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CONFLICT MINERALS POLICY

Conflict minerals are columbite-tantalite, cassiterite, and wolframite that are mined in areas of armed conflict and human rights abuses in the eastern provinces of the Democratic Republic of the Congo (DRC) and adjoining countries. Conflict metals are gold and the tantalum, tin, and tungsten refined from the conflict minerals. Some profits from the mining or refining (smelting) of these minerals and metals funded fighting in the Second Congo war and fund continuing conflicts. To counter the trade in conflict materials, the Dodd-Frank Wall Street Reform and Consumer Protection Act¹ added a section to the Securities Exchange Act of 1934², that required the Securities and Exchange Commission (SEC) to promulgate a rule³ requiring certain companies using conflict materials to determine and disclose their sources of those materials. The intent is to discourage obtaining materials from sources who contribute to conflict and abuse in the DRC and adjoining countries.

The rule requires all publicly traded companies in the United States to submit conflict mineral reports if their products contain conflict materials. Companies not directly regulated by the SEC will also be affected because conflict minerals traceability is being established throughout the supply chain.

The Electronic Industry Citizenship Coalition (EICC) was established in 2004 to promote a common code of conduct for the electronic industry supply chain. The Global e-Sustainability Initiative (GeSI) fosters collaborative and innovative approaches to social and environmental sustainability. In 2005, the EICC and GeSI formed an alliance, the Conflict Free Sourcing Initiative (CFSI), to address common corporate responsibility supply chain issues in the global electronics sector. One area of cooperation supports efforts to ensure that information and communications technology (ICT) products do not contain conflict minerals. To facilitate this effort, EICC/GeSI created the Conflict-Free Smelter (CFS) program. Within this program are the Compliant Smelters and Refiners lists. Listed are smelters and refiners that have been independently audited to verify that they do not purchase raw materials from sources that contribute to conflict and abuse in the DRC and adjoining areas. EICC/GeSI also created the Conflict Minerals Reporting Template (CMRT) tool for identifying processors of conflict materials used in the supply chain.

Wurth Electronics Midcom, Inc. has a program for responsible sourcing of conflict metals that are used in our products. This program includes communicating our expectations to our suppliers that they have a conflict-free sourcing policy, provide conflict-free metals, and monitor their supply chain. In addition, our suppliers are required to:

- Demonstrate due diligence in the procurement of conflict metals.
- Show corrective action if conflict metals are traced to unverified sources within the conflict region of the DRC or adjoining countries.
- Use the Conflict Minerals Reporting Template.

1. U.S. Public Law 111-203, Section 1502(b), 21 July 2010

2. 15 U.S.C. 78m, Section 13(p), effective 22 July 2010

3. 17 CFR Parts 240 and 240b, effective 13 November 2012, compliance required 01 January 2013

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Wurth Electronics Midcom, Inc. expects its suppliers to be persistent in determining the origin of gold, tantalum, tin, and tungsten when used in their products. Wurth Electronics Midcom, Inc. also understands that this is a challenge because of the complex route that conflict materials may take from a mine to a smelter and then to a metal wholesaler and on to our suppliers; full traceability may not be a certainty. The goal is to prevent the use of conflict metals that originate from sources whose profits support armed groups and human rights abuses in the DRC and adjoining countries, yet support the use of materials from legitimate sources, possibly in the same region.

John Hauber
 Materials Compliance Engineer

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