

## **Neuronetics, Inc.**

### **Policy on Conflict Minerals**

Neuronetics, Inc. (“Neuronetics”) fully supports the goals and objectives of Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act (the “Act”), which aims to reduce violent conflict in the Democratic Republic of the Congo and certain adjoining countries (the “Conflict Region”), by providing transparency regarding the use of certain minerals that finance or benefit armed groups in the region. These minerals include columbite-tantalite (coltan) (i.e., tantalum), cassiterite (i.e., tin), gold, wolframite (i.e., tungsten) or their derivatives (“Conflict Minerals”) and could expand to include other minerals or their derivatives, as determined by the U.S. Secretary of State.

Under Section 1502 of the Act, as well as the related rules issued by the U.S. Securities and Exchange Commission, Neuronetics is required to report to the SEC the presence of any Conflict Minerals, originating in the Conflict Region, in the products it manufactures or contracts to manufacture, if the Conflict Minerals are necessary to the functionality or production of the products. In connection with our due diligence review of our supply chain, Neuronetics will follow the Organisation for Economic Cooperation and Development Framework and utilize the reporting template developed by the Electronic Industry Citizenship Coalition, Incorporated & Global e-Sustainability Initiative to obtain information from our suppliers, in conformance with IPC-1755 (e.g., CMRT).

We will work with our suppliers to determine the potential use of Conflict Minerals in our supply chain and, where appropriate, work with them to remediate issues and source more responsibly. We will expect our suppliers to conduct the necessary inquiry and, where appropriate, additional due diligence to provide us with confirmation of the source of the materials used in their processes and ultimately contained in our products. As a leading manufacturer of products for the mental health industry, Neuronetics is committed to supporting efforts to reduce violence and human rights violations in the Conflict Region.

Concerns or reports of possible violations of this policy can be reported confidentially at 877-472-2110.