

DEKKO

Dear Customer:

Dekko engages in supply chain due diligence to comply with the regulations of Section 1502 of the Dodd-Frank Act concerning “Conflict Minerals” and subsequent disclosure requirements as defined by the SEC: measures designed to inhibit human rights abuses (notably in the eastern provinces of the Democratic Republic of the Congo). Conflict Minerals, commonly referred to as the “3TG”, may pass through a variety of intermediaries before being purchased by Dekko and in no case does Dekko directly control the selection of any one mine or smelter entity.

Dekko has adopted a compliance and reporting plan sufficient to keep with the intent of the legislation and its objectives, meet legal reporting requirements to the SEC and to provide basic due diligence information to our customers. Dekko conducts an annual RCOI campaign, reporting the applicable smelters/ refiners reported to us by our responding supply chain. Note that nearly all supplier information received (supplier CMRTs) is at a company level. Traceability of specific procured materials and components to a specific reported smelter or refiner is not possible: only the potential association.

Dekko does not utilize any third party compliance system providers such as Assent, iPoint or SourceIntelligence. Declarations from our annual RCOI are published at the end of the first calendar quarter of the following RCOI year, at a company level, and can be accessed via our webpage at <<http://www.dekko.com>>. RCOI results are submitted to the SEC through the Graham Holdings Company. For purposes of consistency and practicality, Dekko does not report in customer specific formats or at a product level declaration or upload this information to one of the previously listed third party systems.

While the use of RMAP conformant smelters is both preferred and encouraged, it is not presently a requirement of SEC regulations or Dekko’s Conflict Minerals Program (recognizing that while non-RMAP conformant smelters present a higher risk, their non-RMAP conformant status does not necessarily mean they source from conflict mines). A concise, openly accessible (i.e., non-fee based) list of smelting and refining entities reasonably suspected of, or confirmed as, sourcing from conflict mines is not available on the RMI website. Dekko does not act as an “on-site audit or enforcement” entity for the law in the covered countries. Dekko must rely on the reported input from its suppliers, as well as its customers, to identify smelters and refiners sourcing from conflict mines (i.e., “high risk” smelters).

Once identified, however, the ability to lead in the removal of these smelters and refiners from our supply chain is significantly limited from Dekko’s position within it. Finite resources (Dekko does not have the capacity to provide product level CMRTs) and customer specified content (i.e., the component/ component manufacturer controlled by the customer and responsible for the introduction of these entities) being the most notable restrictions.

Upon request, further due diligence is limited to providing a list of the input suppliers reporting the identified “high risk” smelters to Dekko in order to facilitate potential actions by the requestor.

7310 Innovation Blvd. Suite #104
Fort Wayne, IN 46818
P 800-829-3101|Dekko.com

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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. Dekko does not intentionally procure materials or products containing 3TG metals where those metals are determined as originating from sources identified as “conflict mines” in the DRC region.

We ask for your understanding that Dekko’s policy and due diligence meet the legal requirements enacted by Dodd-Frank and subsequently the SEC.

Sincerely,

Barry Laughlin
Chief Operating Officer

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