



Behavioral Guidelines

Conflict Minerals

1 Introduction

Although not a direct addressee of this regulation, OMICRON supports the recent US legislation (i.e. Section 1502 of the 2010 Dodd-Frank Act and the related rule of the U.S. Securities and Exchange Commission) which promotes transparency and consumer awareness regarding the use of Conflict Minerals and seeks to cut direct and indirect funding of armed groups engaged in conflict and human rights abuses in the Conflict Region.

2 Scope

The present “**Conflict Region**” includes the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, South Sudan, Tanzania and Zambia.

“**Conflict Minerals**” currently include Columbite-Tantalite (Tantalum), Cassiterite (Tin), Gold, Wolframite (Tungsten).

These lists may be updated from time to time by the US Secretary of State.



3 OMICRON’s Approach

OMICRON does not purchase directly, and does not procure knowingly any products containing, Conflict Minerals from the Conflict Region.

To the extent that OMICRON products may include components or mechanical parts containing Conflict Minerals which are necessary to the functionality or production of the product, OMICRON is committed to working with its supply chain to increase transparency regarding the origin and traceability of these minerals.

OMICRON encourages and supports its suppliers to adopt policies and management systems with respect to Conflict Minerals and to drive those efforts throughout their supply chain to ensure that the specified minerals are being sourced only from mines and smelters outside the Conflict Region or mines and smelters within the Conflict Region which have been duly certified by an independent third party as “conflict free.”

To this end, OMICRON is actively approaching suppliers by requiring them to complete standardized surveys regarding the use and origin of any and all Conflict Materials which are present in the OMICRON supply chain.

The results of these surveys, once completed, will be made available to purchasers of OMICRON products, who may use this information to fulfil their own legal obligations in regard to Conflict Materials.