Durabook 2025 Conflict Minerals Disclosure

Durabook Americas Inc. | Reporting year: 2025 | Published: November 2026

This annual disclosure covers tin, tantalum, tungsten and gold (3TG) and cobalt in Durabook products. Durabook Americas Inc. commissions Twinhead International Corp. ("Twinhead"), which designs and manufactures Durabook products, to carry out conflict minerals due diligence every year. The due diligence follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") and its five-step framework (Annex I). The table below shows where each requirement is addressed.

Requirement	Section
Company sourcing policy for 3TG	1
OECD Step 1: Establish strong company management systems	1, 2
Reasonable country of origin inquiry (RCOI) and smelter/refiner lists	3
OECD Step 2: Identify and assess risk in the supply chain	3, 4
Due diligence on the source and chain of custody of 3TG	4, 5
OECD Step 3: Design and implement a strategy to respond to identified risks	4
OECD Step 4: Independent third-party audit of smelter/refiner due diligence	5
OECD Step 5: Report annually on supply chain due diligence	6

1. Conflict Minerals Policy

Durabook Americas and Twinhead respect human rights and do not want the minerals in our products to give direct or indirect support to armed groups. We investigate our supply chain to make sure that tin, tantalum, tungsten, gold, cobalt and palladium are not sourced from mines controlled by armed groups in the Democratic Republic of the Congo or its adjoining countries. Our policy commitments are:

- We do not procure conflict metals from conflict-affected regions.
- We require suppliers to refuse conflict metals from conflict-affected regions and to sign a declaration confirming this.
- We require suppliers to pass this requirement on to their own upstream suppliers.

The policy is communicated to suppliers through the annual survey and the supplier declaration, and to the public on this page and in Twinhead's annual Sustainability Report.

2. Management Systems (OECD Step 1)

- Oversight: Twinhead's Sustainability Development Committee is a functional committee approved by the Board of Directors. Its members are two independent directors, the Chairman and the General Manager. Supply chain management is covered by its Sustainable Environment team. The Committee meets at least once a year to review sustainability performance and reports to the Board of Directors every year.
- Responsibilities: The Sustainability Development Office sets the conflict minerals policy and due diligence procedures. Twinhead's Conflict Minerals Management Procedures define internal responsibilities. Procurement runs the supplier survey and follows up with suppliers.
- Controls and transparency: Every year, suppliers report the smelters and refiners in their supply chain using the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT). This identifies the upstream smelters/refiners for our products.
- Supplier engagement: Key suppliers sign a declaration confirming they do not use conflict minerals. We provide training on the conflict minerals policy and due diligence to employees and suppliers.
- Grievance mechanism: Anyone, including suppliers and the public, can raise a concern about the sourcing of minerals in Durabook products at ESG@twinhead.com.tw.

3. Reasonable Country of Origin Inquiry (RCOI) and Smelter/Refiner Lists (OECD Step 2)

- Every year we ask our key direct suppliers to complete the RMI CMRT (3TG) and EMRT (cobalt).
- We review each response for completeness and consistency, and follow up with suppliers whose responses are missing or incomplete to improve the response rate and the accuracy of the smelter information.
- We match each reported smelter/refiner to its RMI Smelter Identification number, its country, and its status under independent audit programmes (see Section 5).

Results for reporting year 2025:

- Durabook supply chain: 418 smelters/refiners (388 for 3TG and 30 for cobalt). List: https://media.durabook.com/wp-content/uploads/2026/11/11173304/Supply_Chain_Smelter_Refiner_List2025.pdf
- Durabook U11 rugged tablet (EPEAT-registered): 219 smelters/refiners for 3TG. List: https://media.durabook.com/wp-content/uploads/2026/11/16103752/Supply_Chain_Smelter_Refiner_List_U11_2026.pdf

4. Risk Assessment and Response (OECD Steps 2 and 3)

We treat a smelter/refiner as a risk when it is not conformant with an independent audit programme, or when a supplier reports that 3TG in its supply chain may originate from the Democratic Republic of the Congo, its adjoining countries or other conflict-affected and high-risk areas. For the U11 product, some suppliers reported that their supply chains may include 3TG from such areas. For these sources we check whether the smelters/refiners concerned are conformant with an independent audit programme, whose audits cover the source and chain of custody of the minerals they process.

Our risk response:

- Findings are reported to the Sustainability Development Committee as part of the annual review of sustainability performance.
- Where a risk is found, Procurement follows up with the supplier, reviews its documents and tracks improvement, for example confirming smelter information.
- If a supplier does not cooperate, we take the necessary corrective actions, including re-examining the supplier and evaluating alternative suppliers.

In 2025, we followed up with suppliers that had not responded or had reported incomplete smelter information.

5. Independent Third-Party Audits of Smelters/Refiners (OECD Step 4)

As a downstream company, we do not buy directly from smelters or refiners. In line with the OECD Guidance for downstream companies, we rely on independent third-party audits of smelter/refiner due diligence under the RMI Responsible Minerals Assurance Process (RMAP), the LBMA Responsible Gold Guidance and the Responsible Jewellery Council (RJC). We check every reported smelter/refiner against the RMI conformant smelter list.

Result for the Durabook U11 (RMI conformant list of October 13, 2026): 192 of 219 3TG smelters/refiners (87.7%) are conformant.

Metal	Conformant	Total
Gold	87	90
Tin	47	66
Tantalum	32	32
Tungsten	26	31
Total	192	219

6. Annual Reporting (OECD Step 5)

We publish this disclosure and the smelter/refiner lists every year at https://www.durabook.com/us/durabook-conflict-minerals-management-process/ and summarize them in Twinhead's annual Sustainability Report.

Contact: ESG@twinhead.com.tw