



Conflict Minerals Policy

The ores from which gold, tantalum, tin and tungsten are derived, that come from the Democratic Republic of Congo (DRC) and adjoining countries (the “Conflict Region”) may be making their way into the medical device industry supply chain. Some mining operations in the Conflict Region have been linked to poor labor and environmental practices, and there is evidence that they are supporting the on-going conflicts in that region. As part of the Dodd-Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) passed legislation which requires U.S. listed companies to report on the origin of these conflict minerals including tin, tantalum, tungsten and gold.

Perseon Corporation is committed to ethical practices and compliance with all applicable laws and regulations. While we do not source these metals directly, they may exist in the materials and components we source. We are therefore committed to working with our customers and suppliers to responsibly source the materials and components we use in manufacturing our customers’ products which may contain these minerals.

To comply with the SEC reporting regulations relating to conflict minerals, Perseon Corporation requests chain of custody declarations from our suppliers to question the origin of the conflict minerals contained in their products. The process of tracing the conflict minerals through the supply chain is complicated. Therefore, we will look to industry initiatives, such as the Conflict Free Smelter Program, the Electronic Industry Citizenship Coalition® (EICC®) and The Global e-Sustainability Initiative (GeSI) for assistance and resources in complying with the SEC reporting requirements on conflict minerals.

Perseon Corporation’s efforts will be geared towards procuring conflict minerals from responsible sources in the Conflict Region. For this purpose, we are in the process of developing programs and practices that are intended to maintain, as necessary and appropriate, records of supplier verifications for both internal and/or external audit. We will expect suppliers whose products contain conflict minerals to establish policies, due diligence frameworks, and management systems consistent with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas that are designed to accomplish this goal, and require their suppliers to do the same.