

## NICOLAY POLICY ON CONFLICT MINERALS

As one of the global market leaders in the development and manufacture of medical device accessories for non-invasive patient monitoring and diagnostic, Nicolay GmbH is committed to ensure the safety, health and protection of people and the environment everywhere in the world.


As required by the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act, HR 4173, Section 1502 ("Conflict Minerals Act"), Nicolay GmbH is working with their suppliers to confirm that their supplies of material do not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or an adjoining country.

Nicolay GmbH will not knowingly purchase raw material supplies that contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or an adjoining country. Due to the complexity of the routes by which metals, and in particular precious metals, are smelted, recycled and sold, including the common practice of commingling ores and scrap from many different sources, it is often impossible for any company to obtain full traceability to an exact origin of all.

However, we will take continuous practical action to seek to ensure that minerals from the conflict region do not enter our supply chain, including obtaining reliable certificates of origin for all materials that might possibly originate in conflict areas or adjacent countries.

If you have specific questions or any additional information is required, please contact Nicolay GmbH at +49 7452 823 0 or by e-mail at [quality@nicolay.de](mailto:quality@nicolay.de).

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