

Teldor's Conflict Minerals policy

Teldor's Conflict Minerals policy applies to the selection and retention of all Teldor Cables & Systems direct (or "tier one") suppliers that provide materials containing tin, tantalum, tungsten and/or gold.

Severe human rights abuse and other atrocities, enabled in part by proceeds from the mining or trade of so-called "conflict minerals" or 3TGs (tin, tantalum, tungsten and gold) led to the creation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, built on the framework of the UN Guiding Principles on Business and Human Rights.

Legal requirements have followed, requiring certain companies to disclose their due diligence consistent with the OECD Guidance, mitigating the risk that the 3TGs they purchase may directly or indirectly fund such conflict, human rights abuse and other atrocities in high-risk areas of the world. At the same time, companies are expected to source responsibly from these areas to avoid a de facto embargo, which can have significant adverse impacts or unintended consequences for artisanal miners and their families whose livelihood depends on the mining industry.

By adopting this Policy and collaborating with our customers and suppliers, especially through the Responsible Minerals Initiative (RMI), formerly Conflict-Free Sourcing Initiative (CFSI), Teldor Cables & Systems is working with others to promote responsible business practices and foster peace and prosperity, which is consistent with Teldor Cables & Systems' values.

Teldor Cables & Systems is committed to responsible sourcing of 3TGs using the OECD due diligence framework, so as not to support conflict or human rights abuses in the DRC region or other areas of the world, while avoiding de facto embargoes.

This position is consistent with Teldor Cables & Systems's Human Rights Policy and Teldor Cables & Systems's respect for human rights in our own operations and our supply chains, as well as with the OECD Due Diligence Guidance and UN Guiding Principles.

Teldor Cables & Systems global suppliers are required to:

- Supply materials to Teldor Cables & Systems that are "Conflict-Free," meaning 3TGs that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo, adjoining countries or any other high-risk area of the world as determined by regulatory bodies and as applied by RMI ("high-risk areas").
- We expect our suppliers to be transparent and responsibly source from the DRC, adjoining countries, and high-risk areas, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems consistent with OECD Guidance to identify, prevent, mitigate and, where appropriate, remediate risks associated with 3TGs as well as require their suppliers to adopt similar policies and practices.
- Teldor Cables & Systems expects suppliers to cooperate with Teldor Cables & Systems in
- evaluating compliance with these requirements.
- Provide Teldor Cables & Systems information on the presence of 3TGs in their products and data on the smelters and refiners in their respective supply chains, consistent with the industry standard for Supply Chain Transparency provided in the Conflict Mineral Reporting Template (CMRT) as developed by RMI.
- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation or non-conformance with Teldor Cables & Systems' policy.

Therefore based upon the information provided by our suppliers, Teldor Cables & Systems' components do not knowingly contain minerals derived from the DRC Conflict Region as defined above.



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