

NETGEAR®

Conflict Minerals Sourcing Policy

NETGEAR is deeply concerned that “Conflict Minerals”¹ originating from Democratic Republic of Congo (DRC) or adjoining countries are sometimes mined and sold by armed groups to finance extreme levels of violence. These minerals can make their way into the supply chains of the products used around the world, including those in the electronics industry. As a part of NETGEAR’s commitment to corporate responsibility and respecting human rights, it is NETGEAR’s goal to use tantalum, tin, tungsten and gold (3TG) in our products that do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

The U.S. Securities and Exchange Commission (“SEC”) has adopted rules regarding disclosure and reporting requirements with respect to “conflict minerals” as required by the Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require publicly traded companies in the U.S. to disclose the presence and country of origin of 3TG that are necessary to the functionality or production of their products.

NETGEAR has been working closely with the Responsible Business Alliance (RBA) (formerly the Electronic Industry Citizenship Coalition (EICC)), Responsible Minerals Initiative (RMI) (formerly Conflict-Free Sourcing Initiative (CFSI)) Smelter Engagement Team (SET) and our direct suppliers to trace 3TG back to their origin in order to ensure responsible sourcing.

If NETGEAR becomes aware of a supplier whose supply chain includes minerals from a conflict source, NETGEAR will take the appropriate actions to engage supplier in measurable risk mitigation efforts that are consistent with the OECD Guidance, including but not limited to reassessment of supplier relationships, to achieve its commitment. NETGEAR expects our suppliers to take similar measures with their suppliers to ensure alignment throughout the supply chain.

Feedback or violations regarding execution of this policy can be reported: online: www.openboard.info/ntgr or email: ntgr@openboard.info

Sincerely,



Michael Falcon

Chief Operations Officer

NETGEAR, Inc.

May, 2019

¹ “Conflict Minerals”, as defined by the U.S. Securities and Exchange Commission (SEC), means tin, tantalum, tungsten and gold regardless of whether these minerals finance conflict in Democratic Republic of the Congo or adjoining countries.