



SPECIALISTS IN PRACTICAL PRECISION ENGINEERING™

Effective September 15, 2013

Conflict Minerals Policy

RDL expects its suppliers to have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture and supply to RDL are "conflict free". "Conflict-free" means that any "conflict minerals" (gold, columbite-tantalite, also known as coltan, cassiterite, wolframite, or their derivatives: tin, tantalum or tungsten) necessary to the functionality or production of the supplied products, either do not originate from the "Conflict Region" situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries or are from recycled or scrap sources.

RDL does not knowingly procure products containing any of the above-specified metals that originate from facilities in the "Conflict Region" that are not certified as "conflict free".

Suppliers to RDL must adopt a policy regarding conflict minerals consistent with RDL's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.

RDL expects suppliers to establish their own due diligence program to ensure that the specified metals are being sourced only from smelters outside the "Conflict Region" or from smelters which have been certified by an independent third party as "conflict free" if sourced within the "Conflict Region". Smelters are qualified "conflict free" if validated as compliant to the EICC Conflict Free Smelter (CFS) protocol, using the CFS Compliant Smelter List.

RDL expects suppliers to maintain compliance systems and be able to demonstrate a satisfactory record of written evidence to support their due diligence programs. RDL may in its sole discretion assess and monitor ongoing performance and compliance with its Conflict Minerals Policy, including but not limited to a review of appropriate supplier documents and review of past practices of the supplier.

Suppliers are expected to provide written confirmation that the products it supplies are "conflict free" and to complete RDL's EICC-GeSI Conflict Minerals Reporting survey. RDL suppliers are expected to pass the EICC-GeSI public Conflict Minerals Reporting Template to their suppliers and successively upstream until the smelter/refiner is identified. The survey information must then be passed back down through the levels of the supply chain to RDL's direct supplier, who must incorporate the provided information in RDL's survey.

If RDL discovers the use of "conflict minerals" produced in facilities that are considered to be "non-conflict free", in any supplied products, RDL will take appropriate actions to transition the products to be "conflict free".

RDL Quality Assurance Dept.
Radio Design Labs, Inc.