



Molex
Supply Chain Management
Conflict Minerals Policy

1.0 Purpose

Molex’s Conflict Minerals Policy reflects the commitment of Molex to comply with legal, customer, and industry requirements to ensure Molex does not directly or indirectly engage with suppliers where Molex identifies a reasonable risk that they are sourcing from, or linked to, any party committing human rights or related abuses. The Conflict Minerals Policy supplements the Molex Code of Conduct for Suppliers by providing additional detail regarding the responsible sourcing of minerals used to produce materials and components sold to Molex.

2.0 Overview

Facility Applicability:	Applies to all Molex entities and all suppliers who provide materials or components that contain tin, tantalum, tungsten, and/or gold (3TG) that are used in Molex products. Columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, including tin, tantalum, tungsten, and gold are commonly referred to as “conflict minerals”.
Requirements Included in this Document:	Conflict Mineral Policy (documented) Implemented Due Diligence Process in accordance with OECD guidance Remediation of high-risk smelters/refiners Conflict-Free Minerals Reporting Template (CMRT) (current version)
Additional Resources:	Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (www.sec.gov) OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (www.oecd.org) Conflict-Free Sourcing Initiative (CFSI) (www.conflictreesourcingin.org)

3.0 Who Should Understand the Requirements of This Document?

- Molex Management
- Molex Sourcing Team
- Molex Supply Chain Partners / Suppliers

4.0 Key Messages

What are “conflict minerals” and why is it important to Molex.

Policies and due diligence measures must be in place that will enable Molex to reasonably assure that products and components supplied to us containing conflict minerals are conflict free.

Timely, accurate disclosure of smelters and refiner is required.

Molex will not do business with supply chain partners who directly or indirectly fund or benefit armed conflicts.

5.0 Revision History

Document Released:	October 24, 2011
Document Revised:	November 21, 2016
Revision Details:	Annual Review

6.0 Background

The U.S. Securities and Exchange Commission (SEC) requires public companies to disclose their use of tin, tantalum, tungsten and gold (3TG) that originated in the Democratic Republic of the Congo or an adjoining country. Their concern is that the sale of these so called “conflict minerals” could be used to fund or benefit armed conflicts in the region. Molex is a privately held company and excluded from the SEC requirements. However, we still believe it is important to ensure that the 3TG used in our products are responsibly sourced. We participate in the Conflict-Free Smelters Sourcing Initiative (CFSI) to stay engaged in industry activities to address this complex issue. As part of our participation, we leverage the CFSI Conflict-Free Smelting Program (CFSP) audit process to identify legitimate smelters and refiners found to be compliant by the program. This Policy requires us to ensure that we do not directly or indirectly engage with suppliers where there is a reasonable risk that they are sourcing from, or linked to, any party committing human rights or related abuses. Consistent with industry best practices, we conduct surveys and mapping exercises of our current suppliers, collecting and analyzing data annually (at a minimum) to identify at-risk smelters. We also reach out directly to smelters that serve our supply chain and encourage them to participate in the CFSI program to demonstrate their commitment to being conflict-free.

7.0 Requirements

Molex 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, Molex has the responsibility to respect human rights and not contribute to these conflicts. Molex 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.

IMPORTANT

Molex 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:

- 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.
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7.1 Define Program Responsibilities

Molex, LLC.

In order to meet our commitment, Molex shall:

- implement a due diligence program in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- adopt, communicate, and incorporate into contracts and agreements with suppliers the requirement for responsible sourcing of minerals;
- participate in the development of industry initiatives, including CFSI membership;
- review supplier CFSI CMRTs and compare identified smelters/refiners to those verified to be compliant with the CFSI CFSP;
- map its supply chain to identify smelters/refiners in the supply chain and require smelters/refiners to participate in the CFSI CFSP;
- recommend that its supply chain only use smelters/refiners verified to be compliant with the CFSI CFSP;
- where risks are identified, work to improve the supply chain and, where necessary, suspend or discontinue engagement with suppliers where Molex identifies a reasonable risk that they are sourcing from, or linked to, any party committing abuses as defined above;
- provide information about its conflict minerals due diligence program using the CFSI CMRT format, and publish additional information about its due diligence program on its website;
- support the responsible sourcing of minerals from the Democratic Republic of the Congo and adjoining countries where the supply chain has been verified to be compliant with the CFSI CFSP

IMPORTANT

Supply Chain Partners

Molex suppliers who provide materials or components that contain tin, tantalum, tungsten, and/or gold that are used in Molex products shall:

- create a conflict minerals policy and provide it to Molex;
- implement a due diligence program in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- identify all smelters/refiners in its supply chain and require that they participate in the CFSI CFSP;
- notify Molex of risks associated with smelters/refiners in its supply chain;
- remove high-risk smelters/refiners as identified by Molex;
- provide a completed CFSI CMRT at least annually and upon request;
- proactively provide updates to Molex when changes to information in the CFSI CMRT occur