

## CONFLICT MINERALS UPDATED POLICY STATEMENT

Raytheon is committed to ethical business conduct and the responsible sourcing of minerals through our global supply chain. In 2012, the Securities and Exchange Commission (SEC) issued final rules implementing the Conflict Minerals disclosure provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Under these rules, publicly traded companies must report annually on their use of conflict minerals (tantalum, tin, tungsten and gold) from the Democratic Republic of Congo ("DRC") or certain adjoining countries.

We work diligently with our global supply chain partners to ensure compliance with SEC regulations. The international supply chain for these minerals is complex and the tracing of them is challenging.

Raytheon is focusing our compliance efforts in the following areas:

- *Tracing Conflict Minerals* – Raytheon conducts a Reasonable Country of Origin Inquiry (RCOI) with our supply base using a coordinated, risk based approach. As part of this process, we collect and evaluate supplier responses to an industry established Conflict Minerals Reporting Template (CMRT).
- *Validating Conflict-Free Sources* – As part of our due diligence process, Raytheon follows the Organization for Economic Co-operation and Development (OECD) framework. As part of that framework, we work with multi-industry consortia to validate responsible sourcing practices. Engagement with a broad coalition of affected industries regarding the complexities of conflict minerals allows us to look at the associated issues more strategically and holistically than as an individual company.
- *Reporting Results* – Raytheon participates in the Conflict Free Smelter Initiative and expects our suppliers to utilize independent third party validated smelters. We also engage independent third parties, as appropriate, to review Raytheon's conflict minerals approach and processes as well as our final report before it is filed with the SEC

If you have specific questions or would like additional information, please email

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