



## **Omnicell Conflict Minerals Policy**

Omnicell is committed to complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (DF1502) relating to the use of so-called 'conflict minerals' – tin, tantalum, tungsten and gold in its products. DF1502 requires SEC issuers, including Omnicell, to conduct a reasonable country of origin inquiry (RCOI) and due diligence as necessary on the origin of 'conflict minerals'. Omnicell's policy and management systems governing due diligence on conflict minerals are designed to be in conformance with the internationally recognized OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Omnicell follows the 5-step process recommended by the Guidance which prescribes setting up a company policy, strong management systems, conducting risk assessments for conflict minerals, carrying out risk mitigation and reporting on activities.

### **Omnicell's Responsibilities**

It is the policy of Omnicell to conform to DF1502 regarding the sourcing of conflict minerals that are used in our products. Consequently, Omnicell commits to taking reasonable measures in accordance with its position in the conflict minerals supply chain to source conflict free minerals from smelters approved by the Conflict Free Smelter Program (CFSP) developed by the Electronic Industry Citizenship Coalition (EICC) and Global e-Sustainability Initiative (GeSI). Omnicell requests suppliers within scope that provide products where the conflict minerals are necessary to the functionality or production of its products to do the same.

Where suppliers within scope do not source from CFSP verified smelters, Omnicell will request they do so. Omnicell will also support industry wide initiatives by requesting suppliers report using of the EICC-GeSI Conflict Minerals Reporting Template (CMRT) to undertake the RCOI.

### **Supplier Responsibilities**

Omnicell requests suppliers within scope of its conflict minerals policy to be aware of DF1502 requirements and to respond in a timely manner to requests to provide the CMRT as a key part of Omnicell's RCOI process. We recognize that our compliance with these obligations will require time and effort from the members of our supply chain. However, we expect that suppliers will take reasonable, good faith steps toward assisting Omnicell in achieving its compliance obligations.

Suppliers within scope of Omnicell's conflict minerals policy will be requested to provide evidence on an annual basis that they source solely from CFSP approved smelters. Suppliers may also be request to provide details of their own conflict minerals due diligence program upon request.

### **Grievance Mechanism**

If suppliers or external parties have any questions or concerns about Omnicell's Conflict Minerals Policy, please email us at [conflictminerals@omnicell.com](mailto:conflictminerals@omnicell.com).