



## **MULTI-FINELINE ELECTRONIX, INC.**

### **CONFLICT MINERALS POLICY**

**May 22, 2015**

#### **Introduction**

Multi-Fineline Electronix, Inc. (the “Company”) has adopted this Conflict Minerals Policy to set forth its position on:

- the use of tin, tungsten, tantalum and gold (collectively, “3TG”) in the products it manufactures, and
- the Company’s expectations of its suppliers and contractors regarding 3TG in the Company’s supply chain.

#### **Scope**

This policy, which supplements the Company’s Worldwide Supplier Code of Business Conduct and Ethics, applies to all of the Company’s suppliers and contractors worldwide.

#### **Policy Statement**

The Company does not support the use of minerals or their derivatives, including 3TG, that are illegally mined, transported or traded because of the role such minerals play in financing armed conflict in the Democratic Republic of the Congo and the adjoining countries.

It is therefore the policy of the Company to exercise due diligence over its supply chain in a manner consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, with the ultimate goal of eliminating from the Company’s supply chain 3TG that has not originated from sources verified as conflict-free.

#### **Policy Framework**

To accomplish the policy goals above, the Company has committed to implementing the following policy framework:

- The Company will distribute this policy to all suppliers and contractors. Additionally, the Company will require suppliers and contractors to comply with its Worldwide Supplier Code of Business Conduct and Ethics, which has been updated to include the requirements of this policy.
- The Company will require its suppliers and contractors to complete the Conflict-Free Sourcing Initiative’s Conflict Minerals Reporting Template no less than annually. In doing so, suppliers must identify the smelters or refiners that processed the 3TG in the components and materials they supply to the Company and, where available, the country of origin of such 3TG.

- Suppliers and contractors must only source 3TG from smelters and refiners that are verified as conflict-free.
  - Suppliers and contractors that do not currently comply with this policy must publicly demonstrate progress toward a conflict-free supply chain by participating in a recognized third-party audit program (as set forth below).
  - The Company will suspend orders or terminate the business relationship with suppliers and contractors who fail to demonstrate progress toward a conflict-free supply chain.
- The Company reserves the right to periodically audit suppliers and contractors for compliance with this policy.
- The Company will distribute this policy to its procurement personnel and manufacturing facility management. The Company will provide appropriate training to relevant personnel and will provide active oversight to ensure its personnel are carrying out this framework effectively.
- Company management will periodically review the Company's progress toward a conflict-free supply chain, including the allocation of personnel and resources to such progress.
- The Company will keep accurate records of its due diligence efforts, for use in its compliance obligations to the United States Securities and Exchange Commission and for assisting its customers in their own supply chain due diligence efforts.

#### **Recognized Third-Party Audit Programs**

The Company recognizes conflict-free verifications provided by the following independent third-party audit programs:

- Conflict-Free Sourcing Initiative (Conflict-Free Smelter Program)
- London Bullion Market Association
- Responsible Jewellery Council

The Company may recognize other programs or organizations from time to time by updating this policy or by providing notice to its suppliers and contractors.