



POLICY NO. 50-0021
REVISION LEVEL: C
DATE EFFECTIVE: 09/29/2015

TITLE: CONFLICT MINERALS

AFFECTED LOCATIONS

All locations		

CHANGE HISTORY

REV	ECO NO.	DESCRIPTION	APPROVAL / DATE		
			Corporate Process Owner	CFO	VP, Corporate Quality & Regulatory
B	41396	Correct Typos and Language	A.Vanasse 02/20/14	S. Longval 02/19/14	G. Gruenhagen 02/19/14
C	43945	Major Rewrite; Update to 2015 Status	A. Vanasse 09/28/15	S. Longval 09/28/15	G. Gruenhagen 09/28/15

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STATEMENT

IntriCon understands the seriousness that profits from mining in conflict areas may be encouraging certain unfair labor practices or other human rights violations in the Democratic Republic of Congo (DRC).

IntriCon has determined it will not manufacture or produce products containing certain minerals mined from the DRC or its adjoining countries (Affected Countries) where proceeds of the mining activities have been used to finance unlawful armed groups committing atrocities in those war-torn countries. These “conflict minerals” are gold, wolframite, cassiterite, columbite-tantalite, and their derivative metals, which include tin, tungsten and tantalum (3TG).

If IntriCon is made aware of a supplier using conflict minerals sourced from the Affected Countries which may finance armed conflict, it will implement appropriate action, which may include seeking alternative sourcing.

IntriCon will rely on the EICC / GeSI Conflict-Free Smelter Program independent third party audits to supplement internal due diligence of conflict mineral suppliers.

IntriCon fully supports Section 1502, “Conflict Minerals” of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and will comply with all reporting requirements.

This policy applies to all IntriCon facilities and subsidiaries.

REFERENCE DOCUMENTS

Conflict Minerals Letter to Supplier	Form 52-0044
Conflict Minerals – Corporate Procedure	51-0015

DEFINITIONS

3TG – Acronym referring to the conflict minerals Tin, Tantalum, Tungsten and Gold.

Approved Supplier CM List – An Excel worksheet that lists all suppliers and information regarding contact dates and efforts taken to obtain a Conflict Mineral Report from the supplier.

CFSI – Conflict-Free Sourcing Initiative; a coalition of the EICC and the GeSI

CFSP – Conflict-Free Smelter Program

CMR – Conflict Minerals Report

CMRT – Conflict Minerals Reporting Template

DRC – Democratic Republic of Congo

EICC – Electronic Industry Citizenship Coalition

GeSI – Global e-Sustainability Initiative

RCOI – Reasonable Country of Origin Inquiry

SEC – United States Securities and Exchange Commission

POLICY

1. GENERAL:

- 1.1. IntriCon will assure to the best of its ability that no product includes conflict minerals from Affected Countries that support unlawful armed conflict.
- 1.2. A Conflict Minerals Team will be maintained, comprised of representatives from Corporate Finance, Quality and Regulatory, and Supply Chain Management.

The team must include Corporate Controller, and Vice President, Corporate Quality Assurance and Regulatory Affairs.

2. DUE DILIGENCE:

- 2.1. Suppliers are expected to supply materials to IntriCon that are “DRC conflict-free.” DRC conflict-free means, any conflict mineral necessary to the functionality or production of supplied materials that do not directly or indirectly finance unlawful armed groups through mining or mineral trading in the Affected Countries, or any 3TG in supplied materials that are from recycled or scrap sources.

Suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems.

- 2.2. A statement will be included on purchase orders requiring that products and materials sold to IntriCon will not contain conflict minerals from the affected countries that support unlawful armed conflicts.
- 2.3. Applicable IntriCon Procedures must include steps to identify suppliers of 3TG, and document the source of the 3TG in product supplied to IntriCon.
- 2.4. Annually, a CMR via a CMRT will be requested from all IntriCon suppliers of product containing 3TG declaring the source of conflict minerals in any product furnished to IntriCon. IntriCon has adopted the EICC / GeSI reporting template available from the CFSI Website.

Smelters reported by suppliers that are identified to be at risk may result in a RCOI to determine the status of the reported smelter(s). The status of smelters that are located in the Affected Countries must be verified to be certified as conflict-free.

If after a good-faith effort to obtain a CMR from the supplier, the report cannot be acquired, IntriCon may document the reasonable efforts taken to obtain this report and close the inquiry.

3. REPORTING:

- 3.1. Section 1502, “Conflict Minerals” of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directs the Securities and Exchange Commission (SEC) to require U.S. publicly traded companies to disclose in filings whether they manufacture products containing 3TG that are necessary to the functionality or production of such products, and to publish a CMR describing the due diligence taken to assure the 3TG did not originate from a mine in the Affected Countries, the proceeds of which may directly or indirectly finance unlawful armed conflict. IntriCon is a publicly traded U.S. company, therefore subject to these reporting requirements.
- 3.2. IntriCon Corporate Finance will prepare a CMR and the associated Form SD by May 31st of each successive year. The report will be filed with the SEC, and a copy uploaded onto the IntriCon Website as required by law.

ADDENDA