Sonic Foundry, Inc. Conflict Minerals Policy May 1, 2014

As part of its commitment to global social responsibility and in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of the 2010 United States Congress, Sonic Foundry prohibits using in its products tin, tungsten, tantalum, or gold from any source whose supply chain, back to the mines of origin of the minerals used to produce these metals, contributes to human rights abuses in the Democratic Republic of Congo or adjoining countries.

Sonic Foundry expects its suppliers to use due diligence to implement policies and procedures throughout the supply chain that are consistent with this policy statement. Due diligence, as used in this policy, generally follows the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (available here: http://www.oecd.org/). Sonic Foundry adopts, and incorporates into this policy, Annex II of this OECD document, which provides substantial policy detail.