

OOMA, INC. CONFLICT MINERALS POLICY

Background. In 2010, Congress enacted the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") to address the exploitation and trade of certain minerals which contribute to violence and human rights abuses in the Democratic Republic of the Congo (the "DRC") and its neighboring countries. In 2012, the SEC adopted rules implementing the conflict minerals provisions of the Dodd-Frank Act (the "Conflict Minerals Rules"), which require public companies to disclose information annually about whether the products they manufacture or contract to manufacture for which Conflict Minerals are necessary to the functionality or production of those products contain Conflict Minerals that originated in any "Covered Countries," and, if so, information about the source and chain of custody of those Conflict Minerals. The "Conflict Minerals" for the purposes of the Conflict Minerals Rules are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), and the U.S. Secretary of State may designate other minerals in the future. The "Covered Countries" for the purposes of the Conflict Minerals Rules are the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola. We support efforts to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which we understand has been partially financed by the exploitation and trade of Conflict Minerals.

Our Policy. We support the Dodd-Frank Act's goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. We are committed to responsible sourcing of materials for our products, including the sourcing of Conflict Minerals, and we expect that our suppliers are likewise committed to responsible sourcing. We also support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy, and we expect that our suppliers will adopt or have adopted similar policies and meet our expectations set forth below.

Our Commitment. We are committed to sourcing products from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. As a result, we expect that all of our suppliers will partner with us to (i) provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the Conflict Minerals Rules, and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that are DRC Conflict Free. For purpose of the Conflict Minerals Rules, "DRC Conflict Free" means that the product does not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries. 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 and to ensure that products and materials in the supply chain are DRC Conflict Free.

We intend to:

- continue to identify conflict minerals necessary for the production or the functionality of in-scope products;
- continue to perform reasonable country of origin inquiries on an annual basis and work to obtain a high response rate;
- review and update this Conflict Minerals Policy from time to time;
- put together a team of employees/specialists to ensure compliance;
- design a training program for our personnel; and
- report to the Company's executive officers on conflict minerals matters when necessary.

Our Expectations for Suppliers. We have the following expectations of our suppliers:

- Suppliers should not supply us with any products or other materials that directly or indirectly finance or benefit armed groups in the Covered Countries;
- Suppliers are expected to source Conflict Minerals only from sources that are identified as DRC Conflict Free;
- Suppliers should develop policies, procedures, due diligence processes and management systems that are reasonably designed to prevent products or materials that are not DRC Conflict Free from entering our supply chain and to provide transparency as to the source of any Conflict Minerals;
- Suppliers are expected to take steps to identify the steps in the supply chain through which Conflict Minerals are introduced, and to undertake all due diligence efforts necessary to identify the smelter, refiner and/or mine from which Conflict Minerals originate, including 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 Conflict Minerals Rules; and
- Suppliers are encouraged to support industry efforts to enhance the traceability and responsible sourcing of Conflict Minerals.

In seeking to meet these expectations, our suppliers will be expected to:

- Implement and communicate policies that are consistent with this Conflict Minerals Policy, and require that their direct and indirect suppliers do the same;
- Establish procedures and contractual provisions that facilitate the traceability of Conflict Minerals within our supply chain and provide for the sourcing of DRC Conflict Free products and materials under all circumstances;
- Provide us with timely and accurate information, at our request, regarding the source of Conflict 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;
- Use reasonable efforts to source Conflict Minerals from smelters and refiners that have been validated by a recognized, independent third party as DRC Conflict Free; and
- Advise us as promptly as possible of any determination that any products or materials in the supply chain are not DRC Conflict Free.

We evaluate our relationship with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this Conflict Minerals Policy. If we determine that a supplier's efforts are deficient, we reserve the right to evaluate the supplier relationship and to take any appropriate action, including terminating our relationship with the supplier.

Nothing in this Conflict Minerals Policy is intended to in any way grant any additional rights or expectations to any of our suppliers, or in any way modify or otherwise limit our contractual or legal rights.

Additional Information. Our employees, suppliers and other interested parties may contact us regarding this Conflict Minerals Policy at: legal@ooma.com.