



APG Cash Drawer, LLC

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Conflict-Free Minerals Policy

APG Cash Drawer (“APG”) is aware of concerns that minerals sourced from conflict-affected regions within the Democratic Republic of the Congo (DRC) and adjoining countries may be making their way into the electronics industry supply chain. We understand that mining and transport operations in these regions have, in some instances, resulted in human rights violations and environmental degradation.

While APG does not source minerals under the purview of Dodd-Frank, APG strives for a DRC Conflict-Free supply chain by supporting industry-wide efforts to implement due diligence in standards, systems, and procedures. In addition to requiring that our suppliers comply with applicable local and national laws, we expect that they source materials from environmentally and socially responsible DRC Conflict-Free suppliers.

Background

In 2010, the U.S. Congress enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank), which compelled the U.S. Securities and Exchange Commission (SEC) to issue rules requiring certain companies to disclose their use of “conflict minerals”—tantalum, tin, gold or tungsten—that originated in the DRC or adjoining countries. In 2012, the SEC adopted rules requiring listed companies to disclose their use of such minerals.

APG Cash Drawer’s Engagement

We are committed to responsible mineral sourcing and we hold similar expectations of our suppliers. United States law now requires all U.S. listed companies, many of whom are direct APG customers, to investigate both the source and chain of custody of tin, tungsten, tantalum, and gold (3TG) used in their products and to disclose whether trade in these minerals supports conflict in the Democratic Republic of Congo and its neighboring countries.

We actively work to implement the five-step framework described in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We support industry-wide efforts, including the implementation of the Conflict-Free Sourcing Initiative’s Conflict Minerals Reporting Template and the efforts of the Conflict-Free Smelter (CFS) Program as described at www.conflictfreesmelter.org.

APG strives for a DRC Conflict-Free supply chain. To help our suppliers understand and meet our expectations, APG has developed its Conflict-Free Minerals Requirements for Suppliers. These requirements are based on the five-step strategy outlined by the OECD documentation.



In 2013, APG actively began surveying our direct suppliers to assess their conflict minerals usage, the state of smelters and refiners in their supply chain, and their preparedness for achieving DRC conflict-free status. This includes the following expectations:

- Each supplier is to adopt and publicly post its own conflict minerals policy and require the same from their suppliers.
- Each supplier is to query its own 3TG suppliers using the Conflict Minerals Reporting Template as directed by the APG supplier relationship manager.
- Each supplier is to submit a completed template to APG with aggregated responses from all of its 3TG suppliers.
- Each supplier must commit to make best efforts to engage with and obtain information from any of its 3TG suppliers that did not respond to the query.
- Each supplier is to update its template bi-annually with new information from all 3TG suppliers. For training and information on how to complete the Template, navigate to <http://www.conflictfreesmelter.org>.

Appendix A includes an overview of general cash drawer construction and our assessment of the likelihood of 3TG presence in our products as of this issue date.

Appendix A - APG Cash Drawer's Product Assessment

A review of the cash drawer materials content

Housing, Chassis, Sliding Tray assembly (including Rails), and Latching Components

Steel Composition: Fabricated and finished cold-rolled steel; conforms to the ASTM Standard Specification for cold-rolled sheet steel ASTM A1008 CS Type B

Refer to Table 1 in the ASTM Standard listed above for chemical composition in cold rolled steel sheet designation CS

A review of the composition of the cold-rolled steel indicates no potential for the inclusion of 3TG.

Cosmetic Front Panel

Steel Composition: Fabricated and finished stainless steel; conforms to the ASTM Standard Specification for stainless steel sheet ASTM A240

Refer to Table 1 in the ASTM Standard listed above for chemical composition in stainless steel sheet

A review of the composition of the stainless steel indicates no potential for the inclusion of 3TG.

Finishing and Coatings

Composition: Electro-deposited zinc; conforms to ASTM Standard Specification Electro-deposited Coatings of Zinc on Iron and Steel ASTM B633

Composition: Powder-coated surfaces

All finishes and coating specified and applied to components by APG or APG vendors conform to the EU Directive 2011/65/EU for the Restriction of Hazardous Substances and are fully RoHS Compliant.

A review of the composition of these coatings indicates no potential for the inclusion of 3TG.

Alternate Sliding Tray and Integral Front Panel

Plastic Composition: Acrylonitrile Butadiene Styrene (ABS) (chemical formula $(C_8H_8)_x \cdot (C_4H_6)_y \cdot (C_3H_3N)_z$) is a common thermoplastic material used in injection molded components

A review of the composition of the ABS plastic indicates no potential for the inclusion of 3TG.

Alternate Latching Components

Plastic Composition: Glass-filled Nylon, injection molded plastic

A review of the composition of these components indicates no potential for the inclusion of 3TG.

Till Insert Tray

Composition: The till insert tray is an assembly of molded plastic and cold rolled steel components.

A review of the composition of these components and materials indicates no potential for the inclusion 3TG.

Electrical Device Components - Solenoid

Composition: The solenoid is an assembly of copper wire wound on an ABS plastic core. A final wrapping is applied for protection.

Terminations (for the subsequent interconnecting cables) are comprised of electrodeposited zinc coating over cold rolled steel terminals.

A review of the composition of the solenoid assembly indicates no potential for the inclusion of 3TG.

Hardware Components and Coatings

Composition: Electrodeposited Zinc coating over common hardware components such as rivets and screws.

A review of the composition of these components indicates no potential for the inclusion of 3TG.

Electronic Components – Microswitch and Interconnecting Cables

Composition:	Varies
	Microswitch - Miniature Basic Switch, Single Pole Double Throw Circuitry, 11 A at 250 Vac, Pin Plunger Actuator, 0.73 N [2.63 oz] Maximum Operating Force, Silver Contacts, Quick Connect Termination, CSA, UL
	Inter-connecting Cable assemblies are comprised of PVC jacket over individual 22-26AWG conductors and various terminations including crimp-style quick connect terminals or "RJ Plugs".
	Circuit Board assemblies are comprised of electronic components and interconnection termination header connectors.

A review of the composition of these components indicates the potential for the inclusion of 3TG.

Gold may be present in trace amounts. For instance, gold is commonly applied as flash coating over steel components used in termination and interconnection components.

Tantalum may be present in trace amounts. For instance, tantalum may be a material used within in a fully encapsulated capacitor component which in-turn may be present on a circuit board assembly inside the cash drawer.

As of this issue date, if either gold or tantalum are present, APG is unable to confirm that these minerals did not originate from the conflict-affected areas defined by the Dodd-Frank legislation.

APG has initiated the actions described above to ascertain the scope of 3TG presence in these components and to attest a conflict-free supply chain.

For more information on this and other APG Cash Drawer policies, navigate to:
<http://www.cashdrawer.com/the-environment>.