

Supply Chain –Conflict Minerals Policy

1.0 PURPOSE

Armed groups engaged in mining operations in the Democratic Republic of the Congo and adjoining countries are believed to be subjecting workers to serious human rights abuses and are using proceeds from the sale of conflict minerals (tantalum, tin, tungsten, and gold, or “3TG”) to finance regional conflicts. In response to these concerns, the US Congress enacted Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act aimed at preventing the use of conflict minerals that finance or benefit these armed groups. The legislation requires US publicly traded companies using conflict minerals in their products to disclose the source of such minerals.

For more information on Conflict Minerals and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, please access the final rule on the SEC website: <http://www.sec.gov/rules/final/2012/34-67716.pdf>

As part of Orchid’s commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is Orchid’s goal to use tantalum, tin, tungsten and gold in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

Orchid expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free. Orchid expects our suppliers to comply with the Electronic Industry Citizenship Coalition (EICC) Code of Conduct and conduct their business in alignment with Orchids’ supply chain responsibility expectations.

2.0 APPLICATION

This policy applies to all Orchid sites that may use the affected materials or are requested to complete a Conflict Minerals declaration. The objective is to specify requirements for compliance to Dodd-Frank in a centralized document for the purpose of ensuring continued compliance to emerging directives and standards.

3.0 DEFINITIONS

- 3.1 Supplier – Company to which a request for a CMRT declaration is made
- 3.2 3TG – Name for Conflict Minerals
- 3.3 CMRT declaration – the standard format in which conflict minerals data is provided in
- 3.4 Orchid Site Matrix file – document which sites will use to compile metals data for their respective site

4.0 REFERENCE DOCUMENTS

- 4.1. Sec Policy 34-67716(Dodd-Frank Act)
- 4.2. Conflict Minerals CMRT4-01 (Declaration)
- 4.3. Orchid Site Matrix file
- 4.4. Metallurgist Response file

5.0 RESPONSIBILITIES

Title	Assignment
Supplier	Provide timely and complete responses to declaration requests by Orchid
Site Level Designee	Will facilitate the collection of metal data for their site, and ensure the Orchid Site Matrix file is completed and submitted in a timely manner
Supply Chain	Will lead all communications to and from the supplier, will respond to all supplier questions, and will collect all supplier declarations. Also will lead all the sites through population of the Orchid Site Matrix file, and will lead the metallurgists through the Orchid Site Matrix file review and confirmation
Metallurgists	Will review the populated Orchid Site Matrix file for thoroughness and accuracy, will revise any incorrect information, then provide finalized Orchid Site Matrix file to Supply Chain

6.0 PROCEDURE

6.1 Completion of the Orchid Site Matrix file

- 6.1.1 Supply Chain will request completion / update of the Orchid Site Matrix file
- 6.1.2 Site Level Designee will work within their site to complete the Site Matrix file, to include the following information:
 - 6.1.2.1 Material Description
 - 6.1.2.2 ASTM Spec (If applicable)

- 6.1.2.3 Conflict Mineral status
- 6.1.2.4 Supplier who provides material
- 6.1.2.5 Contact information of supplier – to include point of contact name, phone number, and email address
- 6.1.3 Sites will submit completed Site Matrix files by a date specified by Supply Chain
- 6.1.4 Supply Chain will compile all files and identify which materials are identified as being at risk for 3TG

6.2 Validation of the Orchid Site Matrix file

- 6.2.1 Supply chain will forward the compiled Matrix File to metallurgists identified within Orchid for review of the data provided by the sites
- 6.2.2 Metallurgists will complete their review, and make any needed updates by the due date set by Supply Chain.
- 6.2.3 The Orchid Site Matrix file will now be finalized

6.3 Supply Chain to contact Suppliers at risk for 3TG

- 6.3.1 With the Site Matrix file finalized, the materials which are at risk for 3TG can be identified, as well as the suppliers who provide them. Supply Chain will develop the list of suppliers to be contacted with a request for a CMRT declaration
- 6.3.2 Supply Chain will contact all applicable suppliers with a request for a CMRT declaration
- 6.3.3 Supply Chain will receive all supplier declarations by a specific due date, will review all declarations, and will work with suppliers to work through data issues with their submissions

6.4 Supply Chain to develop Orchid CMRT declaration

- 6.4.1 With all supplier declarations received and reviewed, Supply Chain will compile results in order to develop a Corporate Declaration that will cover all Orchid sites
- 6.4.2 Once complete, supply chain will publish the new Conflict Minerals declaration to the following groups or people:
 - 6.4.2.1 EVPs / Leadership team
 - 6.4.2.2 General Managers
 - 6.4.2.3 Controllers
 - 6.4.2.4 Supply Chain team
 - 6.4.2.5 Conflict Minerals team
 - 6.4.2.6 Post on GSC Share Point
 - 6.4.2.7 Post of Company Website

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Signature: