

Revision	Release Date	Change Request Number	Reason for Revision
A	01 FEB 2017	NA	Initial Release
B	01 OCT 2020	23221	Review and minor edits to format

Title: EHSS Conflict Minerals Policy		
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1.0 PURPOSE

- 1.1 Integer is committed to ensuring that it conducts its business worldwide with respect for human rights and in compliance with all applicable laws and fair labor practices. We understand that the armed groups responsible for the conflict in the Democratic Republic of Congo (DRC) region may be directly or indirectly financed by the mining of gold and the ores from which tin, tungsten, tantalum are derived, commonly referred to as Conflict Minerals. This policy defines how Integer will comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) in the United States as well as the European Union Conflict Minerals (2017/821) Regulation.

2.0 SCOPE

- 2.1 This policy applies to all Integer facilities and the Integer Supply Chain.

3.0 REFERENCES, ATTACHMENTS, AND FORMS

- 3.1 Section 1502 of the Dodd-Frank Wall street Reform and Consumer Protection Act of 2010
- 3.2 Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Organization for Economic Co-operation and Development
- 3.3 US 17 CFR Parts 240 and 249b.400
- 3.4 National Association of Manufacturers, et al v. SEC, et al, No. 13-5252 (D.C. Cir April 2014)
- 3.5 SEC Statement “Statement on the Effect of the Recent Court of Appeals Decision on the Conflict Minerals Rule.” April 29, 2014
- 3.6 Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017
- 3.7 Statements by the Council and by the Commission relating to Regulation (EU) 2017/821
- 3.8 Integer Standard Terms and Conditions of Purchase

4.0 DEFINITIONS AND ACRONYMS

- 4.1 Definitions
 - 4.1.1 Conflict Mineral: (a) Columbia-tantalite, also known as coltan (the metal ore from which tantalum is extracted), cassiterite (the metal ore from which tin is extracted), gold, wolframite (the metal ore from which tungsten is extracted) and their derivatives and (b) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.
 - 4.1.2 Democratic Republic of the Congo or an adjoining country (DRC): A group of countries in central Africa, which are currently defined as Angola, Burundi, Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.
 - 4.1.3 DRC Conflict Free: Defined to mean products that do not contain conflict minerals or their derivatives determined to be directly or indirectly financing or benefiting armed groups in the DRC or adjoining country.

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- 4.1.4 DRC Conflict Undeterminable: Defined to mean products that may or may not contain conflict minerals or their derivatives determined to be directly or indirectly financing or benefiting armed groups in the DRC or adjoining country.
- 4.1.5 Not been found to be DRC Conflict Free: Defined to mean products that contain conflict minerals, or their derivatives determined to be directly or indirectly financing or benefiting armed groups in the DRC or adjoining country.
- 4.2 Acronyms
 - 4.2.1 3TG — Tin, Tungsten, Tantalum and Gold
 - 4.2.2 CMRT — Conflict Minerals Reporting Template
 - 4.2.3 DRC — Democratic Republic of the Congo or an adjoining country
 - 4.2.4 EHSS COE: Center of Excellence Environmental Health Safety and Security Team
 - 4.2.5 EU — European Union
 - 4.2.6 OECD — Organization for Economic Co-operation and Development
 - 4.2.7 RCOI — Reasonable Country of Origin Inquiry
 - 4.2.8 RMI – Responsible Minerals Initiative
 - 4.2.9 SEC — US Securities and Exchange Commission

5.0 RESPONSIBILITIES

- 5.1 Center of Excellence, Environmental Health Safety and Security Team (EHSS COE)
 - 5.1.1 Manage the reasonable country of origin inquiry (RCOI) and due diligence activities related to supplier outreach as well as respond to customer requests for Integer Conflict Minerals reports.
 - 5.1.2 Initiate annual review of products and suppliers with Site Engineering Manager to ensure new and removed suppliers of 3TG are identified for each Integer location.
 - 5.1.3 Summarize annual information for Corporate Finance for the Form SD report.
- 5.2 Corporate Finance
 - 5.2.1 Author the Dodd-Frank Conflict Minerals Report and Form SD to the US Securities and Exchange Commission (SEC).
- 5.3 Site Engineering Managers
 - 5.3.1 Assist or delegate direct reports in annual site level review of products, raw materials and supplied components for the use of 3TG and report back to EHSS COE.
- 5.4 Integer Supply Chain
 - 5.4.1 Suppliers that manufacture products that contain 3TG shall review this policy and the Integer Standard Terms and Conditions of Purchase and accept its requirements regarding Conflict Minerals.

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6.0 POLICY

- 6.1 Conflict Mineral Commitment: Integer supports transparency in the supply chain and understands its responsibility to comply with Conflict Minerals regulations in an effort to source materials containing 3TG minerals from socially responsible sources.
- 6.2 Requirements
- 6.2.1 The U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to Conflict Minerals, pursuant to the Dodd-Frank Act. The rule requires manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals in a manner or amount necessary to the functionality or production of those products.
- 6.2.2 The EU Parliament and EU Council adopted an import regulation on Conflict Minerals under Regulation 2017/821. The EU Conflict Minerals Regulation (2017/821) applies to EU importers of 3TG materials and targets minerals originating from conflict-affected or high-risk areas without being limited to specific geographical locations. Importers that reach the volume thresholds set out in Annex I of the Regulation require additional due diligence measures.
- 6.2.3 To meet its Dodd-Frank Act and EU Conflict Minerals Regulation obligations, Integer shall conduct an annual product review and a reasonable country of origin inquiry (RCOI) to all suppliers of parts and components suspected to contain 3TG.
- 6.2.4 Based on the results of the RCOI, due diligence measures designed to conform, in all material respects, to the framework set out by the Organization for Economic Co-operation and Development (OECD) in its Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas will be conducted if needed. Integer will work toward continuously improving these processes to ensure compliance with the Dodd-Frank Act and EU Conflict Minerals Regulation.
- 6.2.5 Integer supports transparency in its supply chain and therefore encourages the following from our suppliers:
- 6.2.5.1 Suppliers shall comply with the Dodd-Frank Act and make efforts to identify and eliminate the use of Conflict Minerals sourced from the DRC and surrounding areas unless verified as “DRC Conflict Free” by a third party audit. In addition, we expect our suppliers to conduct business operations in an ethical manner and comply with all applicable laws related to environmental responsibility, workplace health and safety, and human resources.
- 6.2.5.2 Suppliers shall comply with the EU Conflict Minerals Regulation, if applicable, and make efforts to identify and eliminate the use of Conflict Minerals sourced from conflict-affected or high-risk areas without being limited to specific geographical locations.
- 6.2.5.3 Suppliers are required to conduct the necessary RCOI and due diligence for, and provide Integer with, proper verification of the country of origin and the source of the materials used in the products they supply to Integer.

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- 6.2.5.4 Integer will require all suppliers of 3TG material to complete an additional assessment to track and verify material quantities if the 3TG material is being imported to an Integer facility in the EU. Applicable Suppliers shall complete the survey in its entirety and submit back to Integer.
- 6.2.5.5 Integer supports initiatives to verify smelters and refiners that are “Conflict Free,” and expects our suppliers to utilize conflict-free smelter and refinery programs that are available.
- 6.2.6 Integer reserves the right to verify any information received from our suppliers. If Integer discovers a supplier does not comply with these objectives, the supplier will be expected to develop, implement and document plans to remedy such non-compliance in a timely manner. If the non-compliance cannot be resolved, we reserve the right to terminate the relationship with the supplier.
- 6.2.7 At the end of each calendar year, Integer will consolidate all RCOI and due diligence information into specific Integer product summary reports using the Responsible Mineral Initiative’s (RMI) Conflict Minerals Reporting Template (CMRT). Once complete, Integer will distribute the CMRTs to all customers who request the information.
 - 6.2.7.1 All customers shall note that Integer will not label its products as “DRC Conflict Free” or “Not been found to be DRC Conflict Free” per the 2014 ruling in favor of US manufacturers vs the SEC Dodd-Frank Conflict Minerals Act. In that lawsuit the requirement to label products with their status as it pertains to “DRC Conflict Free” or “Not been found to be DRC Conflict Free” was found to be unconstitutional, citing first amendment infringement.
 - 6.2.7.2 Each year, Integer will file the Form SD to the SEC by May 31. The Form SD will contain this Policy, a disclosure regarding our Conflict Mineral determination, a brief description of the RCOI conducted and the results of the inquiry. In addition, the Form SD disclosure will be available on the Integer public website for one year.