

# Conflict Minerals Policy

## Group Management

### Policy

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## Introduction to the Conflict Minerals Legislation

On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was approved by the U.S. Securities and Exchange Commission (“SEC”). The rule imposes reporting requirements on publicly traded companies subject to the SEC to report annually the presence of conflict minerals originating in the Democratic Republic of the Congo (“DRC”) or adjoining countries (“Covered Countries”) in the products they manufacture or contract to manufacture whereby the conflict minerals are necessary to the functionality or production of a product.

HMS Industrial Networks is fully aware of this law and continue to monitor the related ongoing SEC developments.

## Policy statement

Tantalum, tungsten, tin and gold are widely used metals by the electronics industry, including telecommunications equipment. HMS Industrial Networks is concerned about the potential that the mining and trade of minerals these metals are extracted from is fueling military conflict, related human rights violations and environmental degradation, for example in certain regions of the Democratic Republic of Congo (DRC) and adjoining countries.

HMS Industrial Networks does not accept the use of any such “conflict minerals” in its products and communicates this policy to its suppliers. HMS Industrial Networks supports seeking a sustainable solution to the issue of conflict minerals through collaboration of the Information and Communication Technology industry and the mining sector to improve both the traceability of minerals and the transparency of global supply chains.

HMS Industrial Networks Conflict Minerals policy is fully in line with the HMS Industrial Networks’ *Code of Conduct* which articulates the company’s strong commitment to ethical business principles and promoting human rights and environmental protection. HMS Industrial Networks requires all its partners, subcontractors, and suppliers to implement equally high standards.

## Practical implementation

### Surveying suppliers

HMS Industrial Networks are surveying suppliers in our supply chain to track the source of minerals used in the products they manufacture. Information is becoming more readily available and HMS continues efforts to gather Conflict Minerals statements from our suppliers.

We expect suppliers to establish their own due diligence program to ensure conflict-free supply chains.

### Communication to suppliers

HMS Industrial Networks includes the communication of this Policy and its implementation in its supply chain into its existing learning and capability building efforts with its suppliers.