not stop at carefully articulated sourcing policies to remove potential sources of conflict minerals in our supply chain.

Every year, suppliers of materials that may contain minerals of any kind receive our inquiry following the Conflict Minerals Reporting Template (the “CMRT”) and are required to respond accordingly with detailed information regarding the smelters and/or refiners they work with or source from. CMRT is developed by the RMI in order to improve information transparency through the supply chain regarding origin of minerals and the smelters and refiners involved.

When it is unable to determine the country of origin of the minerals contained in certain materials supplied to us, we employ other methods to continuously input efforts towards ascertaining that DT Research does not contribute to any conduct that abuses human rights in the supply chain. The methods include follow-up engagement with suppliers for the purpose of obtaining information about their suppliers, making information available to suppliers for their better understanding of the importance of their participation in excluding conflict minerals, and utilizing the list of conformant smelters and refiners published by the RMI to improve conformance of suppliers.

DT Research aspires to continue raising awareness among our partners and encouraging involvement of more members of the community by constantly educating ourselves on and following the best practice in the industry regarding responsible sourcing.

Conflict Minerals Due Diligence Measures

Despite our endeavors mentioned in the above, the outreach of our actions is inevitably limited by the complex and multi-layered supply chain. Knowledge of the foregoing obstacles and other challenges revealed by our annual RCOI encouraged us to design a set of standard due diligence measures referencing the five-step framework introduced in the Organization for Economic Co-operation and Development (the “OECD”) Guidance to verify where we stand and identify what’s more to be done.

Below are the descriptions of DT Research’s Conflict Minerals Due Diligence Measures:

1. Establishing company’s management systems and sourcing policy:

As part of DT Research’s due diligence measures, practices involving sourcing of materials which may contain minerals are explicitly regulated in agreements or other documentations exchanged with our suppliers. Our procurement department is well-educated on the company’s sourcing policy and is directed to firmly implement all the notice or sign-back requirements. As of 2020, 111 suppliers had signed and returned the Supplier’s Affidavit Letter for Environmental Policy to commit non-use of Conflict Minerals.

Adding to the requirement of written commitment, it is also mandatory that suppliers of materials containing minerals answer our annual inquiry in CMRT format with sufficient details regarding their suppliers and, more importantly, to identify the smelters and/or refiners of minerals in their products. The list of smelters and/or refiners identified in our 2019 CMRT inquiry can be found [here](#).

In order to enhance the efficiency of our measures and to mitigate the burden on our suppliers with regard to their responsibilities for the transfer of information, DT Research plans to utilize third party software to streamline the reporting process for our suppliers.

2. Identify and assess risk in the supply chain:

Being a manufacturer of electronic end products, the many layers between us and the mines from which the minerals in the raw materials supplied to us are sourced effectively prohibit us from getting a first-hand clear picture of where risks lie. In light of such challenges, we have been targeting the smelters and refiners of the minerals contained in our raw materials for the purpose of risk identification and assessment.

Upon receiving results provided by our suppliers in response to the annual CMRT inquiry, our designated specialists would record all the disclosed smelters and refiners and, with help of the list of conformance

smelters and refiners published by the RMI, identify any non-conforming smelter or refiners in our supply chain.

3. Design and implement a strategy to respond to identified risks:

After information collection, all the suppliers whose CMRT responses reveal engagement with non-conforming smelters or refiners will be identified. We make our best efforts to communicate with such suppliers to redirect their spend to conforming smelters and/or refiners to avoid involuntary contribution to human rights abuses. At the same time, we are constantly looking for alternative sources of the highlighted materials which may contain conflict minerals.

4. Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain:

DT Research strives to continue to better its conflict minerals due diligence systems and plan to involve further internal and third-party effort into perfecting its supply chain management mechanism.

5. Report on supply chain due diligence:

List of smelters and refiners will be published annually on DT Research's website for transparency of information, improvements and changes we make to our supply chain due diligence system will also be updated when available.