

# Conflict-Free Minerals

## Conflict-Free Minerals Policy

Everspin strives for a DRC Conflict-Free supply chain by supporting industry-wide efforts to implement due diligence in standards, systems and procedures. In addition to requiring that our suppliers comply with applicable laws, we expect that they source materials from environmentally and socially responsible suppliers and be DRC Conflict-Free.

## Background

In 2010, the U.S. Congress enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank), which required the U.S. Securities and Exchange Commission (SEC) to issue rules requiring certain companies to disclose their use of “conflict minerals”—tantalum, tin, gold or tungsten—that originated in the Democratic Republic of the Congo (DRC) or adjoining countries. In 2012, the SEC adopted rules requiring such companies to disclose their use of such minerals. Companies, including ours, will be required to report on their use of conflict minerals beginning in 2014.

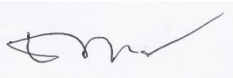
## Everspin’s Engagement

We want our products to be DRC conflict-free. Because of the enactment of Dodd-Frank, we continually work with our existing and new suppliers to develop systems to assist the electronics industry to be able to produce products without minerals that benefit armed groups in the DRC or adjoining countries whose activities are linked to human rights violations and environmental degradation. To produce DRC conflict-free products and comply with the SEC rule mandated by Dodd-Frank, we will continue working with our suppliers.

Through the CFS Program, our internal auditor and supply chain evaluates the procurement activities of smelters and refiners to determine whether the smelter or refiner can demonstrate DRC conflict-free sourcing.

To help suppliers understand and meet our expectations, Everspin implemented Conflict-Free Minerals Requirements for Suppliers through our audit process. The requirements are based on the; OECD (Organization for Economic Co-operation and Development ([OECD](#))) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Area strategies.

In 2013, we surveyed our direct suppliers to assess their conflict minerals usage, *the state of smelters and refiners in the supply chain, and their preparedness for achieving DRC conflict-free status*. As more smelters and refiners are validated through the CFS Program, we will move closer to achieving validated DRC conflict-free status. In the meantime, we intend to work with direct suppliers and smelters and refiners to advocate for participation in the CFS Program.



---

Mehar Mahal, Dir. Of Quality  
Everspin Technologies Inc.

