

Conflict Minerals Overview

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, requires manufacturers and contract manufacturers that are issuers of stock and file reports with the Securities Exchange Commission (SEC) under Sections 13(a) or 15(d) of the Exchange Act to disclose whether the products they manufacturer or contract to have manufactured contain certain "Conflict Minerals necessary to the functionality or production" of their products. Those manufacturers who do use Conflict Minerals in their products or use them as a part of their manufacturing process are tasked with ensuring that their use does not directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo and adjoining countries.

- Conflict Minerals are defined under section 1502 of the Dodd-Frank Act as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin and tungsten.
- Adjoining countries are countries that share an internationally recognized border with the Democratic Republic of the Congo including Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

The Dodd-Frank Act was enacted in July 2010 and required promulgation of specific regulations by early 2011. Preliminary Rules were proposed and an open comment period was afforded for the public which closed in the fall of 2012. Effective November 13, 2012 it was determined that issuers must comply with the final rules, for the calendar year 2013 with the first reports due May 31, 2014.

Hanwha Azdel Inc. neither includes conflict minerals in any of its manufactured products nor does it use any of these metals in its manufacturing processes. See also the letter from Mark Mason, Product Technology Manager.

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