

ALL Circuits Due diligence report on conflict minerals

Meung-sur-Loire, France, 2026/04/16

Overall Description

For years, the mining and sale of certain minerals in the Democratic Republic of the Congo (DRC) and adjoining countries have helped fund conflicts contributing to an emergency humanitarian situation. Conflict Minerals are minerals mined in conditions of armed conflict and human rights abuses, by various armed rebel groups. The profits from the sale of these minerals finance continued fighting in the ongoing wars. These minerals include Cassiterite (tin), Wolframite (tungsten), Coltan (tantalum), and Gold. These minerals have become known as 3TG.

In order to limit these practices, the US Dodd-Frank Act provides for disclosure obligations regarding the use of minerals from the DRC and high-risk regions, through the article 1502. The aim is to increase transparency, identify the source of minerals and reduce indirect funding for armed groups.

Implication of the 4 ALL Circuits sites (MSL Circuits, BMS Circuits, TIS Circuits and GDL Circuits)

Although ALL Circuits manufactures products containing at least one of the following four minerals: tin, gold, tantalum and tungsten, ALL Circuits does not directly supply these minerals. Consequently, ALL Circuits and its 4 sites MSL Circuits, BMS Circuits, TIS Circuits and GDL Circuits are not subject to the obligations related to the «Conflict Minerals» section of the Dodd-Frank Act. However, although the 4 sites are not directly subject to the Dodd-Frank Act, many customers require information that complies with the requirements of this law. MSL Circuits, BMS Circuits, TIS Circuits and GDL Circuits can be brought to:

- identify the components containing 3TG,
- trace their origin,
- meet the due diligence requirements formulated by their clients.

ALL Circuits decisions and undertakings

ALL Circuits supports the ending of human rights violations and violence in the Democratic Republic of Congo (DRC) and the surrounding countries.

As such:

- The group **does not knowingly procure products containing conflict minerals**.
- As part of its services including the manufacture of products potentially containing 3TG, **ALL Circuits is committed to ensuring transparency** within its supply chain.
- ALL Circuits applies a due diligence duty based on the **OECD** guidelines for responsible supply chains of minerals from conflict zones.

The group's suppliers are encouraged to adopt equivalent policies, in particular by favouring supply from certified «**conflict free**» foundries.

CMRT (Conflict Minerals Reporting Template)

The **CMRT** is a standardized template developed by the Responsible Minerals Initiative (RMI) used by companies to declare the source of the minerals used in their products. Although its use is voluntary, the CMRT is widely adopted by companies seeking to comply with regulations.

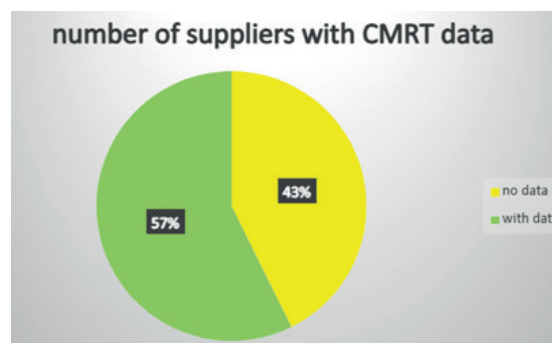
It is used to:

- Harmonize supply chain analyses,
- Improve sectoral coherence and transparency,
- Meet regulatory obligations such as Article 1502 of the Dodd-Frank Act.

The RMI regularly updates this model to reflect regulatory developments and good industrial practices.

Implementation at ALL Circuits: reporting by site

ALL Circuits follows the percentage of suppliers for whom conflict minerals information is available. As of April 15, 2026, 57% of suppliers with complete information and 43% remain waiting for data. The target set for the end of 2026 is to reach a rate of 60% of suppliers for whom ALL Circuits has complete information on conflict minerals.



The reporting indicator on CMRT is applied uniformly to the four ALL Circuits sites. The data collection, reporting and verification processes are identical and harmonized across the group, ensuring full consistency of compliance practices at each site.

Assurance on reporting practices

ALL Circuits warrants that:

- Due diligence procedures are **formalized, documented, and applied across all 4 MSL Circuits, BMS Circuits, TIS Circuits, and GDL Circuits sites.**
- Data collection and verification practices are **centrally supervised.**

These commitments ensure reliable, consistent reporting that complies with international standards for conflict minerals.