



Spok Holdings, Inc. Conflict Minerals Policy

In August 2012, the Securities and Exchange Commission (“SEC”) adopted new rules relating to the use of conflict minerals as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”). The Dodd-Frank Act required the SEC to promulgate rules requiring SEC registrants with conflict minerals, which are necessary to the functionality or production of a product manufactured by the SEC registrant, to disclose annually whether any of those minerals originated in the Democratic Republic of the Congo (“DRC”) or an adjoining country. The goal of the Congressional mandate under the Dodd-Frank Act is to help end civil conflict and human rights abuses in the DRC region committed by armed rebel groups by denying revenue to those groups that derive their funding from control of Conflict Mineral producing mines.

Spok has implemented a program to identify sources of Conflict Minerals as well as human rights violations within our supply chain vendors and support the actions taken by governments and organizations to increase supply chain transparency. Through our research and as defined by the SEC, Spok does not directly purchase raw materials nor does it manufacture or contract to manufacture products that are within the scope of the SEC’s rule. Our commitment is to strive to provide DRC conflict free products by expecting our suppliers to obtain material from environmentally and socially responsible sources. Spok will exercise its right to obtain information annually for our supply chain with regards to minerals that are mined, smelted, or refined utilizing the template for data collection by the Electronic Industry Citizenship Coalition.

Spok fully understands the importance of this issue to its customers, and we have engaged our suppliers to comply with the same. We require our suppliers to work through each of their supply levels to ensure compliance with Section 1502 of the Dodd-Frank Act and ethically source all materials and components from Conflict Mineral free countries as defined by the U.S. Secretary of State. Suppliers are to establish appropriate policies, data exchange methods, due diligence frameworks, risk mitigation strategies and managements



systems designed to accomplish the goal of supply chain transparency. These should be consistent with an internationally recognized diligence framework, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Miners from Conflict-Affected and High-Risk Areas and its applicable supplements. In the case of non-compliance, our suppliers will be reviewed accordingly for future business and sourcing decisions.

This policy, as amended from time to time, will be posted on Spok's website (see www.spok.com). Spok will disseminate this Policy to its suppliers, and subject to each supplier's position in the supply chain and Spok'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.