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Since 1961

12/1/16

To our suppliers of materials, components and processes -

An urgent request – we need a confirmation of your "Conflict Minerals" / "DRC Conflict-Free" status!

DODD-FRANK ACT SECTION 1502 CONFLICT MINERALS REQUIREMENTS -

Section 1502 of the Dodd-Frank Act, Amending Section 13 of the Securities and Exchange Act of 1934, was signed into law in July 2010, adopted by the Securities and Exchange Commission in August 2012, and became effective January 1, 2013.

A number of metals commonly used in the electronics industry: tantalum, tin, gold, and tungsten are derived from basic materials which are identified "Conflict Minerals" (and as "3TG"), having a variety of worldwide sources; including the Democratic Republic of the Congo (DRC) and adjoining countries, which has been determined to be a "Conflict Area", where commerce in such minerals may finance or benefit non-government military groups or unlawful military factions, fueling significant and ongoing humanitarian crisis.

SEC-filing / publicly-traded U.S. companies are required to provide specific and comprehensive annual reporting regarding Conflict Mineral content and supply-chain. Please access http://www.sec.gov/news/press/2012/2012-163.htm or alternative sources of information to learn more about this new law and requirements imposed.

DODD-FRANK ACT SECTION 1502 CONFLICT MINERALS / DRC CONFLICT FREE CERTIFICATION -

The Dodd-Frank Act Conflict Minerals disclosure and reporting requirements are not directly (legally) applicable to Electrocube at a company level, however they are indirectly applicable, as they flow down from our customers, and through Electrocube to specific suppliers for basic materials and components. On a Humanitarian and business basis Electrocube is compelled to formally obtain and document Conflict Minerals (metals) status for a comprehensive list of commodities from the applicable sources of supply, and accurately certify our product to be "DRC Conflict-Free", or otherwise meet our content certification and supply-chain disclosure obligations.

The term "Conflict Mineral" is defined as columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted; gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives (regardless of actual source), 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. The term "Covered Countries" is defined as the Democratic Republic of the Congo (DRC) and adjoining countries sharing an internationally recognized border with the DRC. The term "DRC Conflict Free" is defined as products that do not contain (Conflict) Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries.

Electrocube suppliers are required to provide accurate Conflict Minerals status for commodities provided, and desirably to provide DRC Conflict-Free product.

Electrocube suppliers are required to contact their sources of supply and perform a reasonable country of origin inquiry and supply-chain due-diligence investigation for all applicable commodities having necessary Conflict Mineral content, to the extent necessary to determine and disclose the supply-chain, *smelters* and ultimate sources of mineral supply; and ascertain DRC Conflict status for that Conflict Mineral content. Conflict Mineral content may or may not be "DRC Conflict-Free"

Electrocube suppliers shall provide certifications / declarations accurately reflecting the determined status of a commodity as "Conflict Minerals Free" (when there is no conflict mineral content), or the determined status of necessary Conflict Mineral content (when present) as: DRC Conflict-Free, Not Found to Be DRC Conflict-Free, or DRC Conflict Undeterminable; with sufficient / appropriately comprehensive reporting of inquiry and due-diligence findings. *Reporting shall include a listing of smelters utilized to process the applicable metal ores.*



When supplier investigation has determined that Conflict Mineral content is not present, the supplier shall provide certification / declaration that to the present and best of the suppliers knowledge, the product(s) and process(es) provided to Electrocube, Inc. are "Conflict Minerals Free".

When supplier investigation has determined that necessary Conflict Mineral content is from scrap or recycled sources, or did not originate in the Covered Countries, or the supplier has no reason to believe that necessary Conflict Mineral content may not be from scrap or recycled sources, or may have originated in the Covered Countries, the supplier shall provide certification / declaration, that to the present and best of the suppliers knowledge, the product(s) and process(es) provided to Electrocube, Inc. are "DRC Conflict-Free", and shall provide reporting of inquiry findings / results with certification.

When supplier investigation has determined that necessary Conflict Mineral content is not or may not be from scrap or recycled sources, and does or may originate in the Covered Countries; which content is determined to be "DRC Conflict-Free" or "Not Found to Be DRC Conflict-Free" by further investigation performed, the supplier shall provide certification / declaration that to the present and best of the suppliers knowledge, the product(s) or process(es) provided to Electrocube, Inc. are "DRC Conflict-Free", or "Not Found to Be DRC Conflict-Free" as applicable, and shall provide reporting of inquiry and due diligence findings / results with certification.

When supplier investigation has been unable to determine status of necessary Conflict Mineral content by further investigation performed, the supplier shall provide certification / declaration that to the present and best of the suppliers knowledge, the product(s) or process(es) provided to Electrocube, Inc. are "DRC Conflict Undeterminable", and shall provide reporting of inquiry and due diligence findings / results with certification.

Please be aware that on both humanitarian and legal grounds, Electrocube and our customers ultimately cannot be satisfied with such responses as Not Found to Be DRC Conflict- Free, or DRC Conflict Undeterminable, and that Electrocube will proceed to identify alternative compliant sources for our material and component requirements.

Please review and complete the attached Conflict Minerals / DRC Conflict-Free Certification / Declaration Form. Please provide the requested certification for each material or product you provide to Electrocube, indicating the applicable Conflict Mineral (metal) content and status. You may indicate materials or products specifically by part number or generically as identifiable types, series, or families. It is requested that our suppliers utilize the industry recognized Conflict-Free Sourcing Initiative (CFSI) Conflict Metals Reporting Template (CMRT) of current revision to report content and supply-chain investigation status and source / smelter data, or otherwise provide the required information by attachment to the Electrocube certification. You may alternatively use your own forms, provided the required information is readily ascertained. Please refer to the Electrocube web-site www.electrocube.com to review / obtain applicable supporting documentation of policies and requirements for customers and suppliers. Please refer to applicable CFSI web-site <u>http://www.conflictfreesourcing.org/</u> and the Conflict Metals Reporting Template (CMRT) for additional detail regarding supply chain investigation.

Electrocube understands that our suppliers may have varying capability to determine DRC Conflict status of materials and components provided to Electrocube; that capability to pursue investigation your basic materials may likely be limited to direct contact with your sources of supply and internet search and discovery; that capability to pursue investigation of smelters disclosed by your' suppliers may be similarly limited to internet search and discovery. The current emphasis of Electrocube and of our customers is that our suppliers provide an accurate and complete SMELTER LIST (preferably as part of a current CFSI CMRT). If a Smelter List is fully disclosed, Electrocube can evaluate and may be able to confidently certify some level of DRC Conflict status, or at least provide accurate information to our customer for their consideration. Electrocube requires a Smelter List!



Please note that Electrocube has revised the Conflict Minerals Requirement, imposed by Electrocube Purchase Order Terms And Conditions, as follows. Please visit the Electrocube web-site at www.electrocube.com to review this as well as other Purchase Order Terms And Conditions.

25. Conflict Minerals - Disclosure of Use Under Dodd-Frank Act. Suppliers shall provide full disclosure regarding content of Conflict Minerals (metals) per Section 1502 of the Dodd-Frank Act, amending Section 13 of the Securities and Exchange Act of 1934, signed into law in July 2010, adopted by the Securities and Exchange Commission in August 2012, and effective January 1, 2013. The term "Conflict Mineral" is defined as columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted; gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives (regardless of actual source), 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. The term "Covered Countries" is defined as the Democratic Republic of the Congo (DRC) and adjoining countries sharing an internationally recognized border with the DRC. The term "DRC Conflict Free" is defined as products that do not contain (Conflict) Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries. Electrocube suppliers are required to provide accurate Conflict Minerals status for products provided, and ultimately to provide DRC Conflict-Free product. Electrocube suppliers are required to contact their sources of supply and perform a reasonable country of origin inquiry and supply-chain due-diligence investigation for all applicable commodities having necessary Conflict Mineral content to the extent necessary to determine and disclose the supply-chain, ultimate sources of mineral supply and ascertain DRC Conflict-Free status for that Conflict Mineral content. Electrocube suppliers shall provide certifications / declarations accurately reflecting determined status of necessary Conflict Mineral content as: Conflict Minerals Free, DRC Conflict-Free, Not Been Found to Be DRC Conflict-Free, or DRC Conflict Undeterminable; with sufficient / appropriately comprehensive reporting of inquiry and due-diligence findings. Reporting shall include a listing of smelters utilized to process the applicable metal ores. Suppliers shall certify and or provide sufficient disclosure per continually current requirements of the regulation, as supply-chain status changes, and on request (annually). Additional information regarding this Conflict Minerals Legislation may be obtained at http://www.sec.gov/news/press/2012/2012-163.htm or from alternative sources. Use of the content disclosure / reporting format promoted by the Electronic Industry Citizenship Coalition (EICC) www.eicc.info, or the Global e-Sustainability Initiative (GESI) www.gesi.org, such as the Conflict-Free Sourcing Initiative (CFSI) http://www.conflictfreesourcing.org/ Conflict Minerals Reporting Template (CMRT) is preferred. Use of alternative forms of content certification and reporting may be acceptable.

It is an obligation of Electrocube suppliers to remain actively aware of the current requirements of the Dodd-Frank Act Section 1502 Conflict Minerals Regulation on an on-going basis, as requirements may be further revised and/or clarified, and that any specific certifications provided, and the *Conflict Minerals / DRC Conflict-Free Certifications of Compliance"* (*C of C's*) provided with product deliveries, reflect the current requirements of the regulation.

We thank you for your responsiveness to prior Electrocube requests for Conflict Minerals disclosure. In reaction to our customer's requirement to provide annual reporting, and in consideration that your sources may now have updated status available, we again request that you please provide updated content status.

Please contact us if you have any questions, or require additional information. Please complete and sign the Conflict Minerals Free / DRC Conflict-Free Declaration (or alternative) Forms, and return to Electrocube Quality Assurance by mail, fax or e-mail.

Please do not delay in forwarding this critical requirement to provide content information to your upstream suppliers, and in provision of your response back to Electrocube, to our mutual benefit in the maintenance / support of current and future business.

Thank you for your timely response.

Paul Hamilton

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