

Conflict Minerals Policy

As a responsible company, QTI supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

The definition of “conflict minerals” refers to gold, tin, tantalum, tungsten, derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. QTI supports the humanitarian goal of ending violent conflict in the DRC and surrounding countries. We are committed to the responsible sourcing of “conflict minerals” throughout our supply chain and complying with the underlying SEC rules and regulations surrounding “conflict minerals”.

Commitment to Responsible Sourcing

The supply chain for Conflict Minerals is complex and lacks an established structure for product manufacturers to trace the minerals in the finished goods purchased by QTI back to their source.

QTI is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of minerals contained in the products they manufacture and sell to QTI

Supplier Code

QTI has the following expectations of its suppliers:

- Suppliers should not include, in any products sold to QTI, any Conflict Minerals that are not DRC Conflict Free
- Suppliers should develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the products sold to QTI
- QTI’s suppliers are expected to source Conflict Minerals only from sources that are DRC Conflict Free

In doing so, suppliers will be expected to:

- Communicate to their personnel and suppliers policies that are consistent with this Policy and require their direct and indirect suppliers to do the same
- Implement procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable
- Use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free and require their direct and indirect suppliers to do the same

- Advise QTI of any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to QTI are not DRC Conflict Free
- Maintain reviewable business records supporting the source of Conflict Minerals
- From time to time, at QTI's request, provide QTI with information concerning the origin of Conflict Minerals included in products sold to QTI, which QTI shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph
- Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in Conflict Minerals supply chains

Consequences of Supplier Non-Compliance

QTI evaluates its relationships with its suppliers on an ongoing basis.

- QTI reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy
- QTI reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold to QTI
- Suppliers who do not reasonably comply with this Policy shall be reviewed by QTI's supply chain for future business

In the event QTI determines that a supplier's efforts to comply with this Policy have been deficient and the supplier fails to cooperate in developing and implementing reasonable remedial steps, QTI reserves the right to take appropriate actions up to and including discontinuing purchases from the supplier.

Nothing in this Policy is intended to in any way grant any additional rights or expectations to a QTI supplier or in any way modify or otherwise limit in any way any of QTI's contractual or legal rights.

Conclusion

QTI fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a DRC Conflict Free supply chain. We encourage all of our suppliers to likewise support these efforts.