

Xcerra Corporation Conflict Minerals Policy

“Conflict Minerals” refer to specific minerals and their derivatives, which include gold, tin, tantalum and tungsten, and have been linked to the funding of armed groups located within conflict areas in the Democratic Republic of the Congo and adjoining countries. Conflict Minerals may be making their way into the electronics industry supply chain and fueling human rights violations and environmental degradation.

In 2010, Congress enacted the Conflict Minerals provisions of the Dodd-Frank Street Reform and Consumer Protection Act, with the goals of eliminating the illegal trade in Conflict Minerals and cutting the funding of armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries engaged in significant human rights abuses. Xcerra supports these efforts to curtail human rights abuses and other illegal activities, and expects its suppliers to take actions consistent with that law.

Xcerra strives for a Conflict Mineral free supply chain and supports industry-wide efforts to implement due diligence within the standards, systems and procedures that are intended to ensure that Conflict Minerals are not used in products manufactured in the electronics industry. In addition to requiring that our suppliers comply with applicable laws, we expect all of our suppliers to source materials from environmentally and socially responsible suppliers, and strive to be Conflict Mineral free.

Suppliers should not include in any products sold to Xcerra any tin, tantalum, tungsten or gold mined in the conflict areas that directly or indirectly fund armed conflict. To the extent available, Suppliers are required to use EICC-GeSI designated Conflict Mineral free smelters as the source for any of the Conflict Minerals used in the products sold to Xcerra.

Upon Xcerra’s request, each supplier to Xcerra may be required to provide a statement indicating that all products supplied either (a) do not contain Conflicts Minerals; or (b) any Conflicts Minerals included within such products have originated from non-conflict areas or from smelters that have been validated by an independent private sector party to be conflict free.

Xcerra requires that all of its suppliers develop Conflict Minerals policies, due diligence frameworks, and management systems in order to be able to make the representations described above. Without limitation, each supplier’s policies should be consistent with the Organization for Economic Cooperation and Development (OECD) guidelines. Xcerra further requests that each of its suppliers impose similar requirements throughout its respective supply chain.

Xcerra reserves the right to require suppliers of certain Xcerra products to provide written evidence of their due diligence efforts in this regard, including completion of the EICC-GeSI (Electronic Industry Citizenship Coalition – Global E-Sustainability Initiative) Conflict Minerals Reporting Template.

On an on-going basis, Xcerra will evaluate relationships with its suppliers to ensure continued compliance with this policy. Xcerra reserves the right to request additional documentation from its suppliers regarding the source of any Conflict Minerals included in its products. In addition, suppliers must maintain and provide to Xcerra upon request traceability data. Xcerra reserves the right to terminate its relationship with any suppliers who do not comply with these requirements.

Any questions or concerns regarding Xcerra’s Conflict Minerals Policy, program or report can be addressed to conflictminerals@xcerra.com.