



# Rojone Conflict Minerals - Policy

---

## Document Control

### Document History

Date	Version No	Description	Author
17 Dec 15	1	Initial Release	John Brady

### Approvals

Name	Date
Managing Director	

### Document Custodian

Name	Signature
General Manager	

Copyright © 2014, Rojone Pty Ltd. All rights reserved. This document is for the use of client personnel only. No part of it may be circulated, quoted, or reproduced for distribution outside of the client organisation without the prior consent of Rojone Pty Ltd.

## Table of Contents

Document Control.....	1
Document History .....	1
Approvals .....	1
Document Custodian .....	1
References .....	2
External Documents.....	2
Internal Records/Documents.....	2
Purpose and Scope.....	3
Conflict Minerals Policy.....	3
Risk Assessments .....	3
Increased Risk Factors.....	4
Questions regarding Conflict Materials .....	4

## References

### External Documents

Doc. Num.	Description
V3.02	Conflict Minerals Reporting Template
N/A	CFSI - Reasonable Practices to Identify Sources of Conflict Minerals: Practical Guidance for Downstream Companies, August 2013, revision 1
H.R.4173	Dodd-Frank Wall Street Reform and Consumer Protection Act.

### Internal Records/Documents

Doc. Num.	Description
QPO 005	Rojone Risk Management Policy
QFO 018	Rojone Risk Register
QPR 002	Corrective Action
QPR 005	Purchasing Procedure
QPR 010	Supplier Evaluation Procedure
QPR 013	Design and Development

## Purpose and Scope

The purpose of this document is to outline Rojone's policy towards the sourcing of components for supply and use throughout our supply chain. The scope of this document applies to all materials and components consumed, reworked, and resupplied at both the manufacturing and the resale level. This policy is specifically directed towards the supply of, tantalum, tin, tungsten and gold from rebel-held mines which are funding armed conflict in multiple countries in the Democratic Republic of the Congo (DRC) and adjoining countries (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, or Zambia).

## Conflict Minerals Policy

Rojone recognises that as an Australian company that there is no local regulatory requirement for this policy however, as a responsible and ethical manufacturer and supplier of electronic componentry to both the local and international markets, we have a moral obligation to source responsibly and consider mining activities that fuel conflict as unacceptable. Tracing the origin and chain of custody of minerals throughout a global supply chain is a complex process.

We also recognise that in many situations Rojone is many tiers downstream in the supply chain; however, we will put in place to the best of our efforts, procedures, assessments and policies to ensure we source from a "reasonable country of origin".

The first level of protection against preventing conflict minerals from entering Rojone's supply chain is by sourcing from both level one supplier's and local sources only. We will use an "engagement approach" with our component suppliers to ensure that these companies have in place effective procedures, assessments and policies to demonstrate due diligence to ensure that both Rojone and our Customers meet both the regulatory and moral obligations.

## Risk Assessments

The risk of conflict minerals entering Rojone's supply chain has been identified and will be managed in accordance with the company's 'Risk Management Policy'. The risk to the environment, reputation, and regulatory requirements has been identified and analysed and an assessment of "Low Risk" has been determined. This risk will be annually monitored, and controlled through a combination of avoidance, mitigation and administrative controls; this policy forms one of the controls.

During the risk assessment, the factors listed below have been identified to increase the risk level ("red flag") and when identified require that a new Risk Assessment and a Conflict Minerals Report be completed.

## Increased Risk Factors

- Minerals originating from or which have been transported via a conflict-affected or high risk area.
- Minerals are claimed to originate from a country that has limited known reserves.
- Minerals are claimed to originate from a country in which minerals from conflict affected and high-risk areas are known to transit.
- Gold claimed to originate from recyclable/scrap or mixed sources and has been refined in a country where gold from conflict-affected and high-risk areas is known or reasonably suspected to transit.
- The company's suppliers or other known upstream companies have shareholder or other interests in companies that supply minerals from or operate in one of the abovementioned red flag locations of mineral origin and transit.
- The company's suppliers or other known upstream companies are known to have sourced minerals from a red flag location of mineral origin and transit in the last 12 months

## Questions regarding Conflict Materials

Here is a list of answers to the common questions we have been receiving from our customers. This is reviewed annually. Please contact Rojone for the latest information.

1. What is your company address?

***Rojone Pty Ltd  
44 Aero Rd, Ingleburn  
NSW, 2565, Australia***

2. What is your parent company's name?

***We are not owned by a Parent Company.***

3. Are Conflict Minerals (gold, tin, tantalum or tungsten) contained in any of your products?

***Yes.***

4. If you answered "Yes" to the question above, do you have a Conflict Minerals policy or statement?

***Yes (Copy available on request).***

5. Has your company identified all of the smelter(s) utilized in the refining of Conflict Minerals used in the products that you sell?

**No. We have a significant number of suppliers and we have not received declarations from all of our suppliers.**

6. Are any of the smelters you utilize located in the Democratic Republic of Congo (DRC) or another covered country (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, or Zambia)?

**No. We have not yet identified any of the above smelters from our suppliers. To reduce our risk, we try and source in suppliers from Australia. Please note that we have not received declarations from all our suppliers.**

7. Has your company completed the latest version of the EICC-GeSI conflict minerals reporting template (CMRT)?

**Yes. This is available from our General Manger whose details are below.**

8. Provide the name, title, phone number and email address of the individual from your company who can be contacted for more information regarding this subject.

**Mr John Brady, CSC  
General Manager  
P.O. Box 1, Casula NSW 2170  
Email: [John.Brady@Rojone.com.au](mailto:John.Brady@Rojone.com.au)  
Ph: +61 2 9829 1555**