

CONFLICT METALS POLICY

As a manufacturer and supplier of frequency control products, NAKAGAWA uses certain metals in the products. Some of these metals such as Tin (Sn), Tungsten (W), Gold (Au) and Tantalum (Ta) are mined in various areas in around the world including the eastern region of the Democratic Republic of Congo (DRC) and surrounding areas in neighboring countries. These mines have been declared as conflict mines since it was determined that they may support the conflict in this region resulting in human right violations and unfair labor practices.

NAKAGAWA ELECTRONICS LIMITED (NKG) has committed to contribute to the execution and conformance to the Dod-Frank Wall Street Reform and Consumer Act 2010. NKG will adopt and follow the guidelines given by the Conflict-Free Sourcing Initiative (CFSI) and the Organization for Economic Co-operation and Development (OECD).

The metals used for our products are three of the conflict metals, Tin, Tungsten and Gold. The conflict minerals for these are:

- Cassiterite for Tin (Sn)
- Wolframite for Tungsten (W)
- Gold (Au)

Since NKG is not buying these metals directly but received them with materials used to manufacture the products,, we will work without supply chain to identify the source of the metals and minerals. NKG requires all material suppliers to comply this directive as well and traces the source of the metals down the supply chain in order to determine if the minerals come from a conflict-free smelter or not.

作为频率控制产品的一个制造商和供应商，我司在产品中使用了某些金属。这些金属中的一些如锡，钨，金 和钽在世界各地的不同领域包括刚果共产国东部地区和它邻国的一些周边地区被开采。这些矿产被称为冲突矿，这是由于这些矿产会推动区域的冲突，而区域冲突又会造成违反人权和不公平的劳务实践。

我司已承诺对 Dod-Frank 华尔街改革和消费者 2010 法案作出贡献和执行。我司将会采纳并遵循由 CFSI 和 OECD 所提供的指导方针。

我们产品所使用的金属中包含三种冲突金属：锡，钨和金。冲突矿产品如下：

- 锡石（锡）
- 钨锰铁矿（钨）
- 金(Au)

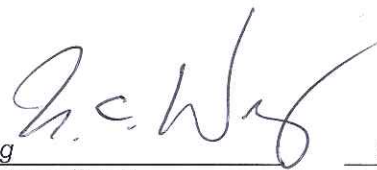
由于我司不是直接购买这些金属而是使用含有这些金属的原材料来生产产品，因此我们会在没有供应链的情况下来确定金属和矿产的来源。

我司要求所有材料供应商同样要遵守这个指令并向供应链追溯金属的来源以便确定这些矿产是否来自无冲突冶金厂。

M. Bruech
VP QA/ENG



N.C. Wong
President NKG 董事长



2015-09-02
Date

REV.	DESCRIPTION	APPROVED	DATE
A	Original release	M. Bruech	2010-07-01
B	Remove Cobalt from list of metals and update.	M. Bruech	2012-07-15
C	New form and update policy (organization change)	M. Bruech	2015-09-02