



Conflict Minerals Policy

1 Background

Certain materials (tin, tungsten, tantalum and gold) commonly found in manufactured electronics often originate from mines located in or near the Democratic Republic of Congo (DRC). Profits from some of these mines are controlled by groups that engage in continued violence and human rights violations, which is why these specific materials have been designated as “conflict minerals” (whether the minerals originated from this region or not). In July 2010, The Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) became U.S. law, requiring companies to respond to new reporting requirements related to conflict minerals usage. On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved a rule requiring all publically traded companies subject to the SEC to report annually the presence of conflict minerals originating in DRC or adjoining countries (Covered Countries) in the products that they manufacture or contract to manufacture when the presence of the conflict minerals are necessary to the functionality or production of a product. Adtran is committed to full compliance with this legislation and is implementing a comprehensive due diligence process to meet our reporting obligations.

2 Policy

Adtran is committed to sourcing components and materials from companies that share our values around human rights, labor, ethics and environmental and corporate social responsibilities. We support the effort to end the violence and human rights violations in the DRC region through the responsible sourcing of conflict minerals, specifically tin, tantalum, tungsten and gold. While Adtran does not source conflict minerals directly, for the materials, parts and components that we procure, we will exercise the due diligence necessary to determine the source of any conflict minerals in our supply chain. We will conform to industry best practices in determining with reasonable certainty the origin of the conflict minerals used in our products and will report these results in accordance with published SEC requirements.

3 Adtran’s Expectation for Our Supply Chain

Adtran expects its suppliers to follow industry standard best practices for the sourcing of conflict minerals. In support of that, suppliers are encouraged to:

- **Adopt a conflict minerals policy** to reasonably ensure that tin, tungsten, tantalum and gold used in the products that they manufacture are not supporting the violence and human rights violations in the DRC region.
- **Establish their Conflict Mineral Status** via the timely completion of the RBA-GeSI Conflict Minerals Reporting Template (CMRT).
- **Establish their own Due Diligence Program** to ensure that their supply chain is not supporting the violence and human rights violations in the DRC region, including passing down RBA-GeSI Conflict Minerals Reporting Template (CMRT) to their suppliers.
- **Ensure parts and products provided to Adtran originated from a RMI Conformant Smelter** as validated by the Responsible Minerals Assurance Process.