

Conflict Minerals Policy

Dear Valued Business Partner,

on August 22, 2012, the U.S. Securities and Exchange Commission (SEC) approved the final rule regarding the sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Under this rule, publicly traded companies must report to the SEC the presence of conflict minerals originating in the DRC or adjoining countries in the products they manufacture or contract to manufacture if the conflict minerals are necessary to the functionality or production of a product. These reports must be filed annually by May 31st beginning in 2014.

Intermas-Elcom is committed to support this initiative and will source materials from companies that share our values around human rights, ethics and environmental responsibility. We support the Electronics Industry Citizenship Coalition (EICC) and the Global e-Sustainability Initiative (GeSi), both are collaboratively committed to work with the industry to collect the sourcing information related to 'Conflict Minerals'.

What we expect from suppliers:

- Supply “DRC Conflict Free” materials. Under Intermas-Elcoms conflict mineral’s policy, suppliers are expected to supply materials to Intermas-Elcom that are “DRC conflict free,” which means either: 1) any 3TGs necessary to the functionality or production of supplied materials must not directly or indirectly fund armed conflict in the DRC or adjoining countries, or 2) any 3TGs must be from recycled or scrap sources.*
- Adopt conflict minerals policies. Suppliers to Intermas-Elcom must adopt a policy regarding conflict minerals consistent with Intermas-Elcoms policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.
- Send surveys to their suppliers, and complete Intermas-Elcoms survey. Intermas-Elcoms suppliers are expected to pass the latest version of CFSI public Conflict Minerals Reporting Template to their suppliers and successively upstream until the smelter/refiner is identified. The survey information must then be passed back down through the levels of the supply chain to Intermas-Elcoms direct supplier, who then can complete Intermas-Elcoms Conflict Minerals Reporting Template.
- Update and check annually whether they have changed the source of minerals or supplier and provide an updated version of the latest EICC template.

We do not encourage implementing a de facto embargo on the DRC and adjoining countries in the sourcing of Conflict Minerals. This is in line with our requirement to comply with the principles of non discrimination with regard to supplier selection and treatment and follows the call of many internationally active human rights organizations.

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