

Conflict Metals Corporate Policy

Effective Date: 2/9/2014

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.



An initiative of the EICC and GeSI

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Conflict Minerals Reporting Template (CMRT)

English

[Click here to check required fields completion](#)

Revision 3.02
November 7, 2014

[Link to Terms & Conditions](#)

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

Mandatory fields are noted with an asterisk (*). The information collected in this template should be updated annually. Any changes within the annual cycle should be provided to your customers

Company Information	
Company Name (*):	Torrey Hills Technologies, LLC
Declaration Scope or Class (*):	A. Company
Description of Scope:	Heat sink, tungsten/molybdenum products, Three-roll mill
Company Unique ID:	Register Certificate Number: 200403110090
Company Unique ID Authority:	
Address:	6370 Lusk Blvd., F-111, San Diego, CA 92121
Contact Name (*):	Carrie Lee
Email - Contact (*):	clee@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 (*):	5-Feb-2015

Answer the following questions 1 - 7 based on the declaration scope indicated above

1) Is the conflict metal intentionally added to your product? (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold (*)	No	
Tungsten (*)	Yes	

2) Is the conflict metal necessary to the production of your company's products and contained in the finished product that your company manufactures or contracts to manufacture? (*)	Answer	Comments
Tantalum (*)	No	
Tin (*)	No	
Gold (*)	No	
Tungsten (*)	Yes	

3) Does any of the conflict metal originate from the covered countries? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	

4) Does 100 percent of the conflict metal (necessary to the functionality or production of your products) originate from recycled or scrap sources? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	No	

5) Have you received conflict metals data/information for each metal from all relevant suppliers of 3TG? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes, 100%	

6) For each conflict metal, have you identified all of the smelters your company and its suppliers use to supply the products included within the declaration scope indicated above? (*)	Answer	Comments
Tantalum		
Tin		
Gold		
Tungsten (*)	Yes	

7) Has all applicable smelter information received by your company been reported in this declaration? (*)	Answer	Comments
Tantalum		
Tin		

[Click here to enter smelter names](#)

	Gold	
	Tungsten (*)	Yes
Answer the Following Questions at a Company Level		
Question	Answer	Comments
A. Do you have a policy in place that addresses conflict minerals sourcing? (*)	Yes	
B. Is your conflict 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 be DRG conflict-free? (*)	Yes	
D. Do you require your direct suppliers to source from smelters validated by an independent private sector audit firm? (*)	Yes	
E. Have you implemented due diligence measures for conflict-free sourcing? (*)	Yes	
F. Do you collect conflict minerals due diligence information from your suppliers which is in conformance with the IPC-1755 Conflict Minerals Data Exchange standard [e.g., the CFSI Conflict Minerals Reporting Template]? (*)	No	
G. Do you request smelter names from your suppliers? (*)	Yes	
H. Do you review due diligence information received from your suppliers against your company's expectations? (*)	No	
I. Does your review process include corrective action management? (*)	Yes	
J. Are you subject to the SEC Conflict Minerals rule? (*)	No	

