

NCAB Group Conflict Mineral Policy Statement

January 1, 2017

NCAB Group is committed to take full responsibility when doing business, which includes making decisions, operating and acting with sustainability in focus. We are convinced that a responsible business is a profitable one and we want to continue on that path. In 2014 we developed a sustainability strategy based on ISO 26000, an international standard for social responsibility. The strategy is covering ethical, social and environmental dimensions, with clear priorities for a sustainable business.

To support our corporate goals of sustainable business, NCAB Group has a comprehensive conflict mineral policy that has been established to communicate our position to sustain a conflict mineral free supply chain. This policy sets the expectation for NCAB Group and our supply chain partners with regards to accountability in the specific area of conflict mineral sourcing. The NCAB Group policy supports the worldwide concerns that metals mined in conflict areas of the Democratic Republic of the Congo (DRC) and neighboring countries may be making their way into the electronics supply chain. It is our position that NCAB Group will not do business with any company that is engaging in trade that supports conflicts and human rights violations in the Democratic Republic of Congo (DRC) and neighboring countries.

As a supplier of printed circuit boards we work throughout our supply chain to assure conflict minerals are not included in the bare printed circuit board. To further support this position, we direct our factories to only work with smelters that are compliant with the Conflict-Free Sourcing Initiative (CFSI) supported by the Electronic Industry Citizenship Coalition and the Global e-Sustainability Initiative.

The NCAB Group conflict mineral policy requires that our supply chain partners certify to us that they do not knowingly procure gold, tantalum, tungsten, cobalt, or tin, from conflict areas of the DRC or adjoining countries of Sudan, Uganda, Rwanda, Burundi, United Republic of Tanzania, Zambia, Angola, Congo, or the Central African Republic. We conduct periodic reviews with our supply chain partners to assure that they are in compliance with our directives. We require statements of compliance from both our direct supply and their suppliers as part of our due diligence.

During 2016 we increased our due diligence on all documentation regarding traceability of conflict minerals submitted by our factories. We review the overall process involved in collecting information on the smelters and work with each factory and upstream chemical and raw material suppliers to confirm that compliant CFSI smelters are being used. Through education and support, we are continually improving accountability and reducing risk across our supply chain.

Hans Ståhl CEO, NCAB Group