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Responsible Conflict Mineral (3TG) Sourcing Policy

The term “conflict mineral,” as defined in Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives – which include tantalum, tin and tungsten – or any other mineral or its derivatives determined by the U.S. State Department to be financing conflict in the DRC or an adjoining country.

GTC buys parts and components which may include 3TG, and we follow the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas to investigate our supply chain and engage with suppliers. We expect our suppliers to have policies and due diligence practices in place to reasonably assure that products and components supplied to GTC are not sourced from conflict mines.

In support of this policy, we:

- Conduct due diligence in accordance with the OECD Due Diligence Guidance and request its use by our suppliers
- Provide our customers, and expect our suppliers to provide us, due diligence information on the sourcing of the tin, tantalum, tungsten and gold in our supply chain

Beyond Conflict Minerals

GTC is committed to continuing to develop our due diligence systems to apply to the sourcing of materials beyond those defined as Conflict Minerals 3TG. As a first step, we have broadened our responsible material management system to include cobalt, which is used in the production of lithium-ion batteries, and are implementing the OECD Due Diligence Guidelines using the tools and programs of the RMI. We expect suppliers to follow this same framework and to participate in cobalt due diligence processes and capability building efforts around responsible minerals sourcing.