

Policy Name: Conflicts Minerals Policy

Effective Date: June 2, 2014

Last Review Date: April 1, 2019

Policy Owner: Compliance and Ethics

Overview & Purpose

In 2012, the Securities and Exchange Commission adopted rules implementing the conflict minerals provisions of the Dodd-Frank Act (the “Conflict Minerals Rules”). This requires public companies to annually disclose information about whether the products they manufacture or contract to manufacture, for which 3TG Minerals are necessary to the functionality or production of those products, contain 3TG Minerals that originated in any of the Covered Countries. If so, information about the source and chain of custody of those 3TG Minerals must also be disclosed.

Applies To:

This Policy applies to McKesson’s employees who manage relationships with suppliers of products to McKesson, its subsidiaries, and its affiliates.

Policy Requirements

Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of 3TG Minerals. As a result, we expect that all of our suppliers will partner with us to provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the Conflicts Minerals Rules. We are committed to working with our suppliers to educate them about these issues and the steps that they can take to increase the transparency of the supply chain.

McKesson suppliers are expected, upon request, to:

- Identify the steps in the supply chain through which 3TG Minerals are introduced, and undertake all due diligence efforts necessary to identify the smelter, refiner and/or mine from which 3TG Minerals originate. This may include requiring direct or indirect suppliers to our suppliers to cooperate in diligence efforts and to provide any information necessary to facilitate our compliance efforts with respect to the Conflicts Minerals Rules;
- Supply us with timely and accurate information regarding the source of 3TG Minerals in our supply chain and the steps that have been undertaken to determine whether such products and materials are DRC Conflict Free, including whether the source has been verified by a recognized, independent third party; and
- Advise us promptly of any determination that any products or materials in the supply chain are not DRC Conflict Free.

We evaluate our relationship our suppliers on an ongoing basis. Although the existence of the Conflict Minerals Rules is no guarantee that our suppliers will be in compliance or cooperate with our requests for additional information, the disclosure requirement is mandatory. If a supplier has failed to comply with this Policy, or if we determine that a supplier’s efforts are deficient, we will take appropriate action, which could result in terminating our relationship with the supplier.

Every McKesson employee has a duty to promptly speak up if he or she becomes aware of a Compliance Concern, which is defined as a good faith belief that McKesson or someone acting on McKesson’s behalf is engaged in conduct that violates the McKesson Code of Conduct, McKesson’s compliance policies, or the laws and regulations governing its business. To report potential violations of this Policy, employees should:

1. Contact their Business Unit Compliance Officer or Business Unit Lawyer;

2. Send an email to conflictsminerals@mckesson.com; or
3. Call McKesson's Integrity Line at 1-877-625-4625. Local toll-free numbers for locations outside of the U.S. are listed at integrity.mckesson.com

McKesson prohibits retaliation against those who, in good faith, raise concerns or ask questions regarding matters of ethics or legal compliance or participate in an investigation.

Nothing in this Policy is intended to modify or otherwise limit our contractual or legal rights.

Key Definitions for this Policy:

3TG Minerals means columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), gold, and any other minerals that the U.S. Secretary of State may designate in the future.

Covered Countries means the Democratic Republic of Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

DRC Conflict Free means that the product does not contain 3TG Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries.

Exceptions

There are no exceptions to this Policy.

Questions and contacts:

If you have questions or need more information about this Policy, contact policy@mckesson.com.

Related Policies & Content:

- [Code of Conduct](#)