TE Connectivity Conflict Minerals Update – E.U. Conflict Minerals Regulation

January 1, 2021

Dear Valued Customer,

At TE, we are committed to creating responsible products that enable a sustainable future.

Part of fulfilling our commitment is responding to developments like the E.U. Conflict Minerals Regulation (EU 2017/821), which came into effect on January 1, 2021. This Customer Letter is intended to help answer any questions you may have about TE’s efforts relating to the E.U. Conflict Minerals Regulation.

First, please note that compliance with Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act continues to be the key focus for TE’s conflict minerals program. TE’s supplier response rate for our conflict minerals campaign in 2019 was 65%. Increasing our supplier response rate is our top near-term priority, even as we continue to monitor developments in the fast-evolving conflict minerals landscape.

One goal of the E.U. Conflict Minerals Regulation is to address the sourcing of minerals from Conflict Affected and High-Risk Areas (CAHRAs) where the profits from mining may fund armed conflicts. Under the E.U. Regulation, E.U. importers within certain thresholds of varying forms (ores, concentrates and metals) of tin, tantalum, tungsten and gold will have to carry out due diligence on their supply chain to help determine if their products are sourced from a CAHRA. Prior to the E.U. Regulation coming into effect, TE conducted a threshold E.U. Conflict Minerals scoping exercise and determined that TE’s activities do not fall within thresholds set forth in the E.U. Conflict Minerals Regulation.

Although TE is not required under the E.U. Conflict Minerals Regulation to provide any formal Conflict Minerals disclosure, TE helps supports E.U. Conflict Minerals due diligence through its use of the most recent Responsible Minerals Initiative’s (RMI) Conflict Minerals Reporting Template (CMRT), which TE is using in its current 2020 conflict minerals survey. We also plan to use the most recent CMRT version available to conduct our 2021 conflict minerals survey. With the release of the CMRT 6.01, the CMRT seeks information on CAHRAs. Thus, by using the CMRT to seek information from our suppliers on possible CAHRAs in their products and then passing that information on to our customers, we support E.U.-style conflict minerals due diligence. In doing so, it is important for all stakeholders in global supply chains to recognize that the E.U.’s CAHRAs List is not intended as a black list and that the E.U. Regulation is not intended to prohibit sourcing from areas on the list (though some sourcing may be prohibited by sanction regimes). It is TE’s objective to use the E.U.’s CAHRAs List as part of our due diligence efforts to help us source from responsible, compliant sources of supply from across the globe to support the many markets we serve.
Given the size and complexity of our supply chain, TE is proud of our diligence achievements, such as our efforts to comply with the U.S. Dodd Frank legislative requirements and our pilot cobalt due diligence program. TE is an active member of the RMI, and we continue to monitor positive initiatives to broaden the scope, objectives and minerals that are the subject of its focus.