Policy Statement on Conflict Minerals

Clover Imaging ("Clover") supports the humanitarian goal of ending violent conflict in Central Africa (the Democratic Republic of Congo (DRC) and surrounding countries of Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda) by adopting a policy on Conflict Minerals.

In response to the conflict, the Securities and Exchange Commission (SEC) promulgated the Conflicts Minerals rule to help end violence and human rights abuses by armed militant groups in the DRC Region by denying revenue to those groups that derive their funding from the control of mines in the region that product Conflict Minerals. In August of 2012 the SEC approved the final rule regarding the sourcing of Conflict Minerals as defined in the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. Under this rule, publicly traded companies must report annually to the SEC the presence of Conflict Minerals originating from the DRC in either the products they manufacture or contract to manufacture, or use in the production process. Conflict minerals are defined as the minerals tin, tungsten, tantalum and gold.

Clover is not a publicly traded company nor do we directly purchase raw minerals that may be used in the manufacture of our products from smelters or mines. We do, however, use suppliers whose products may contain these minerals. In order to commit to responsible sourcing of Conflict Minerals throughout our supply chain we require our suppliers to submit certain information about any Conflict Minerals in the products or components they supply to Clover including, if known, the country of origin and the smelter(s) or refiner(s) used to process the Conflict Minerals.

Clover establishes compliance requirements for our direct suppliers regarding Conflict Minerals and provides them with the tools to facilitate reporting to the SEC. We will continue to evaluate our policies to ensure compliance and make adjustments where necessary.