

Everspin Conflict Minerals Policy

Everspin Technologies is committed to adhering the best ethical and socially responsible practices while carrying out its business activities.

As part of this responsibility, the firm will fully comply with all pertinent globally sanctioned laws and regulations. This includes the directly complying to **Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Wall Street Reform Act)** enacted in July 2010 in which all US publicly traded 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.

As currently defined by the SEC, conflict minerals include:


- 1/ Columbite-Tantalite refined to Tantalum
- 2/ Cassiterite refined to Tin,
- 3/ Wolframite refined to Tungsten, and
- 4/ Gold
- 5/ Cobalt – TBD by legislation

Everspin Technologies conducts due diligence by working closely with its strategic suppliers to identify the origin, source and chain of custody of the conflict minerals that were necessary to the functionality or production of the products that we manufactured or contracted to manufacture to ascertain whether these conflict minerals originated in the Democratic Republic of the Congo or an adjoining country (collectively, “Covered Countries”) and financed or benefited armed groups in any of these countries.

Everspin Technologies, expects its direct suppliers:

- To source materials from socially responsible suppliers and manufacturers (and their subsequent next tier suppliers, etc.), to assure compliance to SEC’s conflict mineral regulations, consistent with Everspin Technologies conflict minerals policy.
- Have established plans, when and where applicable, for the use of alternative suppliers, as part of ongoing strategy for elimination in using conflict minerals or derivative minerals sourced from known conflict mineral mines.
- Provide, upon request, evidential data to Everspin showing active management of conflict minerals that includes sourcing information using the RMI Conflict Minerals Reporting Template (CMRT) as a standard.
- Provide chain of custody declarations verifying origin of conflict minerals that may be contained in their products (per SEC regulations).

Per SEC requirements, and on an annual basis, Everspin declares that its Purchasing Terms and Conditions reinforce this subject policy with its suppliers.


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