

iCAD, Inc

Conflict Mineral Policy

March 12, 2019

iCAD, Inc and its subsidiaries are committed to responsible sourcing of products and compliance with the Dodd Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”). The Dodd-Frank Act requires manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals in a manner or amount necessary to the functionality or production of those products. Conflict Minerals are currently defined as, tin (Sn), tantalum (Ta), tungsten (W), and gold (Au), (collectively known as “3TG”), and are mined from the Democratic Republic of Congo (“DRC”) and its neighboring countries (“Conflict Area”).

In support of this initiative and iCAD’ s commitment to responsible sourcing, the Company has adopted the following policies: The Company

- Will not knowingly procure conflict minerals (3TG) that originate from facilities in the Conflict Area that are not certified as conflict free.
- Will exercise due diligence to establish reasonable country of origin for the use of Conflict Minerals in our products to ensure that the Conflict minerals used are not sourced from Conflict Areas.
- Supports industry initiatives such as the joint Electronic Industry Citizen Coalition (EICC) and the Global e-Sustainability Initiative (GeSI) which is taking action to address responsible sourcing through the development of the Conflict-Free Smelter (CFS) program aiming to enable companies to source conflict-free minerals, and use those guidelines to establish our policies.
- Expects its suppliers of conflict minerals to establish policies and due diligence frameworks consistent with our policies to eliminate the use of Conflict Minerals in their products. The Company will not knowingly use a supplier that does not support these initiatives.
- Expects its suppliers to report to the Company on an annual basis on such supplier’s use of Conflict Minerals.