

Before the Subcommittee on International Monetary Policy and Trade U.S. House of  
Representatives  
Hearing on “The Costs and Consequences of Dodd-Frank Section 1502: Impacts on  
America and the Congo”

Statement of  
Bruce Calder  
General Manager - Claigan Environmental

May 10, 2012

Chairman Miller, Ranking Member McCarthy and Members of the Subcommittee, I am pleased to be have been invited here today to discuss the Security and Exchange Commission’s proposed rule on implementation of Section 1502 of the Dodd-Frank Act.

My name is Bruce Calder. I am the General Manager for Claigan Environmental and I am responsible for Claigan’s conflict minerals program. We work with companies across industries on Conflict Minerals program management, cost management, and compliance assistance for over two hundred small, medium and large companies.

I would like to start by saying we have never seen such widespread early adoption of a transparency law. In ten years of working in restricted material compliance, including global regulations such as Europe’s hazardous substance law, its restricted chemicals law, and California’s toxins and safe drinking water law, I have never seen so many companies becoming compliant before the final rules have come out. I think in many ways we are far past the issue of can it be done and is it costly – it can be done and at lower-than-publicized cost.

The hundred plus pages of our appendix are a listing of public declarations by companies committing themselves and their suppliers to being conflict free. The commitment by industry has been made. What we do not have is a clear rule from the SEC allowing companies to achieve their goals in the least constly manner.

Being transparent on mineral sourcing not only can be done, it is being done. One key element to this is the success of the conflict free smelter program. The conflict free smelter program has completed the certification review process (including full country of origin traceability) for twenty-three refiners, with another thirty-two in process. Kester, a Chicago-based company supplying 60% of the solder wire in North America (solder being one of the principal sources of tin in electronics) has completed full traceability of their supply chain and certified their respective refineries (see Appendix B of my written submission).

We have previously estimated that compliance to Dodd-Frank 1502 will cost companies an average of 0.03% of revenue in the first year (reducing by 50% in each of the following two subsequent years) with the highest possible industry cost of \$800M. Since that estimate, we have seen more efficiency from industry and our previous numbers are now a substantial overestimate.

The key reasons for differences between Claigan's projections and other projections provided to the SEC are:

- a) Claigan's cost estimates are based on real programs being implemented
- b) Contrary to other cost models submitted to the SEC, we assume that only those products that have conflict minerals 'intentionally added' will be reported on. This will exclude common materials where conflict minerals naturally occur, like steel.
- c) SEC staff has indicated the conflict free smelter program would meet the due diligence requirements of Dodd-Frank 1502, and Claigan assumes that also.
- d) Claigan assumes the third-party audit requirements in the SEC rule will not require companies to send third party auditors to their suppliers or to the DRC – this was Congress's intent.

So how is 1502 affecting US industry, and in particular, small businesses? It will go a long way towards leveling the playing field for all companies.

The most costly issue for small business in the US is not the implementation of 1502 but the lack of consistent rules. Without a final rule from the SEC US businesses need to comply to each conflict free standard as interpreted by each of their customers. With a final rule from the SEC businesses will be able to provide one set of information to all of their customers and a uniform report to the SEC - vastly reducing their costs.

The key thing to understand now, is not 'if' conflict free is going to be implemented by industry, but 'how.' The horse is out of the barn. Hundreds of manufacturers are going conflict free because of the law. I think Congress and industry agree on the important simplifications that will drive down costs. Companies need the SEC to issue the rule as soon as possible—the SEC's delay in getting a rule out is the big problem and now the biggest cost driver.


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## KEMET Policy on Conflict Minerals

KEMET fully supports the position of the Electronic Industry Citizenship Coalition (EICC), the Global e-Sustainability Initiative (GeSI), the Electronic Components, Assemblies and Materials Association (ECA) and the Tantalum-Niobium International Study Center (TIC) in avoiding the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries, in line with full compliance to the EICC's Electronic Industry Code of Conduct. KEMET's tantalum supply base has been and continues to be certified to be sourced from conflict free zones. All of KEMET's tantalum material suppliers have complied with and issued signed Letters of Certification attesting that KEMET Corporation will not receive tantalum powders and wire made from tantalum ores illegally mined in the Democratic Republic of Congo. In addition, all KEMET tantalum raw material providers have either been Conflict Free Smelter (CFS) certified per the EICC/GeSI CFS Assessment Program or are awaiting the third party audit to complete their CFS certification. This policy and certification process is being implemented for all conflict minerals. KEMET will immediately discontinue doing business with any supplier found to be purchasing materials which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries. KEMET will continue to work through the EICC, GeSI, ECA and TIC towards the goal of greater transparency in the supply chain.

Summary of activities to develop a transparent supply chain....

- KEMET was a member of the EICC/GeSI working group that developed the Conflict Free Smelter (CFS) Assessment Program.
- KEMET is participating in the pilot implementation phase of the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- KEMET will rely on the EICC/GeSI third party audits to supplement our internal due diligence of conflict mineral suppliers
- KEMET is monitoring the progress of the EICC/GeSI audits to ensure our supply chain is conflict free
- KEMET fully supports section 1502 "Conflict Minerals" of the Dodd-Frank US Financial Reform Bill HR 4173 and will comply with all reporting requirements

February 22nd, 2012

*Manufacturing Mission-Critical Printed Circuit Boards Since 1968!*

Monday, August 29, 2011

For immediate release: Calumet Electronics to begin Conflict Minerals Initiative

CALUMET, MI: PCB Manufacturer - Calumet Electronics Corp. (CEC) announces new initiative to address pending “due diligence” requirements for Conflict Minerals.

Consistent with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, Calumet is undertaking a number of actions to address the problem of conflict minerals –or the exploitation and trade of gold, columbite-tantalite (coltan), cassiterite (tin), wolframite (tungsten), or their derivatives –sourced from the eastern Democratic Republic of the Congo, or DRC, that have helped to fuel conflict in the eastern DRC.

Section 1502 of the Dodd-Frank Act instructs the SEC, in consultation with the Department of State, to promulgate regulations requiring, in part, companies required to file reports with the SEC, to submit annually a description of the measures taken to exercise due diligence on the source and chain of custody of the four “conflict minerals.” “This statement has been interpreted by some privately held companies as an exemption from reporting requirements, states Stephen J. Marshall, Calumet’s Materials Declaration Administrator, the reality is that OEM’s must exercise due diligence on and formalize the origin and chain of custody of conflict minerals used in their products and on their suppliers to ensure that conflict minerals used in the products of such suppliers do not directly or indirectly finance armed conflict or result in labor or human rights violations.”

Calumet believes that it is critical to begin now to perform meaningful due diligence with respect to conflict minerals. Calumet’s Conflict Mineral Initiative will facilitate useful disclosures to customers and suppliers to meet Section 1502 of the Dodd-Frank Act. The initiative features;

- Establish strong company management systems based on industry standards;
- Identify and assess risk in the interconnect industry supply chain;
- Design and implement a strategy to respond to and report identified risks;
- Report on supply chain due diligence.

For more information on RoHS, REACH, and Conflict Minerals Material Declarations for printed electronic circuit boards contact;

[sourcecompliance@calumetelectronics.com](mailto:sourcecompliance@calumetelectronics.com) and visit <http://www.cec-up.com/program.htm>





May 6, 2012

## Conflict Free Minerals Self Audit Checklist

Avago Technologies is committed to eradicate atrocities in the Eastern Region of the Democratic Republic of the Congo (DRC) and to eliminate conflict minerals from our supply chains.

The coverage on human rights violations in the Democratic Republic Congo (DRC) and environmental issues resulted from the mining of minerals, including Tantalum (Ta), Tungsten (W), Tin (Sn) and Gold (Au) has caused wide public concerns. In July 2010, the United States Congress signed into law the <Dodd-Frank Wall Street Regulation and Consumer Protection Act> containing a section that regulates "conflict minerals". The legislation requires companies listed on the U.S stock exchange to disclose annually to the Securities and Exchange Commission (SEC) whether products were produced with conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries.

Avago Technologies is taking measures on the sources and origins of the mentioned minerals to ensure a conflict-free supply chain. Avago Technologies Statement on Conflict Free Minerals can be found in our website <http://www.avagotech.com/pages/corporate/quality/environment/>

We expect our suppliers to comply with the Electronic Industry Code of Conduct and to only source materials from environmentally and socially responsible suppliers.

We ask our suppliers to

1. Comply with all national and other applicable laws and regulations concerning the sourcing of minerals from conflict areas
2. Not use the conflict minerals originating in the Democratic Republic Congo (DRC) and its adjoining countries
3. Trace the origins of the specific metals used, fill in this self audit checklist and submit back to Avago Technologies
4. Make the same requirement to your upstream suppliers

We seek your cooperation to complete the self audit on time. Thank you for your great support in this activity!

For more information, please visit the following links:

- [www.eicc.info](http://www.eicc.info)
- [www.gesi.org](http://www.gesi.org)
- [www.enoughproject.org](http://www.enoughproject.org)

BC Ooi

Senior Vice President  
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Avago Technologies



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### **SiTime Declaration of Conflict Metals/Supplies from Conflict-Free Mines**

SiTime is familiar with and fully supports the conflict free metal/mineral regulation.

SiTime products contain gold, which is considered a conflict metal. Gold wire is used for the wire bonding in SiTime products. SiTime has completed due diligence to verify the source of the gold used in our products is not a conflict metal. SiTime depends on our gold wire suppliers to take commercially reasonable measures to lawfully supply metals from "conflict-free" mines.

To that effect, SiTime has assurance from our gold wire supplier, Tanaka Electronics (Malaysia) SDN. BHD, that all the raw material that the parent company of the supplier (Tanaka Kikinzoku Kogyo) purchases for the bonding wire production are all from legitimate sources; which are 'Good Delivery Gold Bars' certified, or accredited by the 'London Bullion Market Association'. Our supplier certifies the following:

- 1) Tanaka Electronics Malaysia Sdn Bhd DO NOT and WILL NOT directly mine material from any minefield with social problems.
- 2) Tanaka Electronics Malaysia Sdn Bhd DO NOT and WILL NOT knowingly purchase any material from any minefield with social problems.

Additionally, SiTime has reviewed the London Bullion Market Association list of mining suppliers to confirm mines in conflict countries are not accepted. We have reviewed the LBMA policies and are satisfied the LBMA has appropriate screening measures for accepting new mining suppliers.

Yours sincerely,

Mark Hobaugh

Director of Operations and Quality

SiTime Corporation

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Date October 11, 2011

## Declaration on the Use of Conflict Minerals

The coverage on human rights violations in the Democratic Republic Congo (DRC) and environmental issues resulting from the mining of minerals, including Tantalum (Ta), Tungsten (W), Tin (Sn) and Gold (Au) has caused wide public concerns. In July 2010, the United States Congress signed into law the Dodd-Frank Wall Street Regulation and Consumer Protection Act containing a section that regulates conflict minerals. The legislation requires companies listed on the U.S stock exchange to disclose annually to the Securities and Exchange Commission (SEC) whether products were produced with conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries.

SCHURTER complies with all national and other applicable laws and regulations. As a consequence, we are committed to keeping our supply chain free from conflict minerals which are covered by laws and regulations concerning the sourcing of minerals from conflict areas.

Based on currently available information, SCHURTER does not use conflict minerals originating in the Democratic Republic Congo (DRC) and its adjoining countries.

SCHURTER AG is renowned for its commitment to environmental protection – as early as in 1996, we were among the first companies to receive the certification for our environmental management system according to ISO 14001. We have issued two SCHURTER Sustainability Reports, which summarize what we have done and how we have shaped up in the field of economic, social and environmental corporate management. The latest report is available on our web site [www.schurter.com](http://www.schurter.com)

Yours sincerely

SCHURTER AG



Rolf Nussbaumer  
Group Quality Management





# Conflict minerals

## The issue

HP requires its suppliers to conduct their worldwide operations in a manner that respects labor and human rights, including sourcing minerals that do not directly or indirectly finance armed groups. (See the [HP Supplier Code of Conduct](#).) We have, therefore, been deeply concerned by human rights violations related to the trade in minerals from conflict zones in the Democratic Republic of Congo (DRC).

The "conflict minerals" of concern are those used to produce tantalum, tin, tungsten, and gold. Global supplies of these metals come from many sources, including mines in the DRC, which are estimated to provide approximately 18% of global tantalum production, 4% of tin, 3% of tungsten, and 2% of gold.<sup>1</sup> Some of the mines in the DRC are controlled by militias responsible for atrocities that have been committed in that country's decades-long civil war. The background of the Congolese conflict is complicated and its resolution requires action on multiple fronts—but it's clear that promoting legitimate trade in minerals in the region can help.

## HP's engagement with

### nongovernmental organizations

HP collaborates with stakeholder and nongovernmental organizations (NGOs) to understand their perspectives and to work towards ending the link between minerals trade and the funding of armed conflict. For example, HP was one of a select group of corporations to join socially responsible investment (SRI) organizations and NGOs in providing recommendations to the U.S. Securities and Exchange Commission (SEC) regarding rulemaking in this area. (See Influencing policy and legislation below.)

“As one of the key organizers of the multi-stakeholder comments on conflict minerals submitted to the SEC, I can say that it was valuable having HP involved in the process. HP was genuine and pragmatic in our consensus negotiations, and was realistic about what can actually be implemented by electronics companies while striving to do the most possible to ensure armed groups are not benefiting from mineral sales.”

### **Patricia Jurewicz** director, Responsible Sourcing Network (RSN)

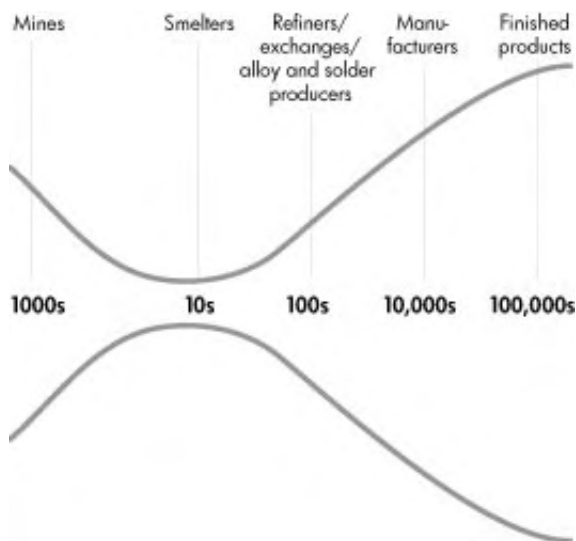
HP also received recognition for its efforts within the industry to address the DRC conflict minerals issue from Enough, a campaign project of the NGO, Center for American Progress, to end genocide and crimes against humanity. Founded in 2007, Enough focuses on crises in Sudan, eastern Congo, and areas of Africa affected by the Lord's Resistance Army. In its 2010 report, [Getting to Conflict-Free: Assessing Corporate Action on Conflict Minerals](#), Enough credits HP with being the leader in the electronics sector.

## Why HP is involved

Tantalum, tin, tungsten, and gold are used to varying degrees in components commonly found in electronic products,<sup>2</sup> although all are used extensively by other industries as well. Perhaps the most significant is tantalum, as more than half of its consumption relates to capacitors for electrical equipment. Tin is also used extensively, primarily in solder (which represents about a third of total tin use across all industries).

The minerals supply chain is long, complex, and involves several layers: from mining, through in-country traders and exporters, to smelters, refiners/metal exchanges/alloy producers, and finally to component and other manufacturers (see graphic). The smelter is a critical control point, because it is the stage where minerals from many sources are processed to produce a refined metal.

### Illustration of global tin supply chain\*



- \* The supply chain varies significantly for each of the minerals/metals discussed in this section. This graphic is designed to illustrate the complexity of the tin supply chain and the relative number of the types of organizations involved, but not to provide precise information. Approximately 20% of the world's production of tin comes from recycled and scrap sources. This is not represented in this graphic.

The vast majority of refined metals used in HP products are sourced by companies within our multi-tier supply chain, typically several stages removed from HP. We are setting clear expectations with our suppliers regarding DRC conflict-free mineral sourcing, as described in our [Supply Chain Social and Environmental Responsibility Policy](#).

## HP's leadership

Our approach to establishing validated DRC conflict-free sources of these metals has four components:

- Tracing the metal to the source
- Developing a conflict-free smelter validation program

- Establishing an in-region mineral certification system
- Influencing policy and legislation

## Tracing the metal to the source

HP was instrumental in establishing the [Electronic Industry Citizenship Coalition \(EICC\)-Global e-Sustainability Initiative \(GeSI\) Extractives Work Group](#) in 2007 and has helped to develop the [common industry supplier survey tool](#) supplier survey tool as a part of a sub-team of the work group. HP and the industry are using the tool to obtain the names of smelters used and information about how this requirement is communicated to sub-tier suppliers. We have made progress in identifying smelters in our supply chain and are working to pinpoint the mines that supply each smelter.

## Developing a conflict-free smelter validation program

Through the EICC-GeSI Extractives Work Group, we have helped to develop stakeholder-approved audit protocols for smelters, and have visited smelters to gain a better understanding of their operations. HP was one of four companies on the Extractives Work Group Executive Audit Review Committee charged with reviewing audit results. Through March 2011, the audit team has audited 14 facilities for tantalum and is currently facilitating an external review of the tin audit protocol. (See [www.eicc.info/extractives.htm](http://www.eicc.info/extractives.htm).) As DRC conflict-free smelters are validated through this program, HP plans to direct our suppliers to use these smelters.

## Establishing an in-region mineral certification system

Conflict-free smelters require access to DRC conflict-free minerals. HP has provided leadership in three distinct efforts to advance responsible sourcing of minerals from the DRC region.

- Contributing financial and in-kind support to ITRI, formerly the International Tin Research Institute, and the Tin Supply Chain Initiative (iTSCi), aimed at developing a system to trace minerals between the mine and smelter.
- Participating in the EICC-GeSI In-Region Sourcing panel which engages government, NGOs, and industry to advance due-diligence, transparency, and certification initiatives in the DRC. In 2010, this body communicated the urgent need for an in-region mineral certification system to the International Conference on the Great Lakes Region (ICGLR).
- Developing a concept paper for a public-private partnership convening relevant stakeholders to advance a credible, market-driven, locally and internationally supported mineral development program in the African Great Lakes region. The mineral development operation would respect human rights and adhere to environmental principles, operate legally, and benefit people and communities as a path to peaceful economic development.

## Dodd-Frank Wall Street Reform

### and Consumer Protection Act

In the United States, new legislation is calling attention to the issue of DRC conflict minerals and requiring action by corporations to conduct and disclose due diligence on the source of these minerals used in products.

The SEC has responsibility for administering Section 1502 of the [Dodd-Frank Wall Street Reform and Consumer Protection Act](#). The law requires due diligence with respect to the sourcing of columbite-tantalite, cassiterite, wolframite, gold, or their derivatives, including a determination as to whether trade in these minerals directly or indirectly finances or benefits armed groups in the DRC or adjoining countries. Publicly traded companies must conduct due-diligence measures to determine the source of these minerals in their products, and must disclose a description of their due-diligence measures and findings if they source conflict minerals from the DRC or an adjoining country (or if they are unable to determine the source of the minerals they use). HP fully supports this legislation.

## Influencing Policy and Legislation

Progress on addressing the DRC conflict minerals issue also requires appropriate regulatory frameworks, and HP has been a leader in this area. We supported the objectives and passing of recent U.S. legislation, the Dodd-Frank Wall Street Reform and Consumer Protection Act (see sidebar). We also contributed to the Organisation for Economic Co-operation Development (OECD) [Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#), endorsed by the United Nations and ICGLR, and referenced by the SEC's proposed rule.

- <sup>1</sup> Gold usage from <http://minerals.usgs.gov/minerals/pubs/commodity/gold/myb1-2008-gold.pdf>, tin usage from <http://minerals.usgs.gov/minerals/pubs/commodity/tin/myb1-2008-tin.pdf>, tantalum usage from <http://minerals.usgs.gov/minerals/pubs/commodity/niobium/mcs-2010-tanta.pdf>, and tungsten usage from table 5 in <http://minerals.usgs.gov/minerals/pubs/commodity/tungsten/myb1-2008-tungs.pdf>.
- <sup>2</sup> HP has taken steps to research and better understand the locations and quantities of these metals used in our products. We estimate that the average HP 2 kg notebook contains approximately 0.6g of tantalum, 10g of tin, 0.00009g tungsten, and 0.3g of gold.

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06 January 2012

Dear Customer:

Thank you for your recent communication regarding conflict minerals. We are aware of the conflict minerals reporting obligations legislated by Section 1501 of the U.S. Dodd-Frank Wall Street Reform Act. We are diligently working to obtain information regarding the source and origin of any conflict minerals that may be present in the product which we provide to you, but due to the breadth of this task, it will take time.

The Securities and Exchange Commission (SEC) has not yet published the regulation and as a result, we believe parts of your inquiry may be premature. Our trade association IPC – Association Connecting Electronics Industries anticipates the SEC will publish the conflict minerals regulation by June 2012.

While the Dodd-Frank legislation has defined the basic reporting requirements for conflict minerals, we believe the forthcoming regulation will provide many important details that may affect the reporting of conflict minerals. Based on the proposed rule published in December, 2010 and the October 18, 2011 SEC roundtable, we expect the SEC regulation to address a number of significant issues including minerals whose origin is undeterminable, minerals mined before the regulation is implemented, and minerals from recycled sources. It is prudent then to wait for the publication of the final regulation prior to providing a declaration regarding the sourcing of conflict minerals in our products.

We are, in addition, working with IPC to develop tools to support efficient data sharing and compliance for the entire supply chain. Some of these tools will include due diligence guidance, a data exchange standard, template communications, and model supplier policies. For more information about these projects, please visit IPC's website at [www.ipc.org/conflict-minerals-resources](http://www.ipc.org/conflict-minerals-resources).

To prepare for these requirements we have already begun work to determine parts/assemblies that incorporate one or more of the identified conflict minerals, communicate the information about the forthcoming SEC requirements to our suppliers, and develop our company policy on conflict minerals and management systems.

Please be assured that we understand the importance of this issue to you, our customer, and that we will continue our efforts to gather the necessary information from our supply chain in preparation for declaring the sourcing of conflict minerals in our products.

Sincerely,

A handwritten signature in blue ink, appearing to read "Griffin Tegeman", with a long horizontal flourish extending to the right.

Griffin Tegeman  
Manager, Environmentally Preferred Products Program  
Freescale Semiconductor, Inc.



## **Molex and Conflict Mining / Conflict Metals**

As an electronics manufacturer, Molex uses certain metals in the products we produce. While Molex requires all our suppliers to comply with our Supplier Code of Conduct, we recognize the complex supply chain involved with certain metals and have taken steps to ensure that virgin metals we purchase do not originate in conflict mines.

'Conflict Mining' and 'Conflict Metals' refers to the illegal control of some mines in the eastern region of the Democratic Republic of Congo in Africa. The electronics industry uses certain types of metals, some of which are potentially refined from minerals obtained from these mines.

The primary minerals and metals that could potentially come from conflict mines are:

- Cassiterite (tin)
- Gold
- Cobalt
- Coltan (niobium and tantalum)
- Wolframite (tungsten)
- Pyrochlore (niobium)

The metals Molex uses in large quantities are tin and gold. Tin is used in certain copper-alloy terminals, some platings, and solder, while gold is used in platings of some terminals. Molex does not directly purchase any of the other minerals and metals listed (cobalt, niobium, tantalum, and tungsten), so we are focusing our efforts on tin and gold suppliers.

Molex requires all our suppliers to conform to our Supplier Code of Conduct (found at [www.molex.com](http://www.molex.com)), and requires immediate corrective action from suppliers who operate in violation of this requirement. Because the supply chain for these metals is complex, Molex has taken the initiative to educate our tin and gold suppliers, trace these metals to their source, and will take corrective actions if any conflict mines are used.

Molex and its suppliers do not knowingly use any virgin tin or gold obtained from conflict mines and will regularly query suppliers to verify our requirements are being met to help ensure the health and safety of all workers in our supply chain.



TriQuint Semiconductor, Inc.  
2300 NE Brookwood Pkwy  
Hillsboro, Oregon 97124  
USA

## **TriQuint Policy on Conflict Minerals**

Thank you for your request concerning Conflict Minerals in TriQuint products. TriQuint shares your concerns about the use of natural resources to fund armed conflict in the Democratic Republic of the Congo, and is working to ensure that its activities are not funding armed conflict. TriQuint has been working with its supply chain for over a year, tracing the origins of the Conflict Minerals derivatives in its products.

### **Dodd-Frank Wall Street Regulation and Consumer Protection Act**

It is important to understand the requirements of the Dodd-Frank Wall Street Regulation and Consumer Protection Act signed on July 21, 2010. Sec. 1502 of this bill requires companies whose manufactured goods contain metals derived from Conflict Minerals or any other mineral or its derivatives determined by the Secretary of State to be directly or indirectly financing conflict in the Democratic Republic of the Congo (DRC) or an adjoining country to:

- a. Report annually to the Securities and Exchange Commission (SEC) if the minerals did originate from the DRC or adjoining countries.
- b. Submit a due diligence plan (audited and certified by an independent 3<sup>rd</sup> party) with the company's annual SEC report that includes:
  - i. A description of the measures taken by the company to prevent sourcing from the DRC; and
  - ii. A description of the products manufactured or contracted to be manufactured that are not conflict free, the facilities used to process the conflict minerals, the country of origin of the conflict minerals, and the efforts to determine the mine or location of origin.

In the original Dodd-Frank Law, the SEC had until April 17, 2011 to promulgate regulations to put this law into practice. Although reporting requirements only apply to companies required to report to the SEC, it is expected that these requirements will filter through the entire supply chain. However, the SEC recently announced that it will take longer than expected to develop these regulations, and has postponed promulgation of any regulations until the fall of 2011. Companies must issue their first report beginning with the companies' first fiscal year that begins after the promulgation of the regulations.

In the original Dodd-Frank Law, by January 17, 2011, the Secretary of State must develop a strategy that includes:

- a. A plan to promote peace and security in the DRC by supporting efforts of the Government of the DCR, to—
  - i. monitor and stop commercial activities involving the natural resources of the Democratic Republic of the Congo that contribute to the activities of armed groups and human rights violations in the Democratic Republic of the Congo; and

## Flextronics Conflict Minerals Policy

“Conflict Minerals” refers to minerals or other derivatives mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States passes HR4173, the Dodd-Frank Financial Reform Bill section 1502(b) requiring all US stock listed companies and their suppliers to disclose the chain of custody usage of conflict minerals (Tin, Tantalum, Tungsten, and Gold . . . 3TG).

Flextronics fully supports this legislation and the Electronic Industry Citizenship Coalition (EICC)/Global e-Sustainability Initiative (GeSI) position to avoid the usage of conflict minerals mined from the DRC and adjoining countries. Furthermore, Flextronics intends to adopt the EICC Due Diligence reporting process and obtain chain of custody declarations from all Flextronics sourced and managed suppliers ensuring transparency in our supply chain.

- Flextronics expects our suppliers to source materials from socially responsible suppliers.
- Flextronics expects all its suppliers to comply with the Dodd-Frank regulation and provide all necessary declarations.
- Suppliers must pass this requirement up the supply chain and determine the source of specified minerals.
- Suppliers who are non-compliant to these requirements shall be reviewed by Global Commodity Management for future business.

This Conflict Minerals policy is in line with the Global Business Initiatives on Human Rights, of which Flextronics is a member, and the framework of the United Nations Principles of Human Rights encouraging governments and businesses to respect, protect and remedy human rights.





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## CORPORATE RESPONSIBILITY



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## SUPPLIERS

### Sourcing of Metals

Motorola is extremely concerned about the social and environmental conditions in some mines that supply metals to the electronics industry. Mining activities that fuel conflict are unacceptable. Together with our peers, we are working to support the development and implementation of a tracking and validation system to ensure these raw materials come from responsible sources.

We require high labor and environmental standards in our own operations, and make concerted efforts to drive improvements. We expect our suppliers to do the same, as reflected in our [supplier code of conduct](#).

Our products contain various metals, including tantalum, tin, tungsten and gold, which originate in mines around the world. Some mining operations have been linked to poor labor and environmental practices, and there is evidence that some mining and transportation of minerals in the Eastern provinces of the Democratic Republic of Congo (DRC) are fueling conflict in the country by funding illegally armed groups.

We do not procure these materials directly; however, we are working to effect positive change. For more than five years we have asked our tantalum capacitor suppliers to identify which smelters their raw materials come from and have required these suppliers to certify that they are not sourcing conflict materials from the DRC.

Motorola supports the development of regulations and standards that help companies determine whether the sources of the materials they use are associated with conflict. We are very concerned that currently a credible, independent system that enables companies to verify the source of the metals in their products does not exist.

Motorola is collaborating with others in the industry to tackle the challenges of traceability/tracking and other issues through the Global e-Sustainability Initiative (GeSI) and Electronic Industry Citizenship Coalition (EICC) extractives workgroup. We believe this effort will drive greater transparency in the electronics industry supply chain and provide opportunities for individual companies to make greater impacts.

#### RECENT PROGRESS

##### Independent efforts

Motorola has been working to identify where potential conflict-related minerals are used in the products we produce. Our rigorous [material declaration process](#) has enabled us to better understand the applications of many different types of metals, including metals associated with the conflict in the DRC and included in the [recent legislation](#).

Motorola is working to increase awareness of the conflict minerals issue among the electronics and other industries. We have updated our supplier training and communication materials and have accepted several opportunities to engage through industry groups and supply chain meetings. We have sponsored several conflict minerals meetings to raise awareness in other industries and have participated on several panels at conferences, such as the SRI in the Rockies conference.

In addition, we have further defined our requirement for conflict-free sourcing in our supplier agreements.

##### Supporting industry efforts

In addition to our independent activities, we are an active contributor to industry efforts to tackle conflict minerals problem. We believe working together will improve our capability at a faster pace than if we tackled these challenges alone. With that in mind, we are preparing our supply chain management processes to best leverage the industry-wide approach.

We are working with other companies in our industry to develop a tracking and assurance system to enable our suppliers to validate that the materials they buy are from responsible sources. The

legitimate mining industry in the DRC is vital to the economic stability of the region, and a tracking system is essential if sourcing of metals from the region is to continue.

Motorola co-leads the GeSI and EICC extractives workgroup, which has made progress in driving greater transparency in the electronics industry supply chain. In 2009, the extractives workgroup conducted [a project to improve visibility in the minerals supply chain](#), with particular focus on identifying sources of specific minerals and understanding how these minerals move through their lifecycles — from mine to electronics manufacturing.

Using the results of this project, the workgroup initiated a conflict-free smelter process in 2010 to identify tantalum mineral smelters/processors that can demonstrate through third-party validation that they source only conflict-free material. The smelters were asked to demonstrate the sources of their materials and seven sites were visited to increase understanding of how smelters trace the source of the materials used in their refining process. Motorola participated in three of these visits, two in China and one in the U.S.

The information gained through the site visits was used to develop the scope of work for an audit program to validate the claims made by the tantalum smelters that they source only conflict-free material. The audits of tantalum smelters are in progress. The process is now being repeated with tin smelters, with plans to expand to gold and tungsten.

Motorola supports the ITRI Tin Supply Chain Initiative (iTSCI) process that allows for tracking/tracing of materials from the mine to the point of export. The Motorola Foundation provided a \$30,000 grant to support ITRI's traceability work. The iTSCI process represents an important first step toward establishing a program to enable the responsible sourcing of materials from the region. Motorola participated in an iTSCI fact-finding mission to the DRC and Rwanda to better understand the conditions on the ground. The delegation met with numerous provincial governmental officials, visited multiple mineral trading houses, a tin and gold mine and met with local non-governmental organizations in North and South Kivu.

#### ENGAGING WITH STAKEHOLDERS

The problem of mining and conflict minerals cannot be solved by one company or a single industry. To succeed, other industries, governments and civil society also must do their part. We are engaging widely to inform regulation, to gain consensus around an approach to the problem and to encourage all stakeholders to play their part. In 2010 we:

- Convened workshops to gain consensus around the tantalum and tin smelter validation processes
- Participated with the Organization of Economic Co-operation and Development (OECD) in the development of its guidelines on due diligence relating to conflict minerals
- Demonstrated our support for conflict mineral regulations in the U.S. and worked with other regional and international governmental bodies on this issue
- Co-sponsored multi-industry sessions to bring awareness of this issue to other industries that use metals, such as the jewelry and automotive sector
- Engaged a coalition of NGOs working on this issue

#### PLANS AND GOALS

We will continue to champion more responsible metal sourcing by engaging our suppliers and by participating in collaborative efforts with other stakeholders including, mining companies, non-governmental organizations, labor organizations involved in mining, other industrial sectors that purchase and use metals, the governments and multi-government organizations with jurisdiction over these issues, and end users.

We are working to support the following goals:

- Continue to participate in industry conflict-free smelter program
- Continue to support the implementation of the In-Region Sourcing program being implemented by iTSCI
- Develop a due diligence process for sourcing of metals in collaboration with our industry partners, by the end of 2011
- Implement the due diligence process for sourcing of metals, by the first quarter of 2012
- Include questions on conflict minerals in our supplier self-assessment questionnaire by the end of 2011

#### U.S. LEGISLATION ON CONFLICT MINERALS

In 2010, a [U.S. law](#) was passed that requires companies to report to the Securities and Exchange Commission (SEC) and disclose on their websites whether any materials in their products originate in the Democratic Republic of Congo or its adjoining countries. The law applies to publicly traded U.S. manufacturing companies that use certain metals in their products.

If companies are using materials from the identified countries, they are required to describe the steps they have taken to ensure the metals are from responsible sources and to give details about the location of the mine from where they originated.

Motorola supports the development of legislation that helps companies determine whether or not the sources of the materials they use are associated with conflict. Together with our industry partners, we are working to develop the systems to enable companies to verify the sources of the metals in their products.

#### FREQUENTLY ASKED QUESTIONS

**Given the severity of the situation in the Democratic Republic of Congo, why doesn't Motorola cease buying from suppliers that source from the country?**

We believe that a total embargo would make things worse, not better. Tens of thousands of people in the region depend on legitimate artisanal mining and their livelihoods and the economic stability of the region would be threatened if the ICT industry stopped buying components that contain minerals from the region. Motorola and our industry partners believe that the best way to improve standards is by working with the mining industry and minerals supply chain to raise standards and bring lasting improvements.






**What steps have you taken to trace the origins of the metals in your products?**


We have been working with our tantalum capacitor suppliers for more than five years to identify which smelters their raw materials come from. During this same time, we have required these suppliers to certify in writing that they are not sourcing materials from conflict areas of the DRC. Together with our industry partners, we are developing a validation process to identify tantalum smelters that can demonstrate through third-party validation that they only source conflict-free materials. The process is being replicated with tin smelters, coordinated by the ITRI industry group.

**Does Motorola produce any verified conflict-free products?**

Presently a system does not exist that enables companies to ensure responsible sourcing of conflict-free metals. Due to the complexity of the minerals supply chain and the number of layers and companies involved, implementing a credible tracking and assurance system takes time and requires the commitment of governments and multiple industries. Significant progress is being made toward the goal of full traceability of the source of metals.

[Motorola Home](#) > [About Motorola](#) > [Corporate Responsibility](#) > [Suppliers](#) > Sourcing of metals

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- ii. develop stronger governance and economic institutions that can facilitate and improve transparency in the cross-border trade involving the natural resources of the DRC to reduce exploitation by armed groups and promote local and regional development.
- b. A plan to provide guidance to commercial entities seeking to exercise due diligence on and formalize the origin and chain of custody of conflict minerals used in their products and on their suppliers to ensure that conflict minerals used in the products of such suppliers do not directly or indirectly finance armed conflict or result in labor or human rights violations.
- c. A description of punitive measures that could be taken against individuals or entities whose commercial activities are supporting armed groups and human rights violations in the DRC.

Also by January 17, 2011, the Secretary of State was to produce a map of areas under the control of armed groups in the DRC and adjoining countries and make this map available to the public. This map must be updated at least every 6 months. TriQuint has pursued a copy of this map, and was directed by the US Dept of Commerce to the following webpage for a copy:

[https://hiu.state.gov/Products/DRC\\_MineralsArmedGroups\\_\(June\\_2010\).pdf](https://hiu.state.gov/Products/DRC_MineralsArmedGroups_(June_2010).pdf)

This map pre-dates passage of the Dodd-Frank Law, and has not been updated every 6 months as required.

### **What are Conflict Minerals and their derivatives?**

The Dodd-Frank Wall Street Regulation and Consumer Protection Act defines “Conflict Minerals” as:

- a. Columbite-tantalum (coltan), cassiterite, gold, wolframite, or their derivatives; or
- b. Any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the DRC or an adjoining country.

It is important to note that this definition of Conflict Minerals means that all coltan, cassiterite, gold, and wolframite are Conflict Minerals, regardless of the source of the minerals. If the source was determined to be located in the DRC or adjoining countries (Angola, Congo, Central African Republic, Sudan, Uganda, Rwanda, Burundi, Tanzania, and Zambia), then reporting to the SEC is required, along with the audited and certified due diligence report.

The common derivatives from these minerals are:

- a. Coltan – columbium (niobium) and tantalum
- b. Cassiterite – tin
- c. Gold
- d. Wolframite – tungsten



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USA

It is possible that cobalt might be considered as a derivative of a Conflict Mineral in the future, as most cobalt is produced as a byproduct of the mining of laterite ores, containing copper and nickel. In 2009, the copper deposits in the Katanga Province of the DRC that stretch into Zambia were over 44% of the world cobalt production with over half the world's reserves of cobalt.<sup>1</sup> As these deposits meet the criteria for Conflict Minerals that require reporting to the SEC, TriQuint believes it is probable that cobalt will become another metal that requires reporting.

TriQuint uses all six of these metals in its products. Not every product contains every metal, but almost every product contains at least one of these metals.

### **What has TriQuint done so far?**

TriQuint has modified its Banned and Restricted Substances Specification to ban metals derived from the Conflict Region, and have been working with its Suppliers to help them begin to understand the issues around Conflict Metals. As mentioned above, TriQuint has been surveying its supply chain for the origin of the metals in components and materials purchased for over a year. Due to recent industry focus on this issue, TriQuint has begun to receive more detailed responses from suppliers regarding the origins of the Conflict Minerals supplied. It is estimated that approximately 75% of the Conflict Minerals origins have been traced either to the smelter or mines, and sometimes both.

If there are any questions regarding Conflict Metals or other Product Compliance issues, please contact TriQuint at [rohs\\_info@tqs.com](mailto:rohs_info@tqs.com).

A handwritten signature in black ink that reads "John Sharp". The signature is written in a cursive, flowing style.

John Sharp  
Corporate Product Compliance Manager

Date: 19-May-2011

USGS Links for More Information:

Cobalt - <http://minerals.usgs.gov/minerals/pubs/commodity/cobalt/>

Gold - <http://minerals.usgs.gov/minerals/pubs/commodity/gold/>

Niobium (Columbium) - <http://minerals.usgs.gov/minerals/pubs/commodity/niobium/>

Tantalum (included with Niobium information) -

<http://minerals.usgs.gov/minerals/pubs/commodity/niobium/>

Tin - <http://minerals.usgs.gov/minerals/pubs/commodity/tin/>

Tungsten - <http://minerals.usgs.gov/minerals/pubs/commodity/tungsten/>

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<sup>1</sup> See <http://minerals.usgs.gov/minerals/pubs/commodity/cobalt/mcs-2010-cobal.pdf>.

## 衝突礦物採購政策

EICC指出，部份金屬礦產已成為非洲剛果民主共和國武裝叛亂團體的主要財源，用來交易軍火、延續其與政府間的血腥衝突、蹂躪當地平民，因此引發國際爭議。建興電子身為世界公民，我們宣示並承諾不接受使用來自衝突礦區的金屬；同時，亦要求建興的供應商：

- (1) 必須履行社會環境責任；
- (2) 確保產品不使用來自剛果金及其周圍的國家和地區的“衝突礦產”；
- (3) 追溯所有產品中所含的金(Au)、鉭(Ta)、錫(Sn)和鎢(W)來源，所有供應商均應完成填寫調查表（請下載無衝突金屬調查模版[Conflict Minerals Reporting Template](#)，已回覆過最新版調查表的廠商不須再填寫）；
- (4) 將此要求傳達給貴司的上游供應商。

衝突金屬: 係指來自剛果民主共和國衝突礦區之礦物，類別有鈮鉭鐵礦，錫石，黑鎢礦與黃金等。這些礦物提煉成鉭(Ta)、錫(Sn)、鎢(W)（簡稱三T礦物）、鈷(Co)和金(Au)等，分別用於電子和其他產品。

在不久的將來，將會禁止使用某些冶煉廠所生產的金屬，因此所有關鍵供應商皆必須追溯其零件所使用到的金屬的來源及冶煉廠。

## Sourcing Policy for Conflict Mineral

Reported by EICC, that the origin of these minerals has become the Democratic Republic of Congo's main revenue sources of armed rebel groups, to deal in arms, continued its bloody conflict between government forces, devastated the local civilian population, thus triggering international disputes. LITE-ON IT, as the global citizen, we declare and commit to refusing the application of metals from fighting region; meanwhile, we request LITE-ON IT's supply chain:

- (1) Conduct your operations in a way of social and environmental responsibility;
- (2) Not use the conflict minerals originated from the Democratic Republic of the Congo (DRC) and its adjoining countries ;

- (3) Trace the origins of the metals used, e.g. Au, Ta, Sn and W, and fill in the investigation form /sign declaration (Please download [Conflict Minerals Reporting Template](#), and no need to reply again if you have completed the latest survey form before)**
- (4) Make the same requirements to your upstream suppliers.**

**Conflict metal:** The minerals composed of columbite-tantalite, cassiterite, wolframite and gold from the fighting region of Democratic Republic of the Congo (DRC). These minerals are refined into tantalum (Ta), tin (Sn), tungsten (W) (referred to as the 3 T's), cobalt (Co) and gold (Au), respectively, and are used in electronics and other products. In the near future, the metals produced by some smelters may be banned, therefore all of our key suppliers are required to map their supply chains for the metals in their components back down to smelter and then to source.

required to lodge "deposits" or identity papers upon commencing employment with the company.

#### Child Labor

Suppliers will not employ anyone under the age of 15, and/or younger than the age of completing compulsory education, or under the minimum ages established by applicable law in the country of manufacture, if higher than the age of 15. Furthermore, Suppliers of any kind will not expose anyone under the age of 18 to situations in or outside of the workplace that are hazardous, unsafe or unhealthy, and will provide adequate protection from exposure to hazardous conditions or materials.

#### Harassment and Abuse

Nordstrom expects our Suppliers to treat every employee with respect and dignity. No employee will be subject to any physical, sexual, psychological or verbal harassment or abuse. Suppliers will not use monetary fines as a disciplinary practice. Furthermore, workers must be free to voice their concerns to Nordstrom or Nordstrom-appointed staff without fear of retaliation by factory management.

#### U.S. Customs

Suppliers will comply with applicable U.S. Customs importing laws and, in particular, will establish and maintain programs and documentation to support country of origin production verification, to avoid illegal transshipping.

Suppliers shall seek ongoing education regarding Customs-Trade Partnership Against Terrorism (C-TPAT) supply chain security requirements, establish an action plan for compliance, be prepared for supply chain security audits by Nordstrom and/or third party auditor, and maintain standards set therein.

#### Environment

Suppliers must demonstrate a regard for the environment, as well as compliance with applicable environmental laws. Further, Nordstrom actively seeks Suppliers who demonstrate a commitment to progressive environmental practices and to preserving the earth's resources.

animal welfare. We strive to do business with Suppliers who source leathers, furs and any other animal by-product from entities who use fair and humane animal-welfare practices.

The Kimberly Process and Conflict Minerals Nordstrom expects all of its Suppliers to purchase all diamonds from legitimate sources not involved in funding conflict, and in compliance with United Nations Kimberly Process resolutions. This shall also be stated as such on all invoices, wherein the seller guarantees that all diamonds are conflict-free, based on personal knowledge and / or written guarantees provided by the supplier of the diamonds. Nordstrom expects all of its Suppliers to avoid use of "conflict minerals" which may directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries, in full compliance with Dodd-Frank Conflict Minerals Provisions.

#### Anti-Bribery

Nordstrom expects all its business suppliers to have programs, policies and training in place to comply with its local and/or applicable anti-bribery regulations, including without limitation the Foreign Corruption Practices Act (FCPA) and the U.K. Bribery Act, and to prevent payments made for the purpose of obtaining or retaining business.

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## **CONFLICT MINERALS POLICY FOR CUSTOMERS OF K&L MICROWAVE, INC.**

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") which contained a section that regulated "Conflict Minerals"<sup>1</sup> for the first time. The Act includes provisions that require manufacturers to perform due diligence in their supply chains to identify and disclosure the use of any Conflict Minerals and whether those Conflict Minerals originated in the "DRC Countries"<sup>2</sup>. The Act is new and regulations related to the requirements of the due diligence process have not yet been issued by the US Securities and Exchange Commission, which oversees compliance with the Conflict Minerals section of the Act.

K&L Microwave, Inc., as an operating company of Dover Corporation, a NYSE listed company, will be compliant with the Act and other regulations concerning the sourcing of our raw materials and the requirements for supply chain due diligence. We expect that our suppliers will also comply with our requests to provide statements and perform due diligence about the source of any Conflict Minerals in their products which are provided to us.

K&L Microwave, Inc., and Dover Corporation are currently implementing system processes and procedures to help us achieve compliance with the Act. We are communicating our requirements to our suppliers and vendors. Due to the complexities of the mineral supply chain, K&L Microwave, Inc. is currently unable to verify the origin for the minerals used in our products. We are working closely with our suppliers and vendors to understand the source countries of the metals contained in our products and manufacturing processes.

We do not knowingly source any product containing Conflict Minerals from the DRC Countries currently; however we are unable to provide clear supply chain verification at this time. We will continue our work on this due diligence process and advise our customers on the status of our process.

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<sup>1</sup> "Conflict Minerals" include Columbite-Tantalite (Tantalum), Cassiterite (Tin), Gold, Wolframite (Tungsten) and any derivatives from these minerals.

<sup>2</sup> "DRC Countries" include the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, Sudan (South Sudan), Tanzania and Zambia.





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2 March 2011

## **STMicroelectronics Statement on Conflict Minerals**

STMicroelectronics has a high level of concern for the issue of 'Conflict Minerals', which involves the trade of minerals (and the associated refined metals) originating in the region of the eastern provinces of Democratic Republic of the Congo (DRC) and surrounding regions where armed conflict results in human rights violations and environmental damage.

STMicroelectronics is committed to take all the appropriate actions to avoid illegal and unethical metal sourcing coming from these areas in its products. The metals in question are Tantalum (Ta), Tungsten (W), Cobalt (Co), Gold (Au) and Tin (Sn).

As part of this commitment, we have already identified the materials potentially containing at least one of the metals of concern. We require our suppliers to respond in writing to confirm that no metals provided by them for inclusion in ST products originate in the identified conflict zones. We are also leading a deeper investigation with targeted suppliers to map and trace the entire supply chain in order to achieve visibility on the complex sourcing of the relevant materials back to the mine of origin.

As a Full Member of the EICC, ST supports the third-party smelter certification program that will provide assurance that the metals they source are totally conflict-free and that their operations fully integrate the guidelines of the EICC Extractives workgroup.

Further to the actions described above, STMicroelectronics will take the appropriate actions to fully comply with the rules of the SEC (Security and Exchange Commission) and will support its customers' efforts to reach our common goal to build up a socially and environmentally responsible supply chain. Our progress on this topic will be reported in our annual Sustainability Report.

**Alain DENIELLE**  
Group Vice-President  
Corporate Sustainable Development

**Jérôme ROUX**  
Group Vice-President  
Global Purchasing & Outsourcing





## Sustainability Report 2010/11

### Conflict Minerals

“Conflict minerals” generally refer to those minerals that may have directly or indirectly contributed to the financing of armed groups. Such armed groups are responsible for violence – often toward women and children – and human rights violations in the Democratic Republic of Congo (DRC). Armed groups may directly manage a given mine or tax the mine and/or the transport routes for the minerals. The minerals then typically change hands eight to 12 times before they are incorporated into end products. See the [known supply chain stages](#) associated with conflict minerals.

In the U.S., a new federal law passed by Congress and signed by President Obama in 2010 – the Dodd-Frank Wall Street Reform and Consumer Protection Act – includes a provision relating to conflict minerals. This provision requires many manufacturers to report to the Securities and Exchange Commission (SEC) annually on whether their products contain metals derived from certain conflict minerals if those metals are necessary for the functionality and production of their products. The sourcing region subject to full reporting includes the DRC and the nine surrounding countries.

According to the federal legislation, columbite-tantalite, cassiterite, wolframite and gold – which are refined into tantalum, tin, tungsten and gold, respectively – are considered to be conflict minerals. The metals derived from conflict minerals are used in a variety of automotive applications, including onboard electronics, metal alloys, lubricity coatings, hot-dip coatings, trim components and more.

In the European Union, similar legislation is being considered, with an EU Commission communication on conflict minerals scheduled for the summer of 2011 and reform of the EU’s Transparency Directive in the autumn of 2011.

Ford is concerned with the potential connection between the automotive industry and conflict in the DRC region. Initial research and engagement has demonstrated that the underlying causes of conflict in this region are complex. A multilateral approach to solutions will be required, and we believe that companies in the downstream supply chain for these minerals have a role to play. We intend to require suppliers to use only metals that have been procured through a validated supply chain, so as to ensure that they have not, at any point, financed conflict. The processes to support validation are in development by local governments, industry groups, international organizations and NGOs, with support from other governments outside of Central Africa. While these processes are being developed and implemented, Ford is taking action to educate ourselves and our suppliers, initiate automotive industry activity and begin the necessary due diligence.

### Policy Engagement

Ford worked with companies such as Microsoft, GE and Hewlett Packard, as well as NGOs and investors such as the Interfaith Center on Corporate Responsibility, to issue multi-stakeholder comments on the SEC rules as they were being developed and finalized. Representatives from Ford also separately met with the SEC and the U.S. State Department to discuss issues relating to procedures and implementation within the automotive supply chain. In March 2011, we submitted a formal comment letter to the SEC stating our position. The intent of this engagement was to inform, to the best of our ability, policy makers and other stakeholders on the current status of information available to Ford while the rules for implementing the conflict minerals legislation were in development.

In addition, through an international forum provided by the Organization for Economic Cooperation and Development (OECD), the United Nations and the governments of the affected African states, Ford has participated in dialogue with multiple stakeholders, including NGOs active in the area of concern. We have also provided input to the development and upcoming implementation phase of the OECD Framework for Due Diligence regarding conflict minerals. This framework provides practical guidance to companies throughout the supply chain on a set of actions that can be taken to ensure responsible due diligence.



Should the Customer dispense with the return of the documents, these must be destroyed on completion of the order with due regard to the requirements of confidentiality.

Material provided by the customer, including tooling, patterns etc. remains the property of the Customer without limitation. Such material must be stored separately from other material and must be accessible to the Customer at all times. The Supplier is fully liable for any damage or loss of such material.

Any processing or transformation of material provided by the Customer may be done only on behalf of the Customer. The Customer is the manufacturer in accordance with § 950 BGB.

## 9. Spare parts

The Supplier guarantees a continued supply of spare parts at economically reasonable conditions for a period of 15 years after cessation of production by the Customer.

## 10. Code of conduct

The Supplier undertakes to comply with national environmental and labour legislation, labour contracts and other applicable regulations concerning competition.

The Supplier undertakes to act in accordance with the principles of the UN Global Compact, the ILO Conventions and other international standards. In particular, the Supplier undertakes to observe human rights. His employees have the right to form or join labour unions and other similar organisations. The Supplier does not permit or make use of child labour. In addition, the Supplier does not participate either directly or indirectly in pricing agreements, monopolies, corruption or any other activities which may restrict competition or are otherwise prohibited by law.

The supplier undertakes to act in conformance with the rules of the “Wall Street Reform and Consumer Protection Act”, chapter 1502. This means that the supplier will check the usage of so-called “conflict minerals” (e. g. Tantalite, Wolframites, Cassiterites or even Gold) throughout his supply chain.

Detailed specifications of “conflict minerals” can be found under:  
<http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>

Some of these minerals are mined under conditions that are highly degrading. This is not only limited to the minerals of Eastern Congo. Minerals from other parts of the world can also fulfil the criteria of being “conflict minerals”.

Should the supplier use “conflict minerals” in his supply chain he is to inform the customer immediately. In this case the supplier is required to introduce actions to substitute these minerals and to close these actions at the shortest notice.

## Risk Assessment

Ford intends to utilize an existing automotive industry database that tracks material content at the part level to analyze the presence of conflict minerals in our vehicles. The database currently tracks material content to monitor for the presence of certain regulated substances; it does not indicate where materials originated. While the presence of the four conflict minerals may, in some cases, be reported to the system by suppliers, reporting of the geographic source of these minerals has not been required to date (as it previously had not been regulated).

In 2011, Ford issued new reporting requirements to suppliers asking for full content reporting of the four conflict minerals so as to achieve a more complete assessment of risk in our supply base of 1,400+ companies. This will give us a starting point for further supply chain inquiries, which should in turn enable the tracing of metals to the point of processing (i.e., the smelter).

## Supply Chain Management Systems

Ford is implementing due diligence actions as guided by the OECD and United Nations Frameworks for Due Diligence. Critical to these frameworks is the identification of upstream and downstream portions of the supply chain from the central “pinch point” – the smelter or processor. In this model, Ford and all downstream companies are responsible for identifying the smelters used in the supply chain and ensuring that those smelters are appropriately validated as sourcing minerals that have not financially supported conflict. Ford is monitoring closely the development of these validation systems.

Within our direct control are Company policies and direct supplier relationships. Although Tier 1 suppliers to Ford make independent sourcing decisions – as do most companies within the automotive supply chain between Ford and the mines – we include in all of our contracts with suppliers explicit [human rights terms \(issues-supply-humanrights-expectations\)](#). We also engage with our suppliers on the topic of policy and management systems through our strategic supplier framework, the Aligned Business Framework. Our ongoing work with these suppliers includes the development or enhancement of [supply chain sustainability management \(issues-supply-relationships\)](#). It is important that we fully align with suppliers on the approach to responsible sourcing of raw materials so as to avoid, where possible, unintended consequences, such as absolute bans on sourcing from the 10 countries listed in the U.S. legislation.

## Industry Engagement

Industry engagement and a coordinated approach to supply chain requirements will greatly enable success and reduce the duplication of efforts and cost of implementation of due diligence. Ford is pursuing automotive industry collaboration at the AIAG, consistent with our approach to other supply chain sustainability opportunities. Ford chairs the industry workgroup on conflict minerals – a group consisting of six global automakers and several global Tier 1 suppliers. Actions taken by the group thus far include:

- Wide distribution of a Conflict Minerals Awareness letter from the six OEM vice presidents of purchasing to the CEOs of Tier 1 suppliers. The intent of the letter was to demonstrate a unified face to the supply chain on the issue, as well as to increase awareness to ensure timely action.
- Participation in a January 2011 industry conference on corporate responsibility, with a heavy emphasis on raw materials transparency in purchasing.
- Planning of a May 2011 webinar and a September/October 2011 industry event to keep the supply base well informed of evolving activity related to regulation, validation programs and customer requirements.

Future activity for the industry group may include collective action for information management, actual data requests and data management. The AIAG conflict minerals workgroup has been actively pursuing collaborative action with the electronics sector as well, given that industry's experience with this issue and possible solutions.

As this complex process unfolds – from mine certification to smelter validation programs to the publication of the SEC rules for federal regulatory compliance – Ford will strive to meet all expectations and require compliance and commitment to due diligence from our suppliers.

## Conflict Minerals: Known Supply Chain Stages

- Mine
- Negotiant
- Comptoir
- Trader(s)
- Smelter
- Refiner/processor
- Product/component manufacturer(s)
- End product manufacturer

In addition, illegal channels operate in parallel to this known supply chain, either leveraging these actors, or via smuggling and other means.

## Related Links

- This Report:
  - [Human Rights in the Supply Chain: Ford's Global Working Conditions Program \(issues-supply-humanrights\)](#)
- External Websites:
  - [AIAG \(http://www.aiag.org/\)](http://www.aiag.org/)
  - [U.S. State Department \(http://www.state.gov/\)](http://www.state.gov/)
  - [International Labor Organization \(http://www.ilo.org/\)](http://www.ilo.org/)
  - [United Nations Global Compact \(http://www.unglobalcompact.org/\)](http://www.unglobalcompact.org/)
  - [Organization for Economic Cooperation and Development \(http://www.oecd.org\)](http://www.oecd.org/)
  - [Interfaith Center for Corporate Responsibility \(http://www.iccr.org\)](http://www.iccr.org)



# Fairview Microwave Inc.®



Website Last Updated: 5/4/2012

[tech\\_support@fairviewmicrowave.com](mailto:tech_support@fairviewmicrowave.com)

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## Links; ROHS; Reach; Conflict; ISO

### ROHS COMPLIANCE:

All of our parts are ROHS compliant except for cables which sometimes are & sometimes aren't depending upon the cable and the application. Some cables are compliant for some applications such as many telecommunication applications but not for others. Our cable assemblies use lead based solder, but we can often build 100% compliant cables upon request. See Annex 1A of WEEE/2002/96/EC, & 2005/747/EC for specific information about your application; an exemption in part says: "7. - Lead in high melting temperature type solders (i.e. lead-based alloys containing 85 % by weight or more lead),- lead in solders for servers, storage and storage array systems, network infrastructure equipment for switching, signaling, transmission as well as network management for telecommunications,"

### REACH:

Re EC1907/2006, We do not use any SHVC's in our manufacturing processes as identified in the June 2011 update. We require on our Purchase Orders to our vendors that we be notified if any SHVC content is present and as of yet no SHVC's have been identified. We are not registered as we sell articles.

### Fairview Microwave Reach Statement

Conflict minerals: We do not purchase minerals from Conflict areas & require our suppliers to notify us if their content includes minerals from conflict areas, to date no such materials have been identified.

### ISO 9001:2008 Certification

### International Certification Network Certificate

### OTHER INFORMATION:

CABLE SPECIFICATIONS	INSERTION LOSS, POWER, Z0, DIA, & ETC	<a href="#">cablespecs.pdf</a>
CONNECTOR COMPATIBILITY	2.92/3.5/SMA ETC	<a href="#">RF CONNECTORS</a>
MATING SMA/2.92/3.5/2.4	VARIOUS CONNECTOR DIMENSIONS & PROPERTIES	<a href="#">MATING RULES</a>
GPO™ Vs. SMP	ARE THE GPO™ & SMP COMPATIBLE?	<a href="#">GPO™ vs SMP</a>
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October 2011

## **Advanced Interconnections Corp. Conflict Minerals/Metals Statement**

In response to customer inquiries regarding compliance with Section 1502 of the Dodd-Frank Act, relating to conflict minerals (also referred to in the marketplace as “conflict metals”) originating from the Democratic Republic of Congo (DRC) and neighboring countries, Advanced Interconnections Corp. has prepared this statement. The scope of this statement is limited to the Conflict minerals currently defined as Tin, Tantalum, Tungsten, and Gold; also referred to as “3TG minerals.”

**Advanced Interconnections Corp. has contacted our direct suppliers of Gold and Tin, and certifies to the best of our knowledge that our supply chain does not contain any minerals or materials originating from or processed (smeltered) within the Democratic Republic of Congo or adjoining countries. Tantalum and Tungsten are not currently used in the manufacture of our products.**

As a privately held company, we are not subject to the SEC disclosure requirement of the Dodd-Frank Act, however to support our customers worldwide and our corporate commitment to environmental compliance, we are committed to ensuring that our metals suppliers are DRC conflict-free.

John Ross  
Operations Manager & Quality Liaison





About AMD

Corporate Responsibility

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Overview

Stakeholder Engagement

Environment

Product Stewardship

Governance and Ethics

**Supplier Responsibility**

AMD Employees

AMD in the Community

Performance Indicators

**GRI Index**

We have declared our reporting to be Application Level "A," (Self-declared).

[Read Our GRI Table](#)

**Contact AMD Corporate Responsibility**

We welcome your input and comments about AMD's Corporate Responsibility program.

[Contact Us](#)

## Supplier Responsibility



AMD's is committed to the highest standards of social, ethical, and environmental conduct, and we apply that commitment to the companies with which we do business. Our approach to supplier responsibility ensures alignment with our corporate strategy to deliver high-quality products and services while maintaining and enhancing long-term, mutually beneficial, and ethical supplier relationships. We believe that well-managed businesses also have strong social and environmental performance. We also believe that the most effective and efficient way to achieve good performance is by placing responsibility with the entities that have authority to institute and manage robust programs—our suppliers. This approach is evident in how AMD has integrated supplier performance into our business processes, rather than treating it as an isolated program.

Our goal is to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.

In addition to the work we are doing with our own supply chain, AMD is actively engaged in industry-wide efforts to embed excellent social, environmental, and ethical performance into the electronics industry's supply chain practices.

Review our supplier responsibility policies and practices in the [2010 Annual CR Report](#).

### Conflict Minerals

The Democratic Republic of Congo (DRC) has been the site of one of the world's worst humanitarian crises during the last decade. An estimated 5 million people have died as a result of violent armed conflict<sup>1</sup>. Illegal armed groups and some Congolese national military units commit human rights abuses and are supported by the trade in minerals.

In 2010, the United States Congress passed a new law requiring US-based public companies to disclose the measures they have taken to eliminate so-called "conflict minerals" from their supply chains. This new law—part of the Dodd-Frank Wall Street Reform Act signed by President Obama in July 2010—requires the Securities and Exchange Commission to draft a rule setting out new reporting requirements. Under the new rule, any U.S.-based publicly traded company will be required to report the measures it has taken to identify the source of conflict minerals—tin, tungsten, tantalum, and gold—as well as disclose any products that are not "conflict-free."

While the mining of mineral ore in Africa is several steps removed from the manufacture of high-tech electronics, our industry has responded. Even before the passage of this new law, members along the electronics industry value chain had been developing a responsible approach to enable conflict-free mineral sourcing from the region. This involves three fundamental elements:

1. An "in-region" mineral certification system that enables the traceability and certification of minerals mined in the DRC region.
2. A conflict-free smelter program that enables third-party validation of a smelter's sourcing practices and a determination of whether its sources are conflict-free.
3. Due diligence verify that the smelters that produced the metals in finished products are certified conflict-free.

AMD is appalled by the stories of conflict, human rights violations, labor, and environmental abuses in the DRC. We are rising to the challenge to do our part through the support and leadership of several key initiatives:

- AMD co-chairs a multi-stakeholder policy and diplomacy working group with the Enough Project—a U.S. based non-government organization (NGO). This working group includes representatives of NGOs, socially responsible investment groups, and companies from multiple industrial sectors. The aim of this working group is to create a workable consensus policy for both implementation of the U.S. law and the diplomacy aimed at eliminating mineral sourcing that contributes to the human suffering in the DRC region. To date, this working group has delivered two sets of consensus policy positions to the U.S. Securities and Exchange Commission (SEC). To our knowledge, these submissions are the only multi-stakeholder consensus positions received by the SEC for the development of this ground-breaking rule.
- Through the Electronics Industry Citizenship Coalition (EICC), AMD is actively engaged in the conflict-free smelter program to ensure responsible sourcing. Smelters are the natural choke point in the supply chain—meaning that there are numerous sources of raw materials (ore) that flow into a smelter and numerous uses of the refined metal that leave the smelter. The objective of this effort is to audit smelters of tin, tantalum, tungsten and gold, and identify "conflict-free smelters."
- AMD is also working closely with an EICC working group to develop a standardized process for tracking these minerals from the smelter through the electronics industry's supply chain. While the effort is still very new, the intent is to build a streamlined system that is efficient and effective for the entire supply chain.
- To support the development of a reliable "in-region" sourcing process, AMD is actively working with stakeholders from civil society, government, and the social investment community. Partnering with the Enough Project, AMD met with senior officials in the U.S. State Department to emphasize the need for government leadership of the "in-region" sourcing process. "In-region" sourcing aims to continue economic development of the region through mineral sales, while eliminating those sales that support armed militias, conflict, and human rights abuses.



- Within our own supply chain, we are developing appropriate processes to identify any conflict minerals. The first step is to understand if and where these minerals exist in our products. Once identified, we will employ the standardized industry processes (currently being developed) to track the minerals back to the smelters of origin, and push for these smelters to become “conflict-free.” While mapping our supply chain back to the smelter is very complex, we are committed to the process and will continue to work with our business partners—both customers and suppliers—to develop a workable and efficient tracking system.

As we look at the potential outcomes of this new policy, we are mindful that tracking metals through the supply chain is only just a start to a solution; a sustainable end to the suffering in the DRC will take much more. Deeply rooted socio-economic factors must be addressed by governments, civil society, private sector interests, and others.

Also, if the implementation of the new law is not handled carefully, it may have the unintended consequence of banning or significantly reducing mineral exports from the DRC region, which could lead to more suffering. AMD will continue to work with all stakeholders to help ensure this policy results in tangible improvements in the DRC. While the electronics industry and the private sector in general have a role in this discussion by providing jobs, fair wages, ethical business practices, and good working conditions, true success must involve all stakeholders.

## California Transparency in Supply Chains Act of 2010

The California Transparency in Supply Chains Act of 2010 (SB 657) (the “Act”) requires manufacturers and retailers doing business in the State of California to disclose information regarding their efforts to address the issues of slavery and human trafficking in their supply chains. In accordance with the requirements of the Act, AMD offers the summary below of our activities to identify and prevent human trafficking and slavery activities by our vendors.

### AMD Policies and Actions

AMD strongly opposes the practice of slavery or human trafficking. AMD utilizes several approaches detailed below designed to ensure and verify the absence of such practices in our supply chain.

AMD is an active member of the Electronic Industry Citizenship Coalition (EICC) and has adopted the [Electronic Industry Code of Conduct](#) (the EICC Code of Conduct). AMD generally requires conformance with this code from its suppliers. The EICC Code of Conduct is based on international labor, environmental and human rights standards that clearly prohibit slavery and human trafficking.

**Risk-based supplier assessments:** As a part of AMD’s supplier management process, we assess our suppliers to evaluate their conformance to the EICC Code of Conduct. This approach includes preliminary risk assessments as well as more detailed supplier self-assessment questionnaires. The results of each method are scored utilizing the EICC scoring system to verify the suppliers’ risk of non-conformance.

**Supplier audits:** Based on the results of the risk assessment, AMD may require a third-party on-site audit of supplier practices and management systems to evaluate supplier compliance with the EICC standards including avoiding human trafficking and slavery in our supply chain and with applicable laws and regulations. These audits may be announced or unannounced depending on the circumstances.

**Supplier assurance:** Each year, AMD communicates with suppliers in writing to ensure that our expectations are clear and up to date with regard to responsible social, ethical and environmental conduct. This letter requires suppliers to comply with international standards, applicable laws and regulations as well as the EICC Code of Conduct. Additionally, AMD’s standard terms and conditions for the procurement of goods and services require conformance to applicable laws and regulations, and reinforce our expectations regarding responsible social, ethical and environmental conduct.

**Accountability:** In addition to risk assessments and audits, AMD discusses conformance to the EICC Code of Conduct as well as related management systems with our suppliers during regular business reviews. AMD’s supplier business reviews are the optimal venue for accountability with regard to responsible social, ethical and environmental conduct because senior management participates in these meetings and future business awards are at stake.

**Training:** AMD suppliers have access to information and training regarding conformance expectations through the Electronic Industry Citizenship Coalition [learning and capability activities](#).

**AMD Standards of Business Conduct:** AMD’s [Worldwide Standards of Business Conduct](#) establish mandatory rules and guidelines for AMD’s employees. These standards are substantially equivalent to the EICC Code of Conduct and specifically prohibit forced and compulsory labor practices. These standards apply to all AMD employees. Every AMD employee receives a copy and mandatory training on these standards. In the event an employee violates these standards, AMD will take immediate and appropriate action, which may include termination of employment.

**Conflict Minerals:** AMD’s commitment to uphold human rights throughout our supply chain is reflected in the policies and procedures outlined above as well as in our actions addressing the issue of conflict minerals. AMD is leading policy and implementation discussions aimed at eliminating human rights abuses stemming from minerals mining in the conflict zones of the Democratic Republic of Congo (DRC) and adjoining nations.

To learn more about AMD’s corporate responsibility programs, please review our latest [Corporate Responsibility Report](#).

1. General Accounting Office. The Democratic Republic of the Congo: US agencies should take further actions to contribute to the effective regulation and control of the mineral trade in the Eastern Democratic Republic of the Congo. GAO 10-1030 report (September 2010).





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CONFLICT MINERALS DUE DILIGENCE TOOL



Dear Valued Supplier,

Over the past few months, many of you have received written and/or verbal communications from Texas Instruments (TI) with regards to the Conflict Minerals issue addressed in the Dodd-Frank Wall Street Reform and Consumer Protection Act that was passed by the US Congress in July 2010. Section 1502 of the Dodd-Frank Act requires all US publicly traded companies to file disclosures and reports with the U.S. Securities and Exchange Commission (SEC) related to the use of Conflict Minerals (tin, tantalum, tungsten and gold) in their products.

TI has been working diligently with the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) Extractives Working Group to create industry agreed upon due diligence methods to use with our suppliers to ensure proper control of the sources of these metals and the ore from which they are extracted.

The EICC/GeSI Extractives Working Group has now released a common template and dashboard for the collection of sourcing company due diligence information related to Conflict Minerals. In an effort to better understand our supply chain and comply with the requirements of the new legislation, TI will use this template and we strongly encourage our supplier's use of it as well. We believe it will be the standard used by the electronics industry to communicate Conflict Mineral supply chain information. Upon completion of the document, it can be sent out to all customers needing this information, not just TI. This approach will reduce redundant efforts and streamline the process to provide the Conflict Minerals information up and down the supply chain.

The EICC/GeSI Conflict Minerals Reporting Template is available in multiple languages and contains written instructions (also available in multiple languages) to help you use the template efficiently. The template dashboard is available in English only.

The template, dashboard and instructions are available free of charge on the GeSI-EICC [Conflict Free Smelter](#) website.

We need to receive your information in a timely manner in order to provide a timely response to our customers. Please review the schedule below, so that you are fully aware of TI's requirements.

Actions	Due Date
Fill in the template with accurate, auditable information and return via attachment in TI external SharePoint site (instructions to be provided later)	October 5, 2011

For audit purposes, we request submission of your completed Conflict Minerals Due Diligence Report Template to our external SharePoint site. To submit your template, please click on the link below and look next to Supply Chain CSR and click the **Conflict Minerals Due Diligence** link. You will then be asked to provide information as the person submitting the template for your company and attach your template.

Click [here](#) to submit your template.

For assistance with any questions or concerns, please contact the Conflict Minerals Compliance Team at TI: [conflictmineralsti@list.ti.com](mailto:conflictmineralsti@list.ti.com).

Thank you for your prompt attention to this matter. We look forward to our continued partnership.

Best regards,

Conflict Minerals Compliance Team  
Texas Instruments Incorporated

Honeywell Electronic Materials  
6760 W. Chicago St.  
Chandler, AZ 85226

## **Honeywell Electronic Materials Conflict Minerals Statement**

On July 21, 2010, President Obama signed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502 of that Act relates to certain requirements on SEC regulated companies concerning Conflict Mineral procurement practices (the “Conflict Minerals Law”). Honeywell takes very seriously the allegations that metals mined in the Democratic Republic of the Congo (“DRC”) may be fueling human rights violations and environmental degradation.

Honeywell Electronic Materials (“HEM”) will comply with the Conflict Minerals Law and related government regulations.

In support of this, HEM actively works with its suppliers to identify the source of the minerals defined in the Conflict Minerals Act. If it is determined that a supplier provides products that include metal made from ore extracted from a Conflict Zone Mine, HEM will review this situation carefully and take all actions required by law.

## TE Statement on Conflict Minerals

At TE, we take very seriously the possibility that “conflict minerals” may find their way into our supply chain. “Conflict minerals” or “conflict metals” are defined as gold (Au), tantalum (Ta), tungsten (W), and tin (Sn) sourced from mines in conflict areas controlled by either nongovernment military groups or armed groups, including but not limited to the Eastern region of Democratic Republic of Congo (DRC). Accordingly, we support the goal of [Sec. 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act](#) to discourage companies from using “conflict minerals.” We understand that those responsible for human rights abuses in this region are obtaining funding from the minerals trade. By identifying the mines funding these activities, companies can help stop a devastating humanitarian crisis by sourcing elsewhere.

Avoidance of sourcing from “conflict mines” is a very serious issue, and we have been actively working with industry groups and our suppliers to increase supply chain transparency toward that goal. However, supply chains in the electronics industry are extremely complex. Metals are procured in many different ways, through a number of suppliers, and are often mixed with recycled materials of indiscernible origin. Currently, there is also no way to know with certainty if a mine in the DRC is considered a “conflict mine.” As a result, the pressure on smelters and suppliers to certify minerals as DRC conflict free is creating a de facto embargo on all minerals exported from Africa. Some companies see it as a necessity, due to fear of non-compliance with future Securities & Exchange Commission (SEC) rules, that their suppliers avoid minerals sourced from Central Africa entirely. Such unintended consequences can serve to escalate violence in the DRC region, having the exact opposite effect that Sec. 1502 was meant to have.

In order to avoid an adverse impact to African economies, we are encouraging the SEC to adopt transition rules that will allow for construction of the proper infrastructure within the DRC region to trace “conflict minerals” back to the mines. We are also asking U.S. government officials to help identify the “conflict mines,” which would then allow certain mines to be certified as conflict free. Such visibility will help achieve the objectives of Sec. 1502 by enabling companies to comply with requirements in a meaningful way.

We are in active dialog with our suppliers on what can reasonably be done to increase supply chain transparency despite these challenges. As information in the industry becomes more freely available, and mine origin more discernable, we will expand our due diligence and tighten our compliance requirements accordingly. As with all products we source, TE holds its suppliers to the company’s high standards of integrity and responsibility.

For additional details on these requirements, and for copies of the TE Guide to Supplier Social Responsibility, please visit <https://supplierportal.tycoelectronics.com/portal/server.pt?sLocale=en-us>.


Sincerely

Michael K. Stockton  
Global Commodity Director, Metals

Kenzie Ferguson  
Director, Corporate Responsibility

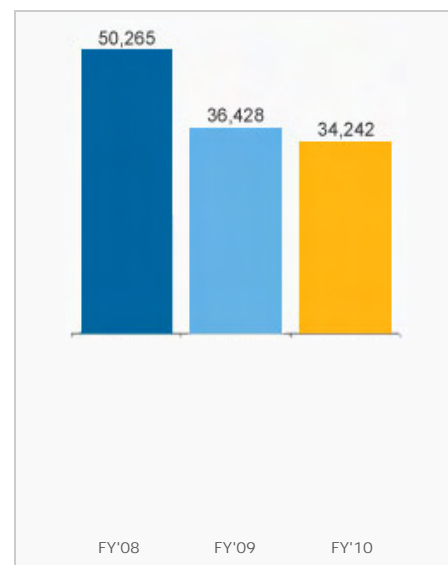


### Resources

- » [Supplier Portal](#)
- » [TE Guide to Supplier Social Responsibility](#)
- » [TE SSR Guide Survey](#)
-  [TE Corporate Responsibility Report](#)

## Key Data & Performance Indicators

During the next three years, we will significantly consolidate our global supplier portfolio. This will give us the opportunity to migrate our spending to our strongest suppliers, as well as to those suppliers that align with our goals of localization, diversity, and social responsibility. We will also continue our social responsibility audits to help assure compliance with our values and expectations.



The EICC has also established a framework for third-party supplier audits based on the EICC Code of Conduct. This framework encompasses the certification of third-party auditors, as well as the provision of necessary auditing tools, including manuals and audit checklists. Up to and including 2010, these audits focused on suppliers in regions where member companies consider the risk of violation to be high.

Sony's suppliers have also undergone audits based on EICC standards through the EICC's shared audit program.

The results of these audits identified a comparatively substantial number of non-conformance issues in the categories of labor and ethical management systems, health and safety, and labor.

\*Corporate group unit(as of June 2011)

## Stakeholder Engagement

(Updated on September 15, 2011)

With the aim of developing a framework for promoting effective supply chain management, the EICC holds discussions periodically with NGOs, socially responsible investors and other stakeholders, in which Sony is also participating. Such discussions were held, in Mexico, the United States, Switzerland, Mainland China and the Netherlands.

## Addressing Issues Related to the Environment, Labor, Human Rights and Conflicts in the Procurement of Raw Materials

(Updated on September 15, 2011)

There has been increasing stakeholders' concern on such issues as environmental degradation, human rights violation and labors issue related to the extraction of metals essential in the manufacture of electronics products. Also, there has been raising concern of those metals relating to financing armed group and which is potentially seen as relating to conflict in the Democratic Republic of the Congo and its adjoining countries. To address these concerns, in July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act, one section of which required the certain companies to report the status of their use of "conflict minerals," that is, minerals sourced from those countries, to the U.S. Securities and Exchange Commission.

In 2008, the EICC and the GeSI (Global e-Sustainability Initiative) established a working group to address such issues and are exploring options for action by the electronics industry. As of the end of 2010, the working group had completed a study for the current status of use of metals in the electronics industry and measures to be taken by the industry to support these issues effectively. Through this study, the working group succeeded in identifying certain metals used in significant quantities in electronics products. The working group also conducted a study aimed at tracing procurement routes for these particular metals up to and including the mining process. As a member company of EICC, Sony will continue participating the working group and support establishing industry framework.

Sony is taking steps in response to the issue of conflict minerals, working first to identify certain minerals used in Sony products, as well as the respective supply chains thereof. Utilizing this information, Sony will review a framework and measures to be included in its fundamental policy to establish systems and implement measures necessary to eliminate such conflict minerals - to the greatest possible - from its supply chain. Recognizing that such issues are common across the electronics industry, Sony is utilizing an industry-wide framework, spearheaded by the EICC/GeSI, in this process. Under its conflict free smelter program, EICC/GeSI has issued the conflict minerals reporting template for the industry-wide supplier survey and several smelters are certified for conflict free smelters. Please refer to below EICC/GeSI press release for the details of the conflict free smelters program.

 [EICC/GeSI launched Conflict Mineral Reporting Template \(Press release\)](#)

 [EICC/GeSI Conflict Free Smelter Program Complaint Smelter List](#)

In August 2011, Sony has started supply chain survey to suppliers for selected categories using EICC/GeSI's "Conflict Mineral Reporting Template."

As tin has been identified as one of the metals under the scope of the US Dodd-Frank Act, in March 2010, the ITRI, a tin industry



1630 McCarthy Boulevard  
Milpitas, CA 95035-7417



**ETHICAL SUPPLY CHAIN / CONFLICT RAW MATERIALS AND SOURCING  
POLICY FOR PRECIOUS METALS PURCHASE AND/OR PROCUREMENT  
CERTIFICATE**

The Dodd-Frank Wall Street Reform and Consumer Protection Act (H.R. 4173) signed into U.S. law on 21 July 2010, requires the Securities and Exchange Commission to establish rules requiring disclosure and reporting procedures on the purchase and use of materials from conflict regions. Linear Technology Corporation has taken steps to back track the supply chain and has attained written confirmation from suppliers that products supplied are not raw materials from conflict regions.

Linear Technology Corporation is supportive of the efforts by the EICC of not utilizing raw materials from the Democratic Republic of the Congo and the adjoining countries. Linear Technology Corporation also confirms that it has not, and will not knowingly supply any customers with products that are manufactured with raw materials which have been sourced from conflict zones or regions where serious ethical and /or environmental concerns have been legitimately raised.

EICC's Conflict Minerals Reporting Template is available upon request.

Metals of concern are:

- Cassiterite (tin)
- Gold
- Cobalt
- Coltan (niobium and tantalum)
- Wolframite (tungsten)
- Pyrochlore (niobium)

**Paul Chantalat**  
Vice President, Quality and Reliability

**LINEAR TECHNOLOGY CORPORATION ACCEPTS NO DUTY TO NOTIFY USERS OF THIS  
DECLARATION OF UPDATES OR CHANGES TO THIS DECLARATION.**

LTC Revision 7 February 3, 2012

CONTACT INFORMATION:

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Title: QA Specification Review Manager and Product Environmental Specialist  
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Tel: 408)432-1900 Fax: (408)434-0507 email: [bdbennett@linear.com](mailto:bdbennett@linear.com)

Linear Technology Corporation, 1630 McCarthy Blvd, Milpitas, CA 95035-7417, 408-432-1900

# Philips' position on responsible sourcing in relation to Conflict Minerals

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As a leading global company in health and well-being, Philips is committed to ensuring the safety, health and protection of people and the environment worldwide. We promote these principles in our global business practices and our code of conduct – Philips General Business Principles.

Philips expects its suppliers, as partners in our sustainability ambitions, to share this commitment. Since 2003, we have required our suppliers to sign up to our Supplier Sustainability Declaration, which promotes social, health & safety and environmental standards, followed by extensive training and auditing. Our supplier sustainability program and its results are published each year in our annual report (see [www.philips.com/annualreport](http://www.philips.com/annualreport)).

## Conflict minerals

The proceeds from harmful social and environmental practices in mines, especially in the eastern provinces of the Democratic Republic of Congo (DRC), have been used to fuel armed conflict in the region. This is a major concern to the electronics industry, among others. The recently enacted Dodd Frank law in the United States defines conflict minerals as Tin, Tungsten, Tantalum and Gold (3TG) and any derivatives thereof<sup>1</sup>.

Our commitment to sustainable development compels us to address this concern, even though Philips does not directly source minerals from the DRC and the mines are typically seven or more tiers removed from our direct suppliers<sup>2</sup>. Philips has committed not to purchase raw materials, subassemblies, or supplies which we know contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.

We have requested our relevant suppliers to confirm that they provide only conflict-free minerals to Philips. While those suppliers have stated that indeed, to their knowledge, they have provided us with conflict-free minerals, we nevertheless recognize that our suppliers may have too limited insight into their supply chains to fully understand the origin of the minerals. Due to the size of our supply chain as well as the complexity of the routes by which these conflict minerals are traded, smelted, recycled, and sold (including the common practice of mixing ores and recycled scrap from many different sources), Philips and its suppliers face a huge challenge to obtain – for all minerals – full traceability to exact origin with a high degree of certainty.

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<sup>1</sup> Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act requires certain manufacturers to conduct due diligence on the use of conflict minerals in their supply chain and to make annual disclosures to the SEC.

<sup>2</sup> The Electronics Industry Citizenship Coalition (EICC), the Global e-Sustainability Initiative (GeSI) and RESOLVE jointly conducted a supply chain study in 2010, "Tracing a Path Forward: A Study of the Challenges of the Supply Chain for Target Metals Used in Electronics," (See [www.eicc-gesi.resolv.wikispaces.net](http://www.eicc-gesi.resolv.wikispaces.net)). The study found that tin, tungsten and tantalum make up a small percentage of the components and subcomponents in electronic products and the supply chain for these minerals generally contains seven or more layers.



To further our commitment to sustainability, Philips joined the Electronics Industry Citizenship Coalition (EICC) in 2006, and has been an active member of the EICC working group on extractives, which seeks to prevent conflict minerals from entering the electronics supply chain. The working group has developed tools to increase transparency of the origin of conflict minerals, including an electronic due-diligence tool for companies and the Conflict-Free Smelter program to audit smelters, which are a key element in the supply chain for determining the origin of the relevant minerals.

Through a combination of these efforts, and in close cooperation with governments and NGOs, Philips works towards achievement of two goals:

1. Minimizing the trade in conflict minerals from mines that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country.
2. Enabling legitimate minerals from the region to enter global supply chains, thereby supporting the Congolese economy and the local communities that depend on these exports.

## Proof points

Philips participates in the EICC-GeSI Extractives Work Group. The EICC and GeSI represent over 80 companies in the Electronics and Information and Communications Technology industries who have come together in the EICC-GeSI Extractives Work Group to positively influence the social and environmental conditions in the metals extractives supply chain. Philips is an active member of the EICC-GeSI Extractives Work Group.

Philips, together with several other EICC-GeSI member companies, convened a multi-stakeholder workshop in San Francisco in October 2009 to engage other sectors and interested stakeholders. We also participate in the organization committee of the first European Extractives workshop planned for September 2011.

In 2010, the research commissioned by the Extractives Work Group to map the supply chain for tin, tantalum, and cobalt used in electronics was completed and the report [Tracing a Path Forward: A Study of the Challenges of the Supply Chain for Target Metals Used in Electronics](#) was published. The research used a tracing method, starting with suppliers from electronics companies, including Philips, and working up the supply chain toward the mine. Companies at each step in the supply chain were contacted (e.g. component manufacturers, refiners, smelters) and were requested to provide contact information of their suppliers and their codes of conduct. In a limited number of instances it was possible to identify a pathway from an electronics product to the mine; however none of the mapped supply chains were traced back to the conflict zones in the Democratic Republic of Congo (DRC).

Philips financially sponsored the pilot of the tin organization ITRI to improve supply chain transparency by tracking minerals and providing verifiable provenance information from individual mine sites in eastern DRC. The pilot is called the ITRI Tin Supply Chain Initiative (iTSCi).

In 2011, Philips contributed to the development of a standardized tool by EICC-GeSI to collect due diligence information in the supply chain, and piloted the tool with our suppliers.

See for more info: <http://www.eicc.info/extractives.htm>.

We requested our relevant suppliers to state that they provide conflict-free minerals to Philips. While all suppliers stated that indeed, to their knowledge, they provided us conflict-free minerals, we continue our efforts to increase transparency and investigate additional ways to determine the origin of the minerals used in cooperation with Electronic Industry Citizenship Coalition (EICC) and the Global eSustainability Initiative (GeSI) members.

Philips further is in dialogue with civil society organizations and Dutch and European policymakers to discuss the role government and other institutions can play to effectively address the issue of conflict minerals.

Philips participates in a multi-stakeholder OECD-hosted working group on implementation of supply chain due diligence. The OECD pilot is intended to test and assist with the implementation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk

Areas. In this pilot we aim to identify, discuss and find ways to overcome possible challenges to implementing due diligence, to ensure that the OECD Guidance and other related due diligence initiatives are implemented effectively.

#### About EICC (Electronic Industry Citizenship Coalition)

The EICC was established in 2004 to improve social, economic, and environmental conditions in the global electronic supply chain through use of a standardized code of conduct. The EICC was incorporated in 2007 as an association to ensure greater awareness of the Code, and to expand its adoption across the industry. The EICC includes over 50 global electronics companies. For more information or to view the EICC Code of Conduct, see [www.eicc.info](http://www.eicc.info) or the latest EICC annual report .

#### About GeSI (Global e-Sustainability Initiative)

The Global e-Sustainability Initiative (GeSI) is uniquely dedicated to information and communication technologies (ICT) sustainability through innovation. GeSI brings together leading ICT companies – including telecommunications service providers and manufacturers as well as industry associations – and non-governmental organisations committed to achieving sustainability objectives through innovative technology. In June 2008, GeSI became a legal independent entity, an international non-profit association (AISBL) with an office near the EU institutions in Brussels, Belgium. For more information, see [www.gesi.org](http://www.gesi.org) .

# Nokia Policy against Illegal Trade of Natural Resources

## Introduction

Nokia's *Code of Conduct* defines the company's overall principles and commitment towards legal compliance, ethical conduct, human rights, anti-corruption work and environmental protection. These high expectations extend to Nokia partners, subcontractors and suppliers, whom we encourage to strive beyond merely fulfilling legal compliance. This Policy provides further clarification to the principles of the [Code of Conduct](#) and [Nokia Human Rights Approach](#) regarding illegal trade of natural resources. This policy has been approved by Nokia Corporate Responsibility Steering Group, chaired by Nokia's Executive Vice President of Corporate Relations and Responsibility.

We are concerned about the link between the illegal extraction and trade of natural resources, and associated human rights violations, conflict and environmental degradation. Currently these issues are acute in the Eastern provinces of Democratic Republic of Congo (DRC) in the extraction and trade of ores of tantalum, tin, tungsten and gold, which flow to world markets through the DRC and adjoining countries. Once refined, these metals are commonly used within electronic products and by many other industries. Nokia does not procure metals directly and only a fraction of the world's minerals produce originates from the DRC, but we are taking action to increase transparency, ensure responsible procurement by our suppliers and sub-suppliers, and drive positive change.

## Our commitment

Nokia is committed to respect human rights and the environment in accordance with accepted international conventions and practices, such as those of the United Nations' Universal Declaration of Human Rights, ILO Core Conventions on Labor Standards, UN Global Compact, and OECD Guidelines for Multinational Enterprises. We want to ensure that all materials used in our products come from socially and environmentally responsible sources. We do not tolerate nor by any means profit from, contribute to, assist with or facilitate any activity that fuels conflict, leads to serious environmental degradation or violates human rights, as set forth by above mentioned international conventions and Nokia policies.

## Implementation of the Policy with Regards to Conflict Minerals

We prohibit human rights abuses associated with the extraction, transport or trade of minerals. We also prohibit any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. Similarly, Nokia has a no tolerance policy with respect to corruption, money-laundering and bribery. We require the parties in our supply chain to agree to follow the same principles.

## Nokia activities

Nokia complies with applicable laws and commits to drive best industry practice. We are participating in the Pilot Implementation of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, and working with our industry peers through the EICC-GeSI Extractives work group to improve traceability of minerals and ensure responsible sourcing.

We have for several years been working with suppliers to trace back mineral flows and ensure commitment to sustainable procurement. From 2012 we will take into use the standardized EICC-GeSI Conflict Minerals Reporting Template to continue mapping and to monitor our suppliers' commitment and activities. More details are requested from suppliers as needed.

We have incorporated the principles of this policy into our contractually binding Nokia Supplier Requirements (NSR) and we work with our suppliers to increase transparency in the supply chain. We aim to create awareness and build capacity within our supplier base through training and regular supplier meetings. We will communicate our policy to our suppliers and request them to set similar policies for their supply chain.

Nokia supports, contributes to and will rely on industry initiatives, such as the Conflict Free Smelter Program (CFS), to validate that the metals used in our products are not contributing to conflict and come from sustainable sources. Once smelter lists are available, suppliers will be requested to procure materials only through validated smelters. Nokia supports in-region sourcing schemes (e.g. iTSCi), which are essential for the success of CFS, through industry initiatives and related partnerships.

Nokia is participating in the Public-Private Alliance for Responsible Minerals Trade (PPA), a joint effort by the U.S. State Department, the U.S. Agency for International Development, non-governmental organizations, industry associations and companies to support responsible minerals trade from the Great Lakes Region of Central Africa.

## Nokia supplier requirements

Nokia policy requires that our suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten, and/or gold must commit to sourcing those materials from environmentally and socially responsible sources only. Materials, which either directly or indirectly contribute to conflict, are unacceptable. Suppliers shall define, implement and communicate to sub-suppliers their own policy, outlining their commitment to responsible sourcing of these materials, legal compliance and measures for implementation. Suppliers shall work with sub-suppliers to ensure traceability of these materials at least to smelter level, e.g. by using the EICC-GeSI Minerals Reporting Template. Nokia reserves the right to request further evidence of the chain down to mine level when necessary. Once mechanisms are

available, suppliers shall ensure that purchased metals originate from smelters validated as being conflict mineral free. Traceability data shall be maintained and recorded for 5 years and provided to Nokia upon request.

Suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

## Assessing and responding to the identified risks

Nokia collects material composition information for all our products which allows us to identify suppliers that use tin, tantalum, tungsten and/or gold in their products. Material composition data along with information gathered from suppliers (e.g. with the EICC-GeSI Conflict Minerals Reporting Template), industry initiatives (e.g. CFS), and other available sources is used to assess risks of non-compliance to this Policy.

Nokia's approach is to establish long-term relationships with suppliers, always seek sustainable solutions, and work with suppliers to drive improvements. If we identify a reasonable risk that a supplier is violating our commitments set forth in this policy, we require them to commit to and implement a corrective action plan within a reasonable timeline. Nokia follows up effectiveness of corrective actions and conducts on-site assessments as necessary. Continued non-conformance and refusal to address issues of concern will lead to termination of business relationship.

## Grievance mechanism & Reporting

This Policy will be reviewed regularly and updated as needed. Nokia commits to disclosing the progress of the implementation of this Policy as part of its annual sustainability reporting and in accordance with legal requirements.

Concerns and violations of this policy can be reported to Nokia's Board of Directors, its non-executive members, or its subcommittees through our official grievance channels:

- Online via <http://www.nokia.com/global/contact/board/>
- By mail to the following address:  
Nokia Board of Directors / Complaint  
Nokia Corporation  
P O Box 226 00045 Nokia Group Finland

Suppliers and other external parties are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this approach, or if they wish to report suspected abuse. They, and other external stakeholders, may also report problems or concerns to the above Nokia's Contact the Board channel.



## Toshiba Social Responsibility



# Conflict Minerals

"Conflict minerals" generally refer to tantalum, tin, tungsten, and gold from mines and smelters that have directly or indirectly contributed to the financing of armed groups. Many of these armed groups are responsible for human rights violations. Specifically, some of the mines in the Democratic Republic of the Congo (DRC) are controlled by militias responsible for atrocities that have been committed in that country's decades-long civil war, including acts of violence toward women and children.

For humanitarian reasons, Toshiba supports the use of conflict-free minerals in its products. We have taken due diligence steps such as the development of a conflict minerals policy as well as surveying our suppliers to ensure sourcing of conflict-free minerals in the region.

### Toshiba Group Conflict Mineral Policy

We are taking steps to develop and implement a policy prohibiting use of cassiterite (tin ore), wolframite (tungsten ore), coltan (tantalum ore) and gold, or their derivatives, whose extraction or trade supports conflict in the Democratic Republic of Congo or adjoining countries, and/or contributes to inhumane treatment, including human trafficking, slavery, forced labor, child labor, torture and war crimes in the region.

- In this regard, we will carry out supply chain due diligence with reference to the OECD guidance. We will use the EICC- GeSI due diligence tool to communicate up and down our supply chain.
- Once a validated supply chain is established through initiatives such as full-fledged smelter verification under EICC- GeSI's Conflict-Free Smelter Program or development of a mineral tracing program, we will require our suppliers to procure the minerals through that validated supply chain.
- Our efforts are not intended at altogether banning procurement of minerals from the DRC and adjoining countries but to assure sourcing from responsible sources in the region.
- We ask our suppliers to cooperate with us in our efforts to assure procurement of non-conflict minerals.

Please visit the following website to review the Toshiba Group policy on conflict minerals and supply chain management [http://www.toshiba.co.jp/csr/en/human\\_rights/index.htm](http://www.toshiba.co.jp/csr/en/human_rights/index.htm)

### Toshiba Corporation's Actions Regarding Conflict-Free Minerals

Toshiba has actively engaged in the following internal and external activities to ensure that its products do not contain conflict minerals:

- In June 2011, Toshiba joined the EICC (Electronic Industry Citizenship Coalition) and attends meetings throughout the year.
- In November 2011, Toshiba developed a Conflict Minerals Policy for all Toshiba Group companies.
- Toshiba Group companies in Japan and North America have formed teams to address conflict minerals.
- In FY 2010, training about conflict minerals was provided to Toshiba Group companies.
- In November 2011, Toshiba began to survey the supply chains of its business units that produce semiconductors, hard disk drives and liquid crystal displays to determine whether conflict minerals are used in these product components. Toshiba plans to survey the supply chains of its other business units in 2012.
- Toshiba is participating in the Public-Private Alliance for Responsible Minerals Trade (PPA), a joint effort by the U.S. State Department, U.S. Agency for International Development, non-governmental organizations, industry associations and companies to support responsible minerals trade from the Great Lakes Region of Central Africa. <http://www.resolve.org/site-ppa/>
- To ensure that our suppliers do not engage in inhumane treatment or acts that abuse human rights, we ask our first-tier suppliers (and their downstream suppliers) to abide by a code of conduct referred to as Supplier

Expectations . We also conduct supplier audits to ensure that this policy is being followed. If any human rights violations are brought to our attention, we ask our suppliers to investigate the matter and take necessary steps to correct the violations.

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## **Fairchild Semiconductor Conflict Minerals Policy**

This document contains Fairchild Semiconductor's statement regarding the content of Conflict Minerals in our products. This statement is based upon information collected from Fairchild Semiconductor's supply chain, manufacturing facilities and affiliates worldwide.

There has been increased awareness of violence and human rights violations in the mining of certain minerals from a location described as the "Conflict Region", which is situated in the eastern portion of the Democratic Republic of Congo (DRC) and surrounding countries. The Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) have requested that companies undertake reasonable due diligence with their supply chain to assure that specified metals are not being sourced from mines in the Conflict Region, which is controlled by non-government military groups, or unlawful military factions.

Fairchild Semiconductor supports the action of the EICC and GeSI and has either obtained, or is in the process of obtaining, information from our current metal suppliers concerning the origin of the metals that are used in the manufacture of Fairchild Semiconductor products. Based upon information provided by our suppliers, Fairchild does not knowingly use metals derived from the Conflict Region in our products.

Suppliers of metals used in the manufacture of Fairchild products (specifically gold, tin, tantalum, tungsten and cobalt) shall demonstrate that they understand and support The Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) and will not knowingly procure specified metals that originate from the Conflict Region of Democratic Republic of Congo (DCR) or the surrounding area.

Suppliers shall provide written evidence of due diligence that raw materials used to produce gold, tin, tantalum, tungsten and cobalt supplied to Fairchild Semiconductor do not originate from the Conflict Region from either mining or smelting operations. Evidence of due diligence from each supplier shall include, but not be limited to, the following:

- Evidence of a Corporate Policy supporting EICC and GeSI Initiatives, publicly available (such as a link on their public website);
- Annual letter stating activities completed and underway that support these initiatives;
- The name and location of the source of the ore and/or the smelter(s) from which the metal(s) was obtained or a statement explaining why this information cannot be provided.

David Lancaster  
Product Ecology Manager  
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Date: April 15, 2011

### **Environmental Declaration**

Providing for limitations below, Fairchild Semiconductor certifies that the information provided in this document is correct as of the date indicated on this page.

Fairchild has implemented systems to ensure our products are compliant with environmental regulations and laws worldwide. However, not all materials in Fairchild's products may have been independently verified regarding substance content. In the event of any issues arising from information in this document, the warranty section of Fairchild's standard terms and conditions of sale shall apply, unless alternate contracts have been agreed upon in writing by both parties.

### Intersil's Conflict Minerals Policy

The Dodd-Frank Wall Street Regulation and Consumer Protection Act defines "Conflict Minerals" as:

- a. Columbite-tantalum (coltan), cassiterite, gold, wolframite, or their derivatives; or
- b. Any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the DRC or an adjoining country.

If the source of the Conflict Mineral is determined to be located in the Democratic Republic of the Congo ("DRC") or adjoining countries, including Angola, Congo, Central African Republic, Sudan, Uganda, Rwanda, Burundi, Tanzania, and Zambia (collectively, the "Conflict Region"), then reporting to the SEC is required.

The common derivatives from these Conflict Minerals are:


- a. Tantalum (symbol "Ta") from Coltan
- b. Tin (symbol "Sn") from Cassiterite
- c. Gold (symbol "Au") from gold ore
- d. Tungsten (symbol "W") from Wolframite

Intersil supports the position of the Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI) to avoid the use of Conflict Minerals which directly or indirectly finance or benefit armed groups in the Conflict Region, in line with full compliance to the EICC's Electronic Industry Code of Conduct. Intersil has been working with its suppliers to help them begin to understand the issues around Conflict Metals, and has been surveying its supply chain for the origin of the metals used in purchased components and materials.

Intersil has either obtained, or is in the process of obtaining, information from our current suppliers concerning the origin of the metals that are used in the manufacture of Intersil's products. Based upon information provided by our suppliers, Intersil does not knowingly use metals derived from the Conflict Region in our products.

Intersil has implemented systems to ensure our products are compliant with environmental regulations and laws worldwide. However, not all materials in Intersil's products may have been independently verified regarding substance content. In the event of any issues arising from information in this document, the warranty section of Intersil's standard terms and conditions of sale shall apply, unless a purchase agreement has been agreed upon in writing by both parties.

Intersil Corporation

By: 

Douglas A. Balog  
Asst. Corporate Secretary





## Declaration Concerning Conflict Metals

**PMC-Sierra Incorporated**  
**1380 Bordeaux Drive**  
**Sunnyvale, CA 94089**  
**USA**

PMC-Sierra strives to be in compliance with all legal, environmental and ethical standards globally.

Regarding the use of metals sourced from the Democratic Republic of Congo (DRC), PMC-Sierra has conducted a series of surveys confirming sourcing policies and conflict free status. As a result PMC-Sierra has found no evidence that these metals are used in our Integrated Circuit or Printed Circuit Board Assembly product lines. We base that statement on reports from our suppliers, some of whom are EICC members, in response to our requests and surveys regarding conflict metals.

PMC-Sierra does not purchase or source the raw metals used in our product and as the supply chain is complex we do not have direct visibility into the original sources of those metals.

As PMC-Sierra is a company registered in the United States of America, the 2010 Financial Reform Bill (Dodd–Frank Wall Street Reform and Consumer Protection Act) legislation enacted in the USA has a direct effect on us. This legislation requires the Securities and Exchange Commission (SEC) to provide reporting requirements in order to develop the appropriate due diligence methods needed to identify and confirm all sources of the metals throughout the supply chain. PMC-Sierra's efforts with regards to any additional survey requirements are still pending as the reporting structure requirement from the SEC is in draft at this time.





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## CONFLICT MINERALS POLICY FOR CUSTOMERS OF SYFER TECHNOLOGY LTD

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") which contained a section that regulated "Conflict Minerals"<sup>1</sup> for the first time. The Act includes provisions that require manufacturers to perform due diligence in their supply chains to identify and disclosure the use of any Conflict Minerals and whether those Conflict Minerals originated in the "DRC Countries"<sup>2</sup>. The Act is new and regulations related to the requirements of the due diligence process have not yet been issued by the US Securities and Exchange Commission, which oversees compliance with the Conflict Minerals section of the Act.

Syfer Technology Ltd, as an operating company of Dover Corporation, a NYSE listed company, will be compliant with the Act and other regulations concerning the sourcing of our raw materials and the requirements for supply chain due diligence. We expect that our suppliers will also comply with our requests to provide statements and perform due diligence about the source of any Conflict Minerals in their products which are provided to us.

Syfer Technology Ltd and Dover Corporation are currently implementing system processes and procedures to help us achieve compliance with the Act. We are communicating our requirements to our suppliers and vendors. Due to the complexities of the mineral supply chain, Syfer Technology Ltd is currently unable to verify the origin for the minerals used in our products. We are working closely with our suppliers and vendors to understand the source countries of the metals contained in our products and manufacturing processes.

We do not knowingly source any product containing Conflict Minerals from the DRC Countries currently; however we are unable to provide clear supply chain verification at this time. We will continue our work on this due diligence process and advise our customers on the status of our process.

<sup>1</sup> "Conflict Minerals" include Columbite-Tantalite (Tantalum), Cassiterite (Tin), Gold, Wolframite (Tungsten) and any derivatives from these minerals.

<sup>2</sup> "DRC Countries" include the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, Sudan (South Sudan), Tanzania and Zambia.


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[Product Selector Application Notes Technical Notes Downloads FAQ](#)
[Product Catalog](#)
[Accelerometers Gyroscopes](#)
**KIONIX QUALITY SYSTEM**

## KIONIX CONFLICT MINERALS POLICY

“Conflict Minerals” refers to minerals mined in conditions of armed conflict and human rights abuses, notably in the eastern provinces of the Democratic Republic of the Congo, by the Congolese National Army and various armed rebel groups, including the Democratic Forces for the Liberation of Rwanda. The profits from the sale of these minerals finance continued fighting in the Second Congo War and control of lucrative mines becomes a focus of the fighting as well.

Kionix expects our suppliers to source materials only from environmentally and socially responsible suppliers. Our suppliers must pass this requirement up the supply chain and determine the source of specified minerals.



on-the-job instruction / training is held to meet various needs.

- ▣ The internal control system and audits are conducted in accordance with laws and regulations.

#### V. Respecting Stakeholder Rights and Fulfillment of Social Responsibility

To display our commitment to social responsibility and deep concern on green energy and environmental protection, our Company has always made a goal to set a good example as a corporate citizen and give back to society. On September 17, the Company was awarded the 2009 Outstanding Green Adoption Company from the Taoyuan-Hsinchu Industrial Park Team. The Company also received a Golden Torch Award in the top ten company potential category.

#### Environment Safety and Health

In order to conform to international trends, the Company has worked to receive green product certifications. We have received Green Partner (GP) certification from Sony and QC080000 certification in 2008. To save energy and reduce carbon emissions, the Company no longer used paper cups and vending machines do not sell beverages in plastic containers. The containers used for beverages sold by the canteen are all made of environmentally friendly, biodegradable materials so personnel can adopt environmentally sound practices in their daily life. To strengthen our safety and health organization, TXC continues to perform internal announcements / instruction / training and strives to reach zero accident / injury targets. In 2009, the Company passed occupational safety and health management performance standards in order to make work safer and provide extra assurance to personnel. Greenhouse Gas Verification (ISO14064-1), Carbon Footprint Verification (PAS2050) and Occupational Health and Safety Management System (OHSAS) certification was received in 2010. Moreover, Corporate Social Responsibility Report certification is scheduled for the end of the year to fully disclose company information and do our part to contribute back society, our country and the Earth. For information on environmental safety and health at the Company, see: [http://www.txccorp.com/en/j\\_esh/01.html](http://www.txccorp.com/en/j_esh/01.html)

TXC published our first Corporate Social Responsibility Report in 2008. In the 2009 issue, an English version of the Corporate Social Responsibility Report was provided to improve report credibility and company performance information transparency. In 2010, the Company plans to obtain verification from an outside third party certification agency.

#### Conflict Minerals Management

##### 1. Legal basis

Legislation of the term Conflict Minerals was first presented by the US Kansas republican senator Sam Brownback in April 2009 as Congo Conflict.

As proposed in the Minerals Act of 2009 but it was not passed by the House of Representatives. Later, the Democratic Party congressman James McDermott of the Washington State and 56 other congressmen jointly signed the Act and again proposed the draft of the Conflict Minerals Trade Act in November 2009. But it was again shelved by the House of Representatives.

In December 2009, Congressman Barney Frank of the Democratic Party and senator Chris Dodd thereby proposed the draft of the Dodd-Frank Wall Street Reform and Consumer Protection Act in view of relevant shortcomings of the financial system as exposed in the financial crisis (hereinafter referred to as the D.F. Act). The Act was reviewed by the House of Representatives and upon passing of the official report, US President Barack Obama signed on July 21, 2010 and became law. The section on Conflict Minerals was added to section 1502 in Chapter 15 on Miscellaneous Provisions set forth unequivocal regulations and requirements on so-called Conflict Minerals.

##### 2. Relevant definitions of Conflict Minerals

In the D.F. Act, the US Administration has expressed solemn concern on violence and persecution of human rights in Congo Democratic Republic and its neighboring countries related to the mining and trading of Conflict Minerals. Therefore, it required relevant personnel to expose and audit the Conflict Minerals coming from Congo and its neighboring nations.

To clarify the relevant terms related to Conflict Minerals, section 1502 has set forth five definitions of which four are explained below:

- ▣ Neighboring nations:

The Republic of Congo in Africa and its neighboring nations.

- ▣ Armed groups:

Refer to the US Foreign Aid Act defining groups which seriously infringed upon human rights using force

refer to the US Foreign Aid not denning groups which seriously infringed upon human rights using force. The Republic of Congo and its neighboring nations having such conduct are referred to this category.

☐ Conflict Minerals:

They refer to minerals as follows: Tantalite, cassiterite, gold, wolframite or others as defined by the US Administration.

☐ Areas controlled by armed groups:

Refer to mineral areas actually controlled by the armed groups in the Republic of Congo and its neighboring nations, or those areas under taxation or extortion by operators of mining, transportation and sale of conflict minerals, as well as the selling channels and production facilities for control of conflict minerals.

As explained above, aforementioned minerals mined and sold for military purpose by people under armed forces within the territory of Congo or its neighboring areas belonging to the scope of conflict minerals (refer to the D.F. Act for relevant information).

3. EICC and GeSI

The two civic groups EICC (Electronic Industry Citizenship Coalition) and GeSI (Global e-Sustainability Initiative) are extremely concerned about the conflict minerals and the related issues. Consequently, starting from 2009, the related companies of the industrial chain have reminded manufacturers on performing corporate social responsibility through group discussions and press release to avoid using aforementioned conflict minerals (refer to the EICC and GeSI websites for relevant information). In February 2011, EICC and GeSI again jointly provided the Conflict Minerals Due Diligence Tool for self-inspection of parts used by manufacturers to avoid using Conflict Minerals as defined by the D.F. Act.

4. TXC Policy and Commitment

As a member of the electronic industry supply chain, TXC will perform its corporate social responsibility. Aside from abiding by the code of conduct as set forth by EICC and GeSI and related requirements, TXC has carried out supply chain survey and formulated its policy and commitment for not using any conflict minerals from the Republic of Congo and its neighboring nations. Our No Conflict Minerals Policy is as follows:

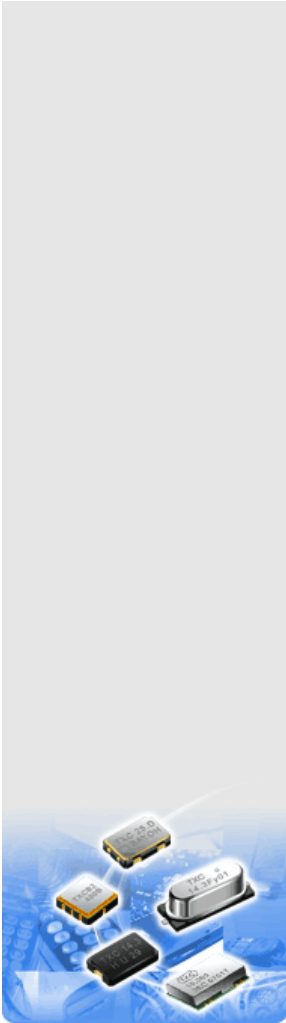
Conflict minerals refer to gold, tantalite, wolframite and cassiterite mined and sold by the armed groups in the mining areas of the Republic of Congo and its neighboring nations. Since mining or control of aforementioned minerals involved serious issues of human rights, races and illegal benefits, TXC thereby makes the following commitment as a member of the global village:

- ☐ Not to purchase conflict minerals produced in the conflicts areas.
- ☐ Strive to require the upstream and various raw materials suppliers to refuse to use conflict minerals from the conflict areas and require to produce a letter of commitment.

To ensure the supply chain manufacturers also comply with this policy, TXC has required all material suppliers to fill out the Commitment on Prohibiting Use of Conflict Minerals for products containing any of the following items of conflict minerals, and concomitantly provide a namelist of the minerals processing manufacturers as approved by EICC and GeSI to ensure that their products do not use any conflict minerals from aforementioned areas.

TXC suppliers whose parts containing tantalite, cassiterite, gold and wolframite have all signed the Commitment on Prohibiting Use of Conflict Minerals as follows.

	Vendor Code	Source	Commitment	Countersign Rate
Gold	594	Japan	V	100%
	1119	Japan	V	
	3125	Japan	V	
	4837	Japan	V	
	2179	Japan	V	
	2454	USA	V	
	1761	Japan	V	



	1383	Taiwan	V	
Tantalite	0	0	0	N/A
Wolframite	594	Japan	V	100%
	1119	Japan	V	
	3125	Japan	V	
	1709	Taiwan	V	
	3226	Japan	V	
	3366	Japan	V	
Cassiterite	1797	Japan	V	100%
	4837	Japan	V	
	2179	Japan	V	

5. Related Links

[Dodd-Frank Wall Street Reform and Consumer Protection Act](#)

[Self-declaration of DRC conflict free](#) (Commitment on Prohibiting Use of Conflict Minerals)

[EICC & GeSI Conflict-Free Smelter \(CFS\) Program Compliant Smelter List](#) (Mineral Processing Manufacturers namelist)

[Statement on Use of Minerals in Electronics Products](#)

[GeSI and EICC Complete First Tantalum Assessment Focused on Responsible Sourcing of Minerals](#)

[www.eicc.info](http://www.eicc.info)

<http://www.eicc.info/PDF/EICC Code of Conduct English.pdf>

[www.gesi.org](http://www.gesi.org)

<http://www.gesi.org/Initiatives/SupplyChain/tabid/75/Default.aspx>



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TXC Corporation TEL: 886-2-2894-1202 FAX: 886-2-2894-1206 4F, No.16, Sec.2, Chung Yang S. Rd. Peitou 112, Taipei, Taiwan ( HQ )  
 TEL: 886-3-469-8121 FAX: 886-3-469-6954 No.4, Kung Yeh 6th Rd., Ping Cheng Industrial District, Tao Yuan, Taiwan ( Factory )



11409 Valley View Road  
Eden Prairie, MN 55344

## Conflict Minerals Position

### Conflict Minerals Declaration to NVE Customers

Notwithstanding any information provided by NVE Corporation on its Website or in this or other communications concerning the substance content of its products, this document represents our knowledge and belief as of the date that it is provided.

NVE is committed to ensuring the safety, health, and protection of people and the environment. As required by the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 ("Conflict Minerals Act"), NVE will not knowingly purchase raw material supplies that contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country.

NVE is working with our suppliers to ensure our suppliers of minerals are aware of our policy and have urged our suppliers to support this policy. Many of our suppliers have similar policies.

We will take continuous practical action to seek to ensure that materials from the conflict region do not enter our supply chain or products by obtaining certification of origin for materials covered by this governance.

Due to the complexity of the routes by which metals, and in particular precious metals, are smelted, recycled and sold, including the common practice of commingling ores and scrap from many different sources, it is often impossible for any company to obtain full traceability to an exact origin of all of these materials.

If you have specific questions or would like additional information, please contact me at NVE Corporation at +1 952-996-1635 or by email at [dexter@nve.com](mailto:dexter@nve.com).

A handwritten signature in black ink that reads "Dexter A. Hansen". The signature is written in a cursive style and is positioned above a horizontal line.

Name: Dexter Hansen  
Title: Quality Manager  
Date: April 28, 2011



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## Company: Communication to our suppliers


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### Communication to our suppliers

At Miranda Technologies, product stewardship is an important aspect of our supply chain relationships. We maintain an unwavering commitment to the safety of our customers, employees and suppliers. Miranda is committed to compliance with applicable environmental laws and regulations, namely the EU RoHS Directive, and in doing so; we have been working with our suppliers to reduce the number and quantity of hazardous substances in our products.

In order to address the numerous environmental compliance requirements which may apply to our suppliers, our customers or our own operations, and in accordance with our environmental, health and safety policy, Miranda is collecting from all suppliers:

Full material disclosure/content data.

Material origins data (with conflict minerals and human trafficking/slavery reporting).

#### 1. Full material disclosure

The aim of this practice is to ensure that each of our suppliers report to Miranda a full material composition declaration (FMD) for each part they supply to us. Those FMD must meet the requirements of the [Consumer Electronics Association \(CEA\)](#) and the [Association Connecting Electronic Industries \(IPC\)](#). All CAS (Chemical Abstracts Service) numbers for substances should be provided.

Receiving full substance content data from our suppliers will greatly reduce the need for repeated requests. RoHS declarations and laboratory test reports will not meet requirements because they do not provide us with information for all reportable substances. Indeed, about every six months, the CEA introduces a new controlled substances list in its joint Industry Guide (JIG).

#### 2. Conflict Minerals reporting

To answer [section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act](#), we are seeking confirmation from our suppliers that the 3TG's (Tantalum (coltan), Tin, Tungsten and Gold) do not originate from zones of conflicts (such as the Democratic Republic of Congo and adjoining countries) for all of the components we purchase.

#### 3. Human trafficking/slavery reporting

We are requiring that all our direct suppliers certify that materials incorporated into their product comply with the laws regarding slavery and human trafficking, including the [California Transparency in Supply Chains Act of 2010 \(S.B. 657\)](#), in the country or countries in which they are doing business.

#### Your declaration in 5 steps

1. If you have joined [BOMcheck.net](#) and uploaded your substances declarations for parts you provide to Miranda, please authorize Miranda to access those declarations. [Please also advise us by signing the attached letter](#) stating if your company has planned to join BOMcheck.
2. Full material disclosure: for each product that Miranda purchases from you, please use Miranda's [XML ICP 1752 blank form](#). For full material disclosure, we need the IPC1752 classes A & D to be filled in. If you do not already have an updated XML IPC 1752 statement, you can use [PTC IPC 1752 builder](#) to prepare it.
3. Conflict Minerals reporting: you can use the [EICC GeSI Conflict Minerals Reporting Template](#) to make your declaration.

4. Human trafficking/slavery statement: please make a declaration stating whether materials incorporated into the product that Miranda purchases from you comply with the laws regarding slavery and human trafficking on the country or countries in which you are doing business.
5. Then please send all your forms in attachment in one single email to [Jeff.Ruocco-Brown@miranda.com](mailto:Jeff.Ruocco-Brown@miranda.com) with `YourCompanyName_EnvironmentalDisclosure_DateDDMMYY` as a subject.

Note: The mass unity of measure for all declarations must be in mg only.

Please contact your Miranda account manager if you have any disclosure-related questions.

Material content and origin of our products is an integral part of our compliance process and requires cooperative effort from our suppliers. Miranda bases its knowledge of the material content of its products on information supplied by third parties. Therefore, it is supplier's responsibility to inform Miranda when an updated declaration is available.

Miranda expects amendments to applicable environmental laws and regulations, and therefore, will aim to update and maintain its environmental compliance process accordingly and continue to promote environmental sustainability.

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of Hazardous Substances in Products and Packaging (NX3-00119) in excess of the applicable quantity limits unless the use of the substance is an exempted application according to the same List.

- Supplier certifies that one or more raw materials, parts or products supplied to NXP do contain, on a homogeneous material level, one or more substances of the NXP Semiconductors List of Hazardous Substances in Products and Packaging (NX3-00119) in excess of the applicable quantity limits. Supplier shall inform NXP, on its own initiative, of the non compliances through a full material content declaration using the NXP Material Declaration Form (NX3-00124).

### 3. Conflict Minerals

As of January 1, 2011 NXP prohibits the use of metals derived from Conflict Minerals in goods (any material, part, sub-component, component, or product, which is to be incorporated into an NXP product). NXP defines a Conflict Mineral as an ore [columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives] originating from a Conflict Region that is processed to create the following metals: Tantalum, Tungsten, Tin, Gold or Cobalt.

A Conflict Region being a geographical region involved in armed conflict where mining operations and proceeds may contribute to serious human rights violations. Currently, the Democratic Republic of Congo and adjoining countries is considered a Conflict Region.

- Supplier declares that any material, part, sub-component, component, semi-finished or finished product supplied to NXP Semiconductors either directly or via third parties do not, to the best of its knowledge, contain any metals (Tantalum, Tungsten, Tin, Gold or Cobalt) derived from columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives originating from the Democratic Republic of Congo and its adjoining countries as defined in the Section 1502 of the “Dodd-Frank Wall Street Reform and Consumer Protection Act” and its affiliated laws or regulations.
- Supplier will proactively undertake due diligence and continuous monitoring of our supply chain to avoid direct or indirect procurement of Conflict Metals.
- If Supplier becomes aware of the use of metals that have been derived from Conflict Minerals in any Goods supplied to NXP, it shall immediately notify NXP. Such notification shall include any tracking information to specify which goods may contain these metals.

Supplier Name	
Name Supplier Representative	
Title Supplier Representative	
Contact Phone	
Contact Email	
Signature	

NXP Semiconductors	<b>Supplier Statement of Conformity</b>	NX5-00009
Sustainability		2012-02-13
Sustainability		Sheet 3 of 3

Revision sheet

Document Author	Date	Description of Change	Document Owner
Eric-Paul Schat	2008-12-03	First issue	Eric-Paul Schat
Eric-Paul Schat	2012-02-13	Added Chapter Conflict Minerals; small adjustments in text.	Eric-Paul Schat
In case of questions or change proposals please contact the latest document author and owner.			



About ZDT

Products and Service

Investors

CSR

Careers

Partner Area

# CSR

Continuous environment excellence to create a greener earth

## Strategic partners

Home > CSR > Strategic partners

Since 2006, ZDT has rooted in China and envisioned a global layout for its rapid development strategy of working closely with its partners and realizing the objective. With just more than five years, ZDT has established five manufacturing sites in Shenzhen, Hua'an, Yantai, Qinhuangdao and Yingkou. The strategic partners play an important role in ZDT development.

ZDT always love to share experiences with its strategic partners, learn from each other, do joint research and innovation. ZDT PCB business platform is a stage where ZDT and its suppliers, professional agency and other strategic partners to share the gains. We look forward to working with strategic partners with mutual-beneficial development strategy through mutual development, innovation, research of the core technology (new products, new technology, new equipments, new materials and new process) and share the results, and also hope that our high quality circuit board can be widely used in end-user products, benefiting the majority of consumers and general public. This is an implementation for one of ZDT mission: continuous technology development for better human life.

Environment and Conservation

Safety & environment management

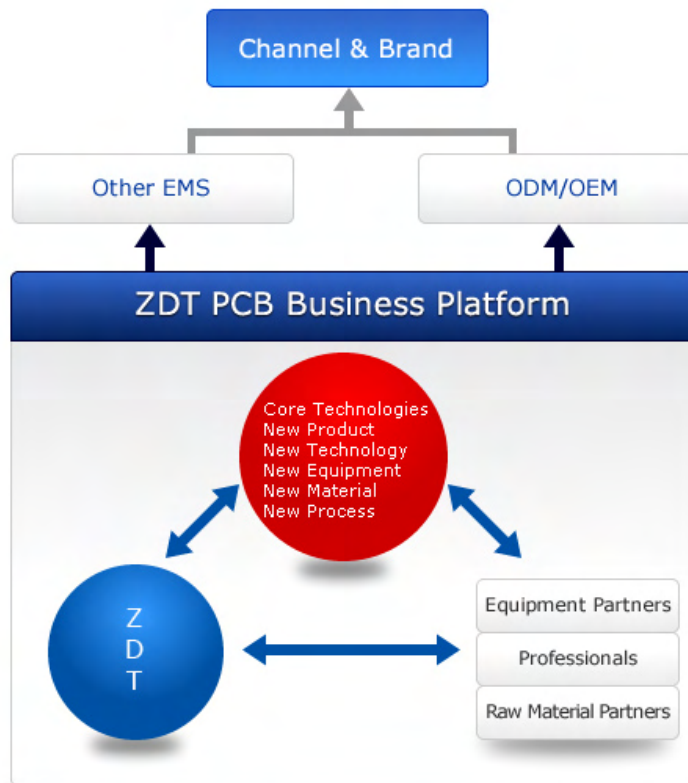
Social Contribution

Strategic partners



### Contact us

If you have comments or questions about ZDT, please feel free to email us at [zdt-contact@zdtco.com](mailto:zdt-contact@zdtco.com). Thank you!



### Conflict Mineral Declaration:

ZDT promises not to accept and use the "Conflict Minerals" or material made by them from areas under the control of armed groups in the Democratic Republic of

the Congo or an adjoining country. Suppliers of ZDT must establish Conflict Mineral Management system, to ensure that gold, tantalum, tin, tungsten and their derivatives contained in their products are not from the conflict mines areas. Suppliers of ZDT shall give the same conflict mineral management requirement to their upstream suppliers.

## Conflict Minerals

“**Conflict Minerals**” refers to minerals or other derivatives mined in the eastern provinces of the Democratic Republic of the Congo (“**DRC**”) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States enacted the Dodd-Frank Financial Reform Bill and Consumer Protection Act § 1502(b) (the “**Conflict Minerals Law**”), which requires all US stock listed companies and their suppliers to disclose information concerning chain of custody and usage of conflict minerals (Tin, Tantalum, Tungsten, and Gold . . . “**3TG**”).

It is Benchmark’s policy to comply with any applicable obligations under the Conflict Minerals Law and the regulations promulgated thereunder, as amended from time to time, relating to Conflict Minerals. Benchmark believes the Conflict Minerals Law and related efforts to avoid using Conflict Minerals aligns with Benchmark’s corporate policy on sustainability. As may be required by the Conflict Minerals Law, Benchmark intends to adopt the EICC-GeSI Due Diligence reporting process or similar methodologies and obtain chain of custody declarations from all Benchmark sourced and managed suppliers, ensuring transparency in our supply chain.

- Benchmark expects our suppliers to source materials from socially responsible suppliers.
- Benchmark expects its suppliers to fully comply with the Conflict Minerals Law and provide all necessary declarations.
- Suppliers must pass these requirements through their supply chain and determine the source of specified minerals, including 3TG.
- Suppliers that are non-compliant to these requirements shall be reviewed by global procurement for future business.

This Conflict Minerals Policy encourages businesses to respect, protect and remedy human rights throughout the world.

[Sustainability Policy BE-00201A.pdf](#)

[Quality Policy BE-20001C.pdf](#)

[Environmental Policy BE-07001A.pdf](#)

For more information about Conflict Minerals see this page from IPC




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# LG Electronics' Statement on Conflict Mi

## Overview of the Conflict Minerals Issue

The Democratic Republic of the Congo ("DRC") is a Central African country with vast mine cassiterite (tin), columbite-tantalite (aka coltan - source of tantalum), wolframite (tungst groups have fought to control mines within the DRC; those armed groups have been cited locals, including murder, rape and forced labor. Armed groups controlling mines smuggle are used to further finance conflict and perpetuate criminal behavior; hence, cassiterite, considered conflict minerals.

The elements tantalum, tin, tungsten and gold are metals used in many manufactured go aerospace, appliances, automotive, electronics, jewelry, medical and tool & die industrie 8% of the gold supply<sup>2</sup> is used in electronic and electrical products. Similarly, about 36% o electronic solders<sup>3</sup>. A small portion of the world's tungsten supply is used in electronic pr vibrator bobs and in the manufacture of integrated circuits.

The Dodd-Frank Wall Street Reform and Consumer Protection Act, passed into law in July companies report to the Securities and Exchange Commission ("SEC") on the origin of con show due diligence if conflict minerals are sourced from the DRC or an adjoining country. regulations implementing Dodd-Frank Section 1502 by April 2011, but regulations have be timeframe. The goal of the act is to cut direct and indirect funding of armed groups enga

## Definitions Related to Conflict Minerals Adopted by LG Electron Conflict Mineral

(A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) determined by the Secretary of State to be financing conflict in the Democratic Republic

## DRC Conflict Mineral Free

DRC Conflict Mineral Free does not contain conflict minerals that directly or indirectly fin Democratic Republic of the Congo or an adjoining country<sup>5</sup>.

## Armed Group

Armed Group means an armed group that is identified as perpetrators of serious human ri on Human Rights Practices under sections 116(d) and 502B(b) of the Foreign Assistance Ac 2304(b)) relating to the Democratic Republic of the Congo or an adjoining country<sup>6</sup>

## LG Electronics' Approach on Conflict Minerals

Suppliers to LG Electronics must develop policies toward preventing the use of conflict minerals controlled by armed groups in all items to be supplied to LG Electronics. In addition, suppliers must document their efforts to determine the source of any conflict minerals or derivatives and the origin of the metals tantalum, tin, tungsten and gold in products to be supplied to LG Electronics. Tantalum, tin, tungsten or gold metals subsequently used in LG Electronics' products are sourced through the EICC/GeSI Conflict Free Smelter (CFS) program.

LG Electronics encourages its suppliers to responsibly source conflict minerals and derivatives from the Democratic Republic of Congo (DRC) and neighboring countries in order to prevent an embargo and associated human suffering.

## Status of LG Electronics' Due Diligence to Prevent Use of Conflict Minerals

(Date of last revision: Feb. 27<sup>st</sup>, 2012)

LGE entered into simple contracts with major contractors<sup>7</sup> to not supply illegally mined minerals (March 2010), the coverage was just focused on tantalum and we have to extend the scope to include tin, tungsten and gold. We will place a Global Procurement Policy internally distributed to all procurement members. The origin/source information of materials to confirm that they are not obtained through illegal mining. Tantalum capacitor suppliers in 2010 showed that the origin of minerals was China or Australia.

## Join EICC and Extractives Work Group

In August 2010, LGE joined the Electronic Industry Citizenship Coalition (EICC) in an effort to develop a common policy and improve the company's compliance in this area. Also, LGE actively has been participating in the EICC work group to adopt the industry consensus approach throughout our supply chain.

## Declare Supplier Code of Conduct

Based on EICC Code, LGE established and declared its Supplier Code of Conduct published on the company website. Suppliers shall evaluate the origin or source of their materials throughout their supply chain to ensure that materials obtained through any illegal form of mining (e.g., materials obtained from the Democratic Republic of Congo) will bind suppliers for not using conflict minerals.

\* LGE's Supplier Code of Conduct - [Download PDF](#)

## Feed into standard contract

Our standard contract contains a "Seller's Social Responsibility" provision. This provision incorporates LG Electronics' requirements for corporate social responsibility and we have applied these provisions to all suppliers.

## Identify materials in supply chain



In October 2011, LGE conducted an analysis of all manufacturing parts using our internal s According to the results, about 25,000 parts contain 3TG (Tantalum, Tin, Tungsten, and g by over 800 suppliers globally. A due diligence survey to identify smelters used by supplie in progress, using EICC Conflict Minerals Reporting Template.

- 1) <http://www.webcitation.org/5v1BooEpg>
- 2) World Gold Council; Gold Demand Trends, First Quarter 2011 (2010 data)
- 3) GHGm; Social and Environmental Responsibility in Metals Supply to the Electronic Indus
- 4) Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502
- 5) Ibid.
- 6) Ibid.
- 7) LGE's procurement team received letters from 8 companies, mainly tantalum capacitor electro-mechanics, AK information communication, Matsuo Shoji Corp., ROHM semiconduc



Global : English

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# CONFLICT MINERALS POLICY

Much of the equipment produced by the electronics and telecommunications industry relies on components and/or parts containing minerals such as tin, tantalum, tungsten and gold. The mining and trading of these minerals in eastern Democratic Republic of the Congo and neighbouring countries is crucial to the region's economy, but in some instances, is helping to finance armed groups causing serious social and environmental issues. The term 'conflict minerals' refers to minerals mined and traded in conditions of human rights abuses, environmental degradation and that are directly or indirectly financing or benefiting these armed groups.

Alcatel-Lucent endorses the United Nations and the Organization for Economic Co-operation and Development definitions and views on conflict minerals. We acknowledge the existence and importance of human and environmental issues related to conflict minerals. As a downstream user of products that may contain conflict minerals, Alcatel-Lucent recognises its role to protect human rights and to take steps to avoid contributing to issues connected to conflict minerals.

Alcatel-Lucent is implementing due diligence practices to eliminate conflict minerals from its supply chain. As it is frequently virtually impossible to determine the actual origin of minerals used in the manufacture of products, many stakeholders must be engaged to develop the processes required to improve the ability to trace the origin of products, and thus the minerals, throughout the supply chain. Alcatel-Lucent expects the support of its suppliers to determine the origin of the minerals used and to not use those identified as conflict minerals.

To this extent, Alcatel-Lucent is:

- Involved in the Global e Sustainability Initiative (GeSI) effort to eliminate the market for conflict minerals through the development of tools to improve the traceability of product/minerals in the upstream supply chain and to detect the presence of conflict minerals; and

- Focused on its sphere of direct influence, the supply chain downstream from the minerals smelter, by leveraging existing collaborative initiatives to address the conflict minerals issue through:

- Raising suppliers awareness of conflict minerals and having them identify the smelters that process the minerals they purchase;
- Determining if identified smelters are 'conflict-free' by using reliable information from industry associations; and
- Engaging in dialogue and requiring mitigation actions with suppliers inadvertently using conflict minerals or not knowing their origin.

Alcatel-Lucent will, with the availability and evolution of industry tools, strengthen its due diligence program and processes to identify the source of the minerals used in company products.

This policy will be regularly reviewed, updated as necessary, and will be applicable and communicated to all impacted stakeholders.



Jean-David Calvet  
Chief Procurement Officer

March 26<sup>th</sup>, 2012

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1AA003100251ASZZA – Revision 1





## Silicon Labs Statement Regarding the Use of Conflict Minerals

In July of 2010, the United States Congress passed legislation requiring corporations to report the use of “Conflict Minerals” in the manufacture of their products.

“Conflict Minerals” in this context refers to specific minerals originating from mines controlled by armed groups in the Democratic Republic of the Congo or adjoining countries. The specific metals in question are: Gold, Tantalum, Niobium, Tin, Iron, Manganese, and Tungsten.

The details of the legislation can be found in Section 1502 of HR 4173, signed into law on July 21, 2010. The United States State Department is required to provide a “Conflict Minerals Map” by the end of January 2011. In addition, the US Securities and Exchange Commission will issue regulations in April 2011 detailing the audit requirements necessary to ensure a product is “DRC Conflict Free”.

Silicon Labs is committed to complying with this legislation and plans to comply with forthcoming regulations to enable designation of all Silicon Labs products as “DRC Conflict Free”. We are currently working with our suppliers to understand or establish their systems for sourcing of raw materials, including any listed metals which may be used in Silicon Labs’ products.

At this time, Silicon Labs is not aware of the use of any Conflict Minerals in Silicon Labs’ products. Should you have additional questions, please contact your Silicon Labs sales support team.

A handwritten signature in black ink, appearing to read 'Jon Ivester', with a long horizontal stroke extending to the right.

Jon Ivester  
Senior Vice President of Worldwide Operations  
Silicon Laboratories Inc.

# **BOURNS®**

## Bourns, Inc. Conflict Minerals Statement

June 7, 2011

To whom it may concern:

During the past few years, worldwide concern regarding the use of certain metals derived from certain minerals obtained from the Democratic Republic of the Congo has been increasing (hereinafter referred to as "Conflict Minerals").

"Conflict Minerals" generally refers to coltan, niobium, tantalum, tin, gold and tungsten, and their derivatives, which are mined in areas of armed conflict and human rights abuses, notably in the eastern provinces of the Democratic Republic of the Congo. Additional information regarding Conflict Minerals is available on the worldwide web.

Bourns, Inc. ("Bourns") has a corporate policy which states that neither Bourns nor any of its subsidiaries will obtain or use Conflict Minerals in its products. Additionally, Bourns has researched its supply chain and is pleased to advise that Bourns' suppliers currently do not supply any goods to Bourns which either contain or are themselves Conflict Minerals.

If you have additional questions, please contact your local Bourns customer service or inside sales representative.

Bourns, Inc.



Mario Zuchovicki  
Vice President  
Global Purchasing and Lean Initiatives





267 Lowell Rd. Hudson, NH 03051 USA Tel: 603-598-0070 Fax: 603-598-0075 email: [vectron@vectron.com](mailto:vectron@vectron.com)  
<http://www.vectron.com>

## **CONFLICT MINERALS STATEMENT FOR CUSTOMERS OF VECTRON INTERNATIONAL**

In July 2010, the United States enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act") which contained a section (Sec. 1502) that regulated "Conflict Minerals"<sup>1</sup> for the first time. The Act includes provisions that require manufacturers to perform due diligence in their supply chains to identify and disclosure the use of any Conflict Minerals and whether those Conflict Minerals originated in the "DRC Countries"<sup>2</sup>. The Act is new and regulations related to the requirements of the due diligence process have not yet been issued by the US Securities and Exchange Commission, which oversees compliance with the Conflict Minerals section of the Act.

Vectron International, as an operating company of Dover Corporation, a NYSE listed company, will be compliant with the Act and other regulations concerning the sourcing of our raw materials and the requirements for supply chain due diligence. We expect that our suppliers will also comply with our requests to provide statements and perform due diligence about the source of any Conflict Minerals in their products which are provided to us.

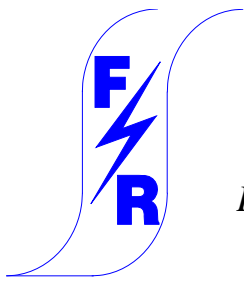
Vectron International and Dover Corporation are currently implementing system processes and procedures to help us achieve compliance with the Act. We are communicating our requirements to our suppliers and vendors. Due to the complexities of the mineral supply chain, Vectron International is currently unable to verify the origin for the minerals used in our products. We are working closely with our suppliers and vendors to understand the source countries of the metals contained in our products and manufacturing processes.

We do not knowingly source any product containing Conflict Minerals from the DRC Countries currently; however we are unable to provide clear supply chain verification at this time. We will continue our work on this due diligence process and advise our customers on the status of our process.

Ram J. Arvikar  
Dir. Global Quality & Compliance  
Vectron International  
[rarvikar@vectron.com](mailto:rarvikar@vectron.com) Tel.: 603-577-6860  
November 18, 2011

<sup>1</sup> "Conflict Minerals" include Columbite-Tantalite (Tantalum), Cassiterite (Tin), Gold, Wolframite (Tungsten) and any derivatives from these minerals.

<sup>2</sup> "DRC Countries" include the Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, The Republic of Congo, Uganda, Rwanda, Sudan (South Sudan), Tanzania and Zambia.



# Fair-Rite Products Corp.

*Ferrite Components for the Electronics Industry*

One Commercial Row  
Wallkill, NY 12589  
Phone: 845-895-2055  
Fax: 845-895-2629  
[www.fair-rite.com](http://www.fair-rite.com)

March 10, 2011

## Conflict Minerals Statement

As an electronic passive component manufacturer, we have required our suppliers to ensure that their supplies of metal do not come from the Conflict Regions.

Our raw materials vendors have established specific supply chain steps and provide certifications that their metals are not knowingly sourced from Democratic Republic of the Congo Conflict Regions. These metals include:

- Gold (Au)
- Tantalum (Ta)
- Tungsten (W)
- Tin (Sn)
- Cobalt (Co)

Fair-Rite conducts periodic reviews with our vendors to ensure that they are in compliance with this policy and we obtain certifications from these vendors that their metal supplies do not come from these Conflict Regions.

Fair-Rite's metal raw materials are sourced from all over the world, including reputable global financial institutions. Based on our knowledge, we are confident that the materials used in our manufacturing do not contain the metals listed above that originate from these Conflict Regions.

In our vigilant environment, we work meticulously to insure that the metals do not come from unknown sources. We continually monitor our supply chain to insure that this policy is strictly adhered.

Rich Eckmann  
Director of Quality





TO: Maxim's Valued Customers

DATE: January 16, 2012

SUBJECT: "Conflict Free" Minerals

The issue of conflict minerals used in the semiconductor, as well as other industries, is complex.

On July 21, 2010 President Obama signed into law the Dodd-Frank Wall Street Reform and Consumer Protection Act (Wall Street Reform Act). Section 1502 of the Wall Street Reform Act requires publicly traded companies to disclose the extent to which their products contain so-called conflict minerals sourced from mines in the Democratic Republic of the Congo (DRC) or adjoining countries, in order to prevent the sale and profit of such minerals from fueling human right atrocities in the DRC region. Conflict minerals include tantalum, tin, tungsten, gold which are integral to the manufacture of semiconductor products.

Certain products manufactured and sold by Maxim do contain metals listed in the legislation as conflict minerals. The minerals listed in the legislation have common uses including:

- Wafer fabrication processes commonly use tantalum, tungsten and gold in the metal interconnect.
- Gold is also commonly used in assembly manufacturing (i.e. wire bonding).
- Tin is commonly used in assembly manufacturing for solder bumps and external lead finish to comply with ROHS requirements.

Maxim is committed to ensuring materials used throughout our supply chain are procured in a responsible and ethical manner. However, the lack of global mechanisms to support the legislation have not been fully developed and deployed. Issues include, but are not limited to:

- Finalization of the SEC regulations, due diligence process and reporting requirements.
- Identification by the US State Department of legitimate mining sources as required by the legislation. The US Dept of State was to provide a map of conflicted mines in the DRC. This has not been done. Furthermore, the Dept of State and the DRC government(s) acknowledge the problems and difficulties in completing this task. In the absence of this task being done, it is not possible to determine if minerals procured by any company originate from conflict mines or not.
- Traceability and certification schemes to track ore to legitimate mining sources in the DRC.

Maxim is closely monitoring the status of conflict minerals with the full intent of complying with the legislation and supporting our customers when it becomes feasible to do so. Governmental and non-governmental agencies are working in cooperation to address the above and other concerns which have prevented companies for achieving the intent of the Conflict Minerals initiative. Maxim believes direction and solutions to the various conflict mineral issues will be forthcoming through the involvement and participation of industry, governmental and non-governmental agencies. We will continue to monitor these developments, and implement due diligence and compliant processes once the required infrastructure and regulations become available.

Regards,

A handwritten signature in black ink, appearing to read "Bryan Preeshl", is written over a white background.

Bryan Preeshl  
Vice President,  
Quality and  
Environmental Management



# RFMD Statement on Conflict Minerals

February 27<sup>th</sup>, 2012

## Background

In recent years, the United States Congress and lawmakers around the world have increasingly focused on regulation of the mining and trade of minerals originating in the Democratic Republic of the Congo and surrounding countries (collectively, the “DRC Countries”), as it is believed that the illicit mining and trade of these “conflict minerals” are helping to finance extreme levels of violence, particularly sexual- and gender-based violence, in the eastern Democratic Republic of the Congo and are contributing to an emergency humanitarian situation in the region. Section 1502 (the “Conflict Minerals Provision”) of The Dodd-Frank Wall Street Reform and Consumer Protection Act, which was adopted on July 21, 2010, requires new annual disclosures from any company for which the use of conflict minerals is necessary to the functionality or production of a product manufactured by that company.

In December 2010, the United States Securities and Exchange Commission (the “SEC”) proposed rules to implement the Conflict Minerals Provision. Under the SEC’s proposed rules, any company that is subject to SEC reporting requirements and for which conflict minerals are necessary to the functionality or production of a product manufactured, or contracted to be manufactured, by that company must disclose in its annual report whether its conflict minerals originated in a DRC Country. If so, the company would be required to furnish a separate report as an exhibit to its annual report that would include, among other things, a description of the measures taken by the company to exercise due diligence on the source and chain of custody of its conflict minerals and an independent private sector audit of the company’s report. Under the proposed rules, “conflict minerals” are defined as cassiterite (ore used to produce tin), columbite-tantalite (ore from which tantalum is extracted), gold, wolframite (ore used to produce tungsten), or their derivatives, or any other minerals or their derivatives determined by the U.S. Secretary of State to be financing conflict in the DRC Countries, regardless of the source of the minerals. The SEC has not yet issued final rules to implement the Conflict Minerals Provision (as was expected to occur during 2011), although it is currently anticipated that such rules will be adopted in the first half of 2012. Companies must provide their initial conflict minerals disclosure and, if necessary, their initial conflict minerals reports after their first full fiscal year following adoption of the SEC’s final rules.

See the following link for additional details: <http://www.sec.gov/rules/proposed/2010/34-63547.pdf>

## RFMD and Conflict Minerals

RFMD supports the goal of ensuring that all minerals used in RFMD products are DRC conflict free. As a publicly traded company, RFMD is subject to SEC reporting requirements and will provide disclosure regarding the source of its conflict minerals in accordance with the U.S. State Department’s guidance and the SEC’s final rules. RFMD shares in the growing concerns of human rights abuses in the DRC Countries and is actively working with its supply chain to certify that metals found in RFMD products are DRC conflict free. Specifically, RFMD is using the EICC/GeSI Conflict Minerals reporting template to collect data from its upstream suppliers with respect to the geographic sources of conflict minerals in use and the associated smelters involved in its extended supply chain. This information will be collected, consolidated and made available to RFMD’s customers in order to assist them with their own supply chain diligence programs. This effort is ongoing, and RFMD will continue to work with its supply chain to update this information and implement other appropriate diligence procedures as necessary to verify the source of its conflict minerals. RFMD is committed to ensuring that metals used in RFMD products are DRC conflict free and will periodically update this statement as new information becomes available from the U.S. State Department, the SEC and RFMD suppliers.



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# Statement on DRC Conflict-Free Minerals

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## STATS ChipPAC Ltd. Policy Statement on DRC Conflict-Free Minerals

STATS ChipPAC is committed to support and subscribe to the use of Democratic Republic of Congo (DRC) Conflict-Free Minerals which include gold (Au), tantalum (Ta), tungsten (W) and tin (Sn). "DRC Conflict-Free" is defined to mean products that do not contain conflict minerals or their derivatives determined to be directly or indirectly financing or benefiting armed groups in the DRC or adjoining country (Sudan, Uganda, Rwanda, Burundi, United Republic of Tanzania, Zambia, Angola, Congo, Central African Republic).

STATS ChipPAC has established and implemented procedures to comply with this policy. STATS ChipPAC requires all suppliers to undertake reasonable due diligence within their supply chain to ensure that the minerals are not being sourced from mines in conflict areas. Suppliers are required to source minerals from any current published list of Electronic Industry Citizenship Coalition-Global e-Sustainability Initiative (EICC-GeSI) audited smelters.

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STATS ChipPAC Ltd. is a leading service provider of semiconductor packaging design, assembly, test and distribution solutions. A trusted partner and supplier to leading semiconductor companies worldwide, STATS ChipPAC provides fully integrated, multi-site, end-to-end packaging and testing solutions that bring products to the market faster.

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### PennEngineering Conflict Minerals Statement



#### Conflict Minerals Statement

May 2011

PennEngineering takes seriously the allegations that metals mined in conflict regions around the world may be making their way into the electronic component and/or other channels of supply. Of particular concern are the metals Tantalum, Tin, Tungsten and Gold coming from the Democratic Republic of the Congo (DRC). The Conflict Minerals Law (1) mandates supply chain due diligence and public disclosure related to the source of these minerals. With this understanding, we have investigated to the best of our ability our current supplier channels and have determined that while some of these metals may be used in our manufacturing processes, none of the supply originates in the aforementioned DRC.

We will continue to work with our suppliers to verify that they and their suppliers use DRC conflict free minerals.

(1) Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

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# Amkor Technology Conflict Minerals Policy Statement

Amkor Technology, Inc. takes very seriously the worldwide concerns that metals mined in the Democratic Republic of the Congo (“DRC”) may be making their way into the electronics supply chain and profits from this mining may be financing human rights violations in the eastern region of the DRC. Amkor is committed to a policy (i) that our supply chain does not knowingly contribute to human rights violations in the DRC and (ii) that the gold, tantalum, tungsten, or tin that we procure from our suppliers is not derived from ore sourced from mines in the conflict areas of the DRC or illegally taxed on trade routes which are controlled by non-government military groups or unlawful military factions.

In support of this effort, Amkor:

- Has developed and implemented procedures that are designed to demonstrate that the metals we procure and sourced in accordance with this policy;
- Requires that our suppliers verify in writing that they have procedures in place to demonstrate that the metals they procure are sourced in accordance with this policy; and
- Requires that our suppliers, to the extent reasonably practicable, document the routes taken and the intermediaries involved from mine of origin to final product.

## **Contact:**

Greg Johnson, Sr. Director, Corporate Communications  
Amkor Technology, Inc.  
480-786-7594  
greg.johnson@amkor.com

## IC-HAUS STATEMENT ON CONFLICT MINERALS

In the electrical industry, "conflict minerals" such as gold (Au), tantalum (Ta), tungsten (W), tin (Sn) and cobalt (Co) are required. The mining of these materials also takes place in certain states where rebel groups, militias and army units are controlling the mining and trade while the the civilian population are victims of massacres, forced labour, and recruitment of child soldiers. These materials can find their way into the supply chain of the electronics industry.

It is the ambition of iC-Haus GmbH not to contribute knowingly to human rights violations. We will therefore give priority to suppliers who support either as a member of the Electronic Industry Citizenship Coalition (EICC) the Code of Conduct (CoC), or bring transparency into the supply chain (according to CoC) to reproduce the origin of the minerals.

[Code of Conduct \(codeofconduct\)](#)



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## Statement on Conflict Materials

Air Products takes very seriously concerns that profits from metals mining ("conflict materials") may be fueling human rights atrocities in the Eastern Region of the Democratic Republic of the Congo (DRC).

In July 2010 in the United States, President Obama signed into law the Dodd-Frank Wall Street Reform and Consumer Protection Act (Wall Street Reform Act) containing a section that regulates "conflict minerals" for the first time. The legislation requires companies like Air Products to disclose annually to the Securities and Exchange Commission (SEC) whether products were produced with conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries. This legislation is new and implementing regulations have not yet been issued by the SEC, but it will initially apply to tin, tantalum, tungsten and gold. These regulations become effective April 17, 2011, and the reporting requirement starts in the first full fiscal year after the regulations are issued. The yet-to-be issued regulations may alter the reporting requirements.

Air Products will be compliant with this act and other regulations concerning the sourcing of our raw materials from conflict areas. We expect our suppliers to comply with our Code of Conduct and have obtained statements from them that there are no conflict minerals sourced from the DRC or adjoining countries in our supply chain.

We also understand this is an important concern worldwide, although formal guidelines may vary between countries. The Electronics industry has been proactive via the Electronic Industry Citizenship Coalition (EICC), and we will continue to follow EICC's actions and recommendations as they apply to this issue. We also will continue to work with our suppliers, other industry trade groups and government regulators to verify that our suppliers and sub-suppliers use DRC conflict free minerals.

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### **Statement on Conflict Minerals**

SpanSion is committed to ensuring that “conflict minerals” are not utilized in our products. We have conducted preliminary surveys of our direct material suppliers and all have reported they do not utilize conflict minerals originating from the Democratic Republic of Congo (DRC) or its adjoining countries. We are now evaluating and validating the responses.

SpanSion is a full member of the Electronics Industry Citizenship Coalition (EICC) and we are aligning efforts with those of the EICC-GeSI Extractives Work Group. This work group, representing over 80 companies in the electronics and information and communications technology industries, has come together to improve the transparency and traceability of metals in our collective supply chain.

The Extractives Work Group has developed: (1) a standardized supplier survey and reporting tool, (2) a Conflict-Free Smelter third-party assessment program, and (3) a regional sourcing program intended to improve the traceability of materials from mine to smelter, and SpanSion is utilizing all of them. We are confident that these EICC-GeSI initiatives will help ensure that conflict minerals are not incorporated into SpanSion products.

We will comply with the requirements of Title XV of the *Dodd-Frank Wall Street Reform and Consumer Protection Act*, and we will continue to pursue supply chain partnership evaluations to ensure that materials incorporated into SpanSion products are sourced from socially responsible companies.

SpanSion

February 23, 2012

FTDI Document No.: FT\_000541

14th November, 2011

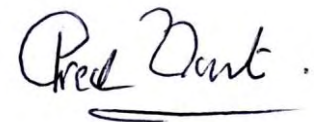
## **FTDI 'Conflict Minerals' Statement**

FTDI has a high level of concern for the issue of 'Conflict Minerals', which involves the trade of minerals and associated metals - Gold(Au), Tantalum(Ta), Cobalt(Co), Tungsten(W) and Tin(Sn) originating in the region of the Democratic Republic of the Congo (DRC) and surrounding regions where armed conflict results in human rights violations and environmental damage.

FTDI have contacted all their supplies with respect to this issue and their suppliers have confirmed that they do not, and will not, knowingly purchase any material from the conflict region.

At this time FTDI is not aware of the use of any 'Conflict Minerals' in FTDI products.

On behalf of Future Technology Devices International Ltd,



Fred Dart, Managing Director  
Future Technology Devices International Ltd.  
Unit 1, 2 Seaward Place, Glasgow G41 1HH, Scotland, United Kingdom  
Tel.: +44(0)1414292777 Fax:+44(0)1414292458

## Conflict Minerals Sourcing Statement

*Commitment to Ethical Practices*



Ecliptek Corporation is concerned that minerals mined in the Democratic Republic of Congo (DRC) and adjoining countries may be making their way into the electronic industry supply chain. Profits from the mining of these minerals have resulted in increased hostilities and human rights violations in the region. These minerals include tin, tungsten, tantalum and gold.

While Ecliptek Corporation does not directly purchase any of the aforementioned minerals, we are committed to ethical practices and full compliance with all applicable laws and regulations.

Ecliptek Corporation is currently implementing system processes and procedures to help ensure that our suppliers comply with our expectations. We are communicating our requirements to our supply base to determine the sources of any Conflict Minerals contained in our products.

Ecliptek Corporation supports the development of independently verifiable supply chain transactions, when available and credible, to document the routes taken and intermediaries involved from mine of origin to final product.

Due to the complexities of the mineral supply chain, Ecliptek Corporation is currently unable to verify the origin for the minerals which are used in our products. We are working closely with our supply base to understand the sources of the metals contained in the product to assure that there are no Conflict Minerals in our supply chain.

Ecliptek Corporation is diligently working to ensure that our supply chain is free of Conflict Minerals and we will continue to provide regular updates regarding our progress on this important objective. Ecliptek has established a Conflict Minerals team that meets regularly to coordinate all company activities and establish company policy. Please contact our [Global Customer Support](#) team if you have any questions about our program.

January 9, 2012

[Conflict Minerals FAQs](#)

[RoHS Compliance Tools and Resources](#)

[REACH Compliance Tools and Resources](#)

[Environmental Stewardship](#)

## Eliminating Conflict Minerals (Conflict Metal)

### EICC (Electronic Industry Citizenship Coalition) Commitment and the Elimination of Ores Originated in the Democratic Republic of the Congo (DRC) and Neighboring Regions



Senju Metal Industry Co., Ltd. and its related companies (Senju Metal Group) fully support the vision and goals of the EICC (\*1) and are committed to fulfilling the following responsibilities:

1. Senju Metal Group recognizes and respects the standards outlined by the EICC code of conducts.
2. To comply with the EICC statement (\*2) and completely eliminate the use of conflict minerals, Senju Metal Group confirmed with all of its tin (Sn) base metal sourcing companies and its smelters in writing that their minerals are conflict-free.
3. In addition to obtaining a written certification, Senju Metal Group conducted on-site audits of tin (Sn) sourcing companies and smelters.
4. As a result, it was verified that none of raw materials used by Senju Metal Group for its products have originated in the DRC and its surrounding conflict regions.
5. If raw materials were ever found to be originated in the DRC or its surrounding conflict regions, Senju Metal Group will immediately discontinue the purchase.
6. Senju Metal Group accepts the independent third-party audit designated by EICC.
7. Senju Metal Group will provide the names of the above tin (Sn) base metal smelters to EICC.
8. Senju Metal Group will provide information on the traceability of tin (Sn) base metal to EICC.

January, 2011  
 Senju Metal Industry Co., Ltd.  
 CSR Office General Manager  
 Kazuhisa Ishida

(\*1) About EICC

<http://www.eicc.info/>

(\*2) EICC Statement



Quartzdyne, Inc.  
4334 West Links Drive  
Salt Lake City, UT 84120  
USA

## **Quartzdyne's Statement on Conflict Minerals**

In July 2010, the United States passed for the first time the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which contains a section that regulates "conflict minerals." The legislation requires companies such as Quartzdyne to disclose annually to the Securities and Exchange Commission (SEC) whether manufactured products were produced with conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries. Implementing regulations for this new piece of legislation have not yet been issued by the SEC, but will initially apply to tin, tantalum, tungsten, and gold. These regulations became effective April 17, 2011, and the reporting requirement starts the first full fiscal year after the regulations are issued. The yet-to-be issued regulations could alter the reporting requirements.

Quartzdyne, as an operating company of Dover Corporation, a NYSE listed company, complies with this act and other regulations concerning the sourcing of our raw materials from conflict areas. We expect that our suppliers will also comply with our requests to provide statements and perform due diligence regarding the sources of any conflict minerals in the products they provided to us.

As more information becomes available regarding due diligence criteria, Quartzdyne will contact our vendors and manufacturers to provide documentation stating that the raw materials do not originate from the DRC or its neighboring countries, thus ensuring Quartzdyne's compliance with the Dodd-Frank Act.

If you have additional questions, please contact your Quartzdyne sales representative for additional information.

Quartzdyne, Inc.



2 Tech Drive, Suite 201  
Andover  
MA 01810

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# MKS “Conflict Minerals” Position Statement Revision B - February 2012

## Background on U.S. Conflict Minerals Legislation:

On July 21, 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act was signed into law (the **Act**). Though the vast majority of the Act is dedicated to improving accountability and transparency in the financial system, Section 1502 of the Act imposes new audit and disclosure requirements on companies required to report to the U.S. Securities and Exchange Commission (**SEC**) regarding their use of "conflict minerals" in products they manufacture. The "conflict minerals" designation was established in response to violence in the Democratic Republic of the Congo (**DRC**) perpetrated by armed groups thought to be financed in part by the exploitation and trade of these minerals.

The SEC is still in the process of finalizing rules implementing Section 1502's reporting requirements, but the basic framework is known. Under the Act "conflict minerals" are columbite-tantalite (coltan), cassiterite, gold, wolframite and any of their respective derivatives as well as any other mineral determined by the Secretary of State to be financing conflict and procured from the following countries: the DRC, Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia.

Section 1502 applies to all SEC reporting companies (both domestic and foreign private issuers) for whom conflict minerals "are necessary to the functionality or production" of a product manufactured or contracted to be manufactured by such entities. Determining whether and how much disclosure is required under Section 1502 is a three-step analysis:

- First, an SEC reporting company must make annual disclosures as to whether conflict minerals are necessary for the functionality or production of a product that it manufactures or contracts to manufacture.
- Second, if conflict minerals are used, the company must then make a reasonable inquiry as to whether the necessary conflict mineral originated in the covered countries. Companies marking a determination that no such minerals are used would need to state this conclusion, briefly describe the reasonable inquiry they undertook and maintain reasonable business records to support their conclusions.
- Finally, if the company cannot verify that the minerals did not originate in a conflict country, the company must then disclose additional information to the SEC in a Conflict Minerals Report—including measures taken to exercise due diligence about the source and chain of custody of the minerals; a description of the products that are not conflict-free or cannot be so verified; and a description of the facilities used to process the conflict minerals, the country of origin of the conflict minerals, and efforts taken to determine the mine or location of origin with greatest possible specificity.

## MKS Compliance Position:

With the SEC rules not yet finalized, there is no compliance obligation currently in effect for MKS. Reporting will not be required until a company's first full fiscal year after enactment. Assuming the SEC promulgates final rules in 2012, MKS would need to make any necessary disclosures in early 2014 for our fiscal year ending December 31, 2013. If we become subject to the requirements, our disclosures may have to be verified by an independent auditor in accordance with a standard to be established by the U.S. Comptroller General.





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### **Risks Beyond MKS' Control:**

1. Even where MKS or its products are not subject to direct obligations pursuant to Section 1502, certain of its customers or business partners may be, depending on their specific operations and products. This position statement is not intended to be an exhaustive discussion of Section 1502, does not address all of the Section 1502 considerations that may be relevant to MKS's customers or business partners in light of their particular circumstances, and is not intended as compliance advice.
2. This position statement is based on current provisions of Section 1502 and the SEC's implementing rules proposed in December 2010, all of which are subject to change. The SEC or any other regulatory or enforcement authority may disagree with our assessments. Because Section 1502's disclosure rules are still in the process of being finalized and are subject to revision, it is impossible to predict with certainty all requirements under Section 1502.
3. It is possible that certain process materials, parts or components may become unavailable or more difficult to procure due to Section 1502. If MKS needs to make process or design changes due to such unavailability, then there may be an impact on our products and/or delays in shipment. We intend to continue to bring our products to market in full compliance with applicable laws and expect our suppliers and customers to be partners in that effort.

### **Disclaimer:**

THIS POSITION STATEMENT IS FOR INFORMATIONAL PURPOSES ONLY, DOES NOT CONSTITUTE A LEGAL REPRESENTATION AND DOES NOT CREATE OR CONFIRM THE EXISTENCE OF ANY RIGHTS, LIABILITIES OR OBLIGATIONS OF MKS, ITS AFFILIATES, ANY OF THEIR RESPECTIVE CUSTOMERS OR ANY OTHER PERSON. THE SALE OF MKS PRODUCTS SHALL BE GOVERNED EXCLUSIVELY BY THE TERMS AND CONDITIONS SET FORTH IN THE APPLICABLE MKS SALE AGREEMENT.

MKS' assessments contained in this position statement are solely MKS' opinion. MKS does not guarantee the accuracy or completeness of its evaluation and neither MKS' customers nor any other party may rely on this position statement. The information contained herein is based on information MKS has obtained as of the date indicated at the top of this position statement. MKS does not have any obligation to update this position statement. Any MKS customer or other person needing information or guidance about Section 1502 should seek advice of legal counsel.



VENKEL LTD.

## **“Conflict Minerals” and “Conflict Mining” Statement**

“Conflict Minerals” and “Conflict Mining” refer to the illegal extraction and control of minerals from within the DRC (Democratic Republic of Congo). Venkel Ltd. uses particular minerals in our products and we require all of our suppliers to conform to our position regarding “Conflict Minerals” and “Conflict Mining.” Venkel Ltd. understands the complexity of the supply chain of our materials and ensures that the products we sell do not contain “Conflict Minerals.”

Based on our own investigations and information obtained from our suppliers, we are confident that the materials used in the manufacturing of our SMT passive components, do not contain these minerals. Venkel’s raw materials suppliers assure that their products comply with our policy regarding “Conflict Minerals” and “Conflict Mining.” These minerals include:

- Cobalt (Co)
- Gold (Au)
- Tin (Sn)
- Tungsten (W)
- Tantalum (Ta)

The minerals of concern used in the SMT passive components that Venkel Ltd. provides, are limited to Tantalum (Ta), Tin (Sn), and in rare cases, Gold (Au). Gold is occasionally used in the termination for special applications like wire bonding.

These raw materials listed above are not sourced from within the DRC and Venkel Ltd. conducts periodic reviews with our suppliers to ensure that the supply chain remains free of “Conflict Minerals.” We continually monitor our supply chain to ensure that this policy is adhered to and that no changes are made without written notification. Venkel Ltd. is committed to supplying our customers with products that are of the highest quality while maintaining awareness of these “Conflict Minerals.”

Nelson Johnson

Materials Manager

VENKEL LTD. • 5900 SHEPHERD MOUNTAIN COVE • AUSTIN, TEXAS 78730

PHONE: 512-794-0081 • FAX: 512-794-0087

[www.venkel.com](http://www.venkel.com)



**Conflict Minerals Policy Statement.**

Many industries utilize the metals derived from minerals that are mined throughout the world, including The Democratic Republic of Congo (DRC). Known to operate in the DRC are mines under the rule of non-government military groups or unlawful military factions.

“Conflict minerals,” as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, are *Columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.* Metals derived from these minerals are tin, tantalum, tungsten, and gold.

It is Selective Plating’s policy to be in full compliance with the Dodd-Frank Wall Street Reform and Consumer Protection Act and explicitly prohibits purchasing anode products or other chemicals and substances from suppliers sourcing metals either known to be derived from conflict regions or designated as NOT *DRC Conflict-Free.*

Brian Snodgrass  
President

An ISO 9001:2008 Registered Company

Selective Plating, Inc. 240 South Lombard Road Addison IL 60101 Tel 630-543-1380 Fax 630-543-1392

[www.SelectivePlatingInc.com](http://www.SelectivePlatingInc.com)

## IR's Policy Statement on Conflict Minerals

International Rectifier ("IR") uses various metals in our products including tin, tantalum, tungsten and gold. Many of these metals are derived from minerals including columbite-tantalite ("coltan"), cassiterite, gold, wolframite, and their derivatives, which are mined in global locations, including the eastern portion of the Democratic Republic of Congo and surrounding countries (the "Conflict Region").

In compliance with applicable US law, and in concert with the efforts of Electronic Industry Citizenship Coalition ("EICC"), IR is committed to responsible sourcing of metals. IR does and will continue to conduct reasonable diligence within our supply chain and will take appropriate steps to ensure that metals are not sourced from mines in the Conflict Region. IR's suppliers are requested to provide written evidence that minerals used to produce gold, tin, tantalum, and tungsten supplied to IR are not from mines or smelters in the Conflict Region.

### COMPANY INFO

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### CORPORATE SOCIAL RESPONSIBILITY

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## CSR-oriented Procurement

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To ensure the soundness of its business activities, the Nikon Group cooperates with its procurement partners to undertake CSR-oriented procurement and green procurement.

### Global Implementation of CSR-Oriented Procurement

#### Promoting CSR-oriented Procurement

In the year ended March 2011, the Nikon Group began holding discussions with its procurement partners in Japan for the purpose of understanding our CSR-oriented approach to them. In the first year, our personnel visited 37 partners and successfully learned the details of each company's CSR initiatives. In addition, we participated in the Supply Chain Subcommittee of the UN Global Compact to discuss optimal methods of CSR-oriented procurement with participating companies.

In the year ending March 2012, we will update the Nikon Procurement Partners' CSR Guidelines and undertake additional CSR-oriented procurement measures such as consideration of creating internal systems for on-site inspections of CSR activities by procurement partners. In addition, a procurement procedures manual that includes CSR perspectives will be prepared and distributed throughout the Group as an operational manual for penetrating CSR-oriented procurement activities. A group-wide basic transaction agreement will be used and Nikon Group companies in Japan are encouraged to have procurement partners sign the agreement. Systems are being put in place to ensure that appropriate transactions are conducted in accordance with signed basic transaction agreements, and prompt reports to management and appropriate responses are made if any instances of non-compliance are discovered.

#### Handling of the "conflict minerals issues"

Minerals (tantalum, tin, tungsten and gold: hereinafter "conflict minerals") mined in the Democratic Republic of the Congo and neighboring countries are becoming sources of funding for armed groups, creating grave issues such as facilitating conflicts, human rights violations and environmental destruction; and international efforts are being made to resolve this issue. The Nikon Group, with cooperation from our procurement partners, will investigate the status of usage of these conflict minerals, and will make efforts to reduce the use of conflict minerals as much as possible.

Based on the Nikon Basic Procurement Policy and the Nikon Procurement Partners' CSR Guidelines, the Nikon Group aims to fulfill its social responsibilities in the entire supply chain.





## HAMBURG INDUSTRIES CO., LTD.

### Declaration of Conflict Minerals Free

Hamburg Corp. and its supply chain shall bear social responsibility and environmental protection.

We do not purchase conflict minerals in the conflict regions.

Request our suppliers to refuse to use Conflict Minerals from conflict regions and present a signed letter of commitment to Hamburg Corp.

Request our suppliers to notify their upstream suppliers of such requirements.

#### Remark:

The Conflict Minerals are including cobalt (Co), gold(Au),palladium (Pd),tantalum (Ta) ,tin (Sn) and tungsten(W) that are not drifted from the mines of Democratic Republic of Congo (DRC) and its neighboring countries controlled by armed groups.

- DRC (剛果民主共和國)
- Central Africa Republic (中非共和國)
- Sudan (蘇丹)
- Zambia (尚比亞)
- Angola (安哥拉)
- Congo Republic (剛果共和國)
- Tanzania (坦尚尼亞)
- Burundi (蒲隆地)
- Rwanda (盧安達)
- Uganda (烏干達)



April 16, 2012

RE: Conflict Minerals

To whom it may concern:

This letter is to assure you that Dymax Corporation does not intentionally add any conflict minerals (tin, gold, tantalum (coltan) and tungsten), to its ultraviolet (UV) and visible light curing products, oligomers or coatings and activator curing metal bonding adhesives. Furthermore, we have asked our suppliers not to ship products that contain conflict minerals/metals that come from the Democratic Republic of Congo (DRC).

If you have any questions, please feel free to contact me at 860-626-6341 or e-mail me at [sthompson@dymax.com](mailto:sthompson@dymax.com).

Sincerely,

DYMAX CORPORATION

A handwritten signature in black ink that reads "Susan R. Thompson".

Susan R. Thompson  
EHS Manager

Technical data provided is of a general nature and is based on laboratory test conditions. Dymax does not warrant the data contained in this bulletin. Any warranty applicable to the product, its application and use is strictly limited to that contained in Dymax standard Conditions of Sale. Dymax does not assume responsibility for test or performance results obtained by users. It is the user's responsibility to determine the suitability for the product application and purposes and the suitability for use in the user's intended manufacturing apparatus and methods. The user should adopt such precautions and use guidelines as may be reasonably advisable or necessary for the protection of property and persons. Nothing in this communication shall act as a representation that the product use or application will not infringe on a patent owned by someone other than Dymax or act as a grant of license under any Dymax Corporation Patent. Dymax recommends that each user adequately test its proposed use and application before actual repetitive use, using the data in this communication as a general guideline.



June 11<sup>th</sup> 2011

**Subject: Logitech Supplier Communication on “Conflict” Mineral Extraction**

Dear Supplier,

Logitech wishes to bring to your attention the issue of mineral extraction and its connection to areas of the globe such as the Eastern region of the Democratic Republic of Congo (DRC). This region has been termed a “conflict region” because illegal mining profits by local military groups in the Eastern DRC are contributing to human rights abuses.

Logitech does not source or buy metals directly, however, we are concerned by the allegations that metals illegally mined in the Democratic Republic of the Congo may be making their way into the electronics supply chain. The minerals of interest are: gold (Au), tantalum (Ta), tungsten (W) and tin (Sn).

There are many challenges in tracking the origins of minerals, not least of which are the lack of a direct contractual relationship with mineral suppliers and no current infrastructure to track minerals through a multi-layered supply chain. However, Logitech is committed to source only materials from environmentally and socially responsible suppliers and in support of this, we will continue to survey our supply chain on an ongoing basis to better understand the source of minerals used in our component supply and attempt to trace the origin of the metals used.

Logitech supports the work of the Electronic Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) to understand how prevalent conflict minerals ([http://en.wikipedia.org/wiki/Conflict\\_minerals](http://en.wikipedia.org/wiki/Conflict_minerals)) are in the electronics supply chain and how members of EICC and GeSI can effectively influence social and environmental issues associated with the mining of metals used in electronic products and establish a certification program for minerals used in our industry.

We believe it is our responsibility to raise awareness on the issue of conflict minerals and encourage accountability in our supply chain until a recognized certification program is in place.


Below are links to the EICC and GeSI statement on the issue of conflict minerals:

<http://www.eicc.info/PDF/EICC%20Statement%20on%20Minerals.pdf>

Logitech is committed to the highest standards of integrity and responsibility and requests our supply chain to share this work ethic. In support of this, we expect your commitment to work in partnership with Logitech to ensure that our respective supply chains do not source conflict minerals.

This is an industry-wide challenge and a collaborative approach is required to yield an effective outcome. We ask that you and your extended sources of supply positively support the process of bringing greater transparency to the supply chain by cooperating with our inquiries and proactively monitoring this issue.

If you have questions or need additional information, please contact the Logitech Social and Environmental Responsibility team on e-mail at [vw\\_compliance@logitech.com](mailto:vw_compliance@logitech.com).



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Jim Van Patten  
VP, Worldwide Quality



---

Joseph Sullivan  
Sr. VP, Worldwide Operations



# W I M A QUALITY ASSURANCE

## DECLARATION OF COMPLIANCE

Components: **WIMA Capacitors**

WIMA Type: all ranges

Ref: The "Conflict Minerals Law" included as "**Section 1502 of the Dodd-Frank Wallstreet Reform and Customer Protection Act**" of the United States of America, requests to identify products which contain "Conflict Minerals"

Based on our suppliers' information this is to declare that raw and semi-finished materials delivered to us needed for production of capacitors of all WIMA ranges, i. e.

- Plastic Film Capacitors
- Metallized Paper Capacitors (WIMA MP EMI Suppression Capacitors)
- Double Layer Capacitors (WIMA SuperCap)

do not contain any substances referred to as "conflict minerals".

Department: Technical Support

Date: October 2011

member of the General Motors Corporation Board of Directors, at the urging of Kofi Annan, former Secretary General of the United Nations. Furthermore, we encourage our suppliers (and their suppliers) to support the Global Sullivan Principles or similar guidelines, such as the European Principles of Social Responsibility and the European Employee Forum.

development work with 40 strategic local automotive suppliers to help develop their businesses in what is an increasingly global market for the auto industry. In the next two years, the team will extend its program scope to include 60 top strategic local suppliers. As a direct result, 14 Australian suppliers have secured increased local manufacturing work worth A\$26 million per year in additional revenue from Holden and, in some cases, have secured opportunities to quote for new global supply

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## GM'S SUSTAINABILITY REPORT

*auto manufacturing initiative in China, Shanghai General Motors has demonstrated a far-reaching commitment to advancing sustainable development across its manufacturing operations. The results have strengthened the performance of GM's suppliers on a variety of indicators. Through this initiative, SGM and its suppliers have saved energy, improved environmental quality and saved large sums of money."*

Terry F. Yosie  
President and CEO,  
World Environment Center

In addition, the U.S. Congress passed in 2010 legislation requiring reporting to the Securities and Exchange Commission on the content and sources of four metals in companies' products: gold, tin, tantalum and tungsten. These raw materials are of concern because certain mines in the Democratic Republic of the Congo (DRC) and certain mines in countries that border DRC are important sources of minerals used to produce these metals. These particular mines are controlled by armed groups that finance their armed conflicts through mining activities. The goal of the legislation is to identify and eliminate any content in companies' products that has been inadvertently derived from these mines. General Motors supports this goal and is preparing for the significant task of identifying and eliminating conflict minerals that may inadvertently have found their way into our supply chain.

### Localization

Our policy is to generally build where we sell and buy where we build. This practice makes commercial sense, not only for our company, but also for the markets and communities in which we operate. A localized supply chain provides:

- Commercial benefits – Localization not only helps make our vehicles competitive, but also enables us to build vehicles that are adapted to suit unique local requirements and conditions that drive customer enthusiasm and brand loyalty, increasing the potential for success in the marketplace.

### China

In China, we continue to promote the Green Supply Chain Initiative. This initiative is aimed at improving the performance of our joint ventures' suppliers in support of the Chinese government's goals of promoting energy efficiency and sustainable development. It was initiated in 2005 as a collaborative project between the World Environment Center, GM's 50/50 joint venture with Shanghai Automotive Industry Cooperation (SAIC) – Shanghai General Motors (SGM) – and eight suppliers.

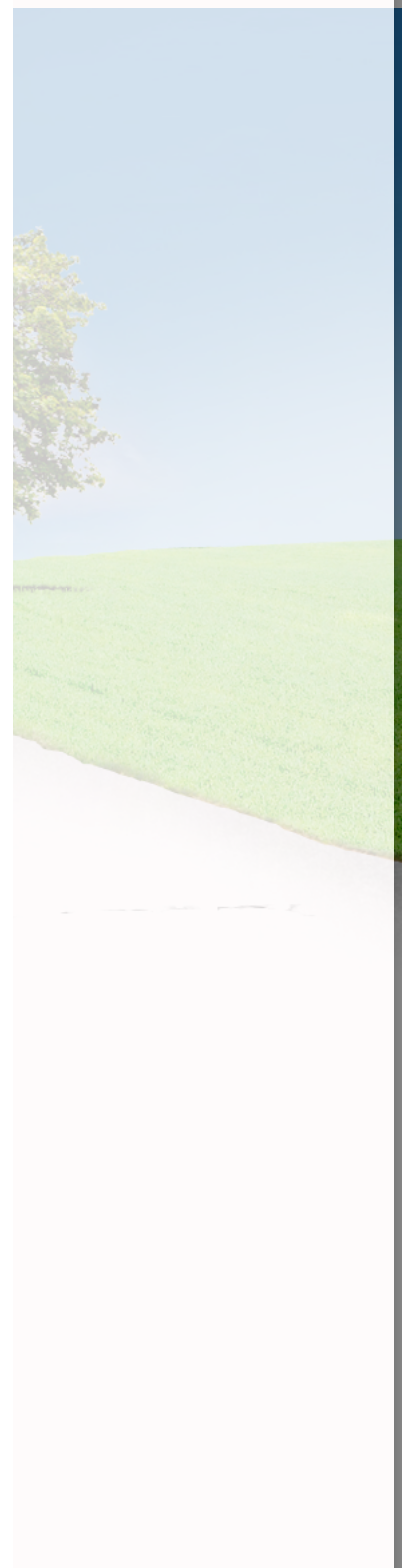
Since its inception, this initiative has made significant measurable strides in sustainability. Terry F. Yosie, president and CEO, World Environment Center, observes, *"Implementing sustainable development creates value for business and society. Through the Green Supply Chain Initiative, the first undertaken by any joint venture auto manufacturing initiative in China, Shanghai General Motors has demonstrated a far-reaching commitment to advancing sustainable development across its manufacturing operations. The results have strengthened the performance of GM's suppliers on a variety of indicators. Through this initiative, SGM and its suppliers have saved energy, improved environmental quality and saved large sums of money."*

The Green Supply Initiative has since expanded to another GM joint venture in China, and the number of participating suppliers has grown to 195. To date, 750 projects have been implemented, of which 383 addressed cleaner production and 367 addressed energy efficiency. The average payback period for the projects is approximately one year. The suppliers have invested over RMB196,000,000 (equivalent to USD \$30,721,000 at an exchange rate of \$1 = RMB6.38) and achieved the following annual savings:

- 1,187,000 metric tons/year of water use
- 74,000,000 kW hours/year of energy use
- 2,000,000 cubic meters/year of natural gas use
- 3,600 metric tons/year of coal use
- 3,700 metric tons/year of diesel fuel use

In addition, the suppliers have reduced their annual waste generation by:

ical component of the  
and provides jobs for  
people who are directly  
to industry.





About EMC

**Sustainability**

- Environment
- » Supply Chain
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- Workplace
- Engaged People
- Governance and Integrity
- Transformative IT

## Sustainability

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### EMC Statement on Conflict Minerals

EMC Corporation supports and respects the protection of internationally proclaimed human rights for all, including the basic human rights of our employees and workers within our supply chain. We believe in treating people with respect and dignity. EMC also expects our suppliers to adhere to the same high standards.

As part of our global program for human rights, EMC is committed to the ethical sourcing of minerals used in our products. We are assessing whether our products contain tantalum, tin, tungsten or gold derived from ores mined in the Democratic Republic of Congo (DRC) and adjoining countries. These minerals are commonly used in electronics and other products. Some of the mining operations in the DRC are controlled by warring militias who we believe are financing armed conflict with profits from the sale of these minerals. This on-going conflict has been linked to human rights violations, labor abuses, and environmental degradation.

EMC is working diligently with our suppliers and other stakeholders to improve and systematically address the process for sourcing minerals that are "conflict-free." The global supply chain for these minerals is complex, and tracing the minerals in our products to their source is a challenge.

To reach our objectives, we are collaborating with industry peers, NGOs, governments, academics and others. We are members of the EICC-GeSI Extractives workgroup which is developing programs for the responsible sourcing of minerals such as the Conflict-Free Smelter program and mineral traceability schemes.

### Facts and Figures

- » A Message from Our CEO
- » Sustainability Reports
- » Priorities for Sustainability
- » Global Reporting Initiative (GRI) Index
- » 2009 Goals and Performance

### Our Sustainability Priorities



Discover how EMC is advancing on its journey of sustainability.

Learn more

### Related Materials

- EMC Supplier Code of Conduct
- EMC Human Rights and Global Labor Principles
- EMC Business Conduct Guidelines

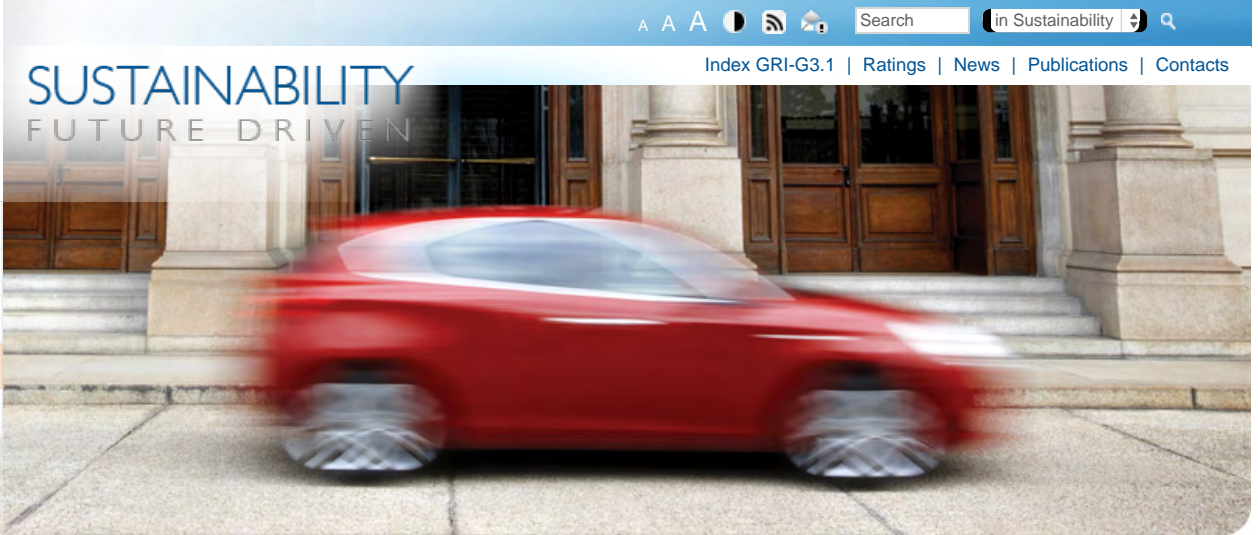


# SUSTAINABILITY

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### SOCIAL RESPONSIBILITY



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#### Conflict minerals

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The Group recognizes value in working with peers to address global challenges across the automotive supply chain. In particular, Chrysler Group in 2011 worked through the Automotive Industry Action Group (AIAG) to develop training on global working conditions and formulate strategies to address the Dodd-Frank legislation aimed at tracing the sources of certain minerals that may originate from the Democratic Republic of Congo and surrounding countries. Should the regulations implementing this legislation be finalized, in 2012, Fiat Group plans to develop a template for its suppliers to report their source(s) for these minerals. The Group will also begin to promote the sourcing of parts and components utilizing conflict-free minerals.

#### Insights

Conflict minerals

**OUR COMMITMENT TO THE FUTURE**  
Commitments, Results, Targets:  
the Sustainability Plan

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Commitments, results, targets - Suppliers

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## Addressing Conflict Minerals: Leading Collective Action Across Our Industry



Many industries rely on certain minerals that are mined in Africa to produce their products. These minerals include cassiterite, wolframite and coltan, which are ores that contain tin, tantalum and tungsten, respectively. Because such metals are used in many products — electronics, vehicle airbag systems, airplanes, jewelry and X-ray film — the demand for them is great.

The Democratic Republic of Congo (DRC) in Central Africa is one of the places in the world where these natural resources can be found and mined in abundance. The DRC has been mired in a brutal conflict since 1998 and the resulting hostilities and human rights abuses are largely fueled by the trade of these "conflict minerals."

### Our Approach to Responsible Sourcing and Supplier Accountability

As a manufacturer of products that contain gold, tantalum, tin and tungsten, Dell is committed to operating in a socially responsible way. It's Dell policy to refrain from purchasing from any known conflict sources, and we expect that our suppliers adhere to the same standards. We have notified all our suppliers of our policy on conflict minerals and have asked each supplier to provide us with a confirmation of their conflict-free status. Dell also works diligently to educate suppliers, investors and customers on this issue through speaking engagements, workshops and stakeholder engagements.



The complexities of the metal supply chain pose many challenges. The mining of these minerals takes place long before a final product is assembled, making it difficult, if not impossible, to trace the minerals' origins. In addition, many of the minerals are smelted together with recycled metals, and at that point it is virtually impossible to trace the minerals to their source. Another challenge is the informal nature of the DRC's minerals economy. Tracing the source of these minerals — from mine through smelter to final product — is a complex challenge that we cannot address alone.

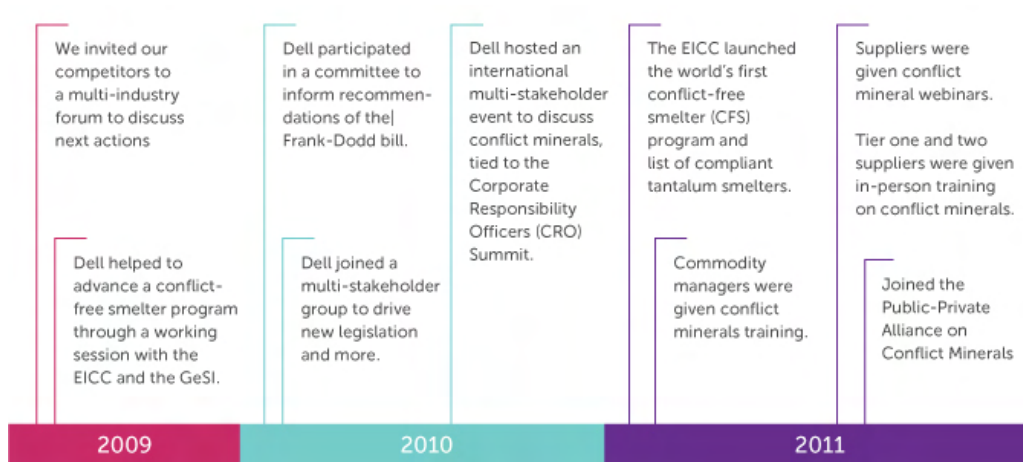
We're engaged with the [Electronics Industry Citizenship Coalition \(EICC\)](#), an organization devoted to improving social and environmental conditions in electronics supply chains, to develop a process that companies can use to track the origin of these minerals regardless of the industry they will be used in. In 2011, the EICC launched the world's first [conflict-free smelter \(CFS\)](#) program, which tracks documentation from the smelter back to the mine of origin.

Dell has been involved in many other efforts to bring us closer to a conflict-free supply chain. We first noted our commitment to act on this issue in our 2010 Corporate Responsibility Report. Our [current report](#) continues to report on our commitment and recent efforts. In fall 2009, [we reached out to our competitors](#) and invited them to join us in issuing a call to action to other industries that use these minerals in their final products.

In October 2010, we hosted an international multistakeholder event on conflict minerals. The conference, which was tied to the [Corporate Responsibility Officers \(CRO\) Summit](#) in Paris, convened leaders from the IT industry, NGOs and the [Organization for Economic Co-operation and Development \(OECD\)](#) to drive other industries to take action on responsible sourcing.

Dell continues to collaborate within our industry and with others on this important issue. Industry research indicates that the electronics industry is responsible for only about 30 percent of the global usage of these minerals. The more industries that agree changes are needed to address conflict minerals, the greater the potential for marketplace incentives to drive those changes.

### Beyond Our Supply Chain: A Timeline of Steady Progress in Promoting Collective Action



#### Explore related timeline content

- Learn more about Dell's [multi-industry forum](#).
- Learn more about [RESOLVE](#) and their [traceability study](#) of the electronics supply chain.
- Learn more about the EICC and Global e-Sustainability Initiative (GeSI)'s [two pilot programs](#) in the DRC.
- Learn more about the [Frank-Dodd bill](#) and [Dell participated in a committee](#) to inform recommendations of the bill.
- Learn more about the [Corporate Responsibility Officers \(CRO\)](#).
- Dell joined a multistakeholder working group to offer input into the rule making process of the new legislation [and more](#).
- Learn more about the EICC and its launch of the world's [first conflict-free smelter \(CFS\) program](#) and list of [compliant tantalum smelters](#).

Dell is working toward the goal of responsible sourcing globally, including from the DRC, through a conflict-free supply chain, confirmed by a robust verification system.

Dell is committed to working with other industries, the government and NGOs to reach an agreement on a solution to purchase conflict-free minerals and to help implement this solution. Dell will continue to participate in the industry conversation, proactively seek solutions and encourage everyone who has a final product that contains these minerals to join us in these efforts. Beyond responsible sourcing, we think about the big picture when it comes to supplier standards and accountability.



# LEVOSIL

## News Archive

### Conflict-Free Minerals Products

All Levosil's products are DRC Conflict Free.

Levosil's shares the concern of the semiconductor and automotive industry about Conflict Minerals. Feel fre to ask us further information on this topic and/or a Conflict-Free Minerals declaration on our products.

Congo Conflict Minerals Act of 2009

Dodd-Frank Wall Street Reform and Consumer Protection Act



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**Conflict-Free Minerals Products**   
 All Levosil's products are Conflict Minerals Free. ... »  
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2-3-2011  
**Interpack 12-18 May 2011**   
 Levosil will be in Interpack 2011. Our booth will be Hall 11 A13 ... » [Read](#)



## Congo Conflict Minerals

Illegal mining of gold (Au), tantalum (Ta), tungsten (W), cobalt (Co), and tin (Sn) from the Democratic Republic of Congo or adjoining countries ("DRC region") is contributing to war and human rights atrocities in the region. These metals are commonly referred to as "conflict minerals".

Altera supports the effort to end these atrocities, and we have notified our suppliers of the need to make commercially reasonable efforts to ensure that metals derived from the DRC region are properly disclosed to Altera.

On April 8th 2011, the SEC indicated in a posting on its website that the rule for Conflict Minerals is planned for the August to December 2011 timeframe. The National Association of Manufacturers (NAM) reports that the SEC would not meet the April 15 deadline. In an earlier posting to the SEC Website, the SEC stated: Some of the Dodd-Frank Act's provisions are not effective until the SEC adopts regulations; of these, some include dates by which the SEC must act, and others are silent in this regard. In these areas, the SEC considers matters with specified dates as an indication of Congressional priorities and will accordingly propose and adopt rules in these areas first. The SEC expects to adopt all rules with specified dates by July 21, 2011 (one year from enactment). SEC Commissioner Mary Schapiro stated on April 8th at a conference for business editors that she had met with a broad cross section of business (including Apple, HP, and Motorola Solutions) and public interest groups regarding the conflict minerals rule and that the final rule would reflect both "business and humanitarian concerns."

As a result, clarification is still needed regarding when the final conflict minerals rule will be issued, and when companies will have to implement the rule.

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# About Samsung

## Conflict Minerals

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### Sourcing Minerals Responsibly

Tin, tantalum/coltan, tungsten (3Ts) and gold are used widely in manufacturing consumer electronic devices. The Democratic Republic of Congo (DRC) has vast reserves of these natural resources. Many of these minerals are illegally sourced and traded by armed groups in the eastern DRC and surrounding areas who are responsible for human rights violations throughout the region. Accordingly, tantalum, tin, tungsten and gold sourced from the DRC have become commonly known as "conflict minerals."

In order to address the issues related to conflict minerals, governments, non-government organizations (NGOs) and the consumer electronics industry are working to develop legitimate trading systems and processes that include more stringent scrutiny over mineral sourcing and the transparency of global supply chains. This effort has become a priority for Samsung Electronics as part of our overall corporate social responsibility initiative. Samsung will continue to closely follow the Securities and Exchange Commission's (SEC) rulemaking and implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1502, July 2010) regarding the use of conflict minerals in the manufacturing of consumer electronics products to ensure responsible mineral sourcing practices.

### Overview of Conflict-free Mineral Sourcing Initiatives

In the United States, the electronics industry, through the Electronic Industry Citizenship Coalition (EICC), began working to resolve the conflict minerals issue in 2007. The EICC and the Global e-Sustainability Initiative (GeSI) formed the Extractives Work Group, which is responsible for identifying the sources of the 3Ts and gold, and understanding supply chains from the mineral's source to the final consumer product.

Using the results of this project, the EICC/GeSI Extractives Work Group developed the Conflict-Free Smelter Program (CFS), which debuted in 2010. The Program aims to identify and certify conflict-free minerals sourced from the DRC. CFS certified smelters undergo third-party validation, certifying that they source only conflict-free material. At present, the CFS has published a list of CFS certified tantalum smelters. Similar lists for tin, tungsten and gold are expected in the near future.

The EICC/GeSI also designed and distributed a due diligence tool, the Conflict Minerals Reporting Template and Dashboard for companies to use when conducting supply chain audits. The tool incorporates the Organization for Economic Co-operation and Development's (OECD) guidelines and may be used to fulfill statutory due diligence requirements.

### Samsung's Progress Toward Conflict-free Mineral Sourcing

Samsung Electronics takes the issue of conflict minerals very seriously. We are seeking ways to eliminate the use of conflict minerals, including tin, tantalum/coltan, tungsten, and gold, in all of our products, and have required our approximately 2,000 suppliers to sign a compliance agreement stating they will not use these minerals. In addition, we are working closely with the Electronic Industry Citizenship Coalition (EICC) to evaluate the current status of minerals distribution to ensure best practices are followed. The EICC/GeSI reporting template was distributed to suppliers and Samsung has completed its first investigation. Samsung is committed to upholding the highest standards of corporate responsibility, and we continue to proactively evaluate our sourcing policies to ensure they are addressing existing and emerging issues associated with our industry.

### Recent progress

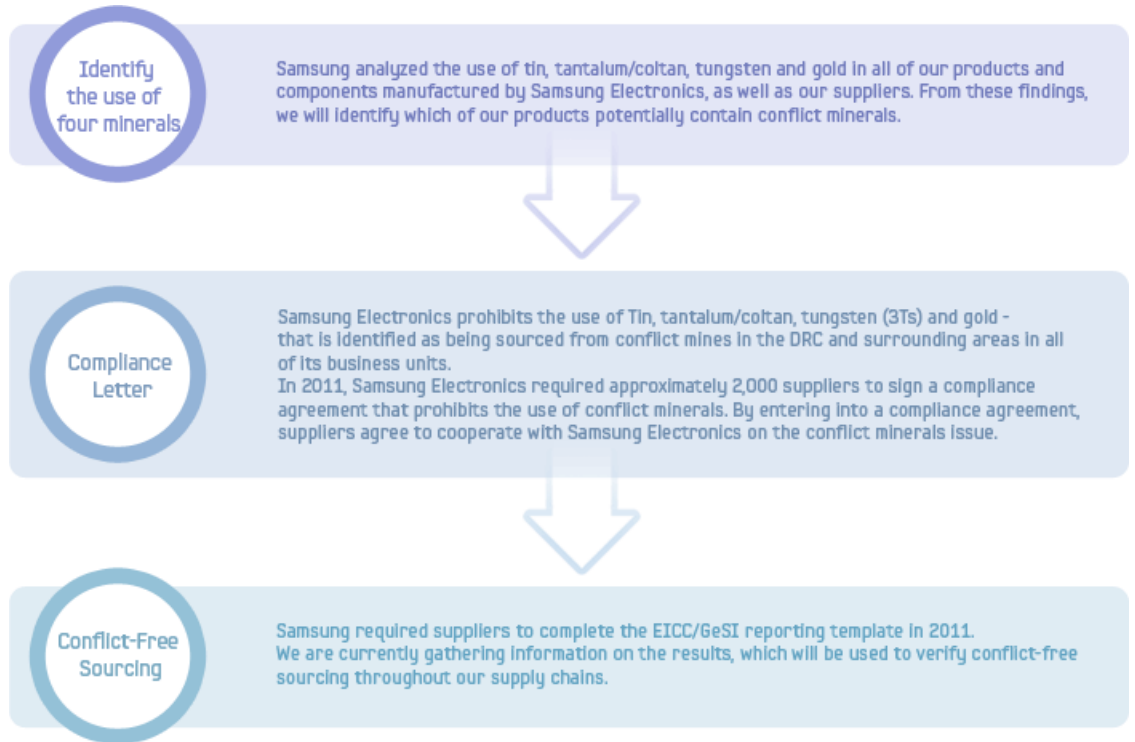


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Download the Samsung Sustainability Report for a full look at our sustainability performance around the world.

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Empowering High Tech Materials



## Raw Material Procurement Statement

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H.C. Starck is one of the leading global producers of technology metals and advanced ceramics as powder or fabricated product. We are committed to ensuring the safety, health and protection of people who come in contact with our products and the environment. As responsible corporate citizens, we meet and are continually striving to exceed governmental, industry and environmental standards worldwide.

H.C. Starck fully supports the position of the Electronic Industry Citizenship Coalition (EICC) and the Organization for Economic Co-operation and Development (OECD) to avoid the use of metallic ores which finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. H.C. Starck also is aware of section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to “Conflict Minerals”. We are committed to actively supporting our customers with their diligence and disclosure requirements as required by the United States Securities and Exchange Commission’s final regulations, which are expected to be issued in the first half of 2012. In support of government and private initiatives to develop Conflict-Free supply chain systems, H.C. Starck is a founding member of the Public-Private Alliance for Responsible Minerals Trade (PPA).

H.C. Starck condemns all activities in connection with the illegal or unlawful exploitation of mineral resources, no matter where such activities take place. We only purchase raw materials that are Conflict-Free and that meet the requirements of the OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The EICC has declared H.C. Starck’s tantalum supply chain free of conflict materials and lists H.C. Starck as a Conflict-Free Smelter.

We have implemented a certified Responsible Supply Chain Management System (RSCM) as a core control system to guarantee that we purchase only conflict-free raw materials. The RSCM system ensures efficient and competitive purchasing as well as supports sourcing from suppliers that act in accordance with environmental and social sustainability - be it miners, traders, or slag and scrap metal providers such as smelters or manufacturers. With a variety of control mechanisms, we perform thorough due diligence on all raw material offers based on current OECD and EICC guidelines before we sign any contract or accept any material. The RSCM fulfils all requirements of a management system standard required by ISO. The successful implementation of the system within H.C. Starck has been confirmed by the external auditor Bureau Veritas.

### Document:

無衝突金屬宣告書

**Declaration of Metal Conflict-Free**

國巨股份有限公司特此聲明所有提供給客戶之產品皆為無衝突金屬之產品：

**Yageo Corporation** herein declare the metal Conflict-Free on products supplied to customers

**國巨股份有限公司**亦正或將致力於詳實調查供應鏈確保金(Au)、鉭(Ta)、鎢(W)、鈷(Co)、錫(Sn)這類金屬並非透過無政府軍團或非法集團，由剛果民主共和國衝突區域之礦區開採或是循非法走私途徑取得。此外，下列國家出口之金屬皆不符合「無衝突規範」：剛果民主共和國(DRC)、盧安達(Rwanda)、烏干達(Uganda)、蒲隆地(Burundi)、坦尚尼亞(Tanzania)、肯亞(Kenya) (聯合國安全理事會認定上述國家皆為剛果礦脈之礦產)。

**Yageo Corporation** is taking and will take due diligence within our supply chain to assure “DRC Conflict-Free” for the metals of gold (Au), tantalum (Ta), tungsten (W), cobalt(Co) and tin (Sn) are not derived from or sourced from mines in conflict areas of the Democratic Republic of Congo (DRC), or illegally taxed on trade routes, either of which are controlled by non-governmental military groups, or unlawful military factions. Trade routes not confirmed to be “Conflict Free” include direct exports from the DRC, as well as exports through Rwanda, Uganda, Burundi, Tanzania and Kenya (countries of whom the U.N. Security Council note are global export routes for DRC-mined minerals).

本公司保證任何出售於客戶之產品所含金屬皆符合無衝突規範 (DRC Conflict-Free)。

We would like to confirm metals used in Products sold to Yageo Corporation are “DRC Conflict-Free” .

Supplier Company (公司名稱): 國巨股份有限公司 **Yageo Corporation**

Authorized Signature (公司負責或授權人簽章): 呂植富 **J.F. Lue**

Title (職稱): 協理 Director GQM

Date (填寫日期): October 22, 2010



# Conflict-Free Supply Chain Due Diligence

February 2012

Several metals commonly used in the electronics industry: gold (Au), tantalum (Ta), tungsten (W) and tin (Sn) have a variety of sources, including what has been termed as a "Conflict Region". Most recently, the eastern region of the Democratic Republic of Congo (DRC) has been determined to be a "Conflict Region". The following are statements describing our policy on procurement of metals from mines in "Conflict Regions" for all Kester Global Operations.

- Kester only sells tin (Sn) alloy as a component of our soldering paste and soldering bar or wire products.
- Kester will undertake reasonable due diligence within our supply chain to assure that tin (Sn) alloy is not procured as a "Conflict Metal." A "Conflict Metal" is a metal derived from ore sourced from mines in conflict areas of the Democratic Republic of Congo (DRC), or illegally taxed on trade routes, either of which are controlled by non-government military groups, or unlawful military factions. Trade routes not confirmed to be "Conflict Free" include direct exports from the DRC, as well as exports through Rwanda, Uganda, Burundi, Tanzania and Kenya (countries of whom the U.N. Security Council note are global export routes for DRC-mined minerals).
- Since 2009 Kester has participated in the research project conducted by RESOLVE ([www.resolve.org](http://www.resolve.org)) for the Electronics Industry Citizenship Coalition (EICC, [www.eicc.info](http://www.eicc.info)) and Global e-Sustainability Initiative (GeSI, [www.gesi.org](http://www.gesi.org)) to positively influence the social and environmental conditions in the metals supply chain.
- Kester sources tin from smelters validated as DRC Conflict-Free using the EICC-GeSI Conflict-Free Smelter (CFS) list. Kester maintains the EICC-GeSI Conflict Minerals Reporting Template software for sources of tin from smelters validated as DRC Conflict-Free.



[www.eicc.info](http://www.eicc.info)



**GeSI**  
GLOBAL e-SUSTAINABILITY  
INITIATIVE

## EICC-GeSI Conflict Minerals Reporting Template

Metal (*)	Smelter Name (*)	Smelter Facility Location: Street / City / Country (*)	Smelter Facility Contact Name	Smelter Facility Contact Email	Is this smelter on the EICC-GeSI CFS list? (*)	Name of Mine(s) or if recycled or scrap sourced, state recycled or scrap	Location (Country) of Mine(s) or if recycled or scrap sourced, state recycled or scrap
Tin (Sn)	Minsur Registered brand: "Minsur Tin"	Av. San Martin 1371 Pisco Playa Pisco - Ica - Peru	Jose Antonio Ore Rivera (056) 53-3300	<a href="mailto:jore@funsur.com">jore@funsur.com</a>	Yes	San Rafael Mine	Puno, Peru
Tin (Sn)	PT Tambang Timah Registered brand: "Banka"	Jalan Jenderal Sudirman 51 Pangkalpinang 33121 Bangka, Indonesia	Fakhrizal Abubakar +62 717 431335	<a href="mailto:timah@pttimah.co.id">timah@pttimah.co.id</a>	Yes	PT Timah Mining Operations	Onshore and Offshore Dredging by PT Timah covering Bangka Belitung and part of Riau Islands, Indonesia
Tin (Sn)	Empresa Metalúrgica Vinto Registered brand: "ENAP"	Empresa Metalúrgica Vinto Casilla 612 Oruro, Bolivia	Job S Yapura 591-2-5278102	<a href="http://www.vinto.qob.bo/">www.vinto.qob.bo/</a>	Yes	Huanuni Mine	Oruro, Bolivia
Tin (Sn)	Yunnan Chengfeng Registered brand: "Yunheng"	Yunnan Chengfeng Non- Ferrous Metals Company 131 Baita Road, Kunming, Yunnan, China	Yunnan Tin Smelting Branch +86 873 2123377	<a href="http://en.yhln.cn/index.html">http://en.yhln.cn/index.html</a>	Yes	Gejiu City of Yunnan Province	Yunnan, China
Tin (Sn)	Thailand Smelting and Refining Co., Ltd. (Thaisarco) Registered brand: "Phuket"	80 Moo 8 Sakdidej Road T.Vichit, A.Muang Phuket 83000 THAILAND	Petcharat Dithkaew Thaisarco Tel: +66(0) 7637- 1111	<a href="mailto:tsr@thaisarco.com">tsr@thaisarco.com</a>	Yes	Thailand Smelting and Refining Co., Ltd. (Thaisarco)	Thailand, Offshore Dredging

Sincerely,

**Carmelle Giblin**  
Vice President and General Manager

[cgiblin@kester.com](mailto:cgiblin@kester.com)  
630-616-6855 - Phone

*For additional information on this subject contact:*

**Tony DiDomenico**  
Environmental, Health and Safety Manager

[tdidomenico@kester.com](mailto:tdidomenico@kester.com)  
630.616.6844 - Phone