

CONFLICT MINERALS POLICY

Background

Many of our products, like virtually all consumer electronics, contain various metals, including tantalum, tin, tungsten and gold (commonly referred to as “3TG”), which originate in mines around the world. The 3TG metals have become known as “conflict minerals”; much of which is sourced from the Democratic Republic of the Congo (“DRC”) and adjoining countries (the “Covered Countries”) where a decades-long civil war is being waged. This conflict has been exacerbated by various groups fighting to control mines and transit routes used in the trade of these minerals.

In the U.S., the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank Act”) requires public companies to file annual reports with the U.S. Securities and Exchange Commission (“SEC”) beginning in May 2014, disclosing whether or not they are using 3TG originating from the Covered Countries. A potential, but unintended, consequence of the Dodd-Frank Act is a widespread withdrawal from trade with the Covered Countries by U.S. companies. These requirements can also be viewed online.

InnoLight believes it is essential to establish validated, conflict-free sources of 3TG within the Covered Countries so that these minerals can be procured in a way that contributes to economic growth and development in the regions.

Policy

InnoLight is committed to corporate social responsibility and sourcing materials for its products in an environmentally responsible way.

The company will:

- not adopt, distribute and incorporate in contracts and/or agreements with suppliers sourcing of conflict mineral(s).
- work with our suppliers to ensure that their products are DRC conflict free by (a) encouraging our suppliers to purchase materials from smelters who are listed on the Conflict-Free Smelter Program Compliant Smelter List and have been certified as conflict-free by an independent auditor through the Conflict-Free Smelter Program administered by the Electronic Industry Citizenship Coalition

("EICC") and the Global e-Sustainability Initiative ("GeSI"); and (b) auditing our suppliers periodically.

- maintain the Management System in an effective way to avoid trading, refining and handling conflict materials that directly or indirectly finance or benefit armed groups from conflict-affected regions.
- continue to encourage our employees to understand conflict-free policy.

May 25, 2015