



# Benchmark's Conflict Minerals Policy

**“Conflict Minerals”** refers to certain minerals commonly referred to as “3TG” (Tin, Tantalum, Tungsten, and Gold) or other derivatives. The US Congress voiced concerns that the exploitation and trade of Conflict Minerals by armed groups helped to finance conflict in the Democratic Republic of the Congo (“DRC”) and adjoining countries was contributing to an emergency humanitarian crisis. To address these concerns, the United States Congress amended the Dodd-Frank Financial Reform Bill and Consumer Protection Act § 1502(b) in July 2010, and in 2012 the U.S. Securities and Exchange Commission adopted “Rule 13p-1” under the Securities Exchange Act (collectively the “Conflict Minerals Law”). The Conflict Minerals Law identifies the DRC and adjoining countries as “Covered Countries,” and further requires all US stock listed companies to annually disclose certain information concerning Conflict Minerals contained in products they manufacture or contract to manufacture to the extent that Conflict Minerals are necessary to the functionality or production of the products.

Benchmark Electronics, Inc. (“Benchmark”) supports the Conflict Minerals Law and efforts to avoid sourcing Conflict Minerals directly or indirectly financing armed groups in the DRC and in adjoining countries. Consistent with the Conflict Minerals Law and the OECD Due Diligence Guidance concerning Conflict Minerals, Benchmark adopted the Responsible Minerals Initiative Due Diligence reporting process and seeks to obtain Conflict Minerals content declarations from its suppliers, promoting supply chain transparency. Benchmark does not directly source 3TG from mines, smelters, or refiners, and is in most cases several or more levels removed from these supply chain participants. Benchmark therefore expects our suppliers to:

- utilize responsible sourcing practices per the Benchmark Conflict Minerals policy and to purge all high-risk smelters from their supply chain.
- preferentially source 3TG from smelters and refiners validated as being conflict free and do not directly or indirectly benefit, or finance armed groups in any Covered Country.
- fully comply with the Conflict Minerals Law and provide all requested conflict minerals (3TG) declarations.
- have a credible, robust conflict minerals program (3TG) which should include: a written conflict minerals policy, communication of requirements to suppliers, CM data collection using the RMI CMRT template, a professional analysis and risk assessment with corrective action on the basis of the CMRTs collected from the suppliers.
- pass these requirements through their supply chain and determine the 3TG sources (Smelters or Refiners – SORs).
- for suppliers representing the top 90% of our global corporate materials spend (our yearly corporate sample), provide their most recent RMI CMRT form, complete and accurate in the latest version with robust comments where appropriate, during our active yearly CM data collection campaign.

Any suppliers not willing to comply with these requirements shall be reviewed by global procurement with regard to future business and sourcing decisions. This Conflict Minerals Policy encourages suppliers to respect and protect human rights throughout the world. A copy of this Conflict Minerals Policy is available on our public website.