



Conflict Minerals Policy Statement

PacketLight Networks, Ltd. is committed to the highest standards, in quality of products, quality of services, and the integrity in which we conduct our business. We work with our suppliers, vendors and contractors to ensure the working conditions throughout our supply chain are safe, workers are treated with respect and dignity, and that production processes are environmentally and socially responsible.

The U.S. Securities and Exchange Commission (SEC) has adopted rules (Section 1502 of the Dodd–Frank Act) requiring publicly traded companies to disclose whether they use tantalum, tin, tungsten or gold (Conflict Minerals, 3TG) which originate in the Democratic Republic of the Congo (DRC) or neighboring countries (Covered Countries) and if so, companies are to exercise due diligence on the source and chain of custody of those Conflict Minerals and report the results of their inquiry.

PacketLight does not procure metals directly, and while only a fraction of the world’s minerals produce originates from the DRC and covered countries, we are taking action to increase transparency, ensure responsible procurement by our suppliers and sub-suppliers, and drive positive change. PacketLight is committed to source its raw materials, components and parts from suppliers that respect and comply with human rights, integrity and environmental regulations.

PacketLight complies with all applicable laws, and is committed to working towards improving traceability of conflict minerals and ensuring responsible sourcing. We have implemented measures in conformance with the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) and support the Conflict-Free Sourcing Initiative (CFSI).

PacketLight uses an external contractor for the collection and maintenance of data regarding our products and compliance of parts, in accordance with the continuing changes and updates in environmental regulations and directives.

PacketLight requires that suppliers whose products contain 3TGs, provide information regarding the conflict minerals throughout their supply chain using the CFSI's Conflict Minerals Reporting Template.

PacketLight expects suppliers to take similar measures with their suppliers to ensure compliance throughout their supply chain, and to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing 3TGs are DRC / covered countries free.

PacketLight has incorporated the principles of the conflict minerals requirements into its business practices, and our approval process for new suppliers contains these requirements.

PacketLight will communicate this policy to its suppliers and encourage them to set similar policies throughout their supply chain.

Suppliers that will not adhere to conflict minerals regulations, and will not work towards a conflict-free supply chain, will be considered "risk supply source", and will be replaced and removed from future business opportunities with PacketLight.

For further information, please contact:

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