



Responsible Minerals Sourcing Policy

Effective May 21, 2020

Perspecta Inc. and its wholly-owned subsidiaries (collectively, “**Perspecta**”) is committed to the goal of preventing armed groups in the Covered Countries from benefiting from the sourcing of Conflict Minerals from that region. This Conflict Minerals policy articulates our efforts to further this goal, and our expectations of our suppliers.

In 2012, the Securities and Exchange Commission adopted rules implementing certain provisions of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act relating to disclosure around conflict minerals used in manufactured products (the “**Conflict Minerals Rules**”). The Conflict Minerals Rules require public companies to annually disclose information regarding whether any products they manufacture or contract to manufacture contain tin, tungsten, tantalum, gold, or their derivatives (collectively, the “**Conflict Minerals**”) that originated in the Democratic Republic of the Congo (“**DRC**”), Angola, Burundi, the Central African Republic, the Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively, the “**Covered Countries**”). If so, information about a company’s efforts to identify the source and chain of custody of those Conflict Minerals must be disclosed. The concern addressed by the Conflict Mineral Rules is that the mining and trade of Conflict Minerals sourced from this region may benefit armed militia groups and contribute to human rights abuses.

While Perspecta is considered a downstream purchaser in the supply chain from the mining of minerals, some of the materials we purchase for manufactured products may contain Conflict Minerals. We work to determine the origin and status of any Conflict Minerals that may be necessary to our products’ functionality or production in alignment with the Organisation for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “**OECD Guidance**”). This includes (i) inquiries to determine whether any such Conflict minerals originated in the Covered Countries and (ii) due diligence on whether any such Conflict Minerals directly or indirectly benefit armed groups in the Covered Countries.

In addition, we expect our suppliers (and their suppliers) to complete their own due diligence regarding the source and chain of custody of any Conflict Minerals used in components or products that they supply to us. Our suppliers are required to:

- Comply with the Conflict Minerals Rules and adopt policies and due diligence procedures in alignment with the OECD Guidance, which are reasonably designed to prevent products or components containing Conflict Minerals that are not responsibly sourced from entering the Company’s supply chain.

- Participate in our due diligence efforts by (i) reporting to Perspecta regarding the Conflict Minerals being sourced for parts that are used in its products, (ii) cooperating with any inquiries, due diligence, or information requests that the Company chooses to perform with respect to the Conflict Minerals used in its products or components.
- Extend these expectations to their own up-stream suppliers by working to identify the chain of custody of any Conflict Minerals supplied and used in the Company's products (including the country of origin, smelter or refiner, mine location and status of any Conflict Minerals).

References:

Organisation for Economic Cooperation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition (2016) and its related Supplements on Tin, Tantalum and Tungsten and on Gold (available at: <https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>).