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CONFLICT MINERALS POLICY

Conflict materials are minerals columbite-tantalite, cassiterite, wolframite and metals tantalum, tin, tungsten, and gold that are processed in areas of armed conflict and human rights abuses, in the eastern provinces of the Democratic Republic of the Congo (DRC) and adjoining countries. These activities may fund continuing conflict.

To counter this trade, 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. Companies not directly regulated by the SEC are also affected, because conflict minerals traceability is being established throughout the supply chain.

The Responsible Minerals Initiative (RMI) maintains Compliant Smelters and Refiners lists. Listed entities are independently audited to verify that they do not source materials that contribute to conflict and abuse in the DRC and adjoining areas. RMI also maintains the Conflict Minerals Reporting Template (CMRT) tool for identifying processors of conflict materials in supply chains.

Würth Electronics Midcom Inc. has a responsible sourcing program that includes communicating our expectations to our suppliers that they have a conflict-free sourcing policy, provide conflict-free metals, and monitor their supply chain. They are also 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, and use the Conflict Minerals Reporting Template.

Würth Electronics Midcom Inc. expects its suppliers to be persistent in determining the origin of gold, tantalum, tin, and tungsten when used in their products, but 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.

The Würth Electronics Midcom Inc. CMRT is available by navigating 'Category > Conflict Minerals' on page https://www.we-online.com/web/en/electronic_components/download_center_pbs/Download_Center_PBS.php

A handwritten signature in black ink that reads 'John L. Hauber'.

John Hauber
Materials Compliance Engineer

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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