

Hitachi Astemo Americas, Inc.

CMRT Instructions for Suppliers

The Conflict Minerals Reporting Template (CMRT) is the Hitachi Astemo Americas, Inc. (ASTEMO)-AM approved tool for suppliers to document their Conflict Minerals (CM) declaration. The CMRT can be found on the Responsible Minerals Initiative (RMI) website:

<https://www.responsiblemineralsinitiative.org>

We will accept the latest approved CMRT version as stated within the Responsible Minerals Initiative (RMI) website.

To accurately complete a CMRT (including Smelter List Tab if applicable), suppliers should already understand / know the Conflict Minerals information from their supply chain.

If further details are needed on the U.S. SEC Dodd-Frank Act, information & webinars are available at <https://www.responsiblemineralsinitiative.org>

The instructions below should be used in conjunction with the instructions located within the CMRT. These instructions are intended to clarify the requirements for a complete CMRT. Use of the “Comments” field(s) located within the CMRT allows the supplier to provide clear explanations which reduce follow up questions from us and other customers that request CMRT data.

Note: If CMRT Submission Scope is at Company Wide level, then only one CMRT listing a manufacturing DUN’s Number is required. This submission will be applied to all in scope manufacturing DUNS locations under that associated (linked) Ultimate DUNS by (ASTEMO)-AM Conflict Minerals Team.

Product and User Defined Scope CMRT submissions will require a separate CMRT for each relevant Manufacturing DUN’s location.

I. Company Information:

Company Name: Enter the legal name of your company at the **Manufacturing DUNS** level. We are requesting a separate response for each **Manufacturing DUNS** number within your company that is shipping products to (ASTEMO)-AM that contain 3TG.

Declaration Scope or Class: Select Company, User defined, or Product (preferred) from the drop down list.

Description of Scope: Type “Manufacturing Site” in this field if User Defined or Product Scope is selected.

Company Unique ID: Enter your Manufacturing Site DUNS number in this field.

Address: Type in your manufacturing site address in this field.

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Authorizer: Enter **all contact information** for the person in your company who is authorized to answer Responsible Minerals Initiative related questions on your company's behalf. Include email address and phone number. **The authorizer will be your company's single point of contact. All communications from our team will be directed to your single point of contact (authorizer).**

Effective Date: Enter the submission date of your current CMRT. Each submission requires a new date, which aids traceability.

II. Questions 1 through 7:

Question 1: "Is any 3TG intentionally added or used in the product(s) or in the production process?"

It is expected you will answer "Yes" for each metal (tin, tantalum, tungsten, or gold) that was intentionally added or used in your product(s) or during the production process of products supplied to (ASTEMO)-AM. For each metal you respond "**Yes**" to, you will be required to answer question 2.

A "No" response should be given for those metals that aren't intentionally added or used in the product(s) or in the production process. Please note that you will be required to enter a comment in the comments field explaining your "No" responses .

Question 2: "Does any 3TG remain in the product(s)?"

It is expected you will answer "Yes" to this question if your product contains **any** amount of 3TG (Tin, Tungsten, Tantalum, or Gold) at the end of the production process.

Please note that if you answer "No" for any of these metals, then you must enter a specific reason in the comments field as to why you feel this metal no longer remains in the product. We will be validating your response to this question against our IMDS (International Material Data System) information, as well as 3TG part information we receive from our manufacturing facilities. For each metal you respond "**Yes**" to, you will be required to answer questions 3 through 7, and provide a complete smelter list for those metals within the smelter list tab.

Question 3: "Do any of the smelters in your supply chain source the 3TG from the covered countries?"

Please be advised that all responses for question 3 will require an explanation in the comments field.

If you have a "**No**" response for any metal, our expectation is that same metal will be Yes for question 5 (100% recycled) **or** that metal will have a complete smelter list on the smelter list tab which will support your "No" response for smelters sourcing from the covered countries. A complete smelter list should include: "Metal, Smelter Reference List, Smelter Country, Smelter Identification, **and most importantly** "Location (Country) of mine" for where the metal is coming from (column O)" for all smelter records.

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There must not be any covered countries listed in column “O” for this scenario. Additional support for a “No” response to question 3 requires a response to questions 5, 6, and 7.

An “**Unknown**” response should be utilized when your smelter’s source location of their metals cannot be determined, such as: (1) 100% recycled, (2) incomplete smelter list, (3) or entire smelter list is composed of unknown smelters. An incomplete smelter list would be defined as a smelter list that did not have all of column “O” filled out with valid Location of mine information. If your company utilizes this response, our expectation is that you will continue to work with your supply chain to determine smelter’s source of all metals of unknown origin. Additional support for an “Unknown” response to question 3 requires a response to questions 4, 5, 6, and 7.

A “**Yes**” response should be utilized when your smelter’s source of 3TG has been determined to originate from the covered countries. We will require a complete smelter list on the smelter list tab for all metals identified with a yes or no response in question 3. A complete smelter list should include: “Metal, Smelter Reference List, Smelter Country, Smelter Identification, **and most importantly** “Location (Country) of mine” for where the metal is coming from (column O)” for all smelter records. In addition, if you responded “yes” for any metal in question 3, we will be looking in your smelter list tab (comments field) for the smelters that contributed to your “yes” response.

Question 4: Do any of the smelters in your supply chain source the 3TG from conflict-affected and high-risk areas? (*)

Please be advised that all responses for question 4 will require an explanation in the comments field.

If you have a “**No**” response for any metal, our expectation is that same metal will be yes for question 5 (100% recycled) **or** that metal will have a complete smelter list on the smelter list tab which will support your “No” response for smelters sourcing from the covered countries. A complete smelter list should include: “Metal, Smelter Reference List, Smelter Country, Smelter Identification, **and most importantly** “ Location (Country) of mine” for where the metal is coming from (column O)” for all smelter records.

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A “**Yes**” response should be utilized when your smelter’s source of 3TG has been determined to originate from the covered countries. We will require a complete smelter list on the smelter list tab for all metals identified with a yes or no response in question 4. A complete smelter list should include: “Metal, Smelter Reference List, Smelter Country, Smelter Identification, **and most importantly** “Location (Country) of mine” for where the metal is coming from (column O)” for all smelter records. In addition, if you responded “yes” for any metal in question 4, we will be looking in your smelter list tab (comments field) for the smelters that contributed to your “yes” response.

Question 5: “Does 100 percent of the 3TG (necessary to the functionality or production of your products) originate from recycled or scrap sources?”

For “Yes” responses, you should provide evidence that these metals come from recycled or scrap sources. Please input your supporting evidence in the comments field for all metals with a yes response to question 4.

A “No” response should be used if you know your metal does not come from 100% recycle or scrap sources.

An “Unknown” response should be used if you do not know if your metal comes from 100% scrap or recycled sources.

Question 6: “What percentage of relevant suppliers have provided a response to your supply chain survey?”

If you respond with less than a 90% response rate, please input in the comments field when you plan to exceed the 90% threshold on response rates. Our expectation is that all suppliers should have received this data from all of their 3TG suppliers (100%), or be very close (greater than 90%).

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Question 7: “Have you identified all of the smelters supplying the 3TG to your supply chain?”

Answer Options:

Yes: Select if you have identified all of the smelters supplying 3TG in your supply chain

Examples:

You have 100% response rate to smelter survey, per question 5

You have received almost all of the responses, and based on commodity representation of your supply chain, you are confident that all known smelters have been identified

No: Select if you have NOT identified all of the smelters supplying 3TG in your supply chain

Example: You are waiting for additional supplier responses and you believe they may contain new smelters

Caution: Some companies may require substantiation if you answer less than 100% to Question 5, and then “Yes” to this question, which should be entered into the Comments Field.

If you answer “Yes,” you must also have a complete smelter list in the smelter list tab. As previously mentioned, a complete smelter list should include: “Metal, Smelter Reference List, Smelter Identification, **and most importantly** “Location (Country) of mine” of where the metal is coming from (column O)”.

If you answer “No”, we ask that you provide comments in the comments field as to when your completed 3TG smelter information will be available. (ASTEMO)-AM expectation is that you would have identified all smelters supplying 3TG within your supply chain and provided this information within your CMRT submission to (ASTEMO)-AM.

Question 8: “Has all applicable smelter information received by your company been reported in this declaration?”

If your answer is “No”, please provide a brief explanation why you did not include all smelter information reported by your supply chain.

III. Questions A through I:

Responses to questions A through I are required for all CMRT submissions. If there are any unique situations that require additional explanations, please use the comments field. The more detail you provide in your CMRT will reduce the amount of follow up questions from (ASTEMO)-AM.

Instructions for certain questions:

Question B: If “Yes”, list the direct web link to your policy in the comments field.

Questions C to F: If “Yes”, briefly state your company’s methodology.

Question G & H: If “Yes”, state your methodology and verification tools.

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IV. SMEALTER LIST TAB:

- For all metals answered YES to in question 2, a complete Smelter list is required for each metal.
 - (ASTEMO)-AM defines complete Smelter List as having 100% of applicable smelters, and responses for all (ASTEMO)-AM required fields (Metal, Smelter Reference List, Smelter Country, Smelter Identification, and most importantly “Location (Country) of mine” for where the metal is coming from (column O)” for all smelter records. **Non country responses (i.e. unknown, N/A, TBD, etc.) for column “O” are considered incomplete responses that will require follow up.**
- If you answered “Yes” to any metal in question 3, you must identify all corresponding smelter(s) in your smelter list tab that contributed to your yes response for this question. In the comments field for each of these smelters, simply input information that links this smelter to your question
 - 3 “Yes” response. In addition, the country of mine information in column “O” should have a covered country documented to support your Yes response.
- **COMPLIANT SMELTERS:** Based on the importance we place in sourcing responsibly; our plan is to utilize compliant smelters/refiners only. Feedback to suppliers that do not use compliant smelters is our way of helping our suppliers identify the smelters that should be encouraged to join the Conflict-Free Smelter Program.

V. General:

- The Conflict-Free Sourcing Initiative CMRT form may be revised at any time and is not controlled by (ASTEMO)-AM. Routinely check the RMI website for the latest version.
- All responses are to be in English.
- Send your completed CMRT’s to your (ASTEMO)-AM Conflict Mineral designee, using the original Microsoft Excel format. (i.e. do not change to Adobe Reader / .PDF format).
- Submit a revised CMRT when there are significant changes to your declaration due to new parts, engineering changes, etc.
- Contact Hitachi Astemo Americas, Inc. with questions prior to your submission: am-purchasing.support@hitachiastemo.com