



# Quality, Environmental, Health & Safety (QEHS) Policy

## CONFLICT MINERALS POLICY

### 1. PURPOSE

AFI's Conflict Minerals Policy reflects the commitment of AFI to comply with legal and customer/industry requirements to ensure AFI does not directly or indirectly engage with suppliers where AFI identifies a reasonable risk that they are sourcing from, or linked to, any party committing human rights or related abuses.

### 2. SCOPE

This policy applies to all AFI entities and all suppliers who provide materials that contain tin, tantalum, tungsten, or gold.

### 3. REFERENCE DOCUMENTS

#### 3.1. USA H.R. 4173

Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502

#### 3.2. OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

See [www.oecd.org](http://www.oecd.org)

#### 3.3. EICC/GESI CONFLICT-FREE SMELTER PROGRAM

See [www.conflictreesmelter.org](http://www.conflictreesmelter.org)

### 4. DEFINITIONS

#### 4.1. CONFLICT-AFFECTED MINES AND HIGH-RISK AREAS

Conflict-affected mines and high-risk areas are mines or areas identified by the presence of armed conflict, widespread violence, or other risks of harm to people, including the eastern region of the Democratic Republic of the Congo

#### 4.2. CONFLICT MINERALS

Conflict minerals are columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, including tin, tantalum, tungsten, and gold, sourced from conflict-affected mines or high-risk areas.

#### 4.3. REFINER

A refiner is a processor who improves the purity of a metal (such as gold).

#### 4.4. SMELTER

A smelter is a processor who obtains minerals (such as columbite-tantalite, cassiterite, or wolframite) and extracts metals (such as tin, tantalum, or tungsten).



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### **5. POLICY**

On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) adopted regulations under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act to enforce disclosure and reporting obligations on covered issuers regarding the use of conflict minerals which are necessary to the functionality of production of a product they manufacture or contract to manufacture.

The regulations enforce reporting and disclosure obligations on all publicly traded companies which file reports with the SEC under Section 13(a) or Section 15(d) of the Exchange Act. This includes domestic companies, foreign private issuers and smaller reporting companies to the extent that conflict minerals are necessary to the functionality or production of a product, or components thereof, that they manufacture or contract to manufacture. It covers issuers, such as automobile manufacturers, which manufacture a product by assembling it out of materials, substances or components that are not in raw material form. Regardless of their place of extraction, are deemed conflict minerals gold, columbite-tantalite, cassiterite and wolframite, including their derivatives, respectively tantalum, tin and tungsten.

Although AFI is not a publicly traded company, we intend to comply with the rules as part of our commitment to our customer and our community. AFI is committed to taking all steps to comply with the legislation and in 2011 initiated an ongoing due diligence effort to gather from its supply chain information concerning the country of origin of potential conflict materials in the supply chain.

AFI expects its suppliers to commit to the EICC Code of Conduct which includes a provision related to the responsible sourcing of minerals. Pursuant to that Code of Conduct, suppliers must have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture are conflict free. AFI expects suppliers to establish their own due diligence program to ensure conflict-free supply chains.

AFI recognizes that extracting, trading, handling and exporting minerals (such as columbite-tantalite, cassiterite, gold, wolframite, or their derivatives), from conflict-affected and high risk areas may lead to human rights or related abuses.

AFI will suspend or discontinue engagement with suppliers where AFI identifies a reasonable risk that they are sourcing from, or linked to, any party committing the following abuses:

- Any forms of torture, cruel, inhuman and degrading treatment;
- Any forms of forced or compulsory labor;
- Child or underage labor;
- Other gross human rights violations and abuses;
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

### **6. IMPLEMENTATION**

This policy is effective immediately

### **7. REVISION HISTORY**

Revision	Date	Description
00	03/05/13	Initial Release