



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. Bay Area Circuits’ (BAC) suppliers acquire and use conflict minerals from multiple sources worldwide. As part of BAC’s commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is BAC’s goal to use tantalum, tin, tungsten and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

BAC 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. BAC expects our suppliers to comply with the Electronic Industry Citizenship Coalition (EICC) Code of Conduct and conduct their business in alignment with BAC’s supply chain responsibility expectations.

In support of this policy, BAC will:

- Exercise 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”⁴.
- Collaborate with our suppliers and others on industry-wide solutions to enable products that are DRC conflict free.
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public.

To provide feedback on the content or execution of this policy, please contact BAC through the following [web feedback form](#).

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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.

⁴ We use the term “conflict free” in a broader sense to refer to suppliers, supply chains, smelters and refiners whose sources of conflict minerals did not or do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.