

DDH ENTERPRISE CONFLICT MINERALS POLICY

TITLE: DDH Enterprise Conflict Minerals Policy
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AUTHOR: Greg Skodacek

Signature Authority

Title	Name	Signature	Date
Vice President	Bill Marsh		
General Manager	John Jenkins		
Director of Quality and Regulatory Affairs	Greg Skodacek		
Director of Materials	Les Odom		
Quality Manager	Linda Sweeny		

Revision History

REV.:	ITEM#:	SUMMARY OF CHANGES:	Date
A	1	New Release	5/30/13

1.0 Purpose and Scope

- 1.1 To establish and maintain a documented policy for identifying and limiting the procurement of conflict minerals identified through the Dodd-Frank Wall Street Reform and Consumer Protection Act.

2.0 Associated Documents

- 2.1 Dodd-Frank Wall Street Reform and Consumer Protection Act

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3.0 Overview:

- 3.1 On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules to implement reporting and disclosure requirements as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act requiring certain public companies to disclose their use of conflict minerals originating in the Democratic Republic of the Congo, or the other Covered Countries.
- 3.2 The rule is intended to prevent human rights violations in conflict regions and will require supplier verification of sourcing for four types of minerals referred to as "conflict minerals" – Cassiterite, Columbite-tantalite, Wolframite, Gold, and their derivatives (tin, tantalum, tungsten and gold (3TGs)). Although the reporting requirements apply only to publicly traded companies, many of our customers are required to file disclosures and reports with the SEC related to the source of these selected minerals in our products, including the country of origin and whether the conflict minerals originating from the Democratic Republic of Congo (DRC) or other Covered Countries are "DRC conflict free".

4.0 Definitions:

- 4.1 Conflict Minerals: includes Cassiterite (the ore from which tin is extracted), Columbite-tantalite (the ore from which tantalum is extracted), Gold, Wolframite (the ore from which tungsten is extracted), and their derivatives, and any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Covered Countries whether or not they actually financed or benefited armed groups.
- 4.2 Covered Countries: Democratic Republic of the Congo (DRC), The Republic of the Congo, Central Africa Republic, Tanzania, South Sudan, Burundi, Zambia, Rwanda, Angola, Uganda
- 4.3 DRC Conflict Free: does not contain minerals that directly or indirectly finance or benefit armed groups in the 'covered countries'.

5.0 DDH Enterprise Conflict Mineral Policy:

- 5.1 Minerals mined in the Democratic Republic of Congo (DRC) and adjoining countries may be making their way into the electronics industry supply chain. Some mining operations in the DRC 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 funding conflict in the country by funding illegal armed groups. As part of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) passed legislation which requires U.S. companies to report on the origin of these conflict minerals including tin, tantalum, tungsten and gold.
- 5.2 DDH Enterprise, Inc. is committed to ethical practices and compliance with all applicable laws and regulations. While we do not source these metals directly, they exist in the materials and components we source. We are therefore committed to working with our customers and suppliers to responsibly source the materials and components we use in manufacturing our customers' products which may contain these minerals. In order to support our customers' compliance with the SEC reporting regulations relating to conflict minerals, DDH Enterprise, Inc. requires chain of custody declarations from our suppliers to verify the origin of the conflict minerals contained in their products.
- 5.3 We request the following from our suppliers:
 - 5.3.1 To source materials from socially responsible sub-tier suppliers and manufacturers
 - 5.3.2 To assist us in supporting our customers with compliance with the SEC regulations related to conflict minerals and to provide all necessary declarations

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- 5.3.3 To undertake reasonable due diligence within their supply chain to determine the origin of the conflict minerals, including developing policies and management systems with the intent of preventing the use of conflict minerals or derivative metals sourced from mines that directly or indirectly finance armed groups through mining or mineral trading in the DRC or any adjoining country, and to pass these requirements along to their sub-tier suppliers and require them to do the same with lower tiers of suppliers.
- 5.4 We request the following from our customers:
 - 5.4.1 To design in components that can be sourced from socially responsible suppliers
 - 5.4.2 To assist in gathering declarations where the supply chain has been established by our customer
 - 5.4.3 To support supply chain changes required to eliminate DRC conflict minerals from the products
- 5.5 In addition, we will work with our suppliers and also our customers, where the supply chain has been established by our customer, to seek remedies for non-compliance.
- 5.6 The process of tracing the conflict minerals through the supply chain is complicated and time-consuming. Therefore, we rely on industry initiatives, such as the Conflict Free Smelter Program, for assistance in complying with the SEC reporting requirements on conflict minerals.
- 5.7 DDH Enterprise, Inc. is committed to working with our customers and our suppliers to ensure effective implementation of this legislation.
- 5.8 This Conflict Minerals Policy encourages businesses to respect, protect and remedy human rights throughout the world.