



Conflict Mineral Policy

GPS Networking's Conflict Minerals Policy provides a framework that ensures compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 ("Dodd-Frank Act") pertaining to: tin, tantalum, tungsten, and gold which are derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold ("Conflict Minerals"). Conflict Minerals originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold, under the control of armed groups, to finance conflict characterized by extreme levels of violence according to the Dodd-Frank Act. GPS Networking expects our suppliers to have policies and due diligence measures in place that will assure knowledge and notification of products and components that contain conflict minerals. GPS Networking expects suppliers to comply with the Electronic Industry Citizenship Coalition (EICC) Code of Conduct and conduct their business in alignment with GPS Networking's supply chain responsibility expectations. In support of this policy, GPS Networking will:

- Exercise due diligence with suppliers consistent with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do the same with their suppliers.
- Provide due diligence information to customers confirming applicability and/or compliance of products supplied by GPS Networking.