

Document Conflict Minerals Declaration	Type of document Instructive	Examined by Corporate Quality & Sustainability Director	Document responsible Supply Chain Responsibility Mgr
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## Conflict Minerals Regulations

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) issued a final regulation, *HR 4173*, on conflict minerals pursuant to *Dodd-Frank Section 1502*. In EU, the conflict mineral regulation *2017/821* was signed into law in June 2017 and the requirements for EU importers applied on January 1, 2021. Both regulations aim to ensure that companies in the supply chain who import 3TG (tin, tungsten, tantalum and gold) meet international responsible sourcing standards, set by the Organisation for Economic Co-operation and Development (OECD).

### NOTE CONFLICT MINERAL DECLARATION

NOTE take social responsibility seriously, we are committed to the UN Global Compact and we have our own Code of Conduct which we expect our suppliers and partners to adhere to. In our extensive supplier evaluation and assessment procedure, we carry out thorough analysis of our supplier's competence, willingness and possibility to meet high standards when it comes to human rights, environmental care, local laws and regulations and such. For further information around our Code of Conduct, please visit:

<https://www.note-ems.com/en/sustainability/policies/>

When it comes to the specific question about mining of minerals in Democratic Republic of Congo and its adjoining countries, or in any region determined to be a conflict affected and high-risk area (CAHRA), NOTE are regularly in contact with our main suppliers (i.e. component distributors) to get their updated views around this important matter. In general they do not guarantee the component manufacturers processes around this. We have therefore to exemplify checked some of the known consumers of material available in the Democratic Republic of Congo: Vishay, Yageo and AVX.

Vishay, Yageo and AVX pursue due diligence on all its suppliers in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk areas*. This to ensure no minerals mined in conflict zones are present in their components.

- [Vishay](#)
- [AVX](#)
- [Yageo](#)

NOTE's position is that if manufacturers of components guarantee compliance with U.S. Congress HR 4173 and/or EU regulation 2017/821 we can count on that our customers products are *conflict free*, given that they specify only *conflict free* components. All material, from for instance above mentioned manufacturers, NOTE purchase from authorized distributors or from the manufacturer itself.

To summarize NOTE's position: As a contract manufacturer it is not possible for NOTE to control, via distribution, all the individual component manufacturers specify in our customers' bills of material's. Materials and components designed by Customer is the Customers responsibility which NOTE cannot be held responsible for. NOTE guarantee our own processes and material selection, i.e. solder tin, soldering paste added in NOTE's manufacturing processes. Within this defined scope, all NOTE sites sustain an RMI Conflict Mineral Report (CMRT) that is available for customers upon request.

NOTE can assist the Customer, who is the product and design owner, with obtaining information from Suppliers about conflict free minerals as a separate service project.

NOTE strive to find basis for cooperation around this question. We welcome a dialogue with customers and suppliers and other parties, to find best possible data and solutions on this topic