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Conflict Materials Policy

CFTen is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. We expect all of our suppliers to comply with the applicable legal standards and requirements.

The Dodd-Franks act defines “Conflict Material” as the minerals; tantalum, tin, tungsten, and gold (3TG materials) mined in the Democratic Republic of the Congo (DRC) and adjoining countries (Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia), which in turn is referred to as the “Conflict Region”. The Democratic Republic of the Congo has been involved in a bloody civil war lasting more than 10 years, and proceeds from the sale of 3TG minerals have been used to directly and indirectly finance armed groups in the DRC. The region is still under conflict between warring factions and many human rights abuses are perpetrated on a daily basis. The Dodd-Franks act requests companies to practice reasonable due diligence within their supply chain to assure that the specified minerals are not being sourced from mines in the Conflict Region controlled by non-government military groups, or unlawful military factions, preventing their use where at all possible.

CFTen is in complete support of the Dodd-Franks act in its desire to help end these vile atrocities. The Act itself presently only relates to companies which have shares listed with the American Securities and Exchange Commission and requires them to report the presence of the four listed minerals and their origin thereof directly to the commission on an annual basis. Although this legislation does not directly affect us, we understand that everyone has a role to play through managing the downward supply chain, and as such Will not knowingly procure or use any product containing materials derived from the “Conflict Region” that have not been certified as “Conflict free”. We will work closely with our supply chain in the continual support of this policy. If CFTen should become aware of a supplier whose supply chain includes metals from a conflict source, we will take the appropriate actions to remedy the situation in a timely manner, including reassessment of supplier relationships.

Further information on this initiative can be found at: <http://www.conflictreesourcing.org/>