

Mitcham Industries, Inc.

Policy Regarding Use of Conflict Minerals

The United States Securities and Exchange Commission (“SEC”) has adopted rules to implement reporting and disclosure requirements related to “conflict minerals”, as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank”). These Dodd-Frank provisions seek to help end the violence and human rights violations in the mining and smelting of certain “conflict minerals” from the eastern Democratic Republic of Congo (“DRC”) and surrounding countries. We support the responsible sourcing of these conflict minerals that would deny support to the conflict in the DRC and the adjoining countries and would contribute to restoring economic growth and development in the region.

Dodd-Frank defines conflict minerals as tin, tantalum, tungsten and gold, and such other minerals as the United States Secretary of State may designate in the future. The SEC rules require certain manufacturers to disclose whether the products they manufacture or contract to manufacture contain conflict minerals that are “necessary to the functionality or production” of those products.

Our Seemap segment purchases materials and components such as integrated circuits, electronic components, connectors and metal housings that may contain conflict materials. . We are committed to working with our suppliers in order to work towards responsible sourcing of these materials and to comply with the SEC disclosure requirements regarding “conflict minerals.”

In support of the objectives of Dodd-Frank and the related SEC regulations we have adopted the following goals and commitments:

- We will work towards responsible sourcing of conflict minerals and will not knowingly purchase conflict minerals that originate from the DRC or surrounding areas that either directly or indirectly finance armed groups in the DRC or surrounding countries.
- We will undertake reasonable due diligence, and ask our suppliers to do the same, to seek to avoid purchasing any conflict minerals that would either directly or indirectly finance armed groups in the DRC or surrounding countries.
- We will support the objectives of Dodd-Frank and the related SEC disclosure requirements regarding conflict minerals.
- Our goal is to obtain information about the source of any conflict minerals that may be contained in any parts, components and materials included in our products that may originate from the DRC or any surrounding countries.

Our efforts will include periodic communications with our suppliers that seek information regarding the origin of any conflict minerals included in the parts, components and materials provided to us, supply-chain surveys, supplier training, and other steps addressed at achieving responsible sourcing of conflict minerals.

If we discover the use of conflict minerals in any parts, components or materials we purchase that support or further the conflict in the DRC or the surrounding countries , we will take appropriate actions to work with our supplier to identify alternative sources, with the goal of avoiding any such purchases in the future.