

## QORVO CMRT REVIEW CRITERIA

### OVERVIEW

To comply with the [OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) (OECD Guidance), Qorvo regularly collects 3TG sourcing information from its supply chain using the industry standard Conflict Minerals Reporting Template (CMRT) developed by the Responsible Minerals Initiative (RMI).

### PURPOSE

This document is intended to inform suppliers of the criteria by which Qorvo will review their CMRT submissions.

### REVIEW CRITERIA

Relevant suppliers should provide Qorvo with 3TG sourcing data using the latest CMRT revision, which can be downloaded from the Responsible Minerals Initiative website at <http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>.

### DECLARATION SCOPE

All mandatory fields marked with an asterisk (\*) must be completed.

- **Declaration Scope or Class (\*)**: Must include all materials supplied to Qorvo, regardless of the scope declared.
  - a. Company: Should include EVERY product your company provides to ANYONE.
  - b. User defined: Limited to a particular scope of products to which the 3TG declared is applicable – *The description of scope must be filled in. (subject to Qorvo verification)*
  - c. Product (or List of Products): Limited to a specific set of components/materials to which the 3TG is applicable – *The Product List worksheet must be filled in. (subject to Qorvo verification)*
- **Effective Date (\*)**: Should be updated on EVERY version sent to Qorvo.
  - a. Must reflect the date your company verified the 3TG used in your supply chain.
  - b. Must equal today or less than today – i.e., cannot be dated with a future date.
  - c. Must be in the current reporting period – i.e., In CY2019 CMRTs cannot be submitted with an effective date from 2018).

### DUE DILIGENCE QUESTIONS 1 - 8

- **Questions 1 & 2 (\*)**: Is the 3TG intentionally added or used in your product(s) or the production process AND if so, does any 3TG remain in the product(s)? [Yes / No]
  - a. Answers will be reviewed compared to your smelter list. For example – if you have stated that “Yes” tungsten does remain in your products, there should be AT LEAST ONE tungsten smelter declared on your smelter list.
- **Questions 3 & 4 (\*)**: Do any of the smelters in your supply chain source the 3TG from the covered countries AND / OR conflict-affected and high-risk areas? [Yes / No / Unknown]
  - a. For any “Yes” answer, a comment should be included.
  - b. For any “No” answer, the following MUST also be true:
    - i. You have identified all smelters for that metal; AND
    - ii. All applicable smelter information for that metal has been reported in your CMRT.
  - c. For any “Unknown” answer, a comment should be included.

**Note:** As defined in the RMAP standards, minimum expectations of conflict-affected and high-risk areas (CAHRAS) include: 1) the Covered Countries, as defined in Dodd-Frank; and 2) any area designated on a CAHRAs list produced by the EU, when available.

**Note:** The location of a smelter does not determine the source of the 3TG. Just because a smelter is located in a certain area, it does not necessarily mean they obtain raw materials from that same location. For example, a smelter located in the US could source minerals from the DRC or surrounding countries.

- **Question 5 (\*)**: Does 100% of the 3TG originate from recycled or scrap sources? [Yes / No / Unknown]
  - a. For any “Yes” answer, the following MUST also be true:
    - i. The metal does NOT originate from the covered countries or other CAHRAs;
    - ii. You have identified all smelters for that metal; AND
    - iii. All applicable smelter information for that metal has been reported in your CMRT.
  - b. Answers will be reviewed compared to your smelter list. For example – if you have stated that 100% of the declared tin is from recycled or scrap sources, column P on your smelter list should not be “No” or “Unknown”.
- **Question 6 (\*)**: What percentage of relevant suppliers have responded to your supply chain survey? [100% / Greater than 90% / Greater than 75% / Greater than 50% / 50% or less / None]
  - a. Answers will be reviewed to determine your progress with obtaining the necessary responses from your supply chain.
  - b. For any answer less than 100%, Qorvo will request details on your action plan to obtain 3TG data from your remaining suppliers.
- **Question 7 (\*)**: Have you identified all of the smelters supplying 3TG to your supply chain? [Yes/No]
  - a. If your answer is “Yes” for any metal, and you have answered less than 100% to Q6 for that metal, you must describe your process for identifying all smelters without receiving data from all relevant suppliers.
  - b. If your answer is “No” for any metal, a comment should be included to describe your plan to identify your remaining smelter sources.
- **Question 8 (\*)**: Has all of the applicable smelter information been reported in your declaration? [Yes/No]
  - a. If your answer is “No” for any metal, a comment should be included to describe why smelter information has been left out of your CMRT.

#### DUE DILIGENCE QUESTIONS A - H

- **Questions A & B (\*)**: Have you established a responsible minerals sourcing policy AND is that policy publicly available on your website? [Yes / No]
  - a. You should have a policy to reasonably assure that the 3TG used in your products is responsibly sourced, in a way that is consistent with the OECD Guidance.
  - b. If your policy is publicly available, the URL should be listed in the comments section of Question B.
  - c. If your policy is not publicly available, a copy should be sent to [Responsible.Sourcing@qorvo.com](mailto:Responsible.Sourcing@qorvo.com).

**Note:** Qorvo does NOT prohibit the use of 3TG from the covered countries or other CAHRAs – only 3TG from sources that have been linked to social and human rights abuses.

**Note:** Previous revisions of the CMRT asked if companies had established a conflict mineral sourcing policy, pertaining specifically to conflict risks in the covered countries. CMRT 6.0 has expanded this question to better align with the OECD Guidance and now includes a global scope and broader human rights risks.

**Note:** OECD Annex II risks can be broken into three overarching criteria: Human Rights, Conflict, and Good Governance. For more information, see: <http://www.responsiblemineralsinitiative.org/minerals-due-diligence/issues/oecd-annex-ii-risks/>.

- **Question 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 / No]
  - a. Qorvo suppliers are required to use smelters that are validated by the RMI's [Responsible Minerals Assurance Process](#) (RMAP) or a cross recognized audit program.
  - b. If your answer is "No" to this question, a comment should be included to explain how your company validates the sourcing practices of smelters used in your supply chain.
- **Question D (\*)**: Have you implemented due diligence measures for responsible sourcing? [Yes/No]
  - a. Suppliers should briefly describe their due diligence activities in the comment section.
  - b. If your answer is "No", a comment should be included to explain why your company does not engage in due diligence for responsible sourcing.

**Note:** *The OECD Guidance provides a 5-step framework for risk-based due diligence beginning on page 17.*

- **Question E (\*)**: Does your company conduct Conflict Minerals survey(s) of your relevant supplier(s)? [Yes, in conformance with IPC1755 (e.g. CMRT) / Yes, using other format (describe) / No]
  - a. We prefer our suppliers use the CMRT in their requests for supplier due diligence and smelter information. The CMRT is aligned with the IPC-1755 Responsible Sourcing of Minerals Data Exchange Standard and is considered to be a best practice for gathering 3TG information.
  - b. If your company uses another format to collect this information, please provide a comment describing your method.
  - c. If your answer is "No", please provide a comment describing how your company obtains relevant 3TG sourcing information.
- **Questions F & G (\*)**: Do you review due diligence information received from your suppliers against you company's expectations AND does this process include corrective action management? [Yes / No]
  - a. Examples include but are not limited to 1) evaluating smelter risk for conflict sourcing; 2) confirming whether or not your suppliers have established policies for responsible 3TG sourcing; and 3) reviewing supplier declarations for accuracy and completion.

## SMELTER LIST

- Suppliers should review the Instructions tab on the CMRT and fill out the smelter list tab as intended.
  - a. If you know the RMAP Smelter Identification Number (CID) 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.
  - b. If you do not know the CID, 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.
  - c. 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.
  - d. 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.
- We will review your smelter list against the information you provided on the declaration tab of your CMRT.
  - a. If you have answered "Yes" to Q7 and Q8 for any metal on your declaration sheet (all smelters have been identified and reported in your CMRT) you must have at least one smelter for that metal on your smelter list.
  - b. 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.
- We will review your smelter list to determine if all facilities you have reported are on the RMI's Smelter Reference List.

- a. The Smelter Reference List reflects all smelters that have been verified as ACTUAL smelters by the RMI – it does not necessarily mean that they have been validated as conformant to the RMAP. The RMI’s Conformant Smelter Lists can be viewed at: <http://www.responsiblemineralsinitiative.org/conformant-smelter-refiner-lists/>.
- b. Suppliers should use the latest CMRT revision, as it contains the RMI’s latest smelter names and alias information as of the date of its release (Smelter Look-up worksheet).
- c. If you have smelters in your CMRT that you know to be actual smelters but are not listed in the CMRT version you are using, try using the most recent CMRT revision. Changes are made to Smelter Reference List all the time.

**Note:** The most up-to-date Smelter Reference List can be downloaded from the RMI’s website 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 actual smelters or not. You can investigate these “alleged” smelters by doing the following:
  - a. Research the facility on the internet. Does their website mention their feedstocks and 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 entry in your CMRT.
  - b. Ask your supplier(s) who listed the facility to verify that it is an actual 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 entry in your CMRT.
  - c. If you feel you have listed actual smelter that should be added to the Smelter Reference List, please email us at [Responsible.Sourcing@qorvo.com](mailto:Responsible.Sourcing@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 request more information later or provide you with a form that you can pass down your supply chain to the smelter for completion.
- We will perform a detailed analysis of your smelter list using information we have gathered through research and our membership/participation in the RMI.
  - a. You will receive feedback from Qorvo on any facility you have listed that requires 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.
  - b. 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.

**ADDITIONAL RESOURCES**

For additional guidance and training on completing the CMRT, please visit <http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>.

**REVISION HISTORY**

Revision	Create Date (mm/dd/yyyy)	Description of Change	Initiator of Change
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A	09/27/2017	Initial Release	A. Raulston
B	05/02/2018	Revised and updated. Changed reference from CFSI to RMI and updated link.	A. Raulston
C	06/05/2019	Revised and updated using external facing template. Information is the same.	A. Raulston
D	05/05/2020	Updated to align with CMRT v6.0 & current IPC1755 standard.	A. Raulston
E	06/18/2020	Updated Qorvo contact information.	A. Raulston
F	06/14/2021	Removed reference to CMRT v6.0 & updated RMI hyperlinks.	A. Raulston

CONTROLLED DISTRIBUTION: N/A