



ATR Conflict Minerals Policy

Background and Definitions

The Dodd-Frank Wall Street Reform and Consumer Protection Act requires all U.S. publicly-traded companies to file annual disclosures related to the use of so-called “conflict minerals”) in their products. The aim of this directive is to stop violent conflict in the Democratic Republic of Congo (DRC) and surrounding countries (the Conflict Region) that is fueled by illicit mining activities. Although these reporting requirements do not apply directly to privately-held companies such as ATR, information production requirements are routinely placed on the entire supply chain, encompassing ATR, its customers and suppliers.

The four most commonly mined conflict minerals (known as 3TGs, from their initials) are cassiterite (for tin), wolframite (for tungsten), coltan (for tantalum), and gold ore, which are extracted from the eastern DRC and surrounding areas, and passed through a variety of intermediaries before being purchased by multinational electronics companies. These minerals are essential to the manufacture of many products, including consumer electronics such as mobile phones, laptops, and MP3 players.

Our Policy

ATR is committed to the highest standards of ethical and socially responsible behavior, and we do not condone the human rights abuses associated with the mining, transporting or trading of conflict minerals. Therefore, whenever possible, ATR will exercise reasonable diligence with respect to its supply chain to assure that ATR is not utilizing elements produced from minerals extracted from the Conflict Region.

ATR will work with our suppliers to trace material content in all of our products in order to determine whether minerals originating from mining or smelting operations in the Conflict Region are used in our products.

ATR will not knowingly use minerals from the Conflict Region in our products. As a result, we will require our suppliers to trace material content in what they supply to us to a conflict-free certified smelter and to provide us with documentation regarding their due diligence efforts.

ATR will require our suppliers to procure components, parts, or products containing tin, tantalum, tungsten, and/or gold from sources identified to be “conflict-free”.

ATR will employ the industry-standard Conflict Minerals Reporting Template (CMRT) to map and monitor our suppliers' commitment and activities in this regard. ATR will comply on a timely basis with CMRT reporting requests received from its customers.

ATR is committed to doing business only with those companies who share our values. We will communicate this policy to our suppliers and require them to establish similar policies for their supply chains.