



MPS Mayorista DE Colombia SA 2023

## **Conflict Minerals Survey Report**

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## **1.0 Overview**

MPS Mayorista DE Colombia SA was established in 1996. It is a highly socially responsible high-tech enterprise in Colombia with a registered capital of 50000 USD, currently has 100 employees . The company is mainly engaged in providing educational technology, computer servers, storage, licensing, security, network and other technical solutions to small and medium-sized companies, enterprise departments, governments, etc. To learn more, please visit [https:// www.mps.com.co](https://www.mps.com.co).

## **2.0 Definition/Definition of terms**

Conflict minerals: The mining of cassiterite, wolframite, coltan, iron ore, gold and other rare metals in the Democratic Republic of the Congo and its surrounding countries and regions has caused serious human rights and environmental problems. Much of the mining activity in these areas is associated with (funded by) conflicting armed groups, leading to long-term instability in the area and hence the name "conflict minerals".

Glossary: CMRT – Conflict Minerals Reporting Template CC – Covered Countries (also known as neighboring countries of the Democratic Republic of the Congo) DD – Due Diligence (Verification/Inspection) DRC – Democratic Republic of the Congo OECD – Organization for Economic Co-operation and Development ([www.oecd.org](http://www.oecd.org)) RBA – Responsible Business Alliance ([www.responsiblebusiness.org](http://www.responsiblebusiness.org)) RCOI – Responsible Country of Origin Survey (Survey/Inquiry) RMAP – Responsible Minerals Assurance Process (RMAP) RMI – Responsible Minerals Initiative

([www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)) SET – Smelter Project Team SOR – Smelter or Refinery 3TG – Tin, Tantalum, Tungsten and Gold CRT – Cobalt Report Template

### **3.0 Reasonable Country of Origin Investigation (RCOI)**

For most companies with electronic products/components, utilizing conflict minerals for the necessary functionality or production of such products is a common industry practice. Therefore, conflict minerals are present in all of our products and listing specific products would be redundant. MPS conducts a Reasonable Country of Origin Investigation (RCOI) to determine whether conflict minerals originate from the Democratic Republic of Congo (DRC) or a conflict country (CC). We use the Responsible Business Alliance (RBA) Responsible Minerals Initiative (RMI) program for RCOI by using the industry-widely used Conflict Minerals Reporting Template (CMRT). We also require our suppliers to use CMRT with their supplier base.

In our RCOI, for suppliers that may use "tin, tantalum (coltan), gold, tungsten" elements, including but not limited to: ITO targets, conductive gold balls, IC, BLU, FPC\PCB, TP , ACF, and solder wire suppliers conduct CMRT investigations. and check responses for completeness, consistency, and questions. Direct verification of supplier conflict minerals policies. Incomplete CMRTs or CMRTs with other problems are returned for corrective action (that is, the policy link is invalid). The reported country of origin is provided in Section 10.0 of this report.

### **4.0 Conflict-free determination**

Based on the RCOI and good faith efforts, MPS has reasonable grounds to believe that the conflict minerals originated in the Democratic Republic of the Congo or

Connecticut. Therefore, we conducted due diligence (DD) on the source and custody of conflict minerals in our products and prepared this Conflict Minerals Report (CMR) based on the required elements. Additionally, based on due diligence described further in this report, MPS has not fully determined that conflict minerals do not finance or benefit armed groups in the area.

**5.0 OECD Due Diligence Standard Implementation** The MPS adopts the OECD guidance entitled "OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" . For a large portion of the parts we purchase, MPS has no direct impact on the parts, ingredients or components within them. Many are industry standard products and we only specify or negotiate with the manufacturer contract terms that are not related to the manufacture of the product (e.g., only price and legal terms). For example, we do not indicate FPC, LENS, metal housing materials, PCBA, fans, heat sinks, LCD, solder materials as parts, ingredients and components in their products instead of restricting hazardous substances. MPS does not purchase raw or refined ore in the Democratic Republic of the Congo, Congo or any other country. We do not have direct knowledge of the upstream originating mines, buyers/sellers/consolidators/middlemen, transportation routes, nor do we have direct knowledge of the "midstream" smelters or refineries (SOR). In fact, not only does MPS have many supply chain tiers far away from the originating mine, but we also have many tiers far away from the SOR. As of now, MPS is not a manufacturer by the definition of the Dodd-Frank Act, nor We do not do Contract to Manufacture because a large portion of our procurement spend is final

assembly/test operations and our suppliers are more like retailers. Many of our vendor relationships are better described as MPS being "sales channels" rather than issuers "outsourced"

Manufacturing". Therefore, there are specific and complex challenges in terms of data accuracy, coverage, vintage, confidentiality, data scope, language/communication/translation, and the lack of any direct business relationship to gain direct transparency into the supply chain. Therefore, once raw ore is smelted, refined and converted into gold ingots, bars or other conflict mineral derivatives, the source of the conflict mineral cannot be determined from the MPS' s position in the supply chain. The OECD Due Diligence Guidelines explicitly acknowledge this complexity and It is further stated: The guidance recommends that downstream companies use their best efforts to identify and review the due diligence processes of smelters/refiners in their supply chains and assess their compliance with the due diligence measures set out in this guidance. Downstream companies may be involved in assessing smelters/refiners Industry-wide programs in which mills comply with this guidance and can use the information provided by these programs to help them implement the recommendations in this guidance. This distinction reflects the fact that, after smelting, internal tracking of minerals owned by a company is Control mechanisms are often not feasible as refined metals enter the consumer market as small parts for various components in end products. Given these practical difficulties, downstream companies should establish internal controls for their direct suppliers, which can be coordinated through industry-wide initiatives Work to build influence

with sub-tier suppliers, overcome practical challenges and effectively implement the due diligence recommendations contained in this guidance. Due to our supply chain positioning and recognizing the complexity allowed by the OECD guidance, MPS Procurement When selecting a new supplier, MPS's conflict minerals policy will be publicized to the supplier, and a " Commitment Letter for Not Using Conflict Minerals" will be signed with the supplier in accordance with the requirements of the " QEP-QA-02 3 Conflict Minerals Management Procedure ", and the supplier will follow the URL: <http://www.conflict-freesmelter.org/cfshome.htm> The latest version of "Conflict-Free Minerals Reporting Template" at [://www.conflict-freesmelter.org/cfshome.htm](http://www.conflict-freesmelter.org/cfshome.htm), conducts surveys on new suppliers, completes the review and improvement follow-up of the questionnaire, and confirms that the supplier's products use Gold, tantalum, tin, tungsten, cobalt, mica and other metals are not conflict minerals, ensuring that the source of these metals can be traced back to the original smelter.

## **6.0 Measures taken by the OECD**

Below are the steps MPS is taking to comply with the Organization for Economic Co-operation and Development (OECD), Dodd-Frank and the Reserve Bank of Australia (RBA) to prevent the use of conflict-free minerals that contribute to conflicts.

### **6.1 Establish a strong management system**

MPS has developed a formal, public, responsible sourcing policy which can be found at <https://www.mps.com.co> . MPS establishes " QEP-QA-02 3 Conflict Minerals Management Procedure " for sustainable development and conflict minerals . The responsibilities of each department are as follows:

6.1.1 Quality, R&D, sales and other customer interface departments (the content of the document is referred to as the customer interface department): (1) When receiving customer requirements for conflict minerals, customer interface department personnel should immediately send the customer requirements and corresponding product information to To the quality department, it should promptly reply to the customer after receipt. (2) Submit the customer's conflict minerals agreement, conflict minerals declaration and similar documents to relevant departments for review, complete the OA approval application, stamp the official seal, and complete the customer's final reply.

6.1.2 Quality Department: (1) Responsible for coordinating the establishment and maintenance of conflict minerals management processes. (2) According to the customer' s conflict minerals needs, complete the filling and submission of documents and information related to the customer' s conflict minerals needs, complete the review of the customer' s conflict minerals agreement and conflict minerals declaration on time, and combine the above information with the customer according to the time required by the customer. The documents are submitted to the corresponding customer interface department personnel in a timely manner. (3) Responsible for responding to customer inquiries related to conflict minerals and other matters requiring cooperation. ( 4 ) Responsible for the formulation and promotion of conflict minerals policies, and assist the quality department and customer interface department to complete the signing of conflict minerals

agreements, conflict minerals declarations and similar documents related to customers' conflict mineral needs

6.1.3 Purchasing Department: (1) Select appropriate suppliers based on the requirements and types of material procurement according to the requirements of customers and external units. (2) Promote MPS' s conflict mineral policy to suppliers. (3) Responsible for signing the conflict minerals agreement with the supplier, signing the supplier's "Conflict Minerals Report" or similar documents, completing the specific investigation on whether the supplied materials use conflict minerals and the source of conflict minerals, and completing the review of the questionnaire, relevant The audit results are entered into the "Conflict Minerals Investigation Return Signature Supplier List", and the above documents and information should be put into the public disk.

The MPS Procurement Department completes the investigation of all suppliers before December 31 of each year. If the investigation results show that conflict minerals are used in the supplier's materials, the supplier is required to provide a written analysis and immediately stop purchasing and using conflict minerals, reselect new mineral sources and provide valid evidence to prove that the new minerals are in compliance with the requirements of the Democratic Republic of the Congo. The Republic of Congo' s conflict-free metal requirements and formulating corresponding improvement and preventive measures to comply with the conflict-free metal requirements of the Democratic Republic of the Congo. We have taken several steps to build and continue to strengthen our supplier engagement. We have long-term



relationships with most of our suppliers to build presence and compliance. The majority of our procurement spend is with smaller suppliers, so transition costs are high. We establish our expectations through formal communications, Supplier RBA Agreements and our MPS Responsible Sourcing Policy. We have also developed a formal Supplier Code of Conduct, which further incorporates our requirements. Responsible procurement has been embedded in MPS supply chain management business processes. Our suppliers continue to provide conflict minerals survey data and provide critical input into business decisions. We not only focus on performance and balance at the economic, social and environmental levels, but also pay close attention to the voices of stakeholders and actively provide feedback and improvements.

6.1.4 R &D Department : ( 1 ) When conducting material sample approval, determine whether the product contains tin (Sn), tungsten (W), tantalum (Ta), gold (Au) , tungsten ( W) , and cobalt (Co) and other conflict metals; (2) When it is found that the materials contain any materials that do not meet the requirements of 3TG, promptly report it to the quality department and purchasing department and require the upstream suppliers to make rectifications.

## **6.2 Identify and assess risks**

Because there are many complex risks involved in ensuring supply chains are conflict-free, and the OECD Due Diligence Guidelines recognize that it is difficult for downstream companies to identify upstream actors, the MPS aims to use a standard industry-wide approach to identifying conflict-free SOR to determine whether conflict

minerals originate from the Democratic Republic of the Congo or neighboring countries. The main resulting risks were identified as:

- Is SOR located in the Democratic Republic of the Congo or in a surrounding country?
- Does SOR purchase ore from DRC or CC?
- Is any information provided by the SOR and multiple levels of the supply chain accurate enough?
- Is basic contact with the smelter/refiner (e.g., email, phone calls, Internet surveys, site visits) sufficient to provide sufficient confidence that conflict will not be fueled?
- Given the global nature of supply chains, will most SOR risks occur where they are located?
- Despite SOR being reported in our supply chain, are we sure that minerals are actually in our products?

### **6.3 Design/implement response strategy**

MPS's strategic goal to adequately address and mitigate risk is to understand all SORs in our supply chain, regardless of whether they are actually in our supply chain, and either bring them into compliance or ultimately cease their use. The initiatives aimed at promoting this goal are as follows: MPS' s strategy to address risks is as follows:

- internal report
  - ✓ Plan status: Report the status of annual initiation and completion of surveys for relevant customers CMRT and EMRT
- external reporting

- ✓ Publicly Responsible Mineral Procurement Policy.
- ✓ Program information is provided externally and will continue to be publicly available in our Corporate Sustainability Report, Corporate Annual Report and supply chain sustainability resources on our webpage.
- ✓ We also provide and will make our due diligence measures available to clients and external stakeholders upon request.
- ✓ Maintain our public policy on conflict minerals and cobalt.
- OECD Due Diligence Guidelines
- ✓ MPS will continue to actively promote compliance with the Guidance, take steps to integrate the five-step framework into our management system, and ensure that the Guidance is disseminated as widely as possible. MPS does not discriminate or limit actions to SORs we believe exist only in our products in order to improve the statistics we report. We take action on all reported SORs in our supply chain, regardless of whether the material is actually present in our products. We believe it is more socially responsible to report all SORs in our supply chain (regardless of whether they provide content in our products) to further our required DD.

#### **6.4 Due Diligence Public Report**

As stated above, MPS discloses our due diligence policies and practices to clients. We also provide information related to social and environmental responsibility on our website.

#### **7.0 Additional measures to be taken**

MPS will take further steps in 2023 to improve our efforts and continue our performance. Our goal is to increase our overall conflict-free posture to 100 percent by the end of 2023. We will: Continue to work closely with our suppliers to obtain the necessary information about the origin of 3TG contained in materials or components used in the products in question. Further institutionalization of cobalt with 3TG. Add additional numbers for further planning.

**8.0 Key Smelter and Refinery Indicators**

Conflict-free consistency was determined from the MPS's RCOI and DD work. The table below shows our 2023 results .

Annual	2023
Supplier return rate	100 %

Conflict Minerals Total SOR Meets Positive Percent Concordance Ta – Tantalum 28 28 0 100% S – Tin 50 50 0 100% W – Tungsten 34 34 0 100% Au – Gold 35 35 0 100% Sum 147 147 0 100% Other Key Statistical data

- Supplier CMRT response rate: 100%
- 100% of suppliers use CMRT with their suppliers, require them to comply and require SOR designation
- Number of suppliers with unqualified/invalid SOR: 0
- Report: By project provides status report to the client.
- Newsletter: Occasionally updated as part of our standard RBA Code of Conduct program implementation reporting

**9.0 Independent Private Sector Audit**

(IPSA) The purpose of International Public Sector Accounting Standards is to express an opinion or conclusion on: that the design of an issuer's due diligence framework conforms in all material respects to the standards set out in the national or internationally recognized due diligence framework used by the issuer, and that A description of the due diligence measures performed that is consistent with the issuer's due diligence process for undertaking and performing the work described. MPS has designed and implemented our overall conflict minerals program based on the OECD's five-step framework. However, the design of our due diligence process is substantially consistent with Steps 3 and 4 of the OECD Guidelines applicable to "downstream" companies with little direct impact on the smelter/refiner. MPS does not conduct an IPSA because we have not achieved a fully conflict-free determination before an IPSA is required. However, we have demonstrated our design and description through the content of this Conflict Minerals Report.

## **10.0 Country of origin and list of smelters/refiners**

10.1 Country of Origin The Dodd-Frank Act requires issuers to make efforts to identify the mines or locations of conflict minerals and to provide the identified mines or locations. However, the Dodd-Frank Act also recognizes OECD requirements that allow for effective restrictions on the location of mines by downstream companies. Therefore, our efforts are to: Identify the SOR via CMRT from our supply chain name and mine location as provided by CMRT Verify the legitimate SOR as provided by RMI including relevant and recognized industry bodies such as LBMA, RJC, Ti- CMC) Audit/certification of SOR using RMAP, which only provides mineral origin on a

limited basis through classification methods L1 – Countries not identified as conflict areas or areas that may be smuggled or exported from these areas of the 3TG L2 – Known or may be smuggled or exported to countries outside the region or 3TG L3 – Democratic Republic of the Congo or adjoining countries (Covered Countries) DRC – Democratic Republic of the Congo

10.2 List of Smelters and Refiners ("List") The following is a list of SORs identified in our supply chain. It is important to note that some of the SOR content listed may not actually be in the MPS product. However, regardless of whether the SOR content is in our products, our intention is to push for a precise list of SORs and require them to be validated for conflict-free conformance via RMAP. This listing, including without limitation all information provided therein, is for informational purposes only as of the date stated therein. Any inaccuracies or omissions in the inventory are not the responsibility of MPS as it is generally recognized that obtaining an accurate inventory is a complex and dynamic process. Decisions as to whether and/or how to use all or any part of the Listing are at the sole discretion and responsibility of the User. MPS makes no representations or warranties regarding this listing. This listing is provided on an "as is" and "as available" basis. MPS hereby disclaims all warranties of any nature, express, implied or otherwise, or arising from trade or custom, including but not limited to merchantability, non-infringement, quality, title, fitness for a particular purpose, No implied warranty of completeness or accuracy. In consideration of access to and use of the Listing, User hereby agrees to release and forever discharge MPS and their respective officers, directors, agents, employees,

volunteers, representatives, contractors, successors and assigns from any and all liability that User may have. or any and all claims, actions, losses, proceedings, damages, judgments, levies and liabilities that may arise. or may own or claim to own rights against MPS arising from the listing or use of the listing. If any part of any provision of these Terms and Conditions is invalid or unenforceable under applicable law, that part shall be deemed invalid only to the extent of such invalidity or unenforceability without affecting in any way the remainder of the provision or the remaining provisions of these Terms and Conditions.

By accessing and using this Listing, and taking this into consideration, Customer agrees to the foregoing.

MPS 3TG smelter list: Eligible smelters:

Metal	smelter	country
Gold	Guangdong Jinding Gold Limited	CHINA
Gold	Henan Zhongyuan Gold Refinery Co., Ltd.	CHINA
Gold	Shandong Zhaojin Gold&Silver Refinery Co.,Ltd	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	Torecom	KOREA, REPUBLIC OF
Gold	Tanaka Kikinzoku Kogyo KK	JAPAN
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF
Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Heraeus Germany GmbH Co. KG	GERMANY
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Gold	Hangzhou Fuchunjiang Smelting Co., Ltd.	CHINA
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	HwaSeong CJ CO., LTD.	KOREA, REPUBLIC OF
Gold	Tanaka Kikinzoku Kogyo KK	JAPAN
Gold	Great Wall Precious Metals Co., Ltd. of CBPM	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA
Gold	Jiangxi Copper Co., Ltd.	CHINA

Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	China's Shandong Gold Mining Co., Ltd	CHINA
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tungsten	ALMT Corp.	JAPAN
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	KGETS Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten (HC) Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Fujian Ganmin RareMetal Co., Ltd.	CHINA
Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Huaxing Tungsten Products Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Jiangxi Minmetals Gao'an Non-ferrous Metals Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	Alpha Metals	UNITED STATES OF AMERICA
Tin	Yunnan Tin Industry Co., Ltd. Tin Industry Branch	CHINA
Tin	China Tin Group Co.,Ltd	CHINA
Tin	Yunnan Tin Company Limited	CHINA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	<a href="#">云南锡业股份有限公司锡业分公司</a>	CHINA
Tin	Thaisarco	THAILAND
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	CV United Smelting	INDONESIA
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Mineracao Taboca SA	BRAZIL
Tin	Minsur	PERU
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Operaciones Metalurgical SA	BOLIVIA (PLURINATIONAL STATE OF)
Tin	PT Bukit Timah	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Stanindo Inti Perkasa	INDONESIA
Tin	PT Timah (Persero) Tbk Kundur	INDONESIA
Tin	PT Timah (Persero) Tbk Mentok	INDONESIA
Tin	PT Tinindo Inter Nusa	INDONESIA



Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	Thaisarco	THAILAND
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Tin	CV Venus Inti Perkasa	INDONESIA
Tin	CV Tiga Sekawan	INDONESIA
Tin	Metallo Belgium NV	BELGIUM
Tin	PT Bangka Prima Tin	INDONESIA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA

## 11.0 Cobalt Due Diligence

Cobalt mining is associated with OECD Annex II risks, including child labor and other human rights abuses in the Democratic Republic of the Congo. MPS has implemented the OECD due diligence guidelines for the procurement of this mineral and expects suppliers to participate in our cobalt due diligence process. Like 3TG, responsible cobalt sourcing is a complex issue that requires industry-wide cooperation. MPS fully supports the Marshall Islands' efforts to address materials outside of 3TG. In 2022, we officially launched a comprehensive cobalt supply chain due diligence work and collected cobalt investigation templates from suppliers. , fans, radiators, LCD, and solder material suppliers conducted an EMRT survey and obtained a 100 % response rate. We estimate that our supply chain is 100% RMI compliant. MPS' s Cobalt Responsible Sourcing Policy can be found at: [https:// www.mps.com.co](https://www.mps.com.co) , the policy requires suppliers to comply with the OECD due diligence guidelines on cobalt and participate in MPS' due diligence processes and capacity building efforts around responsible cobalt sourcing. In 2023, MPS conducts due diligence to reduce supply chain risks. We will also drive due diligence efforts to ensure our commitment to transparency and respect for human rights.

List of MPS cobalt smelters:

Qualified cobalt smelters:

smelter	country
Jingmen GEM Co., Ltd.	China
Gem (Jiangsu) Cobalt Industry Co., Ltd.	China
Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	China
Zhuhai Kelixin Metal Materials Co., Ltd.	China
Ganzhou Tengyuan Cobalt New Material Co., Ltd.	China
Guangxi Yinyi Advanced Material Co., Ltd.	China
Tianjin Maolian Science & Technology Co., Ltd.	China
Zhejiang Huayou Cobalt Company Limited	China
Quzhou Huayou Cobalt New Material Co., Ltd.	China
Jiangsu Xiongfeng Technology Co., Ltd.	China
SungEel HiTech Co.,Ltd.	Republic of Korea
Mechem Taiwan Plant 2	Taiwan Province of China
Minara Resources Pty.	Australia
Murrin Murrin Nickel Cobalt Plant	Australia
Ganzhou Highpower Technology Co., Ltd.	China
Hunan Zoomwe New Energy Science & Technology Co., Ltd.	China

The list of smelters is dynamically updated, and the data in this report was last updated in October 2023.

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