

CUPOWER

Conflict Minerals

Code of Conduct

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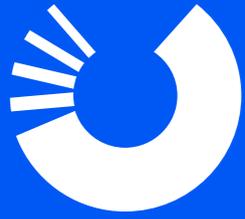
This Conflict Minerals Supplement (hereinafter **"CMS"**) is an integral part of the Code of Conduct for CUPOWER companies concerning their responsibilities with respect to a conflict-free sourcing of **"Conflict Minerals"** in order to effectively ensure that the use and sale of Conflict Minerals by CUPOWER's companies do not contribute to the ongoing conflict in the Democratic Republic of Congo (**"DRC"**) and adjoining countries. The CMS applies to companies of CUPOWER delivering materials, parts, components, sub-assemblies that will be integrated into CUPOWER products as well as to companies of CUPOWER delivering products for the purpose of resale by CUPOWER (hereinafter **"Goods"**). This CMS also applies on indirect deliveries of company's goods to CUPOWER, i.e. it applies on orders and/or deliveries of goods to third parties (contract manufacturers of CUPOWER, distributors) forwarding such goods – in processed or unmodified form – to CUPOWER, provided that company is aware of such forwarding to CUPOWER.

For the purposes of this CMS the following terms shall have the meaning as set out below:

- **"Conflict Minerals"** means columbite-tantalite (coltan), cassiterite, gold, wolframite, cobalt, or their derivatives, which are limited to tantalum, tin and tungsten, unless the United States Secretary of State determines that additional derivatives are financing conflict in the "Covered Countries", in which case they are also considered Conflict Minerals; or any other minerals or their derivatives determined by the Secretary of State to be financing conflict in the "Covered Countries".
- **"Covered Countries"** shall mean the DRC and any country that shares an internationally recognized border with the DRC. Such countries presently include Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.
- **"DRC Conflict Free"** shall mean as an attribute of goods that such goods do not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries.
- **"Final Rule"** shall mean the implementation rule as adopted by the U.S. Securities and Exchange Commission on August 22, 2012, pursuant to Sec. 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act relating to the use of Conflict Minerals.

The company declares herewith:

- to be fully committed to ensuring that its use and sale of Conflict Minerals (whether on a standalone basis or contained in its Goods) do not contribute to the ongoing conflict in the Covered Countries. Therefore, company shall in particular
 - (i) perform a reasonable country of origin inquiry throughout its entire supply chain (in accordance with standards that are equivalent to the requirements of the Final Rule in this regard), and
 - (ii) participate in an established supply chain communication process, such as the Responsible Minerals Initiative (RMI) of the Responsible Business Alliance (RBA).
- not to supply any Goods to customers that are not DRC Conflict Free.
- to duly provide to customers, if requested by a customer, all relevant data regarding the occurrence of Conflict Minerals in its Goods by use of the latest version of the Conflict Minerals Reporting Template (CRMT) of the RMI within three weeks upon customer's request.
- to immediately notify customer in writing in case company should become aware of any warning signs in its supply chain that indicate that the representation in accordance with the preceding paragraphs above might be no longer valid. Company shall in such case promptly conduct further examination to verify, whether Goods delivered by Company contained or still contain Conflict Minerals and shall provide customer with a reasonable documentation.
- to use best efforts to promote among its companies compliance with the representations of this CMS.



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