



Conflict Minerals Policy

In 2012, the U.S. Securities and Exchange Commission (“SEC”) issued final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These rules require publicly traded companies to disclose their use of Conflict Minerals in their products. These Conflict Minerals refer to tin, tungsten, tantalum and gold and related derivatives. The SEC rules require registrants to annually report on whether products they manufacture or contract to manufacture contain Conflict Minerals sourced from the Democratic Republic of Congo or adjoining countries (the “DRC Region”) and, if so, whether they are conflict-free, meaning the products do not contain minerals that directly or indirectly finance or benefit armed groups, or are under the control of armed groups, in the DRC region.

We support sourcing components and materials from suppliers that share our values regarding respect for human rights, ethics and environmental responsibility. We are committed to complying with the SEC disclosure requirements and are working with our suppliers to perform reasonable country of origin inquiries and due diligence in determining the potential for Conflict Minerals in our supply chain and products. In performing these activities, we anticipate that supplier requests could include:

- (1) Completion of a conflict minerals survey.
- (2) Cooperation with us in connection with any reasonable country of origin inquiries and due diligence we perform.
- (3) When we deem necessary, reasonable proof of the due diligence performed by the supplier to support the country of origin certification provided by the supplier.

We expect our suppliers to partner with us in our commitment to compliance and have designed our efforts to align with Conflict Minerals reporting rules.

To provide feedback on the content or execution of this policy, please contact BWXT at (855) 871-9138 or by email at ethics@bwxt.com.