

## **ARRIS International, plc (ARRIS) Conflict Minerals Policy**

### **Our Policy**

ARRIS International, plc including its worldwide subsidiaries (ARRIS) is committed to the advancement of human rights for all and as part of this commitment we strive to be conflict free in our products and within our supply base. We support the [United Nations Universal Declaration of Human Rights](#) per our [ARRIS Human Rights Policy](#) and the [Responsible Business Alliance](#) (RBA, formerly EICC) efforts to drive global policy to reduce and eliminate all conflict minerals.

### **Background**

ARRIS products, like virtually all consumer electronics, contain various metals, including tantalum, tin, tungsten and gold, (3TG) which originate in mines around the world. The 3TG metals have become known as ‘conflict minerals’ because they are in part sourced from Eastern provinces of the Democratic Republic of Congo (DRC) where a decade-long civil war is continuing. Illegal armed groups control mines and transit routes to fund their violent operations.

In the U.S. the Dodd-Frank Act requires companies to file annual reports with the U.S. Securities and Exchange Commission (SEC) beginning 31st May 2014, indicating if they are using 3TG originating from the DRC or adjoining countries.

We are also closely monitoring the development of other Conflict Minerals regulations in our global markets.

### **Our Program**

As a member of the RBA, ARRIS has adopted the [RBA Code of Conduct](#), which our ARRIS Supplier Code of Conduct is based upon. ARRIS has implemented a due diligence program to identify and trace the 3TG minerals in our supply chain, based on the procedures and tools provided by the RBA and the Organization for Economic Co-operation and Development (OECD). Our current due diligence program consists of the following activities:

1. Tracing 3TG in our supply chain using the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT)

We have adopted the RMI CMRT and are requiring our suppliers to use this template as well. Currently, we send the CMRT for completion to all of our production suppliers. We integrate that data into a Conflict Minerals management tool documenting the overall progress of our supplier compliance program. We continue to add supplier information to this database as they respond.

Under the ARRIS Supplier Code of Conduct and RBA code of conduct for responsible sourcing of minerals, suppliers shall exercise due diligence on the source and chain of custody of minerals used in the manufacturing of their products, and make their due diligence measures available to customers upon request. See more details at: [Responsible Minerals Initiative](#).

## 2. Identifying the smelters in our supply chain

Our suppliers should source only from certified conflict free smelters. To accomplish that objective, we are identifying the smelters in our supply chain based on the information gathered through the RBA/RMI reporting template. The RMI maintains [a list of smelters](#) that have been certified as conflict free. We hope to see the process of certification proceed more quickly.

### OECD guidance

ARRIS requires its suppliers to adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and we follow the guidance in our own due diligence program.

## 3. Dodd Frank compliance

ARRIS is compliant with SEC reporting requirements. ARRIS SEC filings related to Conflict Minerals may be found at: [SEC Filings](#)

#### 4. Participation in industry initiatives

ARRIS is a participating member of the RBA's Responsible Minerals Initiative which provides industry tools, due diligence guidance and smelter certification services. More information about RMI's important work may be found here: [Responsible Minerals Initiative](#)

A handwritten signature in black ink, appearing to read "B. McClelland".

**Bruce McClelland**  
ARRIS CEO  
February 2018