

Merit Medical Systems, Inc.
Conflict Minerals Policy

In recent years, there has been an increasing international focus on “conflict minerals” (including tin, tantalum, tungsten and gold) mined in the Democratic Republic of the Congo (DRC) and adjoining countries. Armed groups engaged in mining operations in this region are believed to subject workers and indigenous people to serious human rights abuses and are using proceeds from the sale of conflict minerals to finance regional conflicts.

In response to these abuses, the U.S. Congress enacted legislation requiring certain companies to provide public disclosures about their use of conflict minerals. In August 2012, the U.S. Securities and Exchange Commission (SEC) adopted a final rule requiring public companies that manufacture or contract to manufacture products that contain “conflict minerals” to conduct due diligence on the origin, source and chain of custody of such minerals and provide specialized disclosures regarding the findings of such diligence.

Tin, tungsten, tantalum and gold (“3TG”) are essential in the manufacture of a variety of electronic and medical devices and other products, including some of Merit’s products. Merit sources its components and raw materials from reputable suppliers and has no reason to believe that any of these components or materials contain conflict minerals which contribute to the funding of violence in the DRC. However, given the complexity of the global metals supply chain, we cannot be completely sure that these components do or do not contain such conflict minerals. Accordingly, Merit has initiated a process to meet the conflict minerals regulatory requirements, taking steps to increase its supply chain due diligence measures for these minerals. Merit is also committed to working with its suppliers to responsibly source the materials and components used in its products. (see Merit’s Code of Conduct for Suppliers [here](#))

In furtherance of this commitment, Merit expects its suppliers 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, and to provide Merit with proper verification of the country of origin and source of the materials used in the products they supply to Merit;
- 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;
- At Merit’s request, provide Merit with written certifications and other information concerning the origin of conflict minerals included in products and components supplied to Merit, and require their direct and indirect suppliers to do the same.

Merit reserves the right to verify any information received from its suppliers, and to request from any supplier at any time such information, certifications and documentation as Merit shall deem necessary to monitor or assess compliance with this policy.

If a supplier is found to not be in compliance with the objectives of this policy, the supplier is expected to develop, implement and document plans to remedy such non-compliance in a timely manner. If the non-compliance cannot be resolved, Merit reserves the right to pursue termination of its relationship with the supplier.

For more information on Merit’s conflict minerals program, contact CJ Wolf, Chief Compliance Officer at cj.wolf@merit.com.