



AeroVironment, Inc.

Conflict Minerals Policy

Introduction

In 2012, the U.S. Securities and Exchange Commission (“SEC”) issued rules implementing the conflict minerals disclosure provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”). Pursuant to these rules, certain publicly traded companies are required to report annually on their use of conflict minerals (tin, tantalum, tungsten and gold) originating from the Democratic Republic of Congo (DRC) or any of the DRC’s adjoining countries (collectively, the “DRC Region”) in products manufactured by such companies. We are committed to complying with our SEC reporting requirements.

Compliance Program

AeroVironment, Inc. is committed to ethical business conduct and the responsible sourcing of minerals used in our products through our global supply chain. Tracing conflict minerals through our global supply chain is challenging. As a downstream supplier, we are many steps removed from the mining of conflict minerals and do not have direct knowledge of the sources of such materials. We primarily rely on our direct suppliers to provide information to us regarding the origin of the conflict minerals contained in the components and materials supplied to us.

We have implemented a conflict minerals compliance program that is designed to conform to the framework in The Organisation of Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the related Supplements for gold and for tin, tantalum and tungsten (the “OECD Guidance”) to meet our SEC reporting obligations.

Our conflict minerals compliance program consists of the following:

- *Country of Origin Inquiry and Due Diligence.* Conducting a reasonable country of origin inquiry and due diligence with our suppliers consistent with the OECD Guidance, including obtaining and reviewing supplier responses to the Electronic Industry Citizenship Coalition Global e-Sustainability Initiative’s Reporting Template and encouraging our suppliers to conduct similar due diligence with their suppliers.
- *Contractual Provisions.* Including provisions in our new and renewed supplier agreements requiring suppliers to represent that items supplied to us do not contain conflict minerals originating from the DRC Region and to provide us with information regarding the conflict minerals in items supplied to us.
- *Independent Audit.* Engaging, as required by Dodd-Frank and SEC regulations, an independent auditor to audit our supply chain due diligence process.

We have a Conflict Minerals Compliance Team comprising of representatives from our purchasing, subcontracts, legal and finance teams which is responsible for implementing our conflict minerals compliance strategy. This team will brief senior management periodically on our due diligence efforts and conflict minerals compliance program.