

Product Components and Conflict Minerals Policy

Purpose of Document

This document addresses policy and procedures at BioTelemetry, Inc. and its subsidiaries Braemar Manufacturing, LLC and Telcare, LLC (collectively, “BioTelemetry” or the “Company”) for the procurement and use of conflict free minerals in the manufacturing of products.

Policy Statement or Applicable Policy(s)

There has been increased awareness of violence and human rights violations in the mining of certain minerals from the Democratic Republic of the Congo and surrounding countries. Companies around the globe have been requested to practice reasonable due diligence with their supply chain to assure that specified metals are not being sourced from mines controlled by non-government military groups, or unlawful military factions in the Conflict Region.

BioTelemetry supports this initiative and has either obtained, or is in the process of obtaining, information from our current metal suppliers concerning the origin of the metals that are used in the manufacture of BioTelemetry products.

This Policy and associated Procedures was adopted to help assure that the Company does not knowingly procure or use Conflict Minerals, unless they originate outside the Conflict Area, or from mines and smelters within the Conflict Area that have been certified by an independent third party as “conflict free.”

BioTelemetry requires its suppliers to undertake documented diligence, as outlined in the OECD Framework, and to develop policies, to assure that Conflict Minerals are being sourced only from outside the Conflict Area or from mines and smelters that have been certified by an independent third party as “conflict free,” such as the EICC/GeSI. BioTelemetry reserves the right to verify the compliance of the Company’s supplies with this requirement.

Suppliers of metals used in the manufacture of BioTelemetry’s products (specifically gold, tin, tantalum, and tungsten) must demonstrate and agree in writing that they understand the Conflict Minerals Laws and will not knowingly procure specified metals that originate from the Conflict Region that are not from mines or smelters that are certified by an independent third party as “conflict free.”

Scope

This policy shall apply to all applicable product manufacturing conducted by the BioTelemetry.

Terms & Definitions

“Conflict Minerals” are defined as columbite-tantalite (coltan), cassiterite, gold, wolframite and three specified derivatives: tin, tantalum and tungsten, regardless of where they are sourced, processed or sold. Other minerals may be designated in the future.

“Conflict Minerals Laws” refers to the body of laws that govern the use and reporting of Conflict Minerals in the manufacturing of products, including, without limitation, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 as it may be amended from time to time, and Rule 13p-1 under the Securities Exchange Act of 1934.

“Conflict Region” or “Conflict Area” refers to the Democratic Republic of the Congo and surrounding countries.

“EICC/GeSI” refers to the Electronic Industry Citizenship Coalition and Global e-Sustainability initiative.

“OECD Framework” refers to the current OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and applicable supplements.

Procedure:

1. BioTelemetry conducts diligence, as outlined in the OECD Framework, to ensure that it does not independently procure Conflict Minerals from any non-certified source within the Conflict Area. The Company reserves the right to verify the compliance by the Company’s suppliers with this requirement.
2. BioTelemetry requires suppliers of components used in the manufacture of Company products to demonstrate, through documented due diligence, as outlined in the OECD Framework, that Conflict Minerals utilized for the manufacture of components on behalf of the Company are not procured from any non-certified source within the Conflict Area.
3. BioTelemetry will require suppliers of components to certify in writing that they do not knowingly procure Conflict Minerals that originate from the Conflict Area that have not been certified by an independent third party as “conflict free.”
4. Should BioTelemetry discover the use of Conflict Minerals considered to be “not conflict free,” in any material, parts or components, the Company procures or produces, the Company expects its suppliers to work towards a process, and to take appropriate actions, to transition such material, parts or components to “conflict free” status.
5. BioTelemetry reserves the right to terminate its relationship with any suppliers that do not meet the requirements described in this Policy.