

Natus Medical Incorporated (“Natus”) has adopted this Conflict Minerals Policy (the “Policy”) in connection with its compliance with all applicable Securities and Exchange Commission Rules (the “Conflict Minerals Rules”). The purpose of the Conflict Minerals Rules are to reduce funding for armed groups committing human rights abuses in the eastern Democratic Republic of the Congo (the “DRC”), by encouraging responsible sourcing from the DRC and its surrounding countries through greater transparency. To help achieve that purpose, the Conflict Minerals Rules require U.S. publicly-traded companies such as Natus that manufacture or contract to manufacture products that contain tin, tantalum, tungsten or gold (“3TG”) that is necessary to the functionality or production of the products to publicly report annually on the source of the necessary 3TG in the products.

In addition to complying with the Conflict Minerals Rules, Natus more generally seeks to ensure that the 3TG in its products that comes from conflict-affected or high-risk areas anywhere in the world, beyond just the DRC region, is responsibly sourced. To help Natus meet this goal, it follows the applicable processes and procedures in the Organisation for Economic Co-operation and Development's OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its related supplements (the “OECD Guidance”).

Supplier Expectations

To enable Natus to satisfy the requirements of the Conflict Minerals Rules, and in furtherance of its commitment to responsible 3TG sourcing, Natus expects its suppliers to:

- Source 3TG from sources that do not support conflict and, where possible, source from smelters and refiners that are conformant with an independent “conflict free” assessment protocol;
- Establish procedures for the traceability of 3TG in their supply chains, and promptly provide Natus with such supply chain information as it may request from time to time;
- Adopt a risk mitigation strategy to respond to identified risks in the supply chain;
- Otherwise establish policies, due diligence frameworks and management systems consistent with this Policy and the OECD Guidance; and
- Require their direct and indirect suppliers to adopt policies and procedures that are consistent with this Policy.

Suppliers are expected to fully comply with this Policy. Natus may take compliance with this Policy into account in connection with sourcing decisions.