

Conflict Minerals Policy Statement

On July 21, 2010, the “Dodd-Frank Wall Street Reform and Consumer Protection Act” was signed into law. The Dodd-Frank Act and related U.S. Securities and Exchange Commission rules require certain publicly traded companies to disclose the extent to which the products they manufacture or contract to manufacture contain so-called “conflict minerals” sourced from mines in the Democratic Republic of the Congo (“DRC”) or adjoining countries. Conflict minerals include tantalum, tin, tungsten and gold, which are used in many electronic components and assemblies.

As an electronics manufacturing services provider (EMS), Group Seven promotes the traceability of these minerals and the transparency of the supply chain. Group Seven believes that its customers should be fully informed about the components they have specified for use. While Group Seven, as an EMS service provider, is not able to certify as to the country of origin of the minerals contained in the components specified by the customer, Group Seven is committed to working with its customers to supply products that meet customer AVL and drawing requirements.

With respect to those limited aspects of Group Seven’s business where Group Seven has sole discretion to determine process chemistry or to fabricate components that may contain conflict minerals, Group Seven will not knowingly purchase products that contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Group Seven expects its suppliers of these items to only source minerals from responsible sources.

Group Seven fully understands the importance of this issue to its customers and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a conflict-free supply chain. We are encouraging all our suppliers to likewise support these efforts and make information on the origin of their product components easily accessible on their websites. Group Seven is committed to perform due diligence in its review of the choice of suppliers and sourcing decisions.

For additional information on the law, who it applies to, manufacturer certification, and practices for compliance and audit, please visit these links:

- <http://www.conflictreesourcing.org/audit-protocols-procedures/>
- <http://www.oecd.org/daf/inv/mne/mining.htm>
- http://www.eicc.info/tools_and_resources05.shtml



Group Seven Corporation
2027 O'Toole Avenue, San Jose, CA 95131

Tel 408.435.7477
Fax 408.435.7478
www.group7.net