



Conflict Minerals Policy Statement

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and related U.S. Securities and Exchange Commission rules (the “Conflict Minerals Rules”) require public companies such as American Science & Engineering, Inc. to disclose whether the products they manufacture or contract to manufacture contain tantalum, tin, tungsten and gold (the “3TG Minerals”) that are sourced from mines in the Democratic Republic of the Congo or adjoining countries (the “DRC Countries”). We support the humanitarian goal of the Dodd-Frank Act of preventing armed groups in the DRC Countries from benefitting from the sourcing of 3TG Minerals from that region.

Our conflict minerals policy:

1. We will comply with the disclosure requirements of the Conflict Minerals Rules.
2. We will seek to avoid the use in our products of 3TG Minerals that are not “DRC Conflict Free”.
3. We will work with our suppliers to identify the source and chain of custody of any 3TG Minerals contained in products or components they provide to us.
4. We will cooperate to the best of our ability with our own customers who seek similar information from us.

In support of these goals, we have established the following expectations for our suppliers:

- **Adopt conflict minerals policies.** We expect our suppliers to adopt a policy regarding conflict minerals consistent with ours, implement management systems to support compliance with their policy and require their suppliers to take the same steps.
- **Conduct supply chain due diligence.** Our suppliers are expected to identify the chain of custody within their upstream supply chain of any 3TG Minerals contained in their products until the smelter/refiner of any 3TG Minerals has been identified.
- **Supplier non-compliance.** Compliance with our Conflict Minerals Policy will be taken into account in our evaluation of our suppliers. Suppliers who fail to comply with our policy and do not implement reasonable remedial steps may be disqualified as approved vendors.

Suppliers and other external parties also are encouraged to contact us at conflict.minerals@as-e.com if they wish to seek guidance on this policy or if they wish to report concerns.