
Conflict Metals Corporate Policy

Effective Date: 5/11/23

Purpose

To outline Company's practices regarding the sourcing of Conflict Minerals as well as the verification of such practices.

Scope

This Policy applies to all employees of Torrey Hills Technologies, LLC ("THT" or the "Company") and its subsidiaries and affiliates. THT will, as far as it is reasonably practicable, ensure that the Company's activities, and those of its suppliers and subcontractors, will comply with this Policy.

Policy

THT is committed to implementing programs and practices that promote environmental sustainability and social responsibility, while continually improving product quality and reliability. To that end, THT considers it unacceptable that the sourcing of certain "Conflict Metals" eventually incorporated into its products could be contributing to armed conflict. Conflict Metals are defined as: gold (Au), tantalum (Ta), tin (Sn) and tungsten (W) derived from ores which have been mined in the Democratic Republic of the Congo or adjoining countries.

In carrying out this policy, THT will implement programs and practices that, wherever practicable:

- prevent the introduction of Conflict Metals into its products
- verify the sources of gold, tantalum, tin and tungsten used in its products
- audit its suppliers for the continued accuracy of those verifications
- maintain records of verifications for both internal and/or external audit
- assign internal roles and responsibilities and provide appropriate staff training to manage program
- communicate the Company's efforts to stakeholders

All THT managers, employees, partners and suppliers are expected to adhere to the spirit as well as the letter of this Policy.

Implementation

The senior executive responsible for each local operating unit is ultimately responsible for stewardship of the products made there and shall:

- provide appropriate staffing and assign internal roles and responsibilities to manage the Product Stewardship - Conflict Metals Program
- maintain an awareness of and familiarity with regional, national and multi-national (e.g., European Union) statutes, regulations, directives and criteria applicable to the operation
- develop and implement programs and procedures necessary to carry out this Policy, addressing existing and new product lines
- provide training to all affected employees of the requirements of this Policy and the implementation of its programs and procedures. In particular, those personnel who interface with THT's customers (e.g., sales and marketing, product designers, quality assurance staff) should be familiar with all material aspects of this programs
- maintain an adequate, verifiable database, consistent with the products being manufactured at a local operating unit, to facilitate transfer of information to customers and other stakeholders. Provide current information as input to a company wide database of product information, if such is available.

The Company reserves the right to amend this Policy at any time.



Select Language Preference Here:
请选择您的语言:
선택할 언어를 선택하십시오:
表示言語をここから選択してください:
Sélectionner la langue préférée ici:
Selecione Preferência de Idioma Aqui:
Wählen sie hier die Sprache:
Selecione el lenguaje de preferencia aquí:
Selezionare la lingua di preferenza qui:
Burada Dil Tercihini Belirleyin:

Conflict Minerals Reporting Template (CMRT)

English

Revision 6.22
May 11, 2022

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Company Information

Company Name (*):	Torrey Hills Technologies, LLC
Declaration Scope or Class (*):	B. Product (or List of Products)
Go to Product List tab to enter products this declaration applies to	
Click here to enter the products this declaration applies to	
Company Unique ID:	
Company Unique ID Authority:	
Address:	6265 Greenwich Dr. Suite 105, San Diego, CA 92122
Contact Name (*):	Ken Kuang
Email - Contact (*):	kkuang@torreyhillstech.com
Phone - Contact (*):	(858)558-6666
Authorizer (*):	Ken Kuang
Title - Authorizer:	President
Email - Authorizer (*):	kkuang@torreyhillstech.com
Phone - Authorizer:	(858)558-6666
Effective Date (*):	30-Mar-2023

Answer the following questions 1 - 8 based on the declaration scope indicated above

1) Is any 3TG intentionally added or used in the product(s) or in the production process? (*)		Answer	Comments
Tantalum	No		
Tin	No		
Gold	No		
Tungsten (*)	yes		
2) Does any 3TG remain in the product(s)? (*)		Answer	Comments
Tantalum			
Tin			
Gold			
Tungsten (*)	Yes		
3) Do any of the smelters in your supply chain source the 3TG from the covered countries? (SEC term, see definitions tab) (*)		Answer	Comments
Tantalum			
Tin			
Gold			
Tungsten (*)	No		
4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)		Answer	Comments
Tantalum			
Tin			
Gold			
Tungsten (*)	No		
5) Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)		Answer	Comments
Tantalum			
Tin			
Gold			
Tungsten (*)	No		
6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)		Answer	Comments
Tantalum			
Tin			



Select Language Preference Here:
请选择您的语言:
선택할 언어를 선택하십시오:
表示言語をここから選択してください:
Sélectionner la langue préférée ici:
Selecione Preferência de Idioma Aqui:
Wählen sie hier die Sprache:
Selecione el lenguaje de preferencia aquí:
Selezionare la lingua di preferenza qui:
Burada Dil Tercihini Belirleyin:

Conflict Minerals Reporting Template (CMRT)

English

Revision 6.22
May 11, 2022

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

Gold		
Tungsten (*)	100%	

7) Have you identified all of the smelters supplying the 3TG to your supply chain? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	



Select Language Preference Here:
请选择您的语言:
사용할 언어를 선택하십시오:
表示言語をここから選択してください:
Sélectionner la langue préférée ici:
Selecione Preferência de Idioma Aqui:
Wählen sie hier die Sprache:
Seleccione el lenguaje de preferencia aquí:
Selezionare la lingua di preferenza qui:
Burada Dil Tercihini Belirleyin:

English

Conflict Minerals Reporting Template (CMRT)

Revision 6.22
May 11, 2022

The purpose of this document is to collect sourcing information on tin, tantalum, tungsten and gold used in products

[Link to Terms & Conditions](#)

Mandatory fields are noted with an asterisk (*). Consult the instructions tab for guidance on how to answer each question.

8) Has all applicable smelter information received by your company been reported in this declaration? (*)

	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

Answer the Following Questions at a Company Level

Question	Answer	Comments
A. Have you established a responsible minerals sourcing policy? (*)	Yes	
B. Is your responsible minerals sourcing policy publicly available on your website? (Note – If yes, the user shall specify the URL in the comment field.) (*)	No	
C. Do you require your direct suppliers to source the 3TG from smelters whose due diligence practices have been validated by an independent third party audit program? (*)	Yes	
D. Have you implemented due diligence measures for responsible sourcing? (*)	Yes	
E. Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? (*)	Yes, in conformance with IPC1755 (e.g.	
F. Do you review due diligence information received from your suppliers against your company's expectations? (*)	Yes	
G. Does your review process include corrective action management? (*)	Yes	
H. Is your company required to file an annual conflict minerals disclosure? (*)	No	