

Zhen Ding Technology Holding Limited

Conflict Minerals Report

Conflict Mineral Compliance

Conflict Minerals refers to tantalum, tin, tungsten, gold (3TG) and other minerals from the Democratic Republic of Congo and its neighboring countries, where through forced labor, child labor and other illegal methods. They were sold in exchange for weapons, and caused regional unrest. Tantalum, tin, tungsten, and gold are necessary materials for the operation of electronic products. In order to meet the social responsibility of human rights and environmental protection, Zhen Ding has formulated a conflict-free mineral procurement policy, promising not to use conflict minerals and requiring suppliers to purchase minerals from qualified smelters to meet the company's conflict-free supply chain and customer requirements.

Conflict Mineral Management Process

Zhen Ding establish its management system following the five-step frameworks of the OECD "Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict Affected or High-Risk Areas" to not only identify/assess supplier risks and mitigate these identified risks, but also to design a conflict minerals audit form for suppliers. We were therefore able to provide guidance through both on-site/off-site audits to help suppliers set up management mechanisms that complied with OECD Guidance.



Conflict Mineral Management

Zhen Ding communicates conflict mineral policies to suppliers through the company website. The suppliers are required to comply with Zhen Ding's policy and establish their own conflict minerals policies to communicate with their suppliers. We also require our suppliers to actively evaluate and validate their supply chain, and encourage them to source minerals from Smelters or Refiners that have verified by the Responsible Minerals Assurance Process (RMAP), or other independent third party audit program.

Zhen Ding continues to promote the procurement of conflict-free minerals into the supply chain and expand the due diligence of the supply chain. In 2021, a total of 72 suppliers have completed the CMRT (Conflict Minerals Reporting Template) survey. In addition, we have completed the CRT (Cobalt Reporting Template) survey of 17 suppliers, with a 100% response rate.

Reasonable Country of Origin Inquiry (RCOI)

Each year, Zhen Ding performs RCOI to identify and validate the sources of 3TG in our products, and whether they come from conflict-affected regions. Our RCOI includes two steps:

1. Conduct supplier survey to identify sources of 3TG smelters and refiners through CMRT survey.
2. Suppliers are required to sign the Declaration of Conflict-Free Minerals and to fully reveal the source of the smelters and refiners they sourced from.

In 2021, we have identified 214 smelters and refiners from more than 400 suppliers. According to the supplier survey we conducted in 2021, 100% of our suppliers are compliant with Zhen Ding's requirement for sourcing conflict-free minerals. In addition to 3TG, we have expanded the scope of the investigation by conducting proactively the supply chain survey for Cobalt and Mica since 2020 and 2021 respectively, and disclosed the source of smelters to our customers. In 2021, 17 suppliers used cobalt from 25 smelters, and no suppliers used mica.

Due Diligence

Zhen Ding establish its management system following the five-step frameworks of the OECD “Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict Affected or High-Risk Areas” to not only identify/assess supplier risks and mitigate these identified risks, but also to design a conflict minerals audit form for suppliers. We were therefore able to provide guidance through both on-site/off-site audits to help suppliers set up management mechanisms that complied with OECD Guidance.

Independent Audit and Public Disclosure

We conduct an independent audit on our suppliers to ensure they are in compliance with the requirements.



Countries of Origin of Conflict Minerals

As of September 2022

Countries of Origin of 3TG		
JAPAN	SINGAPORE	ITALY
BRAZIL	PERU	KOREA, REPUBLIC OF

Countries of Origin of 3TG		
UNITED STATES OF AMERICA	ESTONIA	BOLIVIA (PLURINATIONAL STATE OF)
GERMANY	THAILAND	POLAND
UNITED ARAB EMIRATES	PHILIPPINES	TURKEY
UZBEKISTAN	CHILE	KAZAKHSTAN
SWITZERLAND	INDONESIA	MEXICO
CANADA	SOUTH AFRICA	TAIWAN, PROVINCE OF CHINA
VIET NAM	NETHERLANDS	ANDORRA
BELGIUM	CZECHIA	RWANDA
SPAIN	AUSTRALIA	MALAYSIA
INDIA	AUSTRIA	NORTH MACEDONIA, REPUBLIC OF
SWEDEN	CHINA	

Smelter and Refiner of 3TG List

Zhen Ding cooperated with the Responsible Minerals Initiative (RMI) to conduct supply chain mineral source surveys, and all smelters and refineries disclosed in the list are from the smelters and refineries used by Zhen Ding's supply chain. For an up-to-date list of qualified smelters, please refer to the Responsible Minerals Initiative website: <https://www.responsiblemineralsinitiative.org/smelters-refiners-lists/>

As of September 2022

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID000004	Tungsten	A.L.M.T. Corp.	JAPAN
CID002833	Tungsten	ACL Metais Eireli	BRAZIL
CID002502	Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
CID002641	Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA
CID000258	Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
CID003468	Tungsten	Cronimet Brasil Ltda	BRAZIL
CID003401	Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA
CID002645	Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
CID000875	Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
CID002315	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
CID002494	Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID000568	Tungsten	Global Tungsten & Powders Corp.	UNITED STATES OF AMERICA
CID000218	Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
CID002541	Tungsten	H.C. Starck Tungsten GmbH	GERMANY
CID000766	Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
CID000769	Tungsten	Hunan Jintai New Material Co., Ltd.	CHINA
CID002513	Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA
CID000825	Tungsten	Japan New Metals Co., Ltd.	JAPAN
CID002551	Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
CID002321	Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
CID002318	Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
CID002317	Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
CID002316	Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
CID000966	Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
CID000105	Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
CID003388	Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF
CID003407	Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
CID002319	Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
CID002543	Tungsten	Masan High-Tech Materials	VIET NAM
CID002589	Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
CID002827	Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
CID002542	Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY
CID002044	Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
CID002320	Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
CID002082	Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
CID002830	Tungsten	Xinfeng Huarui Tungsten & Molybdenum New Material Co., Ltd.	CHINA
CID000292	Tin	Alpha	UNITED STATES OF AMERICA
CID002773	Tin	Aurubis Beerse	BELGIUM

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID002774	Tin	Aurubis Berango	SPAIN
CID000228	Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
CID003190	Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
CID001070	Tin	China Tin Group Co., Ltd.	CHINA
CID000402	Tin	Dowa	JAPAN
CID000438	Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
CID003582	Tin	Fabrica Auricchio Industria e Comercio Ltda.	BRAZIL
CID000468	Tin	Fenix Metals	POLAND
CID000538	Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
CID000555	Tin	Gejiu Zili Mining And Metallurgy Co., Ltd.	CHINA
CID003116	Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
CID002844	Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
CID001231	Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
CID003387	Tin	Luna Smelter, Ltd.	RWANDA
CID003379	Tin	Ma'anshan Weitai Tin Co., Ltd.	CHINA
CID002468	Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
CID001105	Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
CID001142	Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
CID001173	Tin	Mineracao Taboca S.A.	BRAZIL
CID001182	Tin	Minsur	PERU
CID001191	Tin	Mitsubishi Materials Corporation	JAPAN
CID001314	Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
CID002517	Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
CID001337	Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
CID001399	Tin	PT Artha Cipta Langgeng	INDONESIA
CID002503	Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
CID001402	Tin	PT Babel Inti Perkasa	INDONESIA
CID001406	Tin	PT Babel Surya Alam Lestari	INDONESIA

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID003205	Tin	PT Bangka Serumpun	INDONESIA
CID001428	Tin	PT Bukit Timah	INDONESIA
CID002835	Tin	PT Menara Cipta Mulia	INDONESIA
CID001453	Tin	PT Mitra Stania Prima	INDONESIA
CID001458	Tin	PT Prima Timah Utama	INDONESIA
CID003381	Tin	PT Rajawali Rimba Perkasa	INDONESIA
CID002593	Tin	PT Rajehan Ariq	INDONESIA
CID001460	Tin	PT Refined Bangka Tin	INDONESIA
CID001463	Tin	PT Sariwiguna Binasentosa	INDONESIA
CID001468	Tin	PT Stanindo Inti Perkasa	INDONESIA
CID002816	Tin	PT Sukses Inti Makmur	INDONESIA
CID001477	Tin	PT Timah Tbk Kundur	INDONESIA
CID001482	Tin	PT Timah Tbk Mentok	INDONESIA
CID001490	Tin	PT Tinindo Inter Nusa	INDONESIA
CID002706	Tin	Resind Industria e Comercio Ltda.	BRAZIL
CID001539	Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
CID001758	Tin	Soft Metais Ltda.	BRAZIL
CID002834	Tin	Thai Nguyen Mining and Metallurgy Co., Ltd.	VIET NAM
CID001898	Tin	Thaisarco	THAILAND
CID002180	Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA
CID003325	Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
CID002036	Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
CID002158	Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
CID001076	Tantalum	AMG Brasil	BRAZIL
CID000211	Tantalum	Changsha South Tantalum Niobium Co., Ltd.	CHINA
CID002504	Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
CID000460	Tantalum	F&X Electro-Materials Ltd.	CHINA
CID002505	Tantalum	FIR Metals & Resource Ltd.	CHINA

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID002558	Tantalum	Global Advanced Metals Aizu	JAPAN
CID002557	Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
CID000291	Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
CID002547	Tantalum	H.C. Starck Hermsdorf GmbH	GERMANY
CID002492	Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
CID002512	Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
CID002842	Tantalum	Jiangxi Tuohong New Raw Material	CHINA
CID000914	Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
CID000917	Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
CID002506	Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
CID002539	Tantalum	KEMET de Mexico	MEXICO
CID002548	Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA
CID002847	Tantalum	Meta Materials	NORTH MACEDONIA, REPUBLIC OF
CID001163	Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
CID001175	Tantalum	Mineracao Taboca S.A.	BRAZIL
CID001192	Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
CID001277	Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
CID001200	Tantalum	NPM Silmet AS	ESTONIA
CID001508	Tantalum	QuantumClean	UNITED STATES OF AMERICA
CID002707	Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
CID001869	Tantalum	Taki Chemical Co., Ltd.	JAPAN
CID002544	Tantalum	TANIOBIS Co., Ltd.	THAILAND
CID002545	Tantalum	TANIOBIS GmbH	GERMANY
CID002549	Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
CID002550	Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
CID001891	Tantalum	Telex Metals	UNITED STATES OF AMERICA
CID001969	Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
CID000616	Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID002508	Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA
CID001522	Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
CID000015	Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
CID000035	Gold	Agosi AG	GERMANY
CID000019	Gold	Aida Chemical Industries Co., Ltd.	JAPAN
CID002560	Gold	Al Etihad Gold Refinery DMCC	UNITED ARAB EMIRATES
CID000041	Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
CID000058	Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
CID000077	Gold	Argor-Heraeus S.A.	SWITZERLAND
CID000082	Gold	Asahi Pretec Corp.	JAPAN
CID000924	Gold	Asahi Refining Canada Ltd.	CANADA
CID000920	Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
CID000090	Gold	Asaka Riken Co., Ltd.	JAPAN
CID000113	Gold	Aurubis AG	GERMANY
CID002863	Gold	Bangalore Refinery	INDIA
CID000157	Gold	Boliden AB	SWEDEN
CID000176	Gold	C. Hafner GmbH + Co. KG	GERMANY
CID000185	Gold	CCR Refinery - Glencore Canada Corporation	CANADA
CID000233	Gold	Chimet S.p.A.	ITALY
CID000264	Gold	Chugai Mining	JAPAN
CID000362	Gold	DODUCO Contacts and Refining GmbH	GERMANY
CID000401	Gold	Dowa	JAPAN
CID000359	Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
CID000425	Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
CID003424	Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
CID003425	Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
CID002561	Gold	Emirates Gold DMCC	UNITED ARAB EMIRATES
CID002459	Gold	Geib Refining Corporation	UNITED STATES OF AMERICA

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID002243	Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
CID000694	Gold	Heimerle + Meule GmbH	GERMANY
CID000711	Gold	Heraeus Germany GmbH Co. KG	GERMANY
CID000707	Gold	Heraeus Metals Hong Kong Ltd.	CHINA
CID000801	Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
CID000807	Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
CID000814	Gold	Istanbul Gold Refinery	TURKEY
CID002765	Gold	Italpreziosi	ITALY
CID000823	Gold	Japan Mint	JAPAN
CID000855	Gold	Jiangxi Copper Co., Ltd.	CHINA
CID000937	Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
CID000957	Gold	Kazzinc	KAZAKHSTAN
CID000969	Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
CID002511	Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
CID000981	Gold	Kojima Chemicals Co., Ltd.	JAPAN
CID002605	Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
CID002762	Gold	L'Orfebre S.A.	ANDORRA
CID001078	Gold	LS-NIKKO Copper Inc.	KOREA, REPUBLIC OF
CID000689	Gold	LT Metal Ltd.	KOREA, REPUBLIC OF
CID001113	Gold	Materion	UNITED STATES OF AMERICA
CID001119	Gold	Matsuda Sangyo Co., Ltd.	JAPAN
CID001149	Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
CID001152	Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
CID001147	Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
CID001153	Gold	Metalor Technologies S.A.	SWITZERLAND
CID001157	Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
CID001161	Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
CID001188	Gold	Mitsubishi Materials Corporation	JAPAN

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID001193	Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
CID001352	Gold	MKS PAMP SA	SWITZERLAND
CID002509	Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
CID001220	Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
CID001236	Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
CID003189	Gold	NH Recytech Company	KOREA, REPUBLIC OF
CID001259	Gold	Nihon Material Co., Ltd.	JAPAN
CID001325	Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
CID002919	Gold	Planta Recuperadora de Metales SpA	CHILE
CID001397	Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
CID001498	Gold	PX Precinox S.A.	SWITZERLAND
CID001512	Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
CID002582	Gold	REMONDIS PMR B.V.	NETHERLANDS
CID001534	Gold	Royal Canadian Mint	CANADA
CID002290	Gold	SAFINA A.S.	CZECHIA
CID001555	Gold	Samduck Precious Metals	KOREA, REPUBLIC OF
CID001585	Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
CID001916	Gold	Shandong Gold Smelting Co., Ltd.	CHINA
CID001622	Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
CID001736	Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
CID002516	Gold	Singway Technology Co., Ltd.	TAIWAN, PROVINCE OF CHINA
CID001761	Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
CID001798	Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
CID002918	Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
CID002580	Gold	T.C.A S.p.A	ITALY
CID001875	Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
CID001938	Gold	Tokuriki Honten Co., Ltd.	JAPAN
CID002615	Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN

Smelter or Refiner ID	Conflict Mineral	Name of Smelter or Refiner	Location of Smelter or Refiner
CID001955	Gold	Torecom	KOREA, REPUBLIC OF
CID001980	Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
CID001993	Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
CID002003	Gold	Valcambi S.A.	SWITZERLAND
CID002030	Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
CID002100	Gold	Yamakin Co., Ltd.	JAPAN
CID002129	Gold	Yokohama Metal Co., Ltd.	JAPAN
CID002224	Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA