



Document Type	Policy /Procedure or Work Instruction
<i>Confidentiality Statement</i> <i>This document contains proprietary information and is not to be released outside the Company without approval from the CEO.</i>	Document Control #
Revision #	“A”

Document Title	Product Components and Conflict Minerals Policy
Effective Date:	June 1, 2014
Executive Officer(s) Approval:	<p>_____</p> <p>Joseph H. Capper President & Chief Executive Officer CardioNet, Inc.</p>

1 Purpose of Document

Address policy and procedure for the procurement and use of conflict free minerals in the manufacturing of Braemar Manufacturing, LLC (“Braemar” or the “Company”) products.

2. Policy Statement or Applicable Policy(s)

There has been increased awareness of violence and human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) 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 in the Conflict Region, which is controlled by non-government military groups, or unlawful military factions.

Braemar 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 Braemar products.

Braemar adopts this Policy and associated Procedures to help assure that it 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.”

Braemar will require its suppliers to undertake documented diligence, as suggested by 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 which have been certified by an independent third party as “conflict free”, such as the EICC/GeSI. The Company reserves the right to verify the compliance of the Company’s supplies with this requirement.

Suppliers of metals used in the manufacture of Braemar 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.

3. Scope –

This policy shall apply to all applicable product manufacturing conducted by the Company, as well as the BioTelemetry family of Companies.

4. References – N/A

5. Terms & Definitions –

BioTelemetry Family of Companies – shall include Braemar Manufacturing, LLC, Universal Medical, Inc., as well as any other entity owned by BioTelemetry who is deemed by Conflict Minerals Laws to be an applicable manufacturer of product.

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 area of the world situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries.

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

OECD Framework – refers to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Second Edition OECD 2013).

6. Responsibilities – N/A

7. Procedure:

1. Braemar will undertake diligence, as suggested in the OECD Framework, to insure that it does not independently procure Conflict Materials from any non-certified source within the Conflict Area. The Company reserves the right to verify the compliance of the Company's supplies with this requirement.
2. Braemar will require suppliers of components used in the manufacture of Braemar products to demonstrate, through documented due diligence, as suggested in the OECD Framework, that Conflict Materials utilized for the manufacture of components on behalf of Braemar are not procured from any non-certified source within the Conflict Area.

3. Braemar will require suppliers of components to certify in writing that they do not knowingly procure Conflict Minerals that originate from the Conflict Region.
4. Should Braemar discovers 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. Braemar reserves the right to terminate its relationship with any suppliers that do not meet the requirements described in this Policy.

8. Departmental Approvals Required – N/A

9. Revision Record – N/A