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Doc No.	ZY-3-Q-134	Conflict Minerals Policy		
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1.0 PURPOSE

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

2.0 SCOPE

This policy applies to all GSN entities and all suppliers who provide materials or components that contain tin, tantalum, tungsten, and/or gold that are used in GSN products.

3.0 REFERENCE DOCUMENTS

- 3.1 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
- 3.3 CONFLICT-FREE SOURCING INITIATIVE (CFSI) CONFLICT-FREE SMELTER PROGRAM (CFSP) AND CONFLICT-FREE MINERALS REPORTING TEMPLATE (CMRT)

4.0 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.

5.0 POLICY

GSN 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. As a good corporate citizen, GSN has the responsibility to respect human rights and not contribute to these conflicts. GSN commits to refraining from any action which contributes to the financing of conflict and to comply with relevant United Nations (UN) sanctions resolutions or, where applicable, laws implementing such resolutions.

GSN will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the payment by any party of the following human rights or related abuses:

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- 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.

6.0 SUPPLIER RESPONSIBILITIES

GSN does not directly purchase any Conflict Minerals from any source and does not knowingly procure any product containing Conflict Minerals from the Conflict Region. To the extent that GSN's value-added services offering may include the manufacture of various products that contain "Conflict Minerals" that are necessary to the functionality or production of the product, GSN is committed to working with our supply chain to increase transparency regarding the origin and traceability of minerals contained in minerals contained in products. GSN's due diligence is based on those described in the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We encourage our suppliers to adopt similar policies and management systems with respect to Conflict Minerals and to drive those efforts throughout their supply chain to ensure that the specified metals are being sourced only from (1) mines and smelters outside the "Conflict Region" or (2) mines and smelters within the Conflict Region which have been certified by an independent third party as "conflict free."

Disclaimer:

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