

**VOCERA COMMUNICATIONS, INC.**  
**Conflict Minerals Policy**  
**As adopted: May 21, 2014**

On August 22, 2012, the Securities and Exchange Commission (the “SEC”) adopted a final rule (the “Conflict Minerals Rules”) regarding disclosure of the use of certain minerals (“Conflict Minerals”) originating in the Democratic Republic of the Congo and adjoining countries. These Conflict Minerals are being exploited and traded to finance extreme levels of violence in that geographic area. The Conflict Minerals Rules are mandated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, and establish significant due diligence and reporting requirements for publicly traded companies.

Recognizing the legal and compliance risks and other possible adverse impacts that may be associated with extracting, trading, handling and exporting Conflict Minerals, to the extent that such Conflict Minerals are necessary to the functionality or production of a product manufactured or contracted for manufacture by Vocera Communications, Inc. (“Vocera”), Vocera hereby adopts this Conflicts Mineral Policy (“Policy”) as of the date stated above. This policy, as amended from time to time, will be posted on Vocera’s website (see [www.Vocera.com/corporate-responsibility](http://www.Vocera.com/corporate-responsibility)). Vocera will disseminate this Policy to its suppliers and, subject to each supplier’s position in the supply chain and Vocera’s relative leverage with respect to such supplier, use commercially reasonable efforts to obtain the assent of the supplier to a policy on Conflict Minerals consistent with this Policy.

Vocera’s Board of Directors has delegated to its Nominating and Governance Committee the authority to oversee this Policy and its implementation. Concerned parties can report improper activities in violation of this Conflict Minerals Policy or the Conflict Minerals Rules by reporting such activities to [ConflictMineralsCompliance@Vocera.com](mailto:ConflictMineralsCompliance@Vocera.com).

**Regarding serious abuses associated with the extraction, transport or trade of minerals:**

- I. While sourcing from, or operating in, conflict-affected and high-risk areas, Vocera will not profit from, contribute to, assist with or facilitate the commission by any party of the following:
  - any forms of torture, cruel, inhuman and degrading treatment;
  - any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
  - the worst forms of child labor, as set forth in ILO Convention No. 182;
  - other gross human rights violations and abuses such as widespread sexual violence; or
  - war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

**Regarding risk management of serious abuses:**

- II. If Vocera determines that there is a reasonable risk that a supplier is profiting from, contributing to, assisting with or facilitating the commission by any party of the acts identified in Section I, Vocera will apply a series of escalating risk mitigation measures. Such measures may range from

prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Vocera from the applicable supplier.

**Regarding direct or indirect support to non-state armed groups:**

- III. Vocera shall not, to the best of its knowledge, directly or indirectly support non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals consists of procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who engage in illegal activities such as:
- illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;
  - illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
  - illegally tax or extort intermediaries, export companies or international traders.

**Regarding risk management of direct or indirect support to non-state armed groups:**

- IV. If Vocera determines that there is a reasonable risk that a supplier is sourcing from any party providing direct or indirect support to non-state armed groups as defined in Section III, Vocera will apply a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Vocera from the applicable supplier.

**Regarding public or private security forces:**

- V. Vocera shall not directly or indirectly support public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
- VI. Vocera will, where reasonable and subject to Vocera’s position in the supply chain, support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.
- VII. Vocera will, where reasonable and subject to Vocera’s position in the supply chain, support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

**Regarding risk management of public or private security forces:**

- VIII. If Vocera determines that there is a reasonable risk that a supplier is indirectly or directly supporting public or private security forces in violation of Sections V-VIII above, Vocera will apply a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Vocera from the applicable supplier.

**Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

- IX. Vocera will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

**Regarding money laundering:**

- X. Vocera will, where reasonable and subject to Vocera's position in the supply chain, support efforts, or take steps, to contribute to the effective elimination of money laundering where it identifies a reasonable risk of money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

**Regarding the payment of taxes, fees and royalties due to governments:**

- XI. Vocera will take reasonable efforts to ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments.

**Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money laundering and payment of taxes, fees and royalties to governments:**

- XII. If Vocera determines that there is a reasonable risk that a supplier is engaging in bribery, fraudulent misrepresentation of the origin of Conflict Minerals or money laundering in violation of Sections X and XI above, or is in violation of Section XII above, Vocera will apply a series of escalating risk mitigation measures. Such measures may range from prompt engagement with the supplier to resolve the sourcing issue, to requiring such supplier to implement a risk management plan (which plan may involve, as appropriate, remedial action up to and including disengagement with upstream suppliers), to disengagement by Vocera from the applicable supplier.