



Conflict Minerals Policy

Intevac supports the humanitarian goals of the Dodd Frank Act and recognizes the adverse impact from mining and trade of Tin, Tungsten, Tantalum and Gold (3TG) by armed groups in the Democratic Republic of Congo and its adjoining countries (DRC). Furthermore, we seek neither, directly or indirectly, to finance or benefit those armed groups. 3TG that are used to finance armed conflict in the DRC are known as Conflict Minerals. Intevac will not knowingly purchase or sell any product if we have reason to believe that it contains any Conflict Minerals necessary to the production or functionality of the product.

In keeping with those goals, Intevac seeks to:

1. Educate our supply chain on the issues related to mining and trade in 3TG from the DRC;
2. Require that all suppliers who contract to manufacture products for Intevac containing 3TG complete the conflict minerals reporting template developed by the Responsible Minerals Initiative (RMI); and
3. Continue to work with our supply chain to improve transparency with the goal of neither, directly nor indirectly, financing or benefitting armed groups in the DRC by purchasing or selling products containing Conflict Minerals.

Intevac expects that each of the suppliers with which it contracts to manufacture will:

1. Adopt a policy relating to 3TG sourcing that is consistent with Intevac's Conflict Minerals Policy and Annex II of the *OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas; Third Edition*;
2. Implement a due diligence program in support of its 3TG sourcing policy;
3. Complete the RMI conflict minerals reporting template;
4. Exercise due diligence in seeking upstream information to support the vendor's responses to the questions in the RMI conflict minerals reporting template;
5. Use smelters certified as being free of Conflict Minerals whenever sourcing 3TG mined in the DRC region; and
6. Make available its due diligence in determining the source of 3TG upon Intevac's request.

Intevac is committed to supply chain initiatives and overall corporate social responsibility that works towards a conflict free supply chain. Intevac will evaluate its relationship with its suppliers on an ongoing basis to ensure continued compliance with this policy.