

1 **PURPOSE**

To document the Stereotaxis Conflict Minerals policy

2 **SCOPE**

This policy applies to all Stereotaxis products for sale which are manufactured by Stereotaxis, or contracted by Stereotaxis to be manufactured, after January 1, 2013.

3 **APPLICABLE DOCUMENTS**

This document is part of the Quality System Policy series set forth by QS-2000 Stereotaxis Quality Manual, where applicable references can be found for all QS series documents, including standards and regulations (*i.e. ISO 13485*).

The following documents are considered applicable to this document and are either *required* for use or may be used as *reference*.

Document Type	Document Name
<i>Required</i>	N/A
<i>Reference</i>	CPP-010 Conflict Minerals Procedure Dodd-Frank Act, 111th congress, Second Session, HR 4173, Section 1502, Conflict Minerals

4 **DEFINITIONS**

Terms used in this policy are defined below.

Term	Definition
Conflict Minerals	Minerals mined in conditions of armed conflict and/or human rights abuses.

5 **RESPONSIBILITIES**

The following are the responsibilities of the various departments.

Department	Responsibilities
Manufacturing / Procurement	Reasonable Country of Origin Inquiries (RCOI); Due Diligence on supply chain; Due diligence/update reporting in management reviews; Preparation of supporting documentation and reports as required for SEC disclosures and reporting.
Engineering/R&R	Ensure new designs do not incorporate components that are not conflict-free
Legal/Finance	SEC reporting/filing, as needed

6 POLICY

6.1 Conflict Minerals

- 6.1.1 On August 22, 2012, the U.S. Securities and Exchange Commission (SEC) published regulations implementing Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act governing Conflict Minerals.
- 6.1.2 These regulations enforce disclosure and reporting obligations regarding the use of conflict minerals (gold, columbite-tantalite, cassiterite and wolframite, including their derivatives, respectively tantalum, tin and tungsten) when they are determined to be necessary to the functionality or production of a product a company manufactures or contracts to manufacture.
- 6.1.3 As a SEC registrant, Stereotaxis complies with SEC regulations requiring supply chain reporting, and reasonable due diligence with respect to the sourcing of these minerals and the products in which they are contained.
- 6.1.4 Accordingly, Stereotaxis' policy on Conflict Minerals is:
- a) Stereotaxis endeavors to have a Conflict Free supply chain, and is committed to sourcing products and materials from conflict-free sources;
 - b) Stereotaxis expects our suppliers to have policies and processes in place to be able to trace the source of their materials and products to ensure that any Conflict Minerals contained in products we purchase from our suppliers do not originate from conflict mines within the Democratic Republic of the Congo (DRC) and the surrounding region;
- 6.1.5 Stereotaxis will provide applicable suppliers with an industry-standard Reasonable Country of Origin Inquiry (RCOI) survey. Suppliers will be asked to certify that they have procedures in place to demonstrate materials and products are sourced in accordance with Electronic Industry Citizenship Coalition (EICC) or Organisation for Economic Co-operation and Development (OECD) standards, and to assure the accuracy of RCOI survey responses. Stereotaxis will perform due diligence on the survey results, and may require additional information from those same suppliers in order to determine whether or not a supplier's products or materials are indeed "Conflict Free".
- 6.1.6 Many challenges lie ahead for the industry in establishing reasonable practices to break through existing complexities and barriers to information throughout the Conflict Minerals supply chain. Working together, Stereotaxis and our suppliers can help establish traceability of Conflict Minerals that will promote the eradication of human rights abuses associated with DRC regional mining activities, and provide

assurance to our customers that materials necessary to the function of our products are responsibly sourced.

7 REVISION HISTORY

REV	ECO	DATE	BRIEF DESCRIPTION	AUTHOR
A	14-116	22 April 2014	Initial Release	K. Viles/ J. Kinder
B	19-032	01/22/2019	Update reference document identification	T. Hu

REV	ECO	BRIEF DESCRIPTION	AUTHOR
C	CC-0001225	Update reference section and remove location section	R. Springer