

Conflict Minerals Policy Statement

We support ending the violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. As a result the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of those products.

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other minerals in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of “conflict minerals”.

OUR COMMITMENT:

1. Support the aims and objectives of the U.S. legislation on the supply of “conflict minerals”.
2. Do not knowingly procure specified metals that originate from facilities in the “Conflict Region” that are not certified as “conflict free”.
3. Ensure compliance with these requirements, we ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from:
 - Mines and smelters outside the “Conflict Region” **or**
 - Mines and smelters which have been certified by an independent third party as “conflict free” if sourced within the “Conflict Region”.

Diamond Electric’s due diligence and expectations for our suppliers include:

1. Requiring our suppliers provide written evidence documenting that raw materials used to produce gold, tin, tantalum and tungsten, used in the materials to manufacture components and products supplied to Diamond Electric originate from outside the “Conflict Region” **or** if they originate from within the “Conflict Region” by filing a completed EICC-GeSI public [Conflict Minerals Reporting Template](#) with Diamond Electric as required.
2. Suppliers to Diamond Electric must adopt a policy regarding conflict minerals consistent with Diamonds policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps.
3. Diamond suppliers are expected to pass the EICC-GeSI public Conflict Minerals Reporting Template (link above) to their suppliers and successively upstream until the smelter/refiner is identified. The survey information must then be passed back down through the levels of the supply chain to Diamond Electric,

Important Note: Contacted suppliers should complete both Parts 1 and 2 of EICC-GeSI Template.

If we discover the use of these minerals produced in facilities that are considered to be “non-conflict free”, in any material, parts or components we procure, we will take appropriate actions to transition product to be “conflict free”.
