Frequently Asked Questions

Rev A

Conflict Minerals

1. What minerals are considered conflict minerals?

Conflict minerals include columbite-tantalite (coltan, niobium or columbite, and tantalum), cassiterite (tin), gold and wolframite (tungsten) and their derivatives.

2. Are cobalt and copper included in the definition of conflict minerals?

Cobalt and copper are not included in the current legislation covering conflict minerals.

3. What is the acronym '3TGs'?

The 3T's are the minerals known as tin, tantalum and tungsten. The G stands for the mineral gold.

4. Where can I find conflict mineral legislative information and technical guidance?

You can find additional information about conflict mineral legislative and technical guidance from the below sources.

Global e-Sustainability Initiative (GeSI)

U.S. Securities and Exchange Commission (SEC)

Electronic Industry Citizenship Coalition (EICC)

Conflict Free Smelters

5. What is the GeSI?

The Global e-Sustainability Initiative (GeSI) is an international strategic partnership of the Information Communications Technology (ICT) sector and organizations committed to creating and promoting technologies and practices that foster economic, environmental and social sustainability.

6. What is the EICC?

The Electronic Industry Citizenship Coalition (EICC) was established in 2004 to improve social, economic, and environmental conditions in the global electronic supply chain through use of a standardized code of conduct. The EICC is now beginning to address the conflict mineral issue.

7. What is the Dodd-Frank Act?

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 requires companies regulated by the Securities and Exchange Commission (SEC) to inquire into the origin of 3TG in their supply chain and report on the due diligence or reasonable inquiries to determine whether their products are conflict free. Companies will be expected to know and disclose the source of the 3TG minerals in their products.

8. Is Ecliptek subject to the Dodd-Frank Act?

The SEC disclosure requirements apply to US stock market-listed companies that are subject to the US Securities Exchange Act. Ecliptek is a privately held company and is not listed on the US stock market. As such, it is not by law, subject to the Dodd-Frank Act.

9. Why is Ecliptek addressing the conflict mIneral issue?

While Ecliptek is not subject by law to the Dodd-Frank Act, we are committed to work toward eliminating from our products 3TG that support armed groups in the DRC or in the surrounding countries.

10. What are the reporting requirements as defined by the Dodd-Frank Act?

The exact reporting requirements have not yet been established. Currently being developed by the SEC, companies will be required to disclose whether conflict minerals (3TG) are found in their products and whether those minerals originated from the DRC or its adjoining countries. The SEC regulations, scheduled to be finalized in the near future, will clarify the disclosure requirements needed to support the financial reports to the SEC.

11. Is Ecliptek working in conjunction with the electronics industry to address the conflict mIneral issue?

Ecliptek is working in concert with several industry consortia and forums in an effort to better understand and address conflict mIneral issues.

12. What is Ecliptek's definition of an Article?

Ecliptek's definition of an article is a component or assembly.

13. What is Ecliptek's definition of a Component?

Ecliptek's definition of a component applies to quartz crystal resonator devices.

14. What is Ecliptek's definition of an Assembly?

Ecliptek's definition of an assembly applies to oscillator devices (MEMS Oscillator, XO, VCXO, TCXO, or OCXO).

15. Are Gold, Tin, Tantalum and Tungsten present in Ecliptek articles?

All Ecliptek assembly and components contain one or more conflict minerals.

16. What Ecliptek products contain the conflict minerals and what is the mass of these conflict minerals?

All substances used to construct each Ecliptek product can be found on the applicable Ecliptek IPC-1752-2 material declaration sheet. An IPC-1752-2 material declaration can be obtained via the RoHS / Pb-free certifications and IPC-1752 material declarations page. The material declaration provides the mass of each substance, including any conflict minerals.

17. Is there a minimum amount or percentage content by weight that defines a minimum material content to investigate?

Currently, there is no minimum amount as defined in the proposed legislation.

18. Is only material that originates from the DRC called conflict minerals?

Any substance identified in the legislation, regardless of origin, must be included in due diligence and reporting.

19. Does Ecliptek buy any conflict minerals directly from suppliers or refiners or smelters?

Ecliptek does not purchase conflict minerals or their derivatives, in any form, directly from any supplier, refiner, or smelter. The use of these minerals in Ecliptek articles are only purchased from suppliers of raw subcomponents used to build articles.

20. How will Ecliptek disclose the conflict minerals used in its articles?

Ecliptek intends to use industry-standard tools created by the EICC to facilitate public disclosure that our articles are free of conflict minerals that originate from the DRC or surrounding areas.

21. What is the advantage of using the EICC approach to disclose the conflict minerals used in our articles?

The EICC approach creates a responsible sourcing certification process that focuses on smelters around the world. Ecliptek is working with our suppliers to ensure that all subcomponents used to manufacture Ecliptek articles originate from certified conflict-free smelters.

22. What is the status of the EICC/GeSI conflict free smelter program?

The EICC/GeSI conflict free smelter program has begun to validate smelter processes and operations. Due to the fact that the validation processes in the DRC and adjoining regions are not yet fully operational, only smelters that are not sourcing from the entire region can claim to be validated as 'conflict-free'.

23. Does Ecliptek have a company policy on Conflict Minerals?

Ecliptek Corporation's policy on Conflict Minerals Policy can be found on our website.

24. Has Ecliptek implemented conflict minerals sourcing due diligence measures?

Ecliptek Corporation is currently reviewing system processes and procedures to help ensure that our suppliers comply with our conflict material expectations. We are communicating with our supply base to determine the sources of any conflict minerals contained in our components and assemblies. Existing suppliers have been notified of our position and of our request to comply with this regulation once it is implemented.

25. Can Ecliptek claim that its articles do not contain conflict mineral from the DRC or surrounding countries?

Due to the status of industry standards such as the EICC/GeSI conflict free smelter program, the pending industry standard publication, and the guidance implementing regulations from the SEC , validation of articles has not yet been completed. Ecliptek can not presently certify that its articles do not contain conflict minerals from the DRC or surrounding countries.

26. Will Ecliptek discontinue or change any products as a result of this conflict mIneral issue?

At this time, Ecliptek has no plans to discontinue or change any product specifications as a result of the conflict mIneral regulation requirements.

27. Does Ecliptek have a special marking scheme for conflict mIneral components or assemblies?

At present, there are no legislated conflict mIneral requirements for component or assembly marking. The marking content for all Ecliptek components or assemblies is shown on the applicable specification sheet found on our website.

28. Does Ecliptek have a special labeling method for shipment packaging of conflict mIneral components or assemblies?

At present, there are no legislated conflict mIneral requirements for component or assembly packaging. Ecliptek has no special labeling methods for the packaging of products containing conflict mInerals.

29. Who at Ecliptek is coordinating the company's Conflict MIneral compliance effort?

An Ecliptek conflict mIneral team has been established and meets regularly to coordinate conflict mIneral company policy. This team coordinates all conflict mIneral tasks with respect to our manufacturing locations and qualified subcontractors. All customers can obtain the status of the team's on-going efforts by reviewing these FAQ's and associated links. Please contact our Global Customer Support team if you have any questions about our program.

30. Who do I contact if I have additional technical questions about Ecliptek conflict mIneral issues?

Please contact our Global Customer Support team for Conflict MIneral compliance support. We encourage you to visit our website regularly to obtain the most up-to-date conflict mIneral information.