

## Bradshaw Medical, Inc. Policy Statement on Conflict Minerals

This Bradshaw Medical Policy Statement on Conflict Minerals applies to all suppliers providing stainless steel bar stock to Bradshaw Medical.

The exploitation and trade of “conflict minerals” (including tin, tantalum, tungsten and gold) mined in the Democratic Republic of the Congo (DRC) and adjoining countries may be fueling human rights atrocities in the region. Bradshaw Medical supports actions to improve supply chain transparency and enable companies to source conflict-free minerals.

As required by the Dodd-Frank Wall Street Reform and Consumer Protection Act, the U.S. Securities and Exchange Commission (SEC) adopted a rule regarding disclosure and reporting requirements with respect to the use of conflict minerals. Under the rule, issuers must disclose their use of conflict minerals in the products they manufacture or contract to manufacture if the conflict minerals are necessary to the functionality or production of a product, and companies must report whether the conflict minerals originated in the DRC or adjoining countries. These specialized disclosure reports are required to be filed annually with the SEC by us and our customers.

Bradshaw Medical is committed to working with its suppliers to responsibly source the materials used in manufacturing its products. Bradshaw Medical has initiated a comprehensive process to meet the conflict minerals regulatory requirements, taking steps to increase its supply chain due diligence measures for these minerals. Bradshaw Medical does not typically source conflict minerals directly from mines, smelters or refiners, and, accordingly, in most cases, is several levels removed from these market participants. Bradshaw Medical therefore requires the cooperation of its suppliers in the implementation of this policy and in enabling Bradshaw Medical to meet SEC disclosure and reporting obligations on a timely basis.

Bradshaw Medical expects its suppliers to source conflict minerals from socially responsible sub-tier suppliers and manufacturers and to undertake reasonable due diligence within their supply chains to determine the origin of the conflict minerals contained in materials and products they supply to Bradshaw Medical.

To support this policy, Bradshaw Medical’s suppliers are expected to:

- familiarize themselves with the SEC’s conflict minerals rule;
- implement policies that are consistent with this policy, and require their direct and indirect suppliers to do the same;
- implement procedures to trace conflict minerals at least to the smelter or refiner level, working with their direct and indirect suppliers as applicable;
- where reasonably possible, source conflict minerals from smelters and refiners validated as conflict free, and require their direct and indirect suppliers to do the same;
- maintain reviewable business records for a period not less than seven (7) years supporting the source of conflict minerals; and
- at Bradshaw Medical’s request, provide Bradshaw Medical written certifications and other information concerning the origin of conflict minerals (smelter listing) included in products supplied to Bradshaw Medical, the supplier’s compliance with this policy in general, and require their direct and indirect suppliers to do the same.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

Bradshaw Medical reserves the right to request from any supplier at any time such information, certifications and documentation as it shall deem necessary to monitor or assess compliance with this policy.

Bradshaw Medical understands and appreciates the importance of this issue and is committed to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a conflict-free supply chain. Bradshaw Medical is encouraging its suppliers to likewise support these efforts.

For more information on Bradshaw Medical’s conflict minerals program, contact [conflictminerals@bradshaw-medical.com](mailto:conflictminerals@bradshaw-medical.com).

### Reference Links

- **Conflict Mineral SEC Final Rule:** <http://www.sec.gov/rules/final/2012/34-67716.pdf>
- **Conflict Free Sourcing Initiative:** <http://www.conflictreesourcing.org>
- **OECD Due Diligence Guidelines:** <http://www.oecd.org/investment/guidelinesformultinationalenterprises>