

INOGEN, INC.
Conflict Minerals Policy
Originally adopted August 4, 2015,
amended and restated June 29, 2017

As a leading provider of innovative oxygen concentrators, Inogen, Inc. (together with its subsidiaries, “Inogen”) sources the materials and components for its products from world-class suppliers. Inogen’s supply chain spans the globe, with suppliers in many countries.

Each of Inogen’s suppliers also has its own suppliers for the materials used in Inogen’s products. In particular, one or more of the following minerals may be used in the manufacture of Inogen products: gold, tantalum (columbite-tantalite ore and its derivatives), tin (cassiterite ore and its derivatives), and tungsten (wolframite ore and its derivatives).

The United States government has identified these four minerals as being potentially “conflict minerals” originating in the Democratic Republic of the Congo (DRC) or certain adjoining countries. In August 2012, the Securities and Exchange Commission adopted requirements requiring publicly-traded companies to report annually concerning the presence of “conflict minerals” that are necessary to the functionality or production of products they manufacture or contract to manufacture.

To ensure that no conflict minerals are used in its products, Inogen has notified suppliers of materials and components for its products that, to the best of their ability or knowledge, they are not to source any conflict minerals and use them in any components supplied for use in Inogen products. Additionally, Inogen requires each of its suppliers to complete the Electronics Industries Citizenship Coalition (EICC) Conflict Minerals survey and to comply with the EICC Code of Conduct, which requires that suppliers have a policy to reasonably assure that the tantalum, tin, tungsten, and gold in the products they manufacture are conflict-free. Suppliers must ensure that all parts supplied to Inogen originated from certified conflict-free smelters validated as compliant to the EICC Conflict-Free Smelter (CFS) protocol, using the CFS Compliant Smelter list. The CFS program is a global program where an independent third party evaluates a smelter’s procurement activities and determines if the smelter demonstrated that materials they processed originated from conflict-free sources. Through this industry collaborative effort, smelters are audited globally. The list of compliant smelters and refiners is posted at www.conflictreesmelter.org.

Inogen expects its suppliers to use materials that are environmentally safe and sourced from socially responsible suppliers.

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