

Comtel Conflict Minerals Policy



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Comtel is aware of violence and human rights violations in the mining of certain minerals like tantalum, tin, gold and tungsten from the Democratic Republic of the Congo (DRC) and surrounding countries. Comtel shares the deep concern about sourcing of minerals from these conflict zones and commits to make its products DRC conflict-free and is trying to obtain full transparency throughout its supply chain.

Comtel supports the goals and objectives of Section 1502 of the Dodd-Frank Act, which aims to prevent the use of conflict minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) and adjoining countries.

The Act requires companies to perform due diligence with respect to the sourcing of conflict minerals. Comtel will comply with the conflict minerals diligence and reporting obligations required under the Act. To meet the obligations, Comtel is implementing a comprehensive due diligence process.

Comtel suppliers, including external manufacturers, are required to comply with our Supplier Code of Conduct, which includes requirements relating to conflict minerals. Comtel suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture do not directly or indirectly finance or benefit armed groups. Comtel suppliers shall exercise due diligence on the source and chain of custody of these minerals and shall make their due diligence measures available to Comtel.

Comtel is in the process of obtaining information from suppliers concerning the origin of the metals that are used in the assembly or manufacture of Comtel products. Based upon information provided by our suppliers, Comtel does not knowingly use metals derived from the Conflict Region.

Feb. 2. 2015

Date

Berthold Michels

Berthold Michels
President