

Conflict Minerals Policy




There has been increased awareness of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. The Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) have requested that companies undertake reasonable due diligence with their supply chain to assure that specified metals are not being sourced from mines in the Conflict Region, which is controlled by non-government military groups, or unlawful military factions.

HRA supports the actions of the EICC and GeSI and has either obtained, or is in the process of obtaining, information from our current metal suppliers concerning the origin of the metals that are used in the manufacture of HRA products. Based upon information provided by our suppliers, HRA does not knowingly use metals derived from the Conflict Region in our products. Suppliers of metal used in the manufacture of HRA products (specifically gold, tin, tantalum, and tungsten) must demonstrate that they understand and support EICC-GeSI actions and will not knowingly procure specified metals that originate from the Conflict Region.

Suppliers must provide written evidence of due diligence documenting that raw materials used to produce gold, tin, tantalum and tungsten, supplied to or used in the manufacture of HRA products, do not originate from mining or smelting operations in the Conflict Region. Due diligence from each supplier must include where applicable, completion of the EICC-GeSI Conflict Minerals reporting template.

Signed: Katherine Grekul
Quality Manager

Signature: 
Date: February 4, 2026