

## Operating with Integrity

# Conflict Minerals Policy Statement

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted a final rule to implement reporting and disclosure related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rule requires manufacturers who are SEC filers to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are necessary to the functionality or production of these products.

Conflict minerals refer to tin, tantalum, tungsten and gold (commonly referred to as “3TG”), regardless of where they are sourced, processed or sold. The final rule is intended to bring greater supply chain transparency to the use of such minerals originating from the Democratic Republic of Congo and adjoining countries in an effort to help end the violent conflict that has been financed, in part, by the exploitation and trade of conflict minerals.

Tin, tungsten, tantalum and gold are essential in the manufacture of a variety of electronic and medical devices and other products, including some Owens & Minor products. Owens & Minor is committed to institute procedures and reporting systems and to conduct the necessary diligence to comply with the final rule.

Specifically, we are:

1. Using a reasonable due diligence process that conforms to the Organization for Economic Cooperation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and we are working closely with our suppliers to determine the presence of 3TG’s in our supply chain.
2. Taking steps to determine the use, country of origin, and chain of custody of 3TG’s in our global product portfolio.
3. Committed to improve, over time, the ability to track and trace conflict minerals in our supply chain.

Owens & Minor sources from numerous suppliers and a large number of our suppliers, and their suppliers, are private companies or international companies that are not subject to SEC regulations. Owens & Minor must, therefore, rely on the cooperation of its suppliers in the implementation of this policy and in enabling Owens & Minor to meet its SEC disclosure and reporting obligations in a timely manner. Owens & Minor expects its suppliers to undertake reasonable due diligence within their supply chains to determine the origin of the conflict minerals contained in materials and products they supply to Owens & Minor. Owens & Minor will assess our relationship with, and possibly suspend or discontinue our engagement with, any upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses or providing direct or indirect support to non-state armed groups.