

Quantum Microwave Components

For Vendor Approval:

Please verify no conflict materials are used

Specialized Corporate Disclosure

Background: Title XV of the *Dodd-Frank Wall Street Reform and Consumer Protection Act* contains several specialized disclosure provisions. For example:

Section 1502 requires persons to disclose annually whether any conflict minerals that are necessary to the functionality or production of a product of the person, as defined in the provision, originated in the Democratic Republic of the Congo or an adjoining country and, if so, to provide a report describing, among other matters, the measures taken to exercise due diligence on the source and chain of custody of those minerals, which must include an independent private sector audit of the report that is certified by the person filing the report. Certain aspects of this rulemaking will require consultation with other federal agencies, including the State Department, the Government Accountability Office, and the Commerce Department. Persons are not required to comply with these rules until their first full fiscal year after the date on which the Commission issues its final rules.

Implementation: On December 15, 2010, the Commission proposed rules to implement Sections 1502, 1503 and 1504 of the Dodd-Frank Act. The proposing releases can be found at <http://www.sec.gov/rules/proposed/2010/34-63547fr.pdf> (Conflict Minerals), <http://www.sec.gov/rules/proposed/2010/33-9164fr.pdf> (Mine Safety Disclosure), and <http://www.sec.gov/rules/proposed/2010/34-63549fr.pdf> (Disclosure of Payments by Resource Extraction Issuers).

On December 21, 2011, the Commission adopted rules regarding disclosure of mine safety information: [The rules](#) require mining companies to include information about mine safety and health in the quarterly and annual reports they file with the SEC.

On August 22, 2012, the Commission adopted rules regarding "conflict minerals" disclosure and disclosure by resource extraction issuers. The "conflict minerals" [rule](#) requires companies to disclose use of minerals that originated in the Democratic Republic of the Congo or an adjoining country. The [rules](#) for resource extraction companies require disclosure of payments to U.S. and non-U.S. governments related to commercial development of oil, gas, or mineral resources.

On May 30, 2013, the Division of Corporation Finance published Frequently Asked Questions for [Conflict Minerals](#) and [Disclosure of Payments by Resource Extraction Issuers](#).

<http://www.sec.gov/spotlight/dodd-frank/speccorpdisclosure.shtml>

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