

CONFLICT-FREE MINERALS POLICY

Revision 3.1



Regulations enacted by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and subsequent disclosure requirements as defined by the SEC, were designed to inhibit human rights abuses occurring in certain regions funded by mining activities. These 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 function or production” of those products.

Conflict Minerals are minerals mined in conditions of armed conflict, notably in the eastern provinces of the Democratic Republic of the Congo. Conflict minerals include cassiterite, wolframite, coltan (respectively smelted into tin, tungsten, tantalum and their derivatives) and gold, collectively referred to as the “3TG”. These minerals may pass through a variety of intermediaries before being purchased by multinational companies.

As a global citizen, activities that fuel conflict and human rights abuses are unacceptable to Dekko. Dekko recognizes its social responsibility in all aspects of its domestic and international business activities. This includes, but is not limited to, supply management and global sourcing. Dekko does not intentionally or knowingly use Conflict Minerals in any of its products and is committed to continuously evaluating its supply chain to prevent the incorporation of Conflict Minerals into its products. In keeping with our core values of *Integrity, Passion, Unity, Accountability* and *Customer Focus*, Dekko has established a policy of observance and compliance.

For purposes of consistency and practicality, Dekko must adopt a compliance and reporting plan sufficient to guarantee conflict free sourcing while controlling administration costs of the program and effectively utilizing limited resources. This plan principally consists of an annual Reasonable Country of Origin Inquiry (RCOI) inclusive of due diligence and any resulting follow up actions required. These results will be published annually at a company level using the most current CFSI CMRT revision available at time of publication.

Dekko’s CMRT and this policy will be made available for download on the Dekko website <<http://www.dekko.com>>. Some of the measures Dekko is taking to confirm that the metals used in its products are sourced from “conflict-free” mines include:

- Aligning activities in accordance with the Conflict-Free Sourcing Initiative (CFSI) reference < <http://www.conflictreesourcing.org> >.
- Communicating this policy to Dekko suppliers and customers.
- Conducting an annual RCOI campaign. The RCOI activity consists of establishing and maintaining a list of relevant 3TG suppliers and the issuance of reporting requests to those identified 3TG suppliers. 3TG suppliers are requested to provide reasonable supplier declarations that document and provide evidence that they have also established policies, due diligence frameworks and Conflict-Free sourcing management systems.
- Compliance review of RCOI results that includes a risk-based follow up against CFSI Compliant Smelter List (up to and including termination of supplier relationship).
- An annual compilation and reporting of results on a Dekko company level CFSI CMRT.
- Dekko does not knowingly procure materials or products containing 3TG metals where those metals are determined as originating from sources identified as “conflict mines” in the DRC region.