

Conflict Minerals Policy Statement

Background

In 2012, the Securities and Exchange Commission (the “SEC”) adopted rules (the “*Conflict Minerals Rules*”) implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Conflict Minerals Rules require public companies to make annual disclosures regarding the use in their products of tin, tantalum, tungsten and gold (“*Conflict Minerals*”) from certain “Covered Countries.” For the purposes of the Conflict Minerals Rules, “*Covered Countries*” means the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. The purpose of these rules is to encourage the responsible sourcing of Conflict Minerals, reflecting the concern that the proceeds from the sale of Conflict Minerals from the Covered Countries have, in some cases, been used to finance armed conflict and human rights abuses.

Policy Statement

We support the Dodd-Frank Act’s goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. Our goal is to ensure responsible sourcing of materials for our products, including the sourcing of Conflict Minerals, and we expect that our suppliers are likewise committed to that goal. We also support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy, and we are communicating this policy to our suppliers with the expectation that they will adopt a similar policy and meet our expectations set forth below. We expect each supplier to establish its own due diligence program to ensure conflict-free supply chains with respect to all parts and materials used to manufacture products supplied to us.

We plan to work to identify and reduce, with the goal of ultimately eliminating, the use in our products of Conflict Minerals that directly or indirectly finance armed conflict in the Covered Countries, consistent with guidelines prescribed by the Responsible Minerals Initiative, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, consistent with our position as a downstream company.

We expect our suppliers to be similarly committed to responsible Conflict Minerals sourcing. Specifically, we encourage our suppliers to:

- Work with their own supply chains to ensure that Conflict Minerals used in our products are not being used to finance armed conflict or human rights abuses in the Covered Countries (referred to in this policy as “*Conflict-Free*”);
- Establish their own policies, due diligence frameworks and management systems on Conflict Minerals in order to ensure the Conflict-Free status of those Conflict Minerals; and
- Cooperate with our efforts to ensure the Conflict-Free status of Conflict Minerals used in our products, including by providing to us information annually about their sourcing of Conflict Minerals and their Conflict Minerals policies.