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1 Purpose & Scope

To meet the requirements of the OECD Due Diligence Guidance, Qorvo is required to gather sourcing information regarding conflict minerals from its supply chain. Qorvo will collect this information using the RMI's Conflict Minerals Reporting Template (CMRT).

The purpose of this document is to inform suppliers of the criteria by which Qorvo will use when reviewing CMRT submissions.

The scope of this document covers all suppliers who provide products, components and/or materials to Qorvo that contain conflict minerals and become part of a finished Qorvo product.


If a supplier has any questions regarding this document, please contact ConflictMinerals@qorvo.com.

2 Definitions & Acronyms

Please refer to LIS-000602 for definitions related to this document.

3 References

Reference	Title	Location
LIS-000602	Product Compliance Definitions	Qorvo Doc Center
SPE-001288	Qorvo Supplier Expectations for the Responsible Sourcing of Conflict Minerals	Qorvo Doc Center
OECD	OECD Due Diligence Guidance	http://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf
LBMA	LBMA Responsible Gold Guidance	http://www.lbma.org.uk/responsible-sourcing
RBA	Responsible Business Alliance (formerly, the Electronic Industry Citizenship Coalition) Standards	http://www.responsiblebusiness.org/standards/code-of-conduct/
RJC	RJC Chain-of-Custody Standard	http://www.responsiblejewellery.com/gold-refiner-audit-cross-recognition/
RMI	Responsible Minerals Initiative (formerly, the Conflict-Free Sourcing Initiative)	http://www.responsiblemineralsinitiative.org/
TI-CMC	Tungsten Industry-Conflict Minerals Commitment	http://ti-cmc.org/


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4 CMRT Review Criteria

Suppliers should provide Qorvo with a CMRT using the latest CMRT revision, which can be downloaded at: <http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>.

4.1 Declaration Worksheet


- All mandatory fields (marked with an *) must be completed.
- **Declaration Scope or Class (*):** The Declaration Scope must include all materials sourced by Qorvo, regardless of the level declared.
 - Company: Should include EVERY material you provide to ANYONE.
 - User-Defined: Limited to a particular scope to which the 3TG is applicable ~ MUST COMPLETE THE DESCRIPTION OF SCOPE FIELD (subject to Qorvo verification).
 - Product (or List of Products): Limited to a specific set of materials to which the 3TG is applicable ~ MUST COMPLETE THE PRODUCT LIST WORKSHEET (subject to Qorvo verification).
- **Effective Date (*):** The Effective Date should be updated for each and every version of the CMRT you send to Qorvo.
 - The Effective Date must reflect the date you verified the sourcing in your supply chain.
 - The Effective Date must equal today or less than today ~ your CMRT cannot be dated with a future date.
 - The Effective Date must be in the current reporting period (i.e., for calendar year 2017, CMRTs cannot have an Effective Date of 2016).
- **Question 1 & 2 (*):** Is the 3TG intentionally added or used in the product(s) or in the production process and Does any 3TG remain in the product(s)? [Yes/No]
 - Answers will be reviewed compared to your Smelter List. For example: if you answered “Yes” to Q2, tungsten remains in your product, there should be at least one tungsten smelter on your Smelter List.
- **Question 3 (*):** Do any of the smelters in your supply chain source the 3TG from the covered countries? [Yes/No/Unknown]
 - If your answer is “Yes” for any metal originating from the covered countries, a comment should be included.
 - If your answer is “No” for any metal, the following MUST also be true:
 - Q6 – you have identified all smelters in your supply chain for that metal; and
 - Q7 – all applicable smelter information for that metal has been reported in your CMRT.

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- If your answer is "Unknown" for any metal, a comment should be included.
- **Question 4 (*)**: Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources? [Yes/No/Unknown]
 - If your answer is "Yes" for any metal originating from 100% recycled or scrap sources, the following MUST also be true:
 - Q3 – you must say that the metal does NOT originate from the covered countries;
 - Q6 – you have identified all smelters in your supply chain for that metal; and
 - Q7 – all applicable smelter information for that metal has been reported in your CMRT.
 - Answers will be reviewed compared to your Smelter List. For example: if you have answered "Yes" 100% of your tin comes from recycled or scrap sources, column P on your Smelter List should not be "No" or "Unknown" for any of your tin smelters.
- **Question 5 (*)**: What percentage of relevant suppliers have provided a response to your supply chain survey? [100%/Greater than 90%/Greater than 75%/ Greater than 50%/50% or less/None]
 - We will review your answers to check your progress in getting responses back from your suppliers. If your percentage is less than 100% we will come back to you for details on your plan of action to obtain the remaining data from your suppliers in a timely manner.
- **Question 6 (*)**: Have you identified all of the smelters supplying the 3TG to your supply chain? [Yes/No]
 - If your answer is "Yes" for any metal, and you have answered less than 100% to Q5 for that metal, a comment must be included describing your process for identifying the smelters without receiving data from all relevant suppliers.
 - If your answer is "No" for any metal, a comment should be included describing the status of identifying the remaining smelters.
- **Question 7 (*)**: Has all of the applicable smelter information received by your company been reported in this declaration? [Yes/No]
 - If your answer is "No" for any metal, a comment must be included describing why smelter information has been left out of your CMRT.
- **Question A (*)**: Have you established a conflict minerals sourcing policy?
 - You should have a policy to reasonably assure that the conflict minerals used in your products do not directly or indirectly finance or benefit armed groups in the covered countries, and that policy should be publicly available. *(Note, Qorvo does not prohibit the use of*


materials from the covered countries – only materials from the region that contribute to ongoing conflict). This policy should include:

- A commitment from your company to ensure that your products do not contribute to ongoing conflicts in conflict-affected areas;
 - A commitment from your company to follow all ethical practices in the sourcing of conflict minerals (see the EICC Code of Conduct to view Qorvo’s ethical expectations for its supply chain);
 - A commitment from your company that if you identify suppliers whose actions are contributing to conflict, you will suspend or disengage from using those suppliers; and
 - A commitment from your company to hold your supply chain to these same standards.
- If your answer is “No”, you do not have a conflict minerals sourcing policy, a comment should be included providing a plan an estimated date on when your company expects to have a policy in place.
 - You can find a model policy beginning on page 20 of the OECD Due Diligence Guidance.
- **Question B (*):** Is your conflict minerals policy publicly available on your website?
 - You should have your policy publicly listed on your website, with the URL listed in the comment section for QB.
 - If your answer is “No” and you have answered “Yes” to QA, please provide a copy of your policy to ConflictMinerals@qorvo.com and provide a comment explaining why your policy is not publicly available.
 - **Question C (*):** Do you require your direct suppliers to be DRC conflict-free?
 - We would like to see that our suppliers include a commitment to conflict-free sourcing in the standard contract language for their suppliers.
 - **Question D (*):** 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?
 - We would like to see that you will drive your supply chain to use smelters that have been validated by a third-party audit program such as the RMI’s Responsible Minerals Assurance Process (RMAP). For gold, we will also accept smelters with an LBMA Responsible Gold Certification or RJC Chain-of-Custody Certification. For tungsten, we will also accept TI-CMC members progressing towards RMAP validation.
 - If your answer is “No”, a comment should be included explaining how

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your company validates the responsible sourcing practices of the smelters in your supply chain.

- **Question E (*):** Have you implemented due diligence measures for conflict-free sourcing?
 - We would like an explanation of your company’s due diligence activities in the comment section for QE. The OECD Due Diligence Guidance provides a five-step framework for risk-based due diligence, beginning on page 17:
 - Establish strong company management systems;
 - Identify and assess risk in the supply chain;
 - Design and implement a strategy to respond to identified risks;
 - Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain; and
 - Report on supply chain due diligence.
 - If your answer is “No”, a comment should be included explaining why your company does not engage in due diligence measures for conflict-free sourcing.
- **Question F (*):** Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)?
 - We prefer that our suppliers use the CMRT in their requests to their supply chain for due diligence and smelter information. The CMRT is in conformance with the IPC-1755 Conflict Minerals Data Exchange Standard and is considered to be a best practice for gathering conflict minerals information.
 - If your company is using another format to collect this information, please provide a comment describing your method.
 - If your answer is “No”, please provide a comment describing how your company collects due diligence information from its suppliers.
- **Question G & H (*):** Do you review due diligence information received from your suppliers against you company’s expectations and Does your review process include corrective action management?
 - We would like our suppliers to tell us what they do to verify their conflict minerals information. Do you look for the types of inconsistencies contained in this document? If a supplier gives you a smelter name for a company that is obviously not a smelter, what is your response? How do you work with your suppliers to drive them to improve their policies and establish strong due diligence requirements? How do you monitor the corrective actions you assign to suppliers for improvements?

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4.2 Smelter List Worksheet

- Please review the Instructions worksheet on the CMRT and complete the Smelter List as intended.
 - If you know the Smelter Identification Number for a smelter in your supply chain, input the number in column A – columns B-G and I & J will auto-populate with the correct smelter information.
 - If you do not know the Smelter Identification Number, select the applicable metal in column B and choose the smelter name from the dropdown in column C – columns D-G and I & J will auto-populate.
 - If the smelter is not listed in the column C dropdown, select “Smelter Not Listed” and manually complete columns D (fill-in) and E (dropdown) – columns F & G and I & J will remain blank.
 - We request that you fill in as much information as you have available for each smelter. Use a separate line for each metal/smelter/country combination. Remove all duplicate entries from your smelter list.
- Qorvo will review your Smelter List worksheet against your Declaration worksheet.
 - If you have answered “Yes” to Q6 and Q7 for any metal on the Declaration worksheet (you have identified and reported all smelters in your CMRT) you must have at least one smelter for that metal on your Smelter List worksheet.
 - If you have answered “No” to Q1 and Q2 for any metal on the Declaration worksheet (the metal is NOT present in the products you supply Qorvo) you cannot list a smelter for that metal on your Smelter List worksheet.
- Qorvo will review your Smelter List worksheet to see if all facilities you have listed are on the RMI’s Smelter Reference List.
 - The facilities on the Smelter Reference List reflect smelters that have been verified as true smelters by the RMI – it does not necessarily mean that they have been validated as conflict-free. Refer to the RMI’s Conformant Smelter List for a list of smelters that are conformant to the RMAP protocols:
<http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/>.
 - We recommend that our suppliers use the latest CMRT revision, as it contains the RMI’s latest smelter names/alias information as of the date of its release (Smelter Look-up worksheet). If you have smelters in your CMRT that you know to be actual smelters but are not listed in the version of the CMRT you are using, try using the most recent update to the CMRT. Changes are made to Smelter Reference List all the time.
 - The most up-to-date version of the Smelter Reference List can be

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downloaded at:

<http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/exports/cmrt-export/>.

- Any facility that is not on the Smelter Reference List (“Smelter Not Listed”) requires your investigation into whether they are true smelters or not. You can investigate these “alleged” smelters by doing the following:
 - Research the alleged smelter on the internet. Does their website mention their feedstocks and their products? Are they receiving ores and manufacturing metal ingots? Include any information you find (website, contact information, product information, etc.) in the comment section (column Q) for that smelter in your CMRT.
 - Ask your supplier(s) who listed the alleged smelter to verify that it is a true smelter – i.e., a company that takes in ores and manufactures metal ingots. Ensure that you obtain the contact information for the smelter and include that information in the comment section (column Q) for that smelter in your CMRT.
 - If you feel you have listed a true smelter that needs to be added to the Smelter Reference List, please email us at ConflictMinerals@qorvo.com and tell us about the investigation you have done so far. We will review the information you provide with the RMI’s smelter disposition team. We may come back to you for more information later, or provide you with a form that you can pass down your supply chain to the smelter for completion.
- Qorvo will perform a detailed analysis of your smelter list using the information we have gathered through research and our membership/participation in the RMI.
 - We will provide you with feedback regarding any facility you have listed that will require your further attention. We ask that you review the feedback in its entirety and complete any actions that may be required as soon as possible. For example: Qorvo may have information regarding a “Smelter Not Listed” entry on your CMRT that demonstrates the facility is NOT a smelter. In this case, we will ask you to remove the facility from your smelter list and work with your supply chain to identify the correct smelter source. We expect you to provide an updated CMRT once the action is complete.

5 Metrics

N/A

6 Quality Records

N/A

7 Revision History

Revision	Create Date (mm/dd/yyyy)	Description of Change	Initiator of Change
A	09/26/2017	Initial Release.	A. Raulston
B	5/2/2018	Revised and Updated. Changed CFSI to RMI and updated reference link.	A. Raulston

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