

Conflict Mineral Policy

This policy provides a framework through which Electrical Components International (ECI) shall comply with Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act pertaining to Conflict Minerals.

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act ("Act") governing Conflict Minerals. The Act requires companies to perform due diligence on the source and chain of custody of Conflict Minerals contained in their products. As a family of companies subject to this regulation, having an affiliate that is a US issuer of securities governed by the SEC, ECI adopts this policy to guide the implementation and maintenance of its Conflict Minerals program.

DECLARATION

ECI strives to have a Conflict Free supply chain, and is committed to sourcing products and materials from non-conflict sources; ECI expects that its suppliers have due diligence processes in place to identify the source of the Conflict Minerals contained in their products, and that those sources do not support conflict and violations of human rights; ECI provides all suppliers with the latest revision of the Conflict Minerals Reporting Template (CMRT), previously known as EICC/GeSI Template. Cobalt has been added to Conflict Minerals scope and a Cobalt Reporting Template will also be included (CRT). These surveys must be completed by our supply base to ensure continued eligibility to do business with ECI.

Suppliers will also need to certify, in writing, that they have procedures in place to demonstrate that materials and products are sourced in accordance with ECI standards, and to assure the reliability of the survey responses. Based on the survey results, ECI may require additional information from those same suppliers to determine whether a supplier's product(s) or material(s) are indeed "Conflict Free".

ECI recognizes the challenges that lie ahead in establishing reasonable practices to break through existing complexities and barriers to information throughout the Conflict Minerals supply chain. ECI is dedicated to working with its supply base to help establish traceability of Conflict Minerals and assure that our products are reliable.

For any further information please contact:

Pamela Rodriguez

Global Environmental Compliance Manager pamela.rodriguez@ecintl.com +1 915-521-5909