Response to Conflict Minerals

Europe: Supply Chain Due Diligence Obligations for Importers of Tin, Tantalum and Tungsten, their Ores, and Gold Originating in Conflict Affected and High-Risk Areas, Regulation (EU) 2017/821

USA: Conflict Mineral Disclosure as required by Section 1502 of the Dodd-Frank Act.

Dear Valued Customer,

On March 16, 2017, the European Union (EU) Parliament voted to adopt regulations regarding the sourcing of Conflict Minerals in high risk zones. The regulations, which require supply chain due diligence self-certification of tin, tantalum and tungsten, their ores, and gold originating in high-risk areas, will only apply to Companies placing raw materials on the market and not importers/distributors of products that may contain these minerals. Accordingly to EU regulation Arrow Europe falls into downstream company definition as far as Arrow Europe does not directly purchase/import any raw ore or unrefined Conflict Minerals from any source and consequently does not have obligations under the regulation itself.

Given this, even though Arrow Europe is not directly affected by the Regulation, we recognize our responsibility not to support or contribute to the violence and human rights violations associated with the mining in conflict-affected and high-risk areas of certain minerals that are essential to the performance of today’s electronics.

Considering that Arrow Europe is not a manufacturer of electronics parts we are not in position to provide accurate information relating to the use of Conflict Minerals in the products we distribute. The manufacturers of electronic components and products are the only source of accurate information regarding substances, including any conflict minerals, used in the manufacture of their products.

For information on specific components, we suggest you subscribe to Silicon Expert Technologies. Silicon Expert works directly with component and product manufacturers to obtain Conflict Minerals data as well as hazardous substance content. Information regarding Conflict Minerals is available in the Silicon Expert Technologies parts database. If you would like to subscribe to Silicon Expert please visit: http://www.siliconexpert.com

Arrow is a longstanding member of the Electronic Components Industry Association (ECIA). The ECIA web site can be found at http://www.ecianow.org/industry-issues/conflict-materials/member-company-information/

The web site provides a summary of the final rules for the Conflict Minerals Section of the Dodd-Frank Act along with information on the conflict minerals from a number of electronics manufacturers.

In the U.S., Section 1502 of the 2010 Dodd-Frank Act requires companies to file an annual special disclosure with the U.S. Securities and Exchange Commission beginning in 2014 indicating if their products include metals sourced from the Conflict Region. Arrow Electronics Inc. has established a policy statement to that effect, and the steps to comply with the transparency and consumer awareness requirements in accordance with Rule 13p-1 under the Securities Exchange Act of 1934, as amended.
Pursuant to the Rule, Arrow Electronics Inc. undertook due diligence measures on the source and chain of custody of the conflict minerals in products assembled or integrated (“manufactured”) by Arrow Electronics Inc. and all of its global consolidated subsidiaries.

Arrow Electronics Inc. has prepared a Conflict Minerals Report which is publicly available at http://www.arrow.com/en/about-arrow/overview. This report has been subject to an independent private sector audit.

Please be assured that Arrow understands the importance of this issue to you, our customer. Arrow is committed to the pursuit of responsible procurement practices and has no intention, directly or indirectly, of abetting the human rights violations identified in high-risk or conflict-affected areas.

Accordingly, we will design and implement any necessary and required processes to facilitate compliance with this final regulation.

We thank you for your continued support.

Sincerely,
Arrow Central Europe GmbH

[Signature]

Martin Bielesch
President EMEA Components