

# COWELL Conflict Minerals Policy

## 冲突矿产政策声明

## 분쟁광물 정책

The policy of Cowell Optic Electronics Ltd. (Cowell) is to completely exclude all Conflict Minerals and Metals from its supply chain.

“Conflict Minerals” refers to certain minerals (Tantalum, Tin, Tungsten, or Gold) and their derivatives, some of which are mined in the Democratic Republic of the Congo (“DRC”) and in its nine adjoining countries (“DRC Region”) where revenues generated by their sale may be directly or indirectly financing armed groups engaged in civil war resulting in serious human rights and environmental abuses. In July 2010, the United States Congress passed the Dodd-Frank Financial Reform Bill. Section 1502 of this bill requires all U.S. publicly traded companies and their suppliers to disclose their use and sources of Conflict Minerals.

### **Cowell Commitment:**

1. Fully support efforts to eliminate the use of Conflict Minerals from improper sources and is routinely engaged in the process of obtaining information from its suppliers concerning the origin of the metals that are used to manufacture Cowell’s products.
2. Do not directly source Conflict Minerals from mines or smelters but uses refined metals in the manufacture of some of its products. Cowell expects its suppliers to source materials from socially responsible suppliers and that all of its suppliers will comply with the Dodd-Frank requirements and provide all necessary declarations and supporting information.
3. Suppliers must pass these requirements thoroughly to their supply chain if they do not source directly from mines or smelters and determine the source of the Conflict Minerals used in the product Cowell purchases. We will assess future business with suppliers who are not cooperative with the conflict-free sourcing initiative and not compliant with this Policy. This requirement is defined in legal agreement with the suppliers.
4. In all cases due diligence will be conducted on the supplier and supply chain to ensure that the supply is genuine, legitimate and does not in any way contribute to conflict or human rights abuses.
5. Continue to regularly perform due diligence and survey its suppliers to verify compliance with this Policy.

We trust that the above policy will provide our customers with sufficient assurance that our raw materials are conflict free.

### **INQUIRIES:**

Inquiries Concerning conflict minerals should be addressed to: [conflictminerals@cowellchina.com](mailto:conflictminerals@cowellchina.com)