



## **Conflict Minerals Policy Statement**

In 2010, Congress passed the Dodd-Frank Act, which directs the U.S. Securities and Exchange Commission to issue rules requiring certain companies to disclose their use of conflict minerals if those minerals are “necessary to the functionality or production of a product” manufactured by those companies. Under the Act, those minerals include tantalum, tin, gold or tungsten.

Congress enacted Section 1502 of the Act because of concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in the Democratic Republic of the Congo (DRC) and its surrounding region and is contributing to an emergency humanitarian crisis.

ACSI is committed to comply with the SEC’s rules regarding conflict minerals. ACSI does not directly purchase raw metal ores from smelters or mines. We do purchase components for use in our products that contain conflict minerals, but we are several supply chain layers removed from their origin. It is because of this that we rely on our suppliers to perform a reasonable country of origin inquiry of whether any of their conflict minerals originated from the DRC or an adjoining country, and if necessary, to conduct due diligence to determine whether their conflict minerals financed or benefitted armed groups. ACSI’s suppliers have represented through statements and reporting materials to ACSI that the conflict minerals used in our products did not originate from the DRC or an adjoining country, or did not finance or benefit armed groups.

ACSI fully supports the goal to end the violent civil conflict and human rights abuses in the DRC region. We will continue to audit our suppliers to confirm they remain in compliance.

Sincerely,

Mark LeGrand  
President  
12/08/2015