



CONFLICT MINERALS POLICY STATEMENT



Copper & Optic Terminations Ltd supports putting an end to violence and human rights violations associated with the mining of certain minerals from the area described as the “Conflict Region,” situated in the eastern part of the Democratic Republic of the Congo (DRC) and surrounding countries.

To address this issue, the U.S. Securities and Exchange Commission (SEC) adopted rules under the **Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010**. These rules require manufacturers filing reports with the SEC to disclose whether the products they manufacture, or contract to manufacture, contain Conflict Minerals that are “necessary to the functionality or production” of those products.

The term “**Conflict Minerals**” refers to **gold, tin, tantalum, and tungsten (3TG)**, regardless of where they are sourced, processed, or sold. The exploitation and trade of these minerals has partially financed armed conflict in the DRC and surrounding countries.

Our Commitment

Copper & Optic Terminations Ltd does not directly purchase raw materials for use in the manufacture of products or components supplied to our customers. However, we are committed to supporting the humanitarian goal of ending violent conflict in the DRC and surrounding countries by:

1. **Supporting legislation** – We support the aims and objectives of U.S. legislation on the responsible sourcing of Conflict Minerals.
2. **Responsible procurement** – We do not knowingly procure products or components containing metals that originate from facilities in the Conflict Region unless they are certified as “Conflict Free.”
3. **Supplier due diligence** – We require our suppliers to conduct reasonable inquiry and due diligence within their supply chains to ensure that specified metals are sourced only from:
 - Mines and smelters outside the Conflict Region, or
 - Mines and smelters within the Conflict Region that have been independently certified as “Conflict Free.”

Implementation

Copper & Optic Terminations Ltd will take all practicable measures to ensure that our suppliers provide evidence that any gold, tin, tantalum, or tungsten used in our products originates either from outside the Conflict Region or from certified Conflict Free sources. Our aim is to ensure that all products and components we procure are “Conflict Free.”

Action in Case of Non-Compliance

If it is discovered that any supplied products or components contain Conflict Minerals sourced from non-certified facilities within the Conflict Region, we will take appropriate action, including re-sourcing materials, to ensure compliance with our Conflict Minerals Policy.



Andrew Wardle

General Manager