

Photronics, Inc.

Conflict Minerals Policy Statement

This policy applies to the procurement by Photronics, Inc. (“Photronics”) of tin, tantalum, tungsten, or gold (collectively, “3TG”) necessary to the functionality or production of its products.

Overview of the Conflict Minerals Legislation

In an effort to reduce the violence stemming from the mining of 3TG in the Democratic Republic of Congo (“DRC”) region, Congress used Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act to amend the Securities and Exchange Act of 1934. With Section 1502, Congress directed the Securities and Exchange Commission (“SEC”) to implement new regulations requiring certain companies to perform reasonable due diligence on their use of 3TG necessary to the functionality or production of products manufactured or contracted to be manufactured for it and creating certain disclosure rules following reasonable due diligence (the “Conflict Minerals Rule”).

Photronics, Inc. Compliance Efforts

Photronics is committed to maintaining high standards of corporate responsibility, promoting responsible business practices, and is engaged in efforts throughout its supply chain to prevent human rights abuses in the DRC region or other areas of the world. Photronics has established a conflict minerals compliance program designed to comply, in all material respects, with the Conflict Minerals Rule and internationally recognized due diligence frameworks.

Photronics does not source 3TG directly from smelters and refiners and has a diverse supply chain. As a result, Photronics is committed to requiring its suppliers to:

1. Comply in all respects with the Conflict Minerals Rule as may be administered by the SEC;
2. Supply materials to Photronics which are “Conflict-Free,” meaning they originate from recycled or scrap sources or from sources which have been assessed and approved by independent, internationally recognized third parties;
3. Provide Photronics with all information necessary to enable Photronics to verify a supplier’s compliance with the Conflict Minerals Rule, including, but not limited to, country of origin diligence information and information on their products and smelters and refiners in their supply chains, consistent with the industry standard Conflict Mineral Reporting Template (CMRT) as developed by the Responsible Minerals Initiative (formerly the Conflict-Free Sourcing Initiative);
4. Adopt policies and due diligence management systems designed to identify, prevent, mitigate, and if necessary, remediate risks associated with 3TG;

When non-compliance is found, Photronics will engage in efforts to mitigate or remediate the risks associated with a supplier’s non-compliance and will, if circumstances warrant, suspend or terminate use of that supplier.

Questions or Concerns

Please direct general questions or concerns about this policy or a potential violation to generalcounsel@photronics.com or by dialing (203) 740-5601.

This policy will be reviewed and updated as necessary.