

KOPIN CORPORATION POLICY ON CONFLICT MINERALS SOURCING

“Conflict minerals”¹ originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold, “under the control of armed groups”² to “finance conflict characterized by extreme levels of violence”². Some of these minerals and the metals created from them (such as tantalum, tin, tungsten and gold) can make their way into the supply chains of the products used around the world, including those in the electronics industry. Kopin’s suppliers acquire and use minerals from multiple sources worldwide. As part of Kopin’s commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain it is Kopin’s goal to seek to use suppliers whose products contain tantalum, tin, tungsten and gold that are DRC conflict free³ while continuing to support responsible in-region mineral sourcing from the DRC and adjoining countries.

Kopin expects our suppliers to have in place policies and reasonable due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free. Kopin encourages our suppliers to comply with the Electronic Industry Citizenship Coalition (EICC) Code of Conduct and conduct their business in alignment with Kopin’s supply chain responsibility expectations.

In support of this policy Kopin will:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers.
- Provide and expect our suppliers to cooperate in providing due diligence information to conform to use of tantalum, tin, tungsten and gold in our supply-chain that is DRC conflict-free.
- Collaborate with our suppliers and other on industry-wide solutions to enable products that are DRC conflict free.

¹ Conflict minerals are columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivative as defined in Dodd-Frank Act section 1502 and SEC Rule 13p-1 under the Securities Act of 1934

² Dodd-Frank Act Section 1502

³ DRC conflict free “ means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups” as defined in SEC Rule 13p-1 under the Securities Exchange Act of 1934.