



October 20, 2015

Our Human Rights Policy:

Inside Track Cabling's Human Rights Policy comprises the following five principles:

Children and Young Workers

As a fundamental principle, we do not employ children or support the use of child labor. We do encourage the creation of educational, training or apprenticeship programs tied to formal education for young people.

Freedom of Engagement

We believe that people should work because they want or need to, not because they are forced to do so. We prohibit the use of prison labor, forcibly indentured labor, bonded labor, slavery, or servitude.

Equality of Opportunity

We recognize, respect, and embrace the cultural differences found in the occupational marketplace. Our workplace is a meritocracy where our goal is to attract, develop, promote, and retain the best people from all cultures and segments of the population, based on ability. We have zero tolerance for discrimination or harassment of any kind.

Compensation

We ensure that compensation meets or exceeds the legal minimums and is competitive with industry standards. Our compensation philosophy is clearly communicated to all employees and is in full compliance with all applicable laws.

Freedom of Association

We recognize and respect the freedom of individuals to join, or refrain from joining, legally authorized associations or organizations.

Our Code of Conduct:

Inside Track Cabling has adopted the UN PRR Framework for business and human rights and endorses the UN Global Compact with respect to human rights. The compact's ten principles provide that businesses should support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. We are committed to maintaining a culture of expected adherence to the UN Guiding Principles between ourselves, our suppliers, our business partners and the global community.

In our work environment, we respect human rights primarily by providing safe and healthy working conditions for our employees and ensuring non-discrimination in human resource practices. We value and respect human rights by contributing our time to the well-being of the community in which we operate and in striving to do no harm. We believe we influence the standards of conduct in the community by living our values.

Our ability to directly influence the standards of conduct of people we do not employ, occurs where we maintain strict control of our supply chain. In regard to our suppliers, we mandate practices, such as compliance with all environmental, health, safety and human rights standards. We also conduct audits of both new and existing suppliers to ensure they meet our safety standards and values before they supply materials to our company.

We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, workers in our supply chain, members of the community in which we operate, or others who are affected by our activities. We expect our suppliers and business partners to share this commitment and to put in place policies and processes that support respect for human rights.

David L. James

Quality Systems Manager

Inside Track Cabling

Javid J. James J. Authorized Signatory