

December 4, 2020

Conflict Minerals Sourcing Policy

“Conflict minerals”¹⁾ originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold, “under the control of armed groups”²⁾ to “finance conflict characterized by extreme levels of violence”²⁾. Some of these minerals can make their way into the supply chains of the products used around the world, including those in the electronics industry.

While DataApex Ltd. (DA), as a downstream company, does not purchase raw ore or unrefined minerals directly from mines or any metal processors, metals including tin, tantalum, gold (3TG) are included in some of the parts or components that DA purchases from first-tier suppliers which then end up in our products.

Consistent with DA’s corporate social responsibility mission, DA is committed to conducting business in an ethical, socially and environmentally responsible way and has implemented a conflict minerals management system for 3TG.

As part of DA’s commitment to corporate responsibility and respecting human rights in our own operations and in our supply chain, it is DA’s goal to use tantalum, tin and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.

DA expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free³⁾.

In support of this policy, DA will:

- Check due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.
- Provide and expect our suppliers to cooperate in providing, due diligence information to confirm the tantalum, tin, tungsten and gold in our supply-chain are “conflict free”²⁾.
- Collaborate with our suppliers to enable products that are DRC conflict free.

J. Řehořek



¹⁾ "Conflict minerals" as defined by Securities and Exchange Commission (SEC) rules is a broad term which means columbitetantalite (coltan), cassiterite, gold, wolframite or their derivatives which are limited to tantalum, tin or tungsten, regardless of whether these minerals finance conflict in the Democratic Republic of the Congo (DRC) or adjoining countries.

²⁾ Dodd-Frank Act Section 1502.

³⁾ DRC conflict free “means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups” as defined SEC Rule 13p-1 under the Securities Exchange Act of 1934.