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INDUSTRIA COMPONENTI ELETTRONICI

Castellanza, 08/09/2011
ns. rif.: WM
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Object: Conflict free minerals legislation (U.S. legislation and future U.S. Securities and Exchange Commission rules concerning the use of "conflict minerals.").

In July 2010, U.S.A. President Obama signed into law H.R. 4173, the Wall Street Reform and Consumer Protection Act.

Section 1502 of that act imposes reporting requirements on manufacturers of products that contain metals derived from minerals that originate in the Democratic Republic of Congo or an adjoining country.

"Conflict minerals" listed are:

- columbite-tantalite (coltan, niobium, and tantalum)
- cassiterite (tin)
- gold
- wolframite (tungsten)

their derivatives, and any others so designated by the U.S. Secretary of State.

This "conflict mineral" legislation will require manufacturing companies to report annually to the SEC on whether their products contain "conflict minerals"; it may also require companies to conduct due diligence to determine whether "conflict minerals" are used and the existence of "conflict minerals" in products supplied.

As a consequence of the above, ICEL s.r.l.

- determined which parts/ assemblies used in its products incorporate one or more of the above listed minerals or their derivatives
- mapped the supply chains that are associated with those parts/ assemblies
- worked with suppliers to identify the smelters used in the supply chain to process the listed minerals and their origin (also as recycled or scrap material when/ if applicable)
- determined the origin of the listed minerals, obtaining confirmation that materials coming into its facilities are not from DRC or financing DRC conflict in their original extraction or via illegal taxation on mines and transportation routes.

DECLARATION:

ICEL s.r.l. products do contain Tin only, among the listed materials:

Tin is present in:

- the surface coating of the terminals
- the metal alloy of windings heads sprayed contacts

ICEL s.r.l. is a down stream user in the supply chain.

ICEL s.r.l. do not directly buy from material smelters.

ICEL s.r.l. do buy some components and semi-finished products containing Tin, necessary for ICEL s.r.l. products manufacturing, from its suppliers.

No one of the smelters at the origin of the Tin used by ICEL s.r.l. suppliers chain and present in ICEL s.r.l. products is coming from DRC or an adjoining country.

The smelters at the origin of the Tin used by ICEL s.r.l. suppliers chain and present in ICEL s.r.l. products are Conflict free smelters listed.

As a conclusion, we declare that all used materials and semi-finished and ICEL products are free from conflict minerals.

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