

## **iDirect policy on Conflict Minerals\***

iDirect acknowledges the violence and human rights violations that have occurred in the Democratic Republic of the Congo (DRC) and neighboring countries and understands that minerals mined to produce tungsten, tin, tantalum, and gold (3TG) –commonly referred to as “Conflict Minerals” – have been used to support those activities. iDirect supports the Dodd Frank Financial Reform Law which obligates consumers of these substances to disclose their origins with the goal of eliminating illegally mined materials from their products.

Like virtually all electronic products, iDirect’s hardware products necessarily contain all of these materials, and like that of all manufacturers of application-level electronic products, our supply chain is complex and multi-layered, making the provenance of the four substances immensely complicated to monitor and control.

To comport with the Dodd Frank legislation, and act ethically and responsibly as a corporation, iDirect commits to the following steps:

1. In accordance with the standards of the Organization for Economic Co-operation and Development (OECD), iDirect will require due diligence on the part of all suppliers to undertake a Reasonable Country of Origin Inquiry (RCOI) with respect to all 3TG material in the products they supply, and to produce a standard Electronic Industry Citizenship Coalition (EICC) report detailing that information.
2. iDirect expects suppliers to use the information regarding the origin of these materials to reduce and eliminate dependence upon illegally sourced minerals.
3. iDirect will roll up the EICC reports of all our suppliers and make available to our customers an integrated EICC report disclosing the provenance information for each of these materials.
4. iDirect will use the sourcing information from suppliers to reduce and eliminate materials originating or potentially originating from the illegal mines from our supply chain.
5. iDirect may disqualify suppliers who fail to comply with RCOI requirements or who fail to exert due diligence to reduce and eliminate illegally mined 3TG materials from their supply chains.

\*This policy is effective for manufacturing calendar year 2014, and for as long as the legislative situation requires.