



October 4, 2022

Conflict Minerals Sourcing Policy

In 2010, Congress passed the Dodd-Frank Act, which directs the Commission to issue rules requiring certain companies to disclose their use of conflict minerals if those minerals are “necessary to the functionality or production of a product” manufactured by those companies. Under the Act, those minerals include tantalum, tin, gold or tungsten.

Congress enacted Section 1502 of the Act because of concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in the DRC region and is contributing to an emergency humanitarian crisis. Section 1502 of the Act amends the Securities and Exchange Act of 1934 to add Section 13(p).

The Rule applies to a company that uses minerals including tantalum, tin, gold or tungsten if:

- The company files reports with the SEC under the Exchange Act
- The minerals are “necessary to the functionality or production” of a product manufactured or contracted to be manufactured by the company.

ViaMed expects our suppliers to have in place policies and due diligence measures that will enable us to assure within reason that products and components supplied to us containing conflict minerals are in compliance.

In support of this policy, ViaMed will provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the tantalum, tin, tungsten, and gold in our supply-chain are “conflict free.”

A handwritten signature in blue ink, appearing to read 'C. Witham'.

Chris Witham
President
ViaMed Holdings LLC