

## **KNOLL CONFLICT MINERALS SOURCING POLICY**

**Background.** In 2010, Congress enacted the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) to address the exploitation and trade of certain minerals which contribute to violence and human rights abuses in the Democratic Republic of the Congo (the “DRC”) and its neighboring countries. In 2012, the SEC adopted rules implementing the conflict minerals provisions of the Dodd-Frank Act (the “Conflict Minerals Rules”). The Conflict Minerals Rules require public companies to disclose annually whether the products they manufacture or contract to manufacture for which Conflict Minerals are necessary to the functionality or production of those products contain Conflict Minerals that originated in any “Covered Countries,” and, if so, provide information about the source and chain of custody of those Conflict Minerals. The “Conflict Minerals” for the purposes of the Conflict Minerals Rules are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten).<sup>1</sup> The “Covered Countries” for the purposes of the Conflict Minerals Rules are the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

**Our Policy, Our Commitment.** Knoll supports the Dodd-Frank Act’s goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals in that region. We are committed to responsibly sourcing products, including Conflict Minerals, from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. As a result, we support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals, and expect that all of our suppliers will partner with us to (i) provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the Conflict Minerals Rules, and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that are DRC Conflict Free.<sup>2</sup> We are committed to working with our suppliers to educate them about these issues and the steps that they can take to increase the transparency of the supply chain and to ensure that products and materials in the supply chain are DRC Conflict Free. Accordingly, we have adopted this Conflict Minerals Sourcing Policy, and we expect that our suppliers will adopt a similar policy and meet our expectations set forth below.

**Our Expectations for Suppliers.** Suppliers are expected to:

- Source Conflict Minerals only from parties that are DRC Conflict Free;
- Develop policies, procedures, due diligence processes and management systems that:
  - Are consistent with this Knoll Conflict Minerals Sourcing Policy,
  - Are reasonably designed to prevent products or materials that are not DRC Conflict Free from entering our supply chain,

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<sup>1</sup> The U.S. Secretary of State may designate other additional minerals in the future to be added to this list.

<sup>2</sup> For purpose of the Conflict Minerals Rules, “DRC Conflict Free” means that products do not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries.

- Provide reasonable transparency as to the source of any Conflict Minerals,
  - These efforts include holding direct and indirect suppliers to the same standards;
- Provide any information necessary to facilitate our compliance efforts with respect to the Conflict Minerals Rules; and
- Advise us as promptly as possible of any determination that any products or materials in the supply chain are not DRC Conflict Free.

In addition, suppliers are encouraged to support industry efforts to enhance the traceability and responsible sourcing of Conflict Minerals, such as the programs of the Electronic Industry Citizenship Coalition, Global e-Sustainability Initiative, and Conflict-Free Smelter Compliant Smelter List.

We evaluate our relationships with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this Knoll Conflict Minerals Sourcing Policy. If we determine that a supplier's efforts are deficient, we reserve the right to re-evaluate the supplier relationship and to take any appropriate action, including terminating our relationship with the supplier.

Nothing in this Knoll Conflict Minerals Sourcing Policy is intended to in any way grant any additional rights or expectations to any of our suppliers, or in any way modify or otherwise limit our contractual or legal rights.

**Additional Information.** Our employees, suppliers and other interested parties may contact us regarding this Knoll Conflict Minerals Sourcing Policy at: [Knollconflictminerals@knoll.com](mailto:Knollconflictminerals@knoll.com).