

	<b>CORPORATE POLICY</b>	
Policy Number & Title	Effective: <b>January 18, 2022</b>	<b>Version: 1</b>
<b>PROC-006</b> <b>Responsible Minerals Sourcing</b>	Function: <b>Procurement</b>	
	Approved by: /s/ <b>Dan Ostrosky,</b> <b>Chief Procurement Officer</b>	

## 1.0 POLICY

Peraton is committed to the goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. This Conflict Minerals policy articulates our efforts to further this goal, and our expectations of our suppliers.

## 2.0 PURPOSE & SCOPE

This policy applies to all employees of Peraton Corp. and its wholly-owned subsidiaries (collectively, "Peraton") and establishes our expectations for suppliers of components or products utilizing Conflict Minerals..

## 3.0 DEFINITIONS

**3.1 Conflict Minerals:** Tin, tungsten, tantalum, gold, or their derivatives that originated in Covered Countries

**3.2 Covered Countries:** The Democratic Republic of the Congo, Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia

**3.3 OECD:** Organization for Economic Co-operation and Development

**3.4 Peraton:** References to Peraton or "the Company" include Peraton Corporation and all of its wholly- owned subsidiaries

## 4.0 REFERENCES

ADM-001 Policy and Procedure Management

Organization for Economic Cooperation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition (2016) and its related Supplements on Tin, Tantalum and Tungsten and on Gold (available at: <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>)

## 5.0 POLICY REQUIREMENTS

**5.1** In 2012, the Securities and Exchange Commission adopted rules implementing certain provisions of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act relating to disclosure around conflict minerals used in manufactured products (the "Conflict Minerals Rules"). The Conflict Minerals Rules require public companies to annually disclose information regarding whether any products they manufacture or contract to manufacture contain tin, tungsten, tantalum, gold, or their derivatives (collectively, the "Conflict Minerals") that originated in the Democratic Republic of the Congo ("DRC"), Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively, the "Covered Countries"). If so, information about a company's efforts to identify the source and chain of custody of those Conflict Minerals must be disclosed. The concern addressed by the Conflict Mineral Rules is that the mining and trade of Conflict Minerals sourced from this region may benefit armed militia groups and contribute to human rights abuse.

**5.2** As many Peraton customers are subject to these rules, Peraton is routinely requested to provide this information regarding products that our subsidiaries manufacture or contract to manufacture containing the Conflict Minerals.

- 5.3** While Peraton is considered a downstream purchaser in the supply chain from the mining of minerals, some of the materials we purchase for manufactured products may contain Conflict Minerals. We work to determine the origin and status of any Conflict Minerals that may be necessary to our products’ functionality or production in alignment with the OECD’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”). This includes (i) inquiries to determine whether any such Conflict minerals originated in the Covered Countries and (ii) due diligence on whether any such Conflict Minerals directly or indirectly benefit armed groups in the Covered Countries.
- 5.4** In addition, we expect our suppliers (and their suppliers) to complete their own due diligence regarding the source and chain of custody of any Conflict Minerals used in components or products that they supply to us. Our suppliers are required to:
- a.** Comply with the Conflict Minerals Rules and adopt policies and due diligence procedures in alignment with the OECD Guidance, which are reasonably designed to prevent products or components containing Conflict Minerals that are not responsibly sourced from entering the Company’s supply chain.
  - b.** Participate in our due diligence efforts by (i) reporting to Peraton regarding the Conflict Minerals being sourced for parts that are used in its products, (ii) cooperating with any inquiries, due diligence, or information requests that the Company chooses to perform with respect to the Conflict Minerals used in its products or components.
  - c.** Extend these expectations to their own up-stream suppliers by working to identify the chain of custody of any Conflict Minerals supplied and used in the Company’s products (including the country of origin, smelter or refiner, mine location and status of any Conflict Minerals).

**6.0 STAKEHOLDERS & RESPONSIBILITIES**

- 6.1 Procurement** - Responsible for flowing down to suppliers applicable provisions relating to responsible mineral sourcing. Responsible for annually coordinating inquiries on source and chain of custody of conflict minerals utilized in the manufacture of products by Peraton.
- 6.2 Program Management** - Responsible for ensuring adherence to this Policy by communicating the Policy’s requirement to suppliers, as applicable. Support Procurement efforts to conduct inquiries into source and chain of custody of conflict minerals utilized in manufacturing by facilitating communication with covered suppliers.
- 6.3 Legal** - Responsible for providing guidance and advice as needed to assure compliance with this Policy.

**CHANGE LOG**

Date	Ver.	Change <i>(All changes must be made in accordance with ADM-001)</i>	By Whom
Jan. 18, 2022	1	Initial Release	Amy Benton