

Penumbra, Inc.

Conflict Minerals Statement of Policy

Adopted May 3, 2018

1. Introduction

This Conflict Minerals Statement of Policy (“**Policy**”) of Penumbra, Inc. (together with its subsidiaries, “**Penumbra**”) covers the selection and retention of all Penumbra direct suppliers that provide materials that contain tin, tantalum, tungsten, and/or gold (collectively, “**3TG Minerals**”), which are commonly called “conflict minerals.”

2. Background

Armed groups operating in the eastern Democratic Republic of the Congo (the “**DRC**”) have engaged in conflict and severe human rights abuses, fueled through proceeds from the mining or trade of 3TG Minerals. In 2012 the U.S. Securities and Exchange Commission (the “**SEC**”) adopted a final rule (the “**Rule**”) implementing reporting and disclosure requirements relating to 3TG Minerals as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act. The Rule is intended in part to provide greater supply chain transparency to the use of 3TG Minerals originating from the DRC and adjoining countries.

The Rule applies to SEC filers who manufacture, or contract to manufacture, products containing 3TG Minerals that are “necessary to the functionality or production” of those products. 3TG Minerals are essential in the manufacture of a variety of medical devices, including some of Penumbra’s products. Penumbra does not directly source 3TG Minerals from mines, smelters or refiners; Penumbra therefore requires the cooperation of its suppliers in the implementation of this Policy and in enabling Penumbra to meet its SEC compliance obligations.

3. Penumbra Policy Statement

- Penumbra supports responsible supply chain management and efforts to eliminate the use of 3TG Minerals from sources that could promote environmental and human rights abuses in the DRC and adjoining countries. By adopting this Policy and collaborating with suppliers, Penumbra is working with others to promote responsible business practices, respect human rights, and not contribute to conflict.
- Penumbra is committed to complying with the SEC’s conflict minerals reporting and disclosure requirements and expects its suppliers and supply chain partners to support its efforts and implement conflict minerals compliance programs.
- Penumbra expects its suppliers to undertake reasonable due diligence to avoid the use of 3TG Minerals in the raw materials and components that they supply to Penumbra, and to provide Penumbra with information necessary for Penumbra to comply with all applicable laws and regulations concerning 3TG Minerals.
- Penumbra will work with its suppliers by, among other things, seeking conflict minerals declarations regarding the origin of the 3TG Minerals in products and parts they supply to Penumbra.
- Penumbra may reconsider its willingness to partner with suppliers that fail to comply with this Policy.

4. Grievance Mechanism and Reporting

Concerns or reports of possible violations of this Policy can be reported confidentially through the [Penumbra Whistleblower Hotline](#).