



# Gruber

## Statement on Conflict Materials

Gruber Industries Incorporated is a leading global producer of highly reliable data communication products. We are committed to ensuring the safety, health and protection of people whom come in contact with our products and the environment. As responsible corporate citizens, we meet and are continually striving to exceed governmental, industry and environmental standards worldwide.

Gruber fully supports the position of the Electronic Industry Citizenship Coalition (EICC) and the Organization for Economic Co-operation and Development (OECD) to avoid the use of metallic ores which finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. Gruber also is aware of section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to "Conflict Materials".

Gruber condemns all activities in connection with the illegal or unlawful exploitation of mineral resources, no matter where such activities take place. Gruber only procures raw materials that are Conflict-Free and those that meet the requirements of the OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High Risk Areas.

Gruber demands that our suppliers comply with the EICC and to only source materials from environmentally and socially responsible vendors. Gruber demands that all its suppliers continuously monitor both direct and indirect supply chains to avoid procurement of materials from these conflict regions.

As part of our Contract Terms with our suppliers, a Certificate of Origin(s) of Mines and Countries must be supplied with each delivery, indicating the origin of the minerals and relevant proof of the royalty, tax, duty payments and transportation documentation.

Gruber will never knowingly purchase directly or indirectly raw materials that contain ores from conflict material zones. However, all must recognize that it may not be the policy of some countries to issue such documentation or a system does not exist at this time to address these matters. Gruber will work diligently to meet the spirit of the Certificates of Origin of Mines.

Additionally, Gruber supply chain partners must:

- Comply with all national and international applicable laws and regulations specific to conflict materials and labor laws and that they require their suppliers to do the same.
- Adopt sound human rights practices and treat workers fairly with dignity and respect
- Provide a safe and healthy work environment for their workers
- Conduct business operations in a way that protects and sustains the environment
- Maintain a management system that measures, improve and communicate their companies labor, health & safety, environmental performance and to uphold the highest standards of ethics.

Gruber's corporate policy is to use only materials that come from smelters on the EICC/GeSI (Global e-Sustainability Initiative) conflict smelter review committee list as well as demanding that our vendors do the same. Gruber has confirmed that its vendors do not procure **gold (Au)**, **tantalum (Ta)** or (Columbite-tantalite (Coltan), used to extract tantalum, **tungsten (W)** or Wolframite, used to extract tungsten, or **tin (Sn)** Cassiterite, used to extract tin from the DRC or surrounding countries.

As more information becomes available regarding due diligence criteria, Gruber will contact our vendors to provide documentation stating that the raw materials that they consume do not come from the DRC or it neighboring countries, thus making Gruber compliant with the Dodd-Frank Act.

By: Pete Gruber  
Title: CEO

Tel: +1 800 658 5883  
Fax: +1 (602) 257 4313

*Computer Hardware*  
*Premise Wiring Products*  
*International Field Service*  
*Internet Products & Services*  
*Computer Facility Design/Build*

21439 North 2nd Avenue  
Phoenix, Arizona 85027 USA

E-mail: [support@gruber.com](mailto:support@gruber.com)

Web: <http://www.gruber.com>

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