



# Responsible Minerals Sourcing Report

Fiscal Year 2025

Computers, Displays, Laptops, and Servers

Issue Date: 08/15/26

Revision No. 9

This Report is available online at <https://acecomputers.com/company/sustainability/>

**Revision History:**

| <b>Revision No.</b> | <b>Revision Date</b> | <b>Description</b>                                                           | <b>Sections Effected</b>                  | <b>Revised By</b> | <b>Approved By</b> |
|---------------------|----------------------|------------------------------------------------------------------------------|-------------------------------------------|-------------------|--------------------|
| 1                   | 6/22/2020            | Report initially created                                                     | All                                       | DD                | JS                 |
| 2                   | 7/14/2020            | Added additional responses                                                   | EMS/CI                                    | DD                | JS                 |
| 3                   | 7/20/2021            | Annual Review, updated 2020 Suppliers information, updated report formatting | All                                       | LH                | AR                 |
| 4                   | 8/10/2021            | Added additional responses and information for server supplier Tyan          | Supplier List & Summary                   | LH                | AR                 |
| 5                   | 8/15/2022            | Annual Review, updated 2021 Suppliers information                            | Supplier List, Summary, Follow-up Actions | LH                | AR                 |
| 6                   | 8/08/2023            | Annual Review, updated 2022 Suppliers information                            | Supplier List, Summary, Follow-up Actions | LH                | AR                 |
| 7                   | 7/31/2024            | Annual Review, updated 2023 Suppliers information                            | Supplier List, Summary, Follow-up Actions | MM/ND             | AR                 |
| 8                   | 8/5/25               | Annual Review, updated 2024 Suppliers information                            | Supplier List, Summary, Follow-up Actions | TW                | ND                 |
| 9                   | 8/15/26              | Annual Review, updated 2025 Suppliers information                            | Supplier List, Summary, Follow-up Actions | DB                | ND                 |

# Responsible Minerals Sourcing Report

FISCAL YEAR 2025

## INTRODUCTION

3TG Minerals (Tin, Tungsten, Tantalum, and Gold, aka “3TG minerals”) are commonly found in electronic products and have been determined to be necessary for product functionality and production. Unfortunately, the mining, trade, and sale of 3TG minerals have been used directly and indirectly to finance armed conflict and violence in the Democratic Republic of Congo and several adjoining countries (the “DRC Region”). While Ace Computers does not purchase 3TG minerals directly from mines, smelters, or refiners, 3TG minerals can be found and are used in components that Ace Computers purchases for utilization in critical technology solutions. Therefore, Ace Computers is committed to ensuring that 3TG minerals contained in our products are sourced with due respect for Human Rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices. At the same time, Ace Computers does not ban the use of 3TG Minerals that originate in conflict-affected and high-risk areas when they are sourced in accordance with existing international standards. Avoiding the sourcing of all 3TG minerals from these areas would cause a de facto embargo with serious adverse impact on the living conditions of local populations. In order to meet our program goals, Ace Computers collaborates with suppliers, industry peers, and stakeholders. Ace Computers has implemented processes to perform our own RCOI (Reasonable Country of Origin) search and due diligence practices to evaluate smelters/refiners used within our supply chain.

Ace Computers Conflict Mineral Policy can be found online at:

<https://acecomputers.com/company/sustainability/>

## Conflict Mineral Review Procedure

Annually, Ace Computers will work with suppliers and stakeholders to obtain an exhaustive list of all smelters/refiners that are used in our supply chain. The list of smelters/refiners is compared against the list of independently verified smelters/refiners found to be responsibly sourcing 3TG minerals (i.e., Conflict Free Smelter Program). As necessary, Ace Computers will follow up with our suppliers in the event it has become apparent the use of a nonconformant smelter/refiner is being utilized.

The following procedure outlines the steps that will be taken by Ace Computers to evaluate our suppliers and the use of 3TG minerals within Ace Computers’ Supply Chain;

1. Prepare list of applicable suppliers utilized for previous calendar year. This is done through the utilization of Ace Computers' ERP system.
2. Perform online searches of the United States Security and Exchange Commission (SEC) Form SD system for submittal of the Annual Form SD reporting.
  - a. *Note: Publicly traded companies are required to report to the SEC by the end of May of each calendar year.*
3. If a company is not required to report to the SEC or they have not yet done so, an online search of the supplier's public website for information as it relates to Conflict Minerals, for the most recent calendar year will be conducted.
4. If the company does not have any publicly available information Ace Computers' will send an email to our supplier contact(s) requesting the information be shared.
5. The goal of search/inquiries as noted in # 2, 3, and 4 is to compile an exhaustive list of all smelters/refiners utilized by Ace Computers suppliers.
6. Ace Computers has chosen to use the most recent version of the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) to document and review our smelters/refiners.
7. Once the most exhaustive list possible has been compiled, Ace Computers will then review the list of smelters/refiners against the RMI RMAP conformant smelters and refiners list.
8. If a smelter/refiner on the list is found to be nonconformant or does not currently participate in any third-party verification program, and they are located in a covered conflict region, Ace Computers will take action, working with the supplier to determine an appropriate corrective action.
  - a. *Note: All companies have their own unique set of process and challenges and as such the type of corrective actions may vary on a case-by-case basis, the details of the inquiries and proposed corrective actions will be noted in ACE081 Ace Computers Annual Responsible Sourcing Report.*
9. The results of Ace Computers RCOI and due diligence process will be summarized in ACE081 Ace Computers Annual Responsible Sourcing Report and will be publicly available via Ace Computers website.

## **Smelter/Refiner Participation in OECD-Aligned Third Party Mechanism Procedure**

The following procedure outlines the steps that will be taken by Ace Computers annually to evaluate which Ace Computers smelters/refiners participate in an OECD-aligned third-party mechanism:

1. Ace Computers must complete the Conflict Mineral Review Procedure (outlined above) as the first step of Smelter/Refiner Participation in OECD-Aligned Third-Party Mechanism Procedure. This is performed annually.
2. Ace Computers will utilize the CMRT list of Smelters/Refiners, compiled during the Conflict Mineral Review Procedure, to identify all Smelters/Refiners that participate in the RMI (Responsible Minerals Initiative) conformant smelters/refiners program.
  - a. *Note: The RMI (Responsible Minerals Initiative) list of conformant smelters/refiners is an OECD-aligned mechanism.*
3. All Smelters/Refiners that are identified on the CMRT for Computers, Desktops, and Laptops are then compiled into the Calculation Spreadsheet with the CID smelter identification number.
4. Each Smelter/Refiner CID number identified in step 3, is then verified through the RMI website Conformant Smelters List (<https://www.responsiblemineralsinitiative.org/facilities-lists/export->

[all-conformant/](#) ). If the Smelters/Refiners are listed as a conformant Smelter/Refiner on the RMI website, then this is noted in the 4.10.2.3/7.3.3 Calculation Spreadsheet under columns B, C & D.

- a. Note: Any Smelter/Refiner listed as Conformant also includes the Audit Cycle, Last Audit Date and link to each Smelter/Refiners company website for their Conflict Mineral Policy under the same link. (<https://www.responsiblemineralsinitiative.org/facilities-lists/export-all-conformant/>). A table of this information is provided in columns H-Q of the Calculation Spreadsheet.
5. Once the information is compiled and verified for each Smelter/Refiner, then Ace Computers calculates the percentage of Smelter/Refiner that participate in an OECD-aligned third-party mechanism. This is calculated in the Calculation Spreadsheet as the following:
  - a.  $\% \text{ of RMI Smelter/Refiners Conformant Participation} = (\text{Total amount of Smelter/Refiners Conformant to RMI}) / (\text{Total amount of Smelters/Refiners}) * 100$
6. The accuracy of submitted information and identification and assessment of risk are determined by steps 7-8 of the Conflict Minerals Review Procedure outlined above. Any actions taken as a result of Ace Computers review process including findings/conclusions are outlined in the Responsible Mineral Sourcing Report below, as noted in step 9 of the Conflict Minerals Review Procedure above.
7. Ace Computers relies on the RMI program to determine if smelters and refiners reported by our suppliers are conformant with audit standards. RMI's assurance standards are outlined on the Responsible Minerals Initiatives website and outline the steps taken to align with OECD standards (<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/standards/> ).

## Supplier List

Ace Computers supplier list is updated annually and includes suppliers utilized for computers, desktops, laptops, and servers that conform to the EPEAT Standard. All suppliers listed below have been reviewed through Ace Computers Conflict Materials Review Procedure for the most recently completed calendar year (2025).

| Suppliers used for Computers, Desktops, Laptops, and Servers |                         |
|--------------------------------------------------------------|-------------------------|
| AMD                                                          | Samsung                 |
| AsRock                                                       | Seagate                 |
| ASUS                                                         | Seasonic                |
| Cooler Master                                                | Silverstone             |
| Corsair                                                      | Six United              |
| Crucial/Micron                                               | Sohoo                   |
| Intel                                                        | Solleron                |
| Kingston                                                     | Team Group              |
| NVIDIA                                                       | Tyan/Mitac              |
| PNY                                                          | Western Digital/Sandisk |
| Sager                                                        |                         |

## Summary

Ace Computers has completed the Conflict Mineral Review Procedure, outlined above, for all 2025 suppliers and has compiled Ace Computers Conflict Minerals Reporting Template (CMRT) outlining all Smelters/Refiners utilized during 2025.

The results of Ace Computers review, are as follows:

- 237/306 (77.45%) Smelters/Refiners have been identified on the Responsible Minerals Initiative (RMI) website.
- 69/306 (22.55%) Smelters/Refiners are not currently listed on the RMI website.
  - Of the 22.55% of Smelters/Refiners not listed on the RMI website, 0% of these Smelters/Refiners are considered High-Risk.

*\*Note- High-Risk Smelters/Refiners include Smelters/Refiners found to be nonconformant or do not currently participate in any third-party verification program and are located in a covered conflict region.*

For all suppliers that are not required to file an annual Form SD Report with the SEC, Ace Computers has sent a request to obtain their most recent calendar year list of Smelters/Refiners. This is outlined in step four of the Conflict Minerals Review Procedure above. To help guide our suppliers on completing a full list of their smelters/refiners, Ace Computers also provides these suppliers with the most recent RMI CMRT reporting template. For reporting accuracy, we have also made requests for individual smelter CID numbers from our suppliers. This allows us to more accurately assess compliance of smelters/refiners in our supply chain to the best of our ability. The suppliers that were sent requests and summaries of their responses are outlined below.

**Supplier A** responded promptly and provided complete and up-to-date CMRT and EMRT documents.

**Supplier B** makes their CMRT and EMRT reports available publicly on their website, which is easily searchable.

**Supplier C** has their conflict minerals reporting information available publicly online. However, this is a bit more difficult to find through a simple web search. Confirmation was requested and happily provided.

**Supplier D** responded to our second request with their CMRT however it did not have any smelters listed. We asked for clarity and reminded them that it includes additional parts. They understood the discrepancy and provided one smelter that they source from exclusively and a link to the declaration that their products “are DRC conflict free.”

**Supplier E** responded to our request but asked for clarity since their reporting was done by a third party that wasn’t continuing this year. Additional information including translated instructions and CMRT documents were provided to them. An updated current CMRT was then provided.

**Supplier F** responded promptly but needed time to compile evidence, likely due to separation from business restructuring in 2025. A link to their reporting was found on the SEC website. This information was not as thorough as needed for our complete evaluation, so additional information was requested. A complete CMRT was provided.

**Supplier G** conflict minerals reporting is available on SEC website. A follow-up was requested due to inconsistencies with SEC documents and current RMI lists. Once the correct person was available, detailed CMRT and EMRT were provided.

**Supplier H** promptly responded to our request. The original recipient quickly involved the responsible person, and they provided information from FY2025 using the older CMRT template. This is satisfactory since their reporting was complete and the newest templates were released in April of 2026. They also made assurances that their tracking is expected to expand into the minerals listed in the EMRT for next year's reporting.

**Supplier I** makes their report available publicly on their website.

**Supplier J** promptly returned their CMRT with a complete list of smelters/refiners.

**Supplier K** initially was difficult to contact and had no public information. However, once a reliable contact was located, a detailed CMRT was provided.

**Supplier L**'s conflict minerals reporting is available on SEC website and links to CMRT and EMRT documents are provided through standardized email requests.

**Supplier M** responded with a timeline for providing the completed CMRT. They extended the timeline multiple times but provided a thorough CMRT report.

**Supplier N** responded immediately with the document they had and then provided the updated CMRT without asking.

**Supplier O** responded to our second request with their CMRT. Upon investigation, it was noted that the document declared zero 3TG use and zero smelters/refiners were reported. When they expressed uncertainty about the conflict minerals request, we gave a detailed description of the process including translations. We asked for clarity and reminded them that it includes additional parts. An updated CMRT was provided.

**Supplier P** provided the requested CMRT with only a small delay, likely due to the need to request from their own supplier. All documentation appears thorough and complete.

**Supplier Q** responded promptly and provided a personalized resource for Ace Computers to access documents for conflict minerals and other information. They included detailed reporting.

**Supplier R** has an easily accessible documentation and resource center for its direct customers, which provides the results of their CMRT including CID numbers. This is not public but is easily accessible with our business relationship. Publicly, they do have information on the SEC website as well.

**Supplier S** provided their CMRT and EMRT within 3 weeks of our request.

**Supplier T** has filed a declaration with the SEC, however this does not have individual smelters/refiners listed but instead includes a disclaimer. They use a third party to assess risk of their supply chain and offer support to their suppliers in completing CMRT reporting.

**Supplier U** returned CMRT and EMRT almost immediately.

Ace Computers has concluded that the following suppliers do not source from high-risk Smelters/Refiners based on evidence provided by each supplier:

|                |                         |
|----------------|-------------------------|
| AMD            | Samsung                 |
| AsRock         | Seagate                 |
| ASUS           | Seasonic                |
| Cooler Master  | Silverstone             |
| Corsair        | Six United              |
| Crucial/Micron | Sohoo                   |
| Intel          | Solleron                |
| Kingston       | Team Group              |
| NVIDIA         | Tyan/Mitac              |
| PNY            | Western Digital/Sandisk |
| Sager          |                         |

After a full investigation of Ace Computers suppliers using Ace Computers “Conflict Minerals Review Procedure” outlined above, Ace has compiled an exhaustive list of all smelters/refiners utilized by Ace Computers. Ace has determined that, to the best of our knowledge, Ace Computers supply chain does not source from any Smelters/Refiners that are considered High-Risk for Conflict Minerals.

Additionally, through further review of the computers, desktop, and laptop smelters/refiners utilizing the “Smelter/Refiner Participation in OECD-Aligned Third-Party Mechanism Procedure”, Ace Computers has concluded that **77.45%** of smelters/refiners are currently conformant through the RMI Conformant Smelter/Refiners List program.

## Follow-up Actions

One supplier had difficulty in previous reporting periods, but has improved greatly by sourcing information from 2nd-tier suppliers and provided reporting information to Ace Computers.

Another supplier’s reporting remains publicly available and easy to access. Once made aware, Ace Computers has been able to reliably access this information.

No additional EPEAT products, parts, or supplies were purchased from one supplier in FY2025, thus limiting our current relationship with this supplier. They failed to provide any documentation.

A supplier is becoming more familiar with conflict minerals reporting. Ace Computers continues to promote open communication. As a provider of primarily steel and plastic, the reporting was considered small but accurate.

A supplier was relatively quick in their submittal to Ace Computers of a CMRT. Upon further investigation, the quality of their report came into question. “No” was declared for all 3TG use and zero smelters were listed on the CMRT. Ace Computers promptly followed up with due diligence questioning if the figures received were correct. They responded stating that their product type rarely involves 3TG minerals using primarily steel and plastics. Therefore, the reporting was considered small but accurate.

Through various correspondence it was discovered that a single second-tier supplier had provided inaccurate data to our supplier. Ace Computers was able to isolate the errors and provide references that our supplier could use to update information from their supplier. However, no additional EPEAT products, parts, or supplies were purchased from this supplier in FY2025, thus limiting our current relationship with this supplier. This supplier scaled back the business with Ace Computers by limiting access to information and creating barriers to access important reporting documentation. For this reason, Ace Computers is no longer able to use their products for our own EPEAT registered products. However, they now make their conflict minerals reporting available publicly on the SEC website and their own website.