

## Conflict Minerals Policy

Date: 22 January 2024

### Background

The US Security and Exchange Commission's (SEC) Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act has brought about new requirements for publicly traded companies to promote transparency and consumer awareness in the use of "conflict minerals", namely tantalum, tin, gold and tungsten coming from the Democratic Republic of Congo and surrounding countries.

Effective from November 2012, the SEC's final ruling requires publicly traded companies to submit a report to show the measures they took to exercise due diligence on the conflict minerals' source and if it directly or indirectly finances or benefits armed groups in that region. (<http://www.sec.gov/rules/final/2012/34-67716.pdf>)

### Electronic Industry

QuickCircuit (QC) can see the reasoning of this legislation to be in the effort to enforce corporate responsibility and exposing purchase of conflict minerals that only fuels injustices from armed groups. Although we also recognise the effect on the supply chain which requires significant gathering of information from suppliers to support their publicly traded customers in becoming conflict free.

In a study done by the IPC – Association Connecting Electronics Industries in November 2011, it noted that the SEC had not correctly anticipated the significant cost that the Act would place on the supply chain in producing traceability reports. (<https://www.ipc.org/minerals-sourcing>)

With supply chains stretching worldwide this affects not only the US but also New Zealand's electronic manufacturing.

### QuickCircuit Response and Process

QC is committed to delivering quality products that are ethically, socially, and environmentally responsible.

Our processes are designed to be in line with current legislation and are based on **IPC-1755A: Responsible Sourcing of Minerals Data Exchange Standard** which establishes the requirements for exchanging conflict minerals data between our suppliers and our customers.

The desire is to have a conflict-free supply chain, but this is a long-term objective, and we can request further details from our supply chain partners as to the validity of materials to support the conflict minerals legislation. QC relies on the honesty and accuracy of our supply chain partners for transparency so we acknowledge that it is possible that reports from these sources may be inaccurate, unreliable, or incomplete.

Therefore, due to the uncertainty of the information provided, QC does not make any representation or warranty with respect to the information provided. QC shall have no liability for any losses, expenses, or damages of any nature, including without limitation, special, incidental, punitive, direct, indirect, consequential damages or lost

profits resulting from or arising out of the use of any of the information supplied to support the conflict minerals legislation.

If we become aware of a supplier whose supply chain includes metals from a conflict source, we will take appropriate action to review this situation in a timely manner.

We would hope our supply chain partners take similar measures with their suppliers to contribute to a transparent, conflict-free supply chain.

You are welcome to email your requests for information to your QuickCircuit Account Manager who will follow up the request with the appropriate personnel.



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Warren Yee  
Managing Director



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Daniel Van Wijk  
Purchasing Manager