



Technicolor's statement on Conflict Minerals

August, 2020

Introduction and highlights

“Conflict Minerals” are generally defined as Tin, Tantalum, Tungsten and Gold (so called 3TGs) which may have originated in the Democratic Republic of Congo (DRC) or an adjoining country, mined in conditions of armed conflict and human right abuses which are sold or traded by armed groups. In 2010, the United States enacted the Dodd-Frank Act, Section 1502, introducing supply chain transparency provisions on certain companies if “Conflict Minerals” are necessary to the functionality or production of their products. More recently in May 2017 in Europe, the EU signed the EU Mineral Supply Due Diligence Regulation (Regulation 2017/821) into law, to be enforced in 2021. This regulation will require that upstream companies (EU importers of 3TGs minerals and metals) meet international responsible sourcing standards, such as those set out by the OECD Due Diligence Guidance for Responsible Supply Chains.

In 2017, the Responsible Minerals Initiative (RMI), an affiliate of the Responsible Business Alliance (RBA) added Cobalt as another focus mineral, in addition to the original Conflict Minerals. The DRC is the world's largest producer of Cobalt and holds more than 50% of the global cobalt reserves, and the mineral is extracted in mechanized and artisanal mining operations. Cobalt is used primarily in lithium-ion batteries.

As part of Technicolor's overall commitments to corporate social responsibility, Technicolor is committed to ensure that minerals contained in its products are sourced with due respect to human rights and therefore Technicolor seeks to avoid directly or indirectly any use of these “Conflict Minerals”. As a result of these guiding principles, Technicolor has taken steps to develop and implement a due diligence process for identifying and managing the sourcing of 3TGs and to address concerns for responsible sourcing of Cobalt.

Technicolor Expectations

Technicolor is a member of the Responsible Business Alliance (RBA¹), previously known as EICC (Electronic Industry Citizenship Coalition) and is committed to responsible sourcing as part of the company's overall passion for Corporate Social Responsibility. Technicolor adopted the organization's Code of Conduct in October 2014, and Technicolor fully supports the vision and goals of the RBA as well as its sister organization, the Responsible Minerals Initiative (RMI). By participating and contributing to this industry-wide initiative, Technicolor recognizes that this commitment will enable continuous improvement in the social, environmental and ethical responsibility of our supply chains and better management of conflict minerals sourcing.

In turn, Technicolor expects its suppliers and industrial partners to likewise support these commitments by complying with the RBA Code of Conduct and establishing a company policy for responsible sourcing of conflict minerals. Specifically, suppliers are to conduct business in alignment with Technicolor's supply chain responsibility expectations, which are communicated in the Supplier Responsibility Program and Supplier Responsibility Handbook. Suppliers should establish their own Conflict Minerals and responsible sourcing policy, track the usage of conflict minerals, including identification of all smelters, and implement a due diligence program. This due diligence program should reasonably assure that any products supplied to Technicolor, which may contain conflict minerals, are conformant to the RMI Responsible Minerals Assurance Process (RMAP), which requires a third-party sourcing audit. We require our suppliers to work toward removing from our supply chain the smelters that do not participate in a conflict-free audit program.

Supply Chain Due Diligence Program

Tracing minerals throughout the supply chain is a very complex process. Given this complexity, Technicolor has implemented the due diligence process designed in conformance with the Responsible Mineral Initiative's (RMI) OECD Due Diligence guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition). We request and expect that Technicolor suppliers establish policies, practices, and other due diligence measures consistent with these guidelines, which are communicated via the Supplier Responsibility Program, Supplier Responsibility Handbook, and the commercial contract with each Supplier.

Reasonable Country of Origin Inquiry (RCOI)

Technicolor supports the Responsible Minerals Initiative (RMI) as initiated by the RBA, and the Global e-Sustainability Initiative (GeSI).

For an efficient and effective survey, the standardized RMI Conflict Minerals Reporting Template (CMRT) is the industry-accepted tool adopted by Technicolor for collection of due diligence information from suppliers. CMRT is widely used by the electronics industry and is maintained and updated by RMI continually, so that smelter and mining operations can be clearly identified as RMAP conformant. Where they are not, appropriate action can be identified. Suppliers must conduct a supply chain survey to identify the 3TG smelters and refiners in their supply chain, and report to Technicolor using the CMRT. Suppliers must respond to Technicolor's requests for additional information or action that is necessary for Technicolor to complete its own due diligence. Suppliers are expected to make every effort to source from smelters and refiners that are compliant to RMI's assessment protocols. In addition, Technicolor has started to survey suppliers regarding responsible sourcing of Cobalt using the RMI standardized Cobalt Reporting Template (CRT).

For more information, please go to :

RBA at <http://www.responsiblebusiness.org/>

RMI can be found at <http://www.responsiblemineralsinitiative.org/> .

CMRT at <http://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/> and the CRT (Cobalt Reporting Template) can be found at <http://www.responsiblemineralsinitiative.org/reporting-templates/cobalt-reporting-template/>

¹ RBA's mission is to enable companies to improve the social and environmental conditions in the global electronics supply chain. Technicolor's public letter of commitment is available [here](#).