

Subject: Conflict Minerals

In July 2010, the Dodd Frank Act-2010 was signed into law by President Obama. The new legislation requires all publicly traded companies to report annually to the Securities and Exchange Commission (SEC) whether they use tin, tantalum, tungsten and gold (3TG) originating from the Democratic Republic of Congo (DRC) or an adjoining country. All publicly traded companies are required to conduct due diligence inquiries in their supply chains. This will necessitate supplier cooperation to determine whether products contain conflict minerals from the DRC or an adjoining country. (See rule at [HTTP://www.sec.gov/rules/final/2012/34-67716.pdf](http://www.sec.gov/rules/final/2012/34-67716.pdf))

Comtech supports the position of the Responsible Business Alliance (RBA) and the Global e-Sustainability Initiative (GeSI) to remove the use of Conflict Minerals out of the global supply chain. Comtech is committed to taking all steps necessary to comply with the legislation and has initiated an ongoing due diligence effort to gather information concerning the country of origin of potential conflict minerals in the supply chain.

Comtech expects its suppliers to commit to the RBA Code of Conduct which includes a provision related to the responsible sourcing of minerals. Pursuant to that Code of Conduct, suppliers must have a policy to reasonably assure that the 3TG in the products they manufacture are "DRC Conflict Free". All suppliers will need to establish their own due diligence program to ensure "DRC Conflict Free" supply chains. Suppliers to Comtech must disclose the use, source of origin and chain of custody of 3TG within the product(s) supplied to Comtech.



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VP Supply Chain

Resources and additional Information:

Responsible Business Alliance and Conflict Free Sourcing Initiative resources: <http://www.conflictreesourcing.org/>
The Organization for Economic Co-operation and Development (OECD) has developed a Due Diligence Guidance document that can be found at: <http://www.oecd.org/fr/daf/inv/mne/mining.htm>