HEADWALL PHOTONICS, INC.
601 River Street,
Fitchburg, Massachusetts 01420

CONFLICT MINERALS POLICY

Headwall Photonics is committed to obtaining materials and supplies for our products from businesses that share our values regarding human rights and ethical practices. Under the US government's Conflict Minerals Provision, publicly traded companies and their suppliers must report the presence of conflict minerals in those products that they manufacture or contract to manufacture when conflict minerals are necessary to the production or functionality and those conflict minerals originate in the Democratic Republic of the Congo or adjoining countries (the "conflict area").

The Conflict Minerals Rules define "Conflict Minerals" as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, limited at this time to tantalum, tin, and tungsten (commonly referred to as 3TG). To ensure compliance, and to support our publicly traded customers, Headwall has adopted the following practices:

- Headwall will develop processes which ensure that Headwall does not knowingly procure or use Conflict Minerals from within the Conflict Area unless the mines and smelters have been certified as "conflict free"
- Headwall expects its suppliers to undertake documented due diligence and to develop policies that ensure Conflict Minerals are being sourced only from outside the Conflict Area or from mines and smelters which have been certified as "conflict free", and reserves the right to verify the compliance
- If Headwall discovers the use of Conflict Minerals considered to be "not conflict free" in any material, parts, or component that Headwall procures or produces, Headwall expects its suppliers to take appropriate actions to transition such material, parts, or components to "conflict free" status.

For more information regarding Headwall's conflict minerals processes, please email Support@headwallphotonics.com with the subject line "Conflict Minerals Inquiry"