

CPI Aerostructures, Inc.

Conflict Minerals Policy

The Securities and Exchange Commission (“SEC”) has adopted annual disclosure requirements regarding conflict minerals in accordance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Publicly traded companies are required to perform due diligence and file annual disclosures containing information about certain minerals necessary to the functionality or production of their products. These certain minerals, referred to as “conflict minerals,” include cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten and gold (“3TG”). The due diligence requires an investigation into the origin of 3TG with the aim of discouraging the use of conflict minerals that have funded armed groups in the Democratic Republic of Congo (“DRC”) and its neighboring countries (“Covered Countries”), or are from scrap or recycled sources.

CPI Aerostructures, Inc. (“CPI Aero”) is committed to sourcing components and materials from companies that share our values regarding respect for human rights, ethics and environmental responsibility. CPI Aero expects its suppliers, and its suppliers’ suppliers, to acquire 3TG only from responsible sources that do not directly or indirectly finance or benefit armed groups in the Covered Countries. We will identify and monitor the use of 3TG in our supply chain, including implementing due diligence activities to comply with reporting obligations. We expect that our direct suppliers will also exercise due diligence to investigate the presence and source of any conflict minerals in their supply chains. CPI will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy. If it is discovered that any of the conflict minerals that are sourced in our supply chain are not conflict-free, we will take actions to transition toward conflict-free status.

Please direct any questions or inquiries to conflict_minerals@cpiaero.com.