



<b>Department: Legal</b>		<b>Procedure/Work Instruction No:</b>
		<b>Effective Date: February 22, 2021</b>
		<b>Revision: 5.0</b>
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# Conflict Minerals Policy

	<b>Name</b>	<b>Title</b>	<b>Signature at Source</b>	<b>Date</b>
<b>Approver:</b>	Audit Committee			May 2017
<b>Approver:</b>	Lilach Payorski	CFO		May 2017
<b>Policy Owner:</b>	Vered Ben-Jacob	VP. Head of Legal		May 2017

**Revision Control:**

<b>Revision</b>	<b>Eff. Date</b>	<b>Approver</b>	<b>Description</b>
1.0	April 2014	Audit Committee	Initial Release
2.0	May 2017	Audit Committee	Policy updates
3.0	May 2019	CFO	Update references from CFSI to RMI.
4.0	May 2020	Audit Committee	Policy updates
5.0	Feb 2021	Audit Committee	Policy updates

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## 1. SCOPE

This Policy applies to all Stratasys legal entities worldwide, owned directly or indirectly by Stratasys.

## 2. PURPOSE


Stratasys' Code of Business Conduct and Ethics (the “Code”) defines Stratasys' general principles of and commitment to the highest standards of legal and ethical conduct in carrying out its business activities. Stratasys prohibits human rights abuses associated with the extraction, transport or trade of minerals. Stratasys also prohibits any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. In accordance with the Code, Stratasys has a no-tolerance policy with respect to corruption, money-laundering and bribery in regard to the mining activities of its supply chain.

As Stratasys strive to ensure our staff's compliance with these standards, Stratasys expects and encourages our partners, subcontractors and suppliers to conduct themselves in accordance with the principals set forth in the Code. This Conflict Minerals Policy, which is an integral continuation of the Code, provides more specific details and guidance regarding illegal trade of natural resources.

Stratasys sees a direct link between the illegal extraction and trade of natural resources, and any associated human rights violations, conflict and environmental degradation, and is committed to conduct itself in a manner that discourages and eliminates these negative effects. In 2010, the US Government enacted the Dodd-Frank Act which requires publicly traded companies to disclose their use of conflict minerals from the Democratic Republic of the Congo (DRC) if those minerals are necessary to the functionality or production of a product. The four raw materials subject to this reporting is tantalum, tin, tungsten and gold (also known as 3TGs). In January 2021, the European Commission's Conflict Minerals Regulation, Regulation 2017/821 ("EU Conflict Minerals Regulation"), came into effect. The EU Conflict Minerals Regulation expands on the US SEC's Conflict Minerals Rule to include and target Conflict Minerals originating from conflict-affected or high-risk areas ("CAHRAs"), which are not limited to specific geographical locations. According to the regulation, EU importers of 3TGs should follow responsible sourcing standards. It is expected that our suppliers provide Stratasys information regarding Conflict Minerals within the DRC and CAHRAs. While Stratasys does not generally procure metals directly, and only a fraction of the world's minerals production originates from the DRC or CAHRAs, Stratasys is taking action to increase transparency and ensure responsible procurement from and by our suppliers and manufacturers.

## 3. RESPONSIBILITIES

Stratasys Chief Financial Officer is responsible for the implementation and enforcement of this Policy, which will be reviewed regularly and updated as needed. Concerns and violations of this Conflict Minerals Policy should be reported to Stratasys' Chief Financial Officer (at [Lilach.Payorski@stratasys.com](mailto:Lilach.Payorski@stratasys.com)) and/or Vice President, Head of Legal (at [Vered.BenJacob@stratasys.com](mailto:Vered.BenJacob@stratasys.com)).

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Suppliers and other external parties are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this approach.

#### 4. POLICY

##### 4.1. Stratasys' Activities and Supplier Requirements

Stratasys conducts its business in compliance with applicable laws and is generally committed to drive best industry practices in its operations.

Stratasys applies the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and requires its suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten, and/or gold (i.e. “3TG”) to commit to sourcing those materials from environmentally and socially responsible sources only, and in compliance with section 1502 of the Dodd- Frank Wall Street Reform and Consumer Protection Act of 2010 (the “**Dodd-Frank Act**”) and related OECD guidance.

In order to trace back mineral flows and ensure commitment to sustainable procurement, in 2013 Stratasys adopted the standardized Responsible Minerals Initiative's (RMI, formerly known as the CFSI) Conflict Minerals Reporting Template (“**CMRT**”) to map and monitor its suppliers' compliance. Stratasys reserves the right to request further evidence of the chain down to mine level when necessary.

Once mechanisms are available, Stratasys will request its suppliers to ensure that metals, which are necessary to the functionality or production of its products, originated from smelters or refiners (SORs) that have been validated, approved, or are in the process of such validation or approval, by an independent third party audit body such as the RMI.

Stratasys communicates this Conflict Minerals Policy to its suppliers and expects its suppliers to comply with it. Stratasys encourages its suppliers to define, implement and communicate to their suppliers and stakeholders their own policy, outlining their commitment to responsible sourcing of these materials, legal compliance and measures for implementation. In addition, suppliers shall work with their suppliers to ensure traceability of these materials at least to the smelter or refiner level, e.g. by using the then most current version of the RMI's CMRT. Stratasys relies on industry initiatives, such as the Responsible Minerals Assurance Process (RMAP, formerly the Conflict-Free Smelter Program), to validate that the metals that are necessary for the production or functionality of its products do not directly contribute to conflict or the propagation of human rights abuses and that they come from sustainable sources.

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**4.2. Assessing and Responding to the Identified Risks**

Stratasys collects information from its suppliers (as described above), to assess risks of non-compliance with this Conflict Minerals Policy.

Stratasys’ approach is to establish long-term relationships with its suppliers, to seek sustainable solutions, and work with its suppliers to drive improvements. If a reasonable risk of supplier violation of this Conflict Minerals Policy is identified, Stratasys will work with the supplier to commit to and implement a corrective action plan within a reasonable timeline. Stratasys follows up on the effectiveness of corrective actions and may conduct on-site assessments as necessary. Continued non-conformance and refusal to address issues of concern may lead to suspension and/or termination of the supplier engagement.

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