

## **Conflict-Free Minerals Policy**

Xcerra is aware of concerns that certain minerals mined in conflict areas in the Democratic Republic of the Congo and adjoining countries, including Angola, Burundi, Central African Republic, Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia (“Conflict Minerals”) may be making their way into the electronics industry supply chain, and may be fueling human rights violations and environmental degradation.

Xcerra strives for a Conflict Mineral free supply chain and supports industry-wide efforts to implement due diligence in standards, systems and procedures that are intended to ensure that Conflict Minerals are not used in products manufactured in the electronics industry. In addition to requiring that our suppliers comply with applicable laws, we expect all of our suppliers to source materials from environmentally and socially responsible suppliers, and strive to be Conflict Mineral free.

## **Background**

In 2010, Congress enacted the Conflict Minerals provisions of the Dodd-Frank Street Reform and Consumer Protection Act with the goals of eliminating the illegal trade in gold, tin, tantalum and tungsten and cutting the funding of armed groups in the Democratic Republic of the Congo (DRC) and certain neighboring countries that are engaged in significant human rights abuses. Xcerra supports these efforts to curtail human rights abuses and other illegal activities, and expects its suppliers to take actions consistent with that law.

## **Xcerra’s Expectations of Suppliers**

Suppliers should not include in any products sold to Xcerra any tin, tantalum, tungsten or gold mined in the DRC or adjoining countries that fund armed conflict. To the extent available, Suppliers are required to use EICC-GeSI designated Conflict Mineral free smelters as the source for any of the Conflict Minerals used in the products sold to Xcerra.

Upon Xcerra’s request, each supplier to Xcerra may be required to provide a statement indicating that all products supplied either (a) do not contain Conflicts Minerals or (b) any Conflicts Minerals that such products do contain originated from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free.

Xcerra requires that all of its suppliers develop Conflict Minerals policies, due diligence frameworks, and management systems in order to be able to make the representations described above. Without limitation, each supplier’s policies should be consistent with the Organization for Economic Cooperation and Development (OECD) guidelines. Xcerra further requests that each of its suppliers impose similar requirements throughout its respective supply chain.

Xcerra reserves the right to require suppliers of certain Xcerra products to provide written evidence of their due diligence efforts in this regard, including completion of the EICC-GeSI (Electronic Industry Citizenship Coalition – Global E-Sustainability Initiative) Conflict Minerals Reporting Template.

On an on-going basis, Xcerra will evaluate its relationships with its suppliers to ensure continued compliance with this policy. Xcerra reserves the right to request additional documentation from its suppliers regarding the source of any Conflict Minerals included in its products. In addition, suppliers must maintain and provide to Xcerra upon request traceability

data for a minimum of five years. Xcerra reserves the right to terminate its relationship with any suppliers who do not comply with these requirements.

### **Additional Information**

Questions regarding Xcerra's Conflict Minerals Policy and Compliance program can be addressed to [conflictminerals@Xcerra.com](mailto:conflictminerals@Xcerra.com).