



KEYW

CONFLICT MINERALS

POLICY

KEYW fully supports the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which aims to prevent the use of certain “Conflict Minerals” (as defined below) that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (including Angola, Burundi, The Central African Republic, The Republic of Congo, Uganda, Rwanda, South Sudan, Tanzania, and Zambia). KEYW is committed to responsible sourcing of Conflict Minerals as well as full compliance with the requirements of the Conflict Minerals Rule. KEYW is committed to identifying the potential Conflict Minerals which are necessary to the functionality or production of a product manufactured by KEYW or for KEYW by a contract manufacturer and determining the country of origin of any potential conflict minerals.

In furtherance of the foregoing, we have adopted and communicated to our suppliers and the public this company policy (the “Conflict Minerals Policy”) for the supply chain of Conflict Minerals. As used herein and in the Conflict Minerals Policy, “Conflict Minerals” are columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to the location of origin.

PROCEDURE

KEYW has established a Conflict Minerals Committee to administer its efforts to support the goals and objectives of the Act. The Committee is comprised of the Chief Financial Officer, General Counsel, Ethics and Compliance Officer, and Vice President Corporate Contracts and Purchasing. The Committee may consult with other relevant KEYW personnel and groups as necessary. The Committee reviews KEYW’s products and production processes to identify any necessary potential conflict minerals related to them.

KEYW’s suppliers are required to provide one of the following certifications:

- Supplier certifies that it has not provided nor will it provide any conflict minerals to KEYW;
- Supplier certifies that it has provided conflict minerals to KEYW and has determined that such conflict minerals do not originate in the Democratic Republic of Congo (DRC) or adjoining countries;
- Supplier certifies that it has provided conflict minerals to KEYW and has determined that such conflict minerals originate from a recycler or scrap supplier;
- Supplier certifies that it has provided conflict minerals to KEYW and has determined that such conflict minerals do originate in the DRC or adjoining countries.

To the extent that a supplier certifies that it has provided conflict minerals, it is required to identify the conflict minerals and their origin.

Supplier responses are tracked and analyzed so that follow-up requests can be issued as necessary.

KEYW has adopted a conflict minerals provision for its purchase orders and agreements with suppliers that requires their compliance with the Act and one of the certifications above.