

NantHealth, Inc.
Conflict Minerals Policy
May 2019

Certain minerals originating from an area known as the “Conflict Region,” the Democratic Republic of the Congo (“DRC”) and surrounding countries, are sometimes mined and sold under the control of armed groups to finance conflict characterized by extreme levels of violence. Through the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, publicly traded companies must report on the due diligence performed on their supply chain to determine if these “Conflict Minerals” used in their products are being sourced from mines controlled by non-government or unlawful military groups within the Conflict Region. The definition of Conflict Minerals is tin, tantalum, tungsten and gold (“3TG”).

Tracing materials back to their mine of origin is a complex endeavor. NantHealth, Inc. (the “Company”) will look to industry guidelines for guidance, such as the joint Responsible Business Alliance and the Global e-Sustainability Initiative which is taking action to address responsible sourcing through the development of the Responsible Minerals Assurance Process program aiming to enable companies to source conflict-free minerals.

In the development and implementation of processes to support the objectives of the U.S. regulations on the sourcing of Conflict Minerals within its supply chain, the Company will:

- Develop policies and processes that are intended to prevent or eliminate the use of Conflict Minerals necessary to the functionality or production of its products that finance or benefit armed groups in the Conflict Region.
- Not knowingly procure Conflict Minerals that originate from facilities in the “Conflict Region” that are not certified as conflict free.
- Provide, and expect its suppliers to cooperate in providing, due diligence information to confirm the 3TG in the Company’s supply chain are conflict free.