Policy Statement regarding Conflict Minerals

Key Surgical is the leading provider of sterile processing and O.R supplies; serving the needs of hospitals, surgical centers and more throughout the U.S. and internationally. Committed to manufacturing and distributing the highest quality product, Key Surgical maintains the highest level of applicable ISO and FDA requirements.

Key Surgical supports the efforts of human rights organizations to end violence and atrocities in Central Africa and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda. Like many companies in the medical device industry, Key Surgical manufactures products that contain tungsten carbide as they are required for the functional performance of the products. Key Surgical does not purchase these metals directly from smelters or mines; therefore, we must rely on the source information provided by our suppliers. Our suppliers are expected to adopt policies and management systems with respect to conflict minerals and to require their suppliers to adopt similar policies and systems.

Under the definition of "Democratic Republic of Congo (DRC) Conflict-Free", products supplied to Key Surgical that contain tungsten carbide will either originate outside the DRC, come from scrap or recycled sources, or be supplied from smelters that have been validated by an independent private sector party to be conflict-free. A list of compliant smelters and refiners that are audited globally through the conflict free smelter (CFS) protocol is listed at conflictfreesmelter.org.

Key Surgical products do not contain conflict minerals and we will continue to directly survey our suppliers as part of our conflict minerals due diligence compliance.

KEYSURGICAL

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