Khatod Optoelectronic SRL
Via Alessandrina 25, 20095
Cusano Milanino, Milan, Italy
Tel. +39 0266013695
Fax +39 0266013500
VAT IT02270010966
khatod@khatod.com
www.khatod.com
ISO 9001:2015 CERTIFIED

(Revision 1.1 - July 31, 2026)

Conflict Minerals Policy (3TG Policy)

Purpose

KHATOD OPTOELECTRONIC S.r.l. is committed to conducting its business in an ethical, responsible, and sustainable manner. As part of this commitment, the Company supports efforts to eliminate the use of minerals that directly or indirectly finance armed conflict, human rights abuses, or illegal activities.
This policy addresses the responsible sourcing of Tin (Sn), Tantalum (Ta), Tungsten (W), and Gold (Au), commonly referred to as "3TG" minerals.

Commitment

KHATOD OPTOOELECTRONIC S.r.l. is committed to:

- Supporting responsible sourcing practices throughout its supply chain.
- Complying with applicable regulations and customer requirements regarding conflict minerals.
- Avoiding the knowing procurement of materials originating from sources that contribute to armed conflict or serious human rights violations.
- Promoting transparency within the supply chain through cooperation with suppliers and customers.
- Encouraging suppliers to adopt similar responsible sourcing practices and to provide relevant information regarding the origin of 3TG minerals when requested.

Due Diligence

KHATOD OPTOOELECTRONIC S.r.l. performs reasonable due diligence activities by:

- Requesting information from suppliers regarding the presence and origin of 3TG minerals when applicable.
- Collecting and maintaining Conflict Minerals Reporting Templates (CMRT) and other relevant declarations from suppliers.
- Reviewing available information to identify potential risks related to conflict mineral sourcing.
- Cooperating with customers in the fulfilment of conflict minerals reporting requirements.

Supplier Expectations

Suppliers are expected to:

- Support responsible sourcing of 3TG minerals.
- Provide accurate and timely information regarding the origin of minerals contained in supplied materials or components.
- Cooperate with reasonable requests related to conflict minerals due diligence activities.

Continuous Improvement

KHATOD OPTOOELECTRONIC S.r.l. will periodically review this policy and its due diligence practices to ensure continued alignment with customer requirements, industry expectations, and applicable regulations.

Approval

This policy has been approved by the Management of KHATOD OPTOOELECTRONIC S.r.l. and is effective as of the date indicated below.

KHATOD OPTOELECTRONIC S.r.l.
Carnevale Mauro
Quality Manager