

## **Conflict Minerals Policy Statement**

### **Introduction**

As many of our partners have acknowledged publicly, the Dodd-Frank Act<sup>1</sup> created a new expectation for product manufacturers, which may be far removed from the source of the raw minerals in their products.

Eravant offers thousands of products in its product portfolio that is made possible by a supply chain network comprising hundreds of organizations around the world. Eravant is committed to acting in a socially and environmentally responsible manner, to complying with the law, to meeting its customer commitments, and to supporting its customers' businesses.

Because of the complexity of the supply chain network and the lack of an established system for product manufacturers to track Conflict Minerals back to their source, the joint efforts over an extended period by many governments, industry groups, and companies will be required to make it possible to effectively trace Conflict Minerals back to their source. This document sets forth the policy of Eravant regarding Conflict Minerals.

### **Overview**

As a responsible company, Eravant supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

As a component, subassembly, and test equipment manufacturer of thousands of products, Eravant relies on a global supply chain and is invariably many levels away from the beginning of the supply chain for many of the products it offers to the market.

This Policy shows Eravant's commitment and its expectations for its product suppliers regarding actions to address Conflict Minerals.

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<sup>1</sup> On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law. The Dodd-Frank Act and related 2012 U.S. Securities and Exchange Commission rules require certain companies to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals necessary for the production or the functionality of the products that are sourced from mines in the Democratic Republic of the Congo or adjoining countries. Conflict Minerals are tantalum, tin, tungsten and gold.

## **Commitment to Responsible Sourcing**

Eravant offers thousands of products in its product portfolio that is made possible by a supply chain network comprising hundreds of organizations around the world. Eravant supports the humanitarian goals of the Dodd-Frank Act and encourages our suppliers to adopt that same policy for their businesses.

As a manufacturer of components, subassemblies, and test equipment, Eravant does not directly purchase any raw Conflict Minerals from any source and is many levels removed from the mines, smelters, and refiners that produce the metals used in the products manufactured by Eravant's suppliers.

The supply chain for Conflict Minerals is complex and lacks an established structure for product manufacturers to trace the minerals in the parts and services provided to Eravant back to their source.

Eravant is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of minerals contained in the products they manufacture and sell to Eravant.

## **Supplier Code**

Eravant has the following expectations of its suppliers:

- Suppliers should not include in their parts and services sold to Eravant any Conflict Minerals that are not DRC Conflict Free;
- Suppliers should develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the parts and services sold to Eravant; and
- Eravant's suppliers are expected to source Conflict Minerals only from sources that are DRC Conflict Free.

In doing so, suppliers will be expected to:

- implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same;
- put in place procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable;
- use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free, and require their direct and indirect suppliers to do the same;
- advise Eravant of any determination that the supplier either has concluded or has a reasonable basis to believe that parts and services it currently sells or has sold to Eravant are not DRC Conflict Free; and

- from time to time, at Eravant's request, provide Eravant with information concerning the origin of Conflict Minerals included in products sold to Eravant, which Eravant shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in Conflict Minerals supply chains.

### **Consequences of Supplier Non-Compliance**

- Eravant evaluates its relationships with its suppliers on an ongoing basis.
- Eravant reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.
- Eravant reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold to Eravant.
- Suppliers who do not reasonably comply with this Policy shall be reviewed by Eravant's supply chain organization for future business.
- In the event Eravant determines that a supplier's efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Eravant reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.
- Nothing in this Policy is intended to in any way grant any additional rights or expectations to a Eravant supplier or in any way modify or otherwise limit in any way any of Eravant's contractual or legal rights.

### **Grievance Mechanism and Reporting**

Our employees, suppliers, and other parties can report concerns and alleged violations of this Policy by emailing us at [purchasing@eravant.com](mailto:purchasing@eravant.com). Reports will be kept confidential to the fullest extent practicable and allowed by law. We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith.

### **Conclusion**

Eravant fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain. We encourage all of our suppliers to likewise support these efforts.