

Leidos Holdings, Inc.
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Conflict Minerals Policy Statement

Leidos Holdings, Inc. and Leidos, Inc. (collectively, “Leidos”) fully support the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Act”) which aims to prevent the use of certain “Conflict Minerals” that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act). “Conflict Minerals” currently include: columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives (tantalum, tin and tungsten).

Leidos is committed to avoiding the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Leidos is also committed to complying with the reporting obligations required under Section 1502 of the Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission (SEC).

Leidos has designed its due diligence framework to conform in all material respects to the disclosure requirements adopted under Section 13(p) of the Exchange Act, with the framework provided by The Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, an internationally-recognized due diligence framework. Among other things, Leidos seeks to have its suppliers complete the Electronic Industry Citizenship Coalition and Global e-Sustainability Initiative (EICC-GeSI) Conflict Minerals Reporting Template.

We have the following expectations of our suppliers and their suppliers which we are working diligently to fully implement:

- Suppliers should not supply us with any products or other materials that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.
- Suppliers are expected to source Conflict Minerals only from sources that are identified as DRC Conflict Free.
- Suppliers should develop policies, procedures, due diligence processes and management systems that are reasonably designed to prevent products or minerals that are not DRC Conflict Free from entering our supply chain and to provide transparency as to the source of any Conflict Minerals.
- Suppliers are expected to take steps to identify the steps in the supply chain through which Conflict Minerals are introduced, and to undertake all due diligence efforts necessary to identify the smelter, refiner and/or mine from which Conflict Minerals originate, including requiring direct or indirect suppliers to our suppliers to cooperate in diligence efforts and to provide any information necessary to facilitate our compliance efforts with respect to the Conflict Minerals Rules.
- Suppliers are expected to pass on these requirements on to their supply chain partners who supply them with products containing any Conflict Mineral.

We evaluate our relationship with our suppliers on an ongoing basis, and we will consider the extent to which a supplier has failed to reasonably comply with this Conflict Minerals Policy. If we determine that a supplier's efforts are deficient, we may take any appropriate action, including terminating our relationship with the supplier.