

Conflict Minerals Disclosure

This disclosure for the year ended December 31, 2022 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934 (the “Rule”).

LeMaitre Vascular, Inc. (the “Company” or “we”) conducted an evaluation of its product lines and determined that certain products manufactured by it contain conflict minerals, which are defined by paragraph (d)(3) of Item 1.01 of Form SD as columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives, which are limited to tin, tantalum and tungsten.

Products Overview

The Company develops, manufactures, processes and markets medical devices and implants for the treatment of peripheral vascular disease. We evaluated our product lines for the presence of conflict minerals and determined that a limited number contain conflict minerals necessary to the functionality or production of the product as described further below.

Reasonable Country of Origin Inquiry (RCOI)

We conducted an analysis of our products subject to the Rule and found that “conflict minerals,” as defined by the SEC, can be found in isolated components of our radiopaque tape, certain of our catheters, as well as certain of our illuminators and resectors used in phlebectomy procedures (the “Products”).

We identified and contacted the six suppliers that provide materials used in isolated components of our radiopaque tape, catheters, and certain of our illuminators and resectors. The suppliers demonstrated familiarity with the requirements of the Rule and indicated that they conducted due diligence into their supply chains. We requested that the suppliers provide to us representations or reports regarding the source of the conflict minerals or components containing conflict minerals supplied to us by them.

RCOI Results

Three suppliers indicated that smelters in their supply chain sourcing conflict minerals from the Democratic Republic of the Congo or an adjoining country (“Conflict Region”) have been validated by an independent, third-party assessment against the responsible minerals assurance process and standards, with two of these suppliers indicating conformity with the Responsible Minerals Assurance Process assessment protocols, and one of the sub-suppliers of the third supplier indicating that it has not completed the identification of all of the smelters supplying the conflict minerals in its supply chain but has a policy that requires its direct suppliers to source conflict minerals from smelters whose due diligence practices have been validated by an independent third party audit program.

Two of our other suppliers indicated that based on the due diligence they conduct, they are not aware that they use metals derived from the Conflict Region in their products. Another supplier stated that while it may use metals sourced from the Conflict Region, none are derived from conflict affected and high-risk areas. We have relied on our suppliers’ responses and policies to provide us with information about the conflict minerals contained in the materials supplied to us and we did not identify any warning signs or have a basis to believe their responses were untrue.