

# Mini-Circuits

## Corporate Code of Conduct

### D2-HP03

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## Mission

Corporate social and ethical responsibility is a matter of increasing global importance. Mini-Circuits' corporate governance espouses responsible practices within our company and our supply chain with respect to basic human rights, labor standards, environmental management and anti-corruption.

In all our activities, Mini-Circuits is committed to compliance with applicable laws, rules and regulations of the countries in which we operate. In addition to and beyond legal compliance, we are dedicated to advancing social and environmental responsibility and business ethics in keeping with internationally recognized standards, even where they stipulate higher standards than required by national laws and regulations.

Many policies stated in Mini-Circuits' Code of Conduct are adopted from the United Nations Global Compact, an international initiative which is supported by corporations around the world to ensure accountability in the areas noted above. The Code of Conduct is also based upon standards outlined in the Electronic Industry Citizenship Coalition® (EICC®) Code of Conduct, a widely-accepted standard for business ethics within the electronics industry. However, we are not signatories.

Accordingly, our Code of Conduct is used as a guideline in the production, supply, and support of Mini-Circuits products worldwide for the purpose of protecting human rights, safe working conditions, promoting fair employment practices, responsible management of environmental, safety and health issues, and high ethical standards of business. Compliance with this Code of Conduct is mandatory and in the event of a violation, Mini-Circuits has the option and right to take disciplinary actions including, but not limited to, termination of the applicable relationship.

Mini-Circuits actively requires suppliers and their subcontractors to comply with our Code of Conduct or similar standards, which may require higher standards than required by national laws based on our Terms and Conditions. The Code of Conduct shall be publicly available in order to make our standards clear to employees, suppliers, and customers.

## 1. Labor

Mini-Circuits is committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees and any other type of worker.

Mini-Circuits' labor standards are as follows:

### 1.1 Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purpose of exploitation. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment. Deposits of money and/or excessive fees are unacceptable, and all fees charged to workers must be disclosed.

### 1.2 Child Labor Avoidance

Child labor is not to be used in any stage of manufacturing, and no person is employed who is below the minimum legal age for employment. The term "child" refers to any person under the age of 15 (or 14 in countries where educational facilities are insufficiently developed), or the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest, as set out in Article 2.4 in the ILO Convention No. 138 on Minimum Age.

The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers or that is inconsistent with the child's personal development. "Child" means a person under the age of 18 years, as defined in Article 1 of the United Nations Convention on the Rights of the Child. "Personal development" includes a child's health or physical, mental, spiritual, moral or social development, as described in Article 32 of the United Nations Convention on the Rights of the Child.

### 1.3 Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased turnover and increased injury and illness. Workweeks are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off per seven-day week.

### 1.4 Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. Conditions of employment are to be made clear to workers, and the basis on which workers are being paid is to be provided in a timely manner via paystub or similar documentation.

### 1.5 Humane Treatment

There shall be no harsh or inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, acts of violence, threatening remarks or gestures, verbal abuse, or other disruptive behavior of workers; nor shall there be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### 1.6 Non-Discrimination

Mini-Circuits is committed to a workforce free of harassment and unlawful discrimination. Mini-Circuits prohibits any form of discrimination based on race, color, ethnicity, age, gender, sexual orientation, religion, political opinion, union membership, disability, pregnancy, social origin or status, indigenous status, marital status, parental status, and any other characteristic specific to an individual's identity, background and beliefs. This includes partiality or prejudice in hiring and employment practices such as promotions, rewards, and access to training. Employees with the same qualifications, experience, and performance receive equal pay for equal work with respect to their peers. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

### 1.7 Open Communication

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

## 2. Health and Safety

Mini-Circuits recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of our products and services, consistency of production, worker retention, and morale. Mini-Circuits also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

Mini-Circuits' Health and Safety standards are as follows:

### 2.1 Occupational Safety

Worker exposure to potential safety hazards (e.g. electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering, and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment. Workers shall not be disciplined for raising safety concerns.

### 2.2 Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clearly marked and unblocked exits, emergency exits and evacuation plans for each floor, and recovery plans.

### 2.3 Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide access to first aid equipment and necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work. Appropriate health and safety information is to be provided to employees regarding safe and correct handling, marking and labeling of chemicals, machinery, and work processes.

### 2.4 Industrial Hygiene

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs. Appropriate health and safety information is to be provided to workers regarding safe and correct handling, marking and labelling of any hazardous materials.

### 2.5 Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

## 2.6 Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

## 2.7 General Working Conditions / Sanitation, Food, and Housing

A healthy and safe working environment, and if applicable, housing facilities are to be provided for employees in accordance with international standards and national laws. Workers are to be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by Mini-Circuits or any of its agents are to be maintained to be clean, safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, sufficient lighting, tolerable temperature and noise level, and reasonable personal space along with reasonable entry and exit privileges.



### 3. Environment

Mini-Circuits is proud to be an environmentally responsible electronics manufacturer as well as a good neighbor in the communities where we conduct business. We recognize that environmental responsibility is integral to producing world-class products, and we uphold an Environmental Policy that commits to regulatory compliance, pollution prevention, and continuous improvement. We are committed to compliance with all environmental laws and regulations applicable to our business, and we adhere strictly to an Environmental Management System which complies with the International Standard, ISO 14001. We actively promote environmental consciousness and responsibility throughout our organization, and we are fully committed to maintaining procedures that minimize adverse effects on the community, environment, and natural resources while safeguarding the health and safety of the public.

Mini-Circuits Environmental standards are as follows:

#### 3.1 Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current, and their operational and reporting requirements are to be followed.

#### 3.2 Pollution Prevention and Resource Reduction

Waste of all types, including water and energy, are to be reduced or eliminated at the source by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials. Innovative developments in products and processes that offer environmental and social benefits are supported.

#### 3.3 Hazardous Substances

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

#### 3.4 Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled, and treated as required prior to discharge and disposal.

#### 3.5 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

#### 3.6 Product Content Restrictions

Mini-Circuits adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.

## 4. Ethics

To meet social responsibilities and to achieve success in the marketplace, Mini-Circuits and our agents are to uphold the highest standards of ethics including:

### 4.1 Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Mini-Circuits shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Mini-Circuits' business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### 4.2 No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. Bribes are promising, authorizing, or offering to pay, or payment of, giving, or accepting anything of value, either directly or indirectly through a third party, to a government official, political party or other person for the purpose of influencing an official act or decision, inducing an unlawful act, or to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Gifts, meals, entertainment or other courtesies in any amount should not be provided to a U.S. or foreign government official without the prior approval of the Board of Directors or the Committee established with the authority to make such decisions.

Gifts, meals, entertainment, and business events are allowed to be accepted if they are unsolicited and it is reasonable to accept such offers. It is acceptable to accept when there is a legitimate business purpose, such as discussing Mini-Circuits' business, when there is no real or perceived conflict of interest, and it has been offered to other business persons on the same basis as the offer to you.

### 4.3 Disclosure of Information

Mini-Circuits will disclose information regarding its labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, and potential conflicts of interest in accordance with this Code of Conduct, applicable regulations, prevailing industry practices, and contractual requirements. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

Further to the above, Mini-Circuits will disclose situations that may create a potential conflict of interest, such as:

- If any Public Official or a Family Member of a Public Official has a controlling financial interest in Mini-Circuits;
- If any Public Official is a director or officer of Mini-Circuits; and
- If any employee of Mini-Circuits that is directly involved in negotiating or fulfilling a contract with a customer is a former employee of said customer, or such employee's Family Member is a former employee of said customer.

For purposes hereof, “Public Official” means an employee of a government, ministry, political authority, or other agencies thereof or, any persons acting in an official capacity for or on behalf of any of the aforementioned institutions, politicians and employees of political parties, members of ruling families, and employees of state-owned institutions. For purposes hereof, “Family Member” is limited to spouses, parents, children, grandparents, and grandchildren.

#### 4.4 Conflicts of Interest

Mini-Circuits employees must avoid involvement in actual or apparent conflicts of interest. A conflict of interest occurs when personal interests compromise, or appear to compromise, the ability to perform in your position or your loyalty to Mini-Circuits. In the event of an actual or apparent conflict of interest, the details of the situation must be disclosed promptly to the President’s office. To the extent the conflict exists in the President’s office, the details must be disclosed to the Board of Directors of Mini-Circuits or a committee authorized to advise on such situation.

A conflict of interest may arise if a Mini-Circuits employee or family member of a Mini-Circuits employee holds a financial interest in, or exercises control or influence over, a Mini-Circuits supplier, customer, reseller, or competitor. A conflict of interest may arise when a Mini-Circuits employee obtains outside employment if the employment competes with the work you do for Mini-Circuits or if the employment is with a Mini-Circuits customer, competitor, or supplier. A conflict of interest may also arise when a Mini-Circuits employee is asked to pursue a business opportunity or take a directorship position or advisory role for another company or an organization. This list is not exhaustive of all potential conflicts of interest and if any reasonable question arises as to whether a conflict of interest exists, disclosure should be made to the President’s office and if the potential conflict exists in the President’s office, disclosure should be made to the Board of Directors of Mini-Circuits or the committee authorized to advise on such situations.

#### 4.5 Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer information is to be safeguarded.

#### 4.6 Anti-Competitive Practices

Mini-Circuits employees are prohibited from engaging in anti-competitive practices. Anti-competitive practices are business practices that prevent or reduce competition in a market.

These can include:

- Dumping, where a company sells a product in a competitive market at a loss. Though the company loses money for each sale, the company hopes to force other competitors out of the market, after which the company would be free to raise prices for a greater profit.
- Exclusive dealing, where a retailer or wholesaler is obliged by contract to only purchase from the contracted supplier.
- Price fixing, where companies collude to set prices, effectively dismantling the free market.

- Stealing confidential information.
- Misrepresenting Mini-Circuits' abilities or competitors' abilities.
- Refusal to deal, e.g., two companies agree not to use a certain vendor.
- Dividing territories, an agreement by two companies to stay out of each other's way and reduce competition in the agreed-upon territories.
- Limit pricing, where the price is set by a monopolist at a level intended to discourage entry into a market. (Ex. Licensing)
- Tying, where products that aren't naturally related must be purchased together.
- Resale price maintenance, where resellers are not allowed to set prices independently.
- Absorption of a competitor or competing technology, where the powerful firm effectively co-opts or swallows its competitor rather than see it either compete directly or be absorbed by another firm.
- Subsidies from government which allow a firm to function without being profitable, giving them an advantage over competition or effectively barring competition
- Regulations which place costly restrictions on firms that less wealthy firms cannot afford to implement
- Protectionism, tariffs and quotas which give firms insulation from competitive forces
- Patent misuse and copyright misuse, such as fraudulently obtaining a patent, copyright, or other form of intellectual property; or using such legal devices to gain advantage in an unrelated market.
- Digital rights management which prevents owners from selling used media, as would normally be allowed by the first sale doctrine.

#### 4.7 Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. No Mini-Circuits employee may take an unfair advantage of anyone through abuse of privileged information, concealment, manipulation, misrepresentation of material facts, or through other unfair practices. Appropriate means to safeguard customer information must be available.

#### 4.8 Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers<sup>1</sup> are to be maintained, unless prohibited by law. Mini-Circuits will have a communicated process for our personnel to be able to raise any concerns without fear of retaliation. See also Section 6, Whistleblowing Policy.

#### 4.9 Responsible Sourcing of Minerals

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<sup>1</sup>Whistleblower definition: Any person who makes a disclosure about improper conduct by an employee or officer of a company, or by a public official or official body.

Mini-Circuits shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Mini-Circuits shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request. See also Section 8, Conflict Minerals Policy.

#### 4.10 Privacy

Mini-Circuits is committed to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Mini-Circuits will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. See also Section 7, Protection of Sensitive Information and Data.

## 5. Management Systems<sup>2</sup>

Mini-Circuits has established a management system based on the content of this Code of Conduct. The management system is designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to Mini-Circuits' operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It also facilitates continual improvement.

Mini-Circuits' management system contains the following elements:

### 5.1 Company Commitment

A corporate social and environmental responsibility policy statements affirming Mini-Circuits' commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

### 5.2 Management Accountability and Responsibility

Mini-Circuits clearly identifies senior executives and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

### 5.3 Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

### 5.4 Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety<sup>3</sup> and labor practice and ethics risks associated with Mini-Circuits' operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

### 5.5 Improvement Objectives

Written performance objectives, targets and implementation plans to improve Mini-Circuits' social and environmental performance, including a periodic assessment of Mini-Circuits' performance in achieving those objectives.

### 5.6 Training

Programs for training managers and workers to implement Mini-Circuits' policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

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<sup>2</sup>Mini-Circuits maintains an AS9100/ISO9000 certified Quality Management System which includes documentation of many of these requirements.

<sup>3</sup>Areas to be included in a risk assessment for environmental health and safety are production areas, warehouse and storage facilities, plant/facilities support equipment, laboratories and test areas, sanitation facilities (bathrooms), kitchen/cafeteria and worker housing/dormitories.

### 5.7 Communication

A process for communicating clear and accurate information about Mini-Circuits' policies, practices, expectations and performance to workers, suppliers and customers.

### 5.8 Worker Feedback and Participation

Ongoing processes to assess employees' understanding of and obtain feedback on practices and conditions covered by this Code and to foster continuous improvement.

### 5.9 Audits and Assessments

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code and customer contractual requirements related to social and environmental responsibility.

### 5.10 Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

### 5.11 Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

### 5.12 Supplier Responsibility

A process to communicate Code requirements to suppliers and to monitor supplier compliance to the Code.

## 6. Whistleblowing Policy

Each employee is encouraged to promptly report Alleged Wrongful Conduct (as defined below). No adverse personnel action may be taken against an employee in knowing retaliation for any lawful disclosure of information to an officer or director of Mini-Circuits, which information the employee in good faith believes evidences: (a) a violation of any law; (b) fraudulent or criminal conduct or activities; (c) questionable accounting or auditing practices; (d) misappropriation of Mini-Circuits' funds; or (e) violations of provisions of this Code (such matters being collectively referred to herein as "Alleged Wrongful Conduct").

No supervisor, officer, director, department head or any other employee with authority to make or materially influence significant personnel decisions shall take or recommend an adverse personnel action against an employee in knowing retaliation for disclosing Alleged Wrongful Conduct to an officer or director of Mini-Circuits.

## 7. Protection of Sensitive Information and Data

Employees and suppliers of Mini-Circuits (each, a "Recipient") are to protect from disclosure and misuse all Confidential Information (as defined below) pursuant to the terms of such Recipient's non-disclosure obligations to Mini-Circuits. For purposes hereof, "Confidential Information" means all non-public information, in whatever form, tangible or intangible, that might be of use to Mini-Circuits' competitors or a foreign government or that may be harmful to Mini-Circuits if disclosed, as well as non-public information of any third-party that has disclosed information to Mini-Circuits pursuant to a non-disclosure or confidentiality agreement. The term "Confidential Information" shall also include (i) non-public information that relates to the business, technology, practices, products, marketing, sales, services, finances, accounting procedures, or legal affairs of Mini-Circuits and its affiliates, (ii) information that is marked or otherwise identified as confidential or proprietary, and (iii) information that would otherwise appear to a reasonable person to be confidential or proprietary in the context and circumstances in which the information is known or used. Disclosure and use of Confidential Information by Recipients is only permitted to the extent expressly authorized by members of Mini-Circuits Senior Management or as required by applicable law or regulations. Confidential Information is considered trade secrets or confidential information and remains the property of Mini-Circuits or the applicable third-party that has disclosed the information to Mini-Circuits. Any Confidential Information obtained by Recipients during or through their employment or relationship with Mini-Circuits must be treated as strictly confidential and may not be used for the purpose of furthering current or future outside employment or activities or for obtaining personal gain or profit. The obligations to protect Confidential Information shall continue even after Recipient's employment or relationship with Mini-Circuits has terminated.

When we do accept or retain government classified materials, Mini-Circuits has internal procedures designed to maintain those materials in accordance with applicable law. Employees who have access to such materials will safeguard the materials according to government regulations, including applicable agency procedures, and Mini-Circuits' internal procedures.



## 8. Anti-Corruption

In the conduct of Mini-Circuits' business, no bribe, kickback, or similar remuneration or consideration of any kind is to be given or offered to any individual, entity, or organization.

It is a criminal offense for any U.S. enterprise to offer a bribe to an official, political party, party official or candidate for political office for the purpose of obtaining, retaining, or directing business to any person, regardless of whether that person is the one making the bribe. A bribe may take the form of an offer, payment, promise to pay, or authorization of the payment of any money or anything of value.

All Mini-Circuits' suppliers, agents, contractors, employees and other personnel must comply with all laws, rules and regulations and with Mini-Circuits' Anti-Corruption Policy as may be amended by Mini-Circuits from time to time in each country where we do business.

## 9. Conflict Minerals Policy

Mini-Circuits is committed to the protection of human rights and the promotion of high ethical business standards. Accordingly, Mini-Circuits supports the humanitarian goal of ending the armed conflicts in the Democratic Republic of the Congo and its adjoining countries (collectively, the "DRC Countries"), which are partially financed by the exploitation of "conflict minerals" (as defined in 17 C.F.R. §240.13p-1(d)(3)) sourced from DRC Countries.

### 9.1 Verification Approach

Towards that end, and in consideration of the disclosure requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (P.L. 111-203, §1502), Mini-Circuits set up a multi-functional team in early 2013 in order to develop an approach to implementation of due diligence measures designed to determine the source of conflict minerals necessary to the production or functionality of products manufactured by Mini-Circuits or which Mini-Circuits contracts to manufacture (collectively, "Affected Products").

Mini-Circuits verification process consists of:

- a)** requiring Mini-Circuits' direct suppliers to certify that components of Affected Products sold to Mini-Circuits either (i) are "DRC conflict-free" (as defined in 17 C.F.R. §240.13p-1(d)(4)), or (ii) contain only conflict minerals sourced from smelters validated as compliant to CFS protocol using the CFS Compliant Smelter List; and
- b)** requesting Mini-Circuits' direct suppliers of components of Affected Products verify the accuracy of a completed standard conflict minerals reporting template, which is based on the industry-accepted Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative Conflict Minerals Reporting Template, and the responsiveness or non-responsiveness of the direct suppliers in accordance with such requests.

### 9.2 Reports

Mini-Circuits is pleased to provide our customers with a completed Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative Conflict Minerals Reporting Template. To access visit: [http://www.minicircuits.com/quality/conflict\\_minerals.html](http://www.minicircuits.com/quality/conflict_minerals.html).

### 9.3 Declarations and Determinations

Based on Securities and Exchange Commission Official Release No. 34-67716, Mini-Circuits has determined and assumes that it does not contract to manufacture the commercial-off-the-shelf (“COTS”) components of its parts because Mini-Circuits does not exert sufficient influence over the materials, ingredients or sub-components contained therein. Accordingly, conflict minerals contained in COTS components of Mini-Circuits parts are excluded from conflict mineral declarations made by Mini-Circuits.

In addition, these declarations are based on and made subject to: (a) Mini-Circuits’ purchase order term with its direct suppliers, which requires that all products sold to Mini-Circuits are either (i) ‘DRC conflict-free’ (as defined in 17 C.F.R.§ 240.13p-1(d)(4)), or (ii) contain only conflict minerals sourced from smelters validated as compliant to CFS protocol using the CFS Compliant Smelter List, and the responsiveness or non-responsiveness of the direct suppliers in accordance with such purchase order term; and (b) the responsiveness or non-responsiveness of Mini- Circuits’ suppliers to Mini-Circuits’ standard conflict minerals supplier certification in accordance with such certification, which is based on the Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative Conflict Minerals Reporting Template.

### 9.4 Inquiries

Inquiries concerning conflict minerals should be addressed to:

[conflictminerals@minicircuits.com](mailto:conflictminerals@minicircuits.com).

## 10. Anti-Counterfeit Policy

Mini-Circuits recognizes the need to prevent counterfeit parts from being used in our products and has implemented a documented policy via our ISO 9001/AS9100 systems consistent with the AS5553 standard as follows:

- Maximize availability of authentic parts throughout product lifecycle (anticipate and manage obsolescence)
- Establish preference to buy from OEMs or authorized distributors
- Specify contract/PO quality requirements
- Detect counterfeit parts through incoming inspection
- Detect, verify, control counterfeit parts after initial receiving inspection
- Control suspected or confirmed counterfeit parts to prevent re-entry into supply chain
- Report counterfeit parts to customers, and other authorities

## 11. Code of Conduct – Supplier Supplement

This Code of Conduct is applicable to all Mini-Circuits operations and to any party that contributes to Mini-Circuits products (“Supplier”).

### 11.1 Compliance

Mini-Circuits requires the Supplier and its subcontractors to comply with this Code of Conduct, which may stipulate higher standards than required by national laws.

### 11.2 Obligation to Inform

It is the responsibility of the Supplier to ensure that its employees and subcontractors are informed about and comply with this Code of Conduct.

## IMPORTANT NOTICE

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