IMI Conflict Mineral Policy Statement

In 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was enacted. Section 1502 of this Act requires companies to determine whether tin, tantalum, tungsten, and gold (3TG) used in their products originate from or benefit armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries.

"Conflict minerals" are defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, as well as any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the DRC or adjoining countries. Tantalum, tin, tungsten, and gold (3TG) are derived from these minerals.

As part of the electronics manufacturing industry, IMI utilizes these metals in its products and processes and therefore recognizes its responsibility to ensure responsible sourcing. IMI is committed to responsible sourcing and to addressing risks associated with conflict minerals. IMI does not support or knowingly contribute to the use of minerals that directly or indirectly finance armed conflict or human rights abuses in conflict-affected and high-risk areas (CAHRAs).

To support this commitment, IMI:

- Aligns its due diligence practices with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Supports the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI)
- Utilizes the Responsible Minerals Assurance Process (RMAP) for smelter validation

IMI has established processes to:

- Collect Conflict Minerals Reporting Template (CMRT) data from suppliers on an annual basis
- Identify and assess smelters and refiners within its supply chain
- Verify smelter conformance against the RMI list of conformant smelters
- Communicate expectations to suppliers regarding responsible sourcing
- Encourage suppliers to source from RMAP-conformant smelters and refiners

IMI expects its suppliers to adopt similar responsible sourcing practices and to comply with applicable legal and customer requirements. IMI will continue working with its supply chain partners to improve transparency and ensure responsible sourcing of minerals.

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