



Elhurt EMS statement – related to Conflict Minerals

Dear partner,

With the respect to the EU and US law about conflict minerals, please see our statement concerning this matter.

The European Parliament and Council on 17th of May 2017 passed the EU Regulation 2017/821 laying down supply chain due diligence obligations for EU importers of tin, tantalum and tungsten, their ores and gold originating from conflict-affected and high-risk areas.

Also according to the US Dodd-Frank Act tungsten, tantalum and tin (and the ores from which they originate) and gold are considered “conflict minerals”. Based on Section 1502 of mentioned act companies are obliged to disclose if the products they manufacture or contract to manufacture contain conflict minerals “necessary to the functionality or production”.

Elhurt EMS encourages all direct suppliers to identify the source of their minerals and support necessary extended supply chain due diligence. During the components purchase process, we request that the parts need to fulfill SEC “non-conflict minerals” compliance. If this requirement is not met by the supplier, he has to inform us about the issue. As an Electronics Manufacturing Services provider, we have no insight into data from where the subjected ores are mined and used in the components of our suppliers.

Being a subcontractor also requires us to follow the product owner’s (customer) Bill of Material (BOM) strictly. It starts with product specification, which is imported to our ERP and is based on the listed manufacturer’s P/N’s. There might be electric, electronic, and mechanical components. Components fulfilling compliance with SEC “non conflict minerals” should be defined during the R&D phase of product development by our valuable customers directly or by their subcontractors responsible for this field. All mentioned components are locked in the final product documentation.

Part of our sourcing policy defines the incoming inspection process. During that process, each delivered component is verified if it is compliant with the component P/N that was requested in the order. This routine allows us to commit that we only use components specified in customer documentation (BOM). Therefore end product fulfill the SEC “none conflict minerals” requirement when the customer’s initial documentation indicates components that fulfills mentioned obligation.

Please note that the CMRT document that is attached to this statement is limited to the Elhurt EMS manufacturing process. All parts chosen by our customers are not considered there.

Date 09-02-2023

Declared by Quality Manager
Tomasz Derkowski

Approved by Managing Director
Sławomir Tkacz

ELHURT EMS SP. Z O.O.

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KRS: 0000293807, VAT: PL5842635440,

Spółka zarejestrowana w Sądzie Rejonowym w Gdańsku, VII Wydział Gospodarczy,

Wysokość kapitału zakładowego: 1 000 000 zł

ELHURT EMS Sp. z o.o.
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tel. (58) 554 08 00, NIP 584-26-35-440



Conflict Minerals Reporting Template (CMRT)

Select Language Preference Here:
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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 (*):	ELHURT EMS Sp. z o.o.
Declaration Scope or Class (*):	A. Company
Description of Scope:	EMS
Company Unique ID:	PL5842635440
Company Unique ID Authority:	VAT
Address:	80-299 Gdańsk ul. Galaktyczna 35a, Poland
Contact Name (*):	Tomasz Derkowski
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Authorizer (*):	Tomasz Derkowski
Title - Authorizer:	Quality manager
Email - Authorizer (*):	Tomasz.derkowski@elhurt.com.pl
Phone - Authorizer:	+48 58 554 08 85
Effective Date (*):	9-Feb-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 (*)	Yes	
Gold (*)	Yes	
Tungsten	No	

2) Does any 3TG remain in the product(s)? (*)	Answer	Comments
Tantalum		
Tin (*)	Yes	
Gold (*)	Yes	
Tungsten		

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 (*)	No	
Gold (*)	No	
Tungsten		

4) Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)	Answer	Comments
Tantalum		
Tin (*)	No	
Gold (*)	No	
Tungsten		

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 (*)	No	
Gold (*)	No	
Tungsten		

6) What percentage of relevant suppliers have provided a response to your supply chain survey? (*)	Answer	Comments
Tantalum		
Tin (*)	100%	
Gold (*)	100%	
Tungsten		

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

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English

Revision: 6.22
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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 (*)	Yes	
Gold (*)	Yes	
Tungsten		

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.) (*)	yes	https://www.els.com/
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 IPC1753 (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	

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