

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), Tantalum (Ta) and Cobalt (Co) 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 Responsible Minerals Initiative® (RMI®) and the Organization for Economic Co-operation and Development (OECD).

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

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

Since NKG is not buying these metals directly but received them with materials used to manufacture the products, we will work with our 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制造和供应商，本公司在产品中含有多种金属，这些金属来自世界各地。刚果共和国东部地区及一些周边地区出产诸如锡、钨、金、钽和钴等金属，这些矿厂称为冲突矿厂。它们可能加剧区域冲突，并且存在侵犯人权和歧视劳工等现象。

本公司承诺遵守 Dod-Frank 华尔街改革和消费者 2010 法案，将严格执行 RMI 及 OECD 的相关指令。


我们产品所使用的金属中包含四种冲突金属：锡、钨、金和钴。冲突矿产如下：

- 锡石（锡 Sn）
- 钨锰铁矿（钨 W）
- 金(Au)
- 钴(Co)

由于本公司不直接购买这些金属，而是使用含有这些金属的原材料，因此我们会在整个供应链调查确定金属和矿产的来源。

我司要求所有材料供应商遵守这个指令并向供应链追溯金属的来源，以确定这些矿产是否来自非冲突冶炼厂。

M. Bruech
VP QA/ENG



N.C. Wong
President NKG 董事长




2019-12-16
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
D	Add Cobalt to list of minerals (CRT issued by RMI®)	M. Bruech	2019-12-16