

1.0 Purpose

In accordance with its Corporate Social Responsibility Policy, OFS Fitel (“OFS”) endeavors to prevent the introduction of metals and minerals which fund armed conflict into our supply chain. Commonly called Conflict Metals, these metals and minerals are columbite-tantalite (coltan), cassiterite, gold (Au), wolframite or their derivatives, which are limited to tantalum (Ta), tin (Sn) and tungsten (W). Conflict Metals are, or are derived from, ores mined in the Democratic Republic of the Congo (“DRC”) or an adjoining country such as Rwanda, Burundi, or Uganda as determined from time to time by the U.S. government. The goal of this policy is to preclude Conflict Metals from entering the OFS material supply chain.

2.0 Scope: Global

3.0 Implementation

- 3.1 In carrying out this policy, OFS will implement programs and practices that, wherever practicable:
- prevent the introduction of Conflict Metals into its products.
 - verify that suppliers who provide gold, tantalum, tin, and tungsten to OFS can trace these metals to their origins.
 - verify the continued accuracy of these verifications during routine supplier audits.
 - maintain records of verifications for both internal audit
 - assign internal roles and responsibilities and provide appropriate staff training to manage the program.
 - Communicate the Company's efforts to stakeholders.
- 3.2 All OFS managers, employees, partners, and suppliers are expected to adhere to the spirit as well as the letter of this Policy.
- 3.3 The General Manager or Managing Director for each OFS Facility is ultimately responsible for stewardship of the products made there and shall:
- provide appropriate staffing and assign internal roles and responsibilities to manage the implementation of this Policy.
 - maintain an awareness of and familiarity with regional, national, and multi-national (e.g., European Union) statutes, regulations, directives, and criteria applicable to the operation.

- develop and implement programs and procedures necessary to carry out this Policy, addressing existing and new product lines.
- provide training to all affected employees of the requirements of this Policy and the implementation of its programs and procedures. Those personnel who interface with OFS' customers (e.g., sales and marketing, product designers, purchasing and quality assurance staff) should be familiar with all material aspects of this policy.
- maintain an adequate, verifiable database, consistent with the products being manufactured with the material covered by this policy at an OFS Facility, to facilitate transfer of information to customers and other stakeholders. Provide current information as input to an OFS-wide database of product information if such is available.

4.0 Supplier verification

- 4.1 Procurement is to request a CMRT certification for every supplier of metal or metal products on an annual basis at minimum.

5.0 Customer Certification

- 5.1 Each facility is to have an individual or team responsible to provide customer with CMRT certification for specific products upon request.
- 5.2 Some facilities due to the nature of their products, like fiber sites, may simply provide a CMRT site certification rather than a specific product.

6.0 CMRT Forms

- 6.1 These forms are updated on a regular basis by international organizations monitoring this program.
- 6.2 The most current version of this form is doc 1.8.a of this manual.

7.0 Record Keeping

- 7.1 Every letter of CRMT form provided to a customer or by a supplier must be kept with the PO or order file and follow record keeping timelines.