

## Conflict Minerals Policy

This policy provides a framework through which Gem Cable Solutions Ltd shall comply with Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act pertaining to Conflict Minerals.

On August 22nd, 2012, the U.S. Securities and Exchange Commission ("SEC") published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act ("Act") governing Conflict Minerals. The Act requires companies to perform due diligence on the source and chain of custody of Conflict Minerals contained in their products. Gem Cable Solutions adopts this policy to guide the implementation and maintenance of its Conflict Minerals program.

Gem Cable Solutions Ltd strives to have a Conflict Free supply chain, and is committed to sourcing products and materials from non-conflict sources;

Gem Cable Solutions Ltd expects that its suppliers have due diligence processes in place to identify the source of the Conflict Minerals contained in their products, and that those sources do not support conflict and violations of human rights.

Gem Cable Solutions Ltd provides all suppliers identified under the SEC regulations with a Reasonable Country of Origin survey. This survey must be completed by those suppliers to ensure continued eligibility to do business with Gem Cable Solutions Ltd.

Suppliers will also need to certify, in writing, that they have procedures in place to demonstrate that materials and products are sourced in accordance with Gem Cable Solutions Ltd standards, and to assure the reliability of the survey responses.

Based on the survey results, Gem Cable Solutions Ltd may require additional information from those same suppliers in order to determine whether or not a supplier's products or materials are indeed "Conflict Free".

Gem Cable Solutions Ltd recognises the challenges that lie ahead in establishing reasonable practices to break through existing complexities and barriers to information throughout the Conflict Minerals supply chain.

Gem Cable Solutions Ltd is dedicated to working with its suppliers to help establish traceability of Conflict Minerals and assure that our products and materials are responsibly sourced.