

Preamble:

The Dodd-Frank Wall Street Reform and Consumer Protection Act, and the United States Securities and Exchange Commission (SEC) passed legislation require publically owned U.S. companies to report on the origin of conflict minerals that may be used in product. Conflict minerals are minerals, specifically columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives including tin, tantalum, tungsten, and gold, that could be sourced in the conflict region of the Democratic Republic of Congo (DRC) and adjoining countries.

Luna Innovations does not directly source any of these minerals. We do, however, procure electronic and optical assemblies and components, containing conflict minerals that are necessary to the functionality and production of our products. We therefore have established an appropriate policy that supports the aims and objectives of the legislation and demonstrates our commitment to ethical practices and compliance with all applicable laws and regulations.

Policy:

With regard to sourcing of Conflict Minerals:

1. Luna Innovations shall act in support of the aims and objectives of the U.S. legislation, USA H.R. 4173 Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502.
2. Luna Innovations shall, where feasible, not knowingly procure assemblies or components containing specified metals that originate from facilities in the "Conflict Region" that are not certified as "conflict free". If single source items are found to contain specified conflict minerals we will work with the suppliers to remove them.
3. Luna Innovations shall ensure compliance with these requirements, and undertake reasonable due diligence with our supply chain to assure that specified metals are being sourced only from:
 - a) Mines and smelters outside the "Conflict Region" or
 - b) Mines and smelters which have been certified by an independent third party as "conflict free" if sourced within the "Conflict Region" or
 - c) Recycled or scrap recovery.

Due diligence includes procuring policy statements and written evidence documenting that raw materials used in the materials to manufacture components and products supplied are in line with the requirements outlined in this policy.