

Smelter Public Report (For the year 2019)

1. Company Information

The company was established in 1996. The company's Smelter ID number is CID001539, and it has one smelting facility named Rui Da Hung Technology Materials Co., LTD(RDH) which located in Longtan Taoyuan and Guanin Taoyuan, Taiwan. The registered addresses are following:

R1

No.1-1, Lane 139, Gong 5th Rd., Longtan Dist., Taoyuan City 325, Taiwan (R.O.C).

R2

No.16, Gongye 1st Rd., Guanyin Dist., Taoyuan City 328,Taiwan (R.O.C.).

R3

No.7, Guojian 3rd Rd., Guanyin Dist., Taoyuan City 328, Taiwan(R.O.C).

The smelting and refining facilities are processing in Tin materials and products.

2. RMAP Assessment Summary

The facility of RDH had been successfully completed and passed the supply chain transparency smelter audit for Tin (2013), and it has been our third year as Conformant Tin Smelter since RDH joined RMI in 2015.

The most recent assessment summary report is public and available at RMI platform:

<http://www.responsiblemineralsinitiative.org/tin-smelters-list/>

In addition, the latest audit date will take place on 19th to 21st July 2023.The audit period would be 1st Sep 2019 to 4th June 2023. These assessment was conducted by SCS Audit firm which leading by Jennifer Hsu.

3. Company Supply Chain Policy

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/ or involve serious human rights abuses in high-risk and conflict-affected regions, RDH has developed a supply chain policy. The supply chain policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

(OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. RDH is committed to addressing Annex II risks if identified. The policy was reviewed and approved by senior management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers , employees etc.) and is available on RDH website at <https://www.rdh.com.tw/c-rmsc.html>.

The policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict Affected and High-Risk areas identified. The company is committed to addressing any Annex II risks if identified. The policy was reviewed and approved by General Manager CHEN,KUEI-YUAN, which committed to support its implementation. The policy has been disseminated to relevant stakeholders (e.g. suppliers, customers, employees, etc.) and it is public and available at RMI platform:

<https://www.rdh.com.tw/c-rmsc.html>

- Mitigation plan of RDH
If any suppliers and customers against RDH supply chain, RDH will provide mitigation plan to modify the potential risk.
- ✧ Internal report between departments;
- ✧ Consistent communication with upstream and downstream suppliers;
- ✧ Continue to monitor risk assessment in supply chain policy.

4. Company's Management System

Management structure and responsibility and; Systems of controls and Transparency. RDH had established a management system. General manager (CHEN,KUEI-YUAN) of RDH is responsible for the due diligence program and the design and implementation of risk management.

General manager has assigned the international Sales, CHEN,YU-LUN, as the program coordinator in order to coordinate the work of all relevant departments, which includes sales department, financial department , transportation department and storage department.

RDH asked management team to attend RMAP training classes. Also, RDH arrange annual internal training of due diligence with storage, international sales and financial departments.

- Internal Systems of Control (Please see the attachment of suppliers' commitment).
 - ✧ RDH has establish/ update its due diligence management system to be aligned with the OECD Guidance and RMAP.

RDH has established a management system to gather any RMI complaints through this email address: rdh_42@rdh.com.tw

- Record keeping system
 - ✧ All our records shall be maintained for at least a period of five years unless otherwise indicated or as defined by customer, statutory or regulatory requirement.
 - ✧ All red-flags or any alerts from the upstream or downstream suppliers being detected from our management system, RDH would proceed investigation process of supplier.

5. Risk identification (All SORCES)

RDH has a robust process to identify risks in the supply chain. First of all, referring to the risks in the company's supply chain policy, RDH established a procedure to identify CAHRAs. The procedure includes the resources used, the criteria to define a "conflict-affected and high-risk" area as well as the frequency with which our determination is reviewed. RDH uses the following resources to determine CAHRAs:

- ✧ The INFORM Index for Risk Management provides country-level risk profiles relating to humanitarian crises.
- ✧ The Global emergency overview provides sources related with conflicts.
- ✧ United Nations indicates the sources of human rights.
- ✧ CAHRAs list represents independent sources.
- ✧ Dodd-frank Act represents independent sources too.

Referring to its supply chain policy and external resources, RDH has defined criteria and benchmark indicators to determine CAHRAs.

Secondly, RDH has designed a Know your Suppliers(KYS) to include information concerning supplier legal status and identity, supplier mapping and potential risks. The majority of RDH's suppliers, representing 100% of our annual volume, have completed and returned a KYS form. RDH's due diligence program manager reviewed the provided information and the UN Sanction list with the Purchasing Team. Whenever inconsistencies, errors or incomplete information were identified in the KYS form, RDH would communicate the improvement areas to suppliers and requested an updated

form. If red flags were identified, the company would further engage with its suppliers to clarify and improve the documents as needed. During this reporting period, no red flags were identified related to submitted KYS forms. The collected data shows all suppliers are in low-risk area.

Thirdly, RDH requested origin information for each material transaction and ensured that it was able to understand the transaction origin, transportation route, as well as direct suppliers' names and locations.

Fourthly, all information collected was reviewed by the company against CAHRAs, sanction lists local laws and internal sourcing requirements.

6. Risk Assessment & Management

Our materials are considered as secondary materials primary, being either waste or processed metals created during product or metal manufacturing. Any pure tin or tin smelter's byproducts purchases are solely from RMAP conformant sources. We understand as Tin Smelter we should be more responsible in procurement of this minerals. And to eliminate the risk we established a procedure KYC to identify if there is a high or low risk in our supply chain. As indicated before, we use five sources to structure our CAHRAs. These sources assist RDH to recognize whether our suppliers are in low-risk or high-risk areas. In summary, all our suppliers are assessed in low-risk areas. If any supplier has recognized as red-flags in the future, RDH will continue Step 2 due diligence and pursued its supplier to follow RMI policy. If the red-flag supplier did not make improvement, RDH shall suspend the cooperate relationship.

Signed:

General Manager

CHEN,KUEI-YUAN

RUI DA HUNG TECHNOLOGY MATERIALS CO.,LTD.