

Delta Group Electronics

Conflict-Free Metals Policy

June 1, 2013

Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act signed into law on July 21, 2010, defines ‘Conflict Minerals’ as including columbite-tantalite (tantalum), cassiterite (tin), gold, wolframite (tungsten), or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (DRC) or an adjoining country. Delta Group Electronics supports the objectives of this law (to stop rebel groups in the DRC from illegally using profits from the trading of these minerals to fund their activities) and recognizes the disclosure requirements which this law imposes on SEC reporting companies in the US.

While Delta Group Electronics is a private company and is not subject (by law) to the requirements of the Dodd-Frank Act, we are mindful that many of our customers and suppliers are subject to the requirements of Dodd-Frank. As an EMS provider, Delta Group Electronics assembles printed circuit boards and other products at the request of and pursuant to specifications provided by its customers. The components and materials used by Delta Group Electronics in the assembly process are numerous, and these items are procured from a number of suppliers and sources around the world. Many of our suppliers are SEC reporting companies in the US (and thus are subject to the conflict minerals disclosure requirements of Dodd-Frank).

Due to the fact that tin, tantalum, tungsten and gold are used in large number of electronics products, Delta Group Electronics is committed to undertaking reasonable due diligence within our supply chain to assure that conflict minerals are not used in the component parts and materials supplied to us. These efforts include, but are not limited to, requesting material certifications from our suppliers of bare printed circuit boards (with respect to the raw materials used to produce the boards) and requiring that vendors and suppliers agree and/or certify that the components supplied to Delta Group Electronics are “conflict-free”. In addition, our suppliers are required to establish policies, due diligence frameworks, and management systems consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

For additional information on this subject please contact:

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