

1.0 Purpose

- 1.1 The purpose of this Policy is to ensure that iRhythm Technologies, Inc. (“iRhythm” or “Company”) complies with all federal laws regarding conflict minerals in the Company’s supply chain.

2.0 Scope

- 2.1 This Policy applies to all iRhythm products manufactured by or contracted to manufacture by iRhythm anywhere in the world, which will include all products that contain potential conflict minerals necessary to the functionality or production of the products.

3.0 Definitions

- 3.1 **Conflict Minerals:** Any minerals originating in the Democratic Republic of Congo, or neighboring countries, used in the presence of manufacturing or contract to manufacturing of iRhythm products. The metals are identified as tantalum, tin, gold, and tungsten (“3TG”).

4.0 Responsibilities

- 4.1 **Manufacturing:** The senior most leader in the Manufacturing department is responsible for the interpretation and implementation of this Policy.
- 4.2 **Chief Compliance Officer (“CCO”):** The CCO oversees compliance with this Policy.

5.0 Policy

- 5.1 **Conflict Minerals.** Under Section 1502 of the Dodd-Frank Act, the U.S. Securities and Exchange Commission (“SEC”) established a rule requiring publicly traded companies to annually report the use of conflict minerals originating in the Democratic Republic of Congo (DRC) or neighboring countries in the production of their products where the minerals are necessary to functionality of the product.
- 5.2 **Company Commitments.** iRhythm is committed to taking steps necessary to comply with the Dodd-Frank Act, including implementing appropriate due diligence processes to meet such obligations. iRhythm is committed to sourcing materials from suppliers that share its values around human rights, ethics, and environmental responsibility.
- 5.3 **Supplier Obligations.** iRhythm expects its suppliers to commit to processes designed to ensure the responsible sourcing of minerals and to reasonably ensure that the tantalum, tin, tungsten, and gold in the products they produce are conflict-free.

- 5.3.1 iRhythm expects suppliers to establish their own due diligence program to achieve conflict-free supply chains.
- 5.3.2 If iRhythm determines a supplier is not conflict-free, iRhythm will expect the supplier to remediate such matters or consider using alternative suppliers.

5.4 **Due Diligence.** To ensure compliance with all applicable laws under the Dodd-Frank Act, the Company conducts due diligence of its suppliers by:

- Requiring all suppliers who provide products or components to iRhythm containing conflict minerals to complete annual surveys regarding the country of origin of conflict minerals contained in such products.
- Requiring that all suppliers agree to cooperate with iRhythm and any due diligence that iRhythm chooses to perform with respect to country-of-origin inquiries.
- Requiring that a supplier, when iRhythm deems necessary, provides reasonable proof of due diligence performed by the supplier to support country of origin certification provided by the supplier to iRhythm.

6.0 References

- iRhythm Code of Conduct
- iRhythm Supplier Code of Conduct
- iRhythm Conflict Minerals Disclosure and Report filed with the SEC