

On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the Dodd-Frank Act) was approved by the U.S. Securities and Exchange Commission (“SEC”). This rule which requires certain public companies to provide disclosures about the use of specified conflict minerals emanating from the Democratic Republic of the Congo (DRC) and nine adjoining countries (Covered Countries) is intended to make transparent the financial interests that support armed groups in the covered countries area. By requiring companies using conflict minerals in their products to disclose the source of such minerals, the law is aimed at dissuading companies from continuing to engage in trade that supports regional conflicts. The conflict minerals are tin, tungsten, tantalum and gold (called the 3TG’s).

We support and are committed to the respect of human rights and ethical and lawful conduct in their mineral sourcing practices. We also intend to cultivate transparent mineral supply chains and sustainable corporate engagement in the mineral sector with a view to enabling suppliers to benefit from their mineral resources and prevent the extraction and trade of minerals from becoming a source of conflict, human rights abuses, and insecurity. We believe in treating people with respect and dignity, and we incorporate these principles into our business processes and relationships. We also expect our suppliers to adhere to the same high standards.

Our goal is to purchase only product materials that can be certified as DRC “conflict-free”. The global supply chain for these minerals is complex, and tracing minerals to their source is a challenge. Our due diligence measures are based on the OECD Framework and extensive communications with its suppliers to improve and systematically address the process for sourcing minerals that are “conflict-free.” We have adapted its internal processes, procedures and systems to accommodate the capture, maintenance, retrieval and reporting of conflict minerals supplier and parts status thereby improving transparency and the ability to certify its status in forthcoming years.

We recognize the need for broad collaboration throughout the supply chain to reach our objectives. We are actively engaged in this process. In addition, we expect our suppliers (and their suppliers) to commit to the EICC Code of Conduct which includes a provision related to the responsible sourcing of minerals. Thus, suppliers must have a policy to reasonably assure that the 3TG in the products they manufacture or provide are conflict free. Based upon information learned through our due diligence efforts, we intend to make steady progress toward ensuring responsible mineral sourcing and improved transparency throughout the supply chain.

**DOCUMENT HISTORY:**

16 Aug 2015      Document issued