

Conflict minerals policy of Datecs Ltd.

General information

In May 2017 European Parliament and Council Regulation (EC) 2017/821 was enacted on 17.05.2017 for determining supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, ores of these metals and gold originating in conflict-affected and high-risk areas, to focus attention on supply chain transparency. The new legislation addresses the sourcing of conflict minerals and affects the import of materials and substances used in products that are intended for the end consumer. Together with Recommendation (EC) 2018/1149 of the Commission from 10.08.2018. regarding non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks, it sets out supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores and gold originating in conflict-affected and risk areas.

For these reasons, many companies now consider whether and to what extent their products contain conflict minerals and whether these conflict minerals come from conflict countries or high-risk regions of the world. „Datecs“ Ltd strives to be a socially responsible organization. Although our position in the supply chain is as a 'consumer of finished goods' and the raw materials used in our products are acquired from our supplier, we are committed to ensuring the health, safety and protection of people who come into contact with our products and services. We require high social, environmental and human rights standards from our suppliers. Managing our conflict minerals obligations is part of this corporate responsibility. The company complies with the requirements of the Responsible Minerals Initiative (RMI), which was created by the Responsible Business Alliance (RBA) and the Global e-Sustainability Initiative, and works closely with our suppliers to trace newly mined minerals back to their origin to ensure responsible sourcing.

Commitment of Datecs Ltd.

We strive to ensure that our products do not contain conflict minerals that are supplied by mines that finance military conflicts. Therefore we commit to:

- identify which Datecs Ltd products are affected and direct our efforts accordingly;
- we do not buy products and materials containing conflict minerals, originating from conflict sources;
- we require our suppliers to ensure that all conflict minerals contained in the products and materials supplied to Datecs Ltd originate from conflict-free sources;
- we contribute to conflict-free trade by encouraging our suppliers not to discriminate against legitimate sources of conflict minerals.

In addition, we are committed to assisting our clients with their disclosure obligations.

Measures of Datecs Ltd

In working to deliver on these commitments, we have taken a number of steps which include:

- requiring our suppliers to support our efforts to conduct reasonable country of origin intelligence (RCOI) and documenting the countries of origin for tin, tantalum, tungsten and gold from which they purchase;
- requiring our suppliers to ensure that they do not intentionally or unintentionally promote human rights abuses in these high-risk areas;

- requiring our suppliers to implement a policy of reasonable prevention and mitigation of risk in relation to conflict minerals, exercise due diligence to investigate the source of those minerals and make their intelligence measures available to customers at the customer's request;
- cooperation and engagement with our suppliers so that they respond in a timely manner to our requests for evidence of compliance. Going forward, the willingness of our suppliers to comply with this initiative will be a factor in our material purchasing decisions.

We recognize that it will take time to gather the necessary information on the use of conflict minerals and to address our customers' concerns, but we are confident in our ability to achieve compliance with current EU policy.



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