

## **Gilat Satellite Networks Ltd. Conflict Minerals Policy**

### **Introduction**

Under the Dodd-Frank Wall Street Reform and Consumer Protection Act and related rules adopted by the U.S. Securities and Exchange Commission (“SEC”), publicly traded companies subject to the SEC, such as Gilat, are required to disclose whether the products they manufacture or contract to manufacture contain Conflict Minerals that are originating in the Democratic Republic of the Congo (“DRC”) or adjoining countries, whereby the Conflict Minerals are necessary to the functionality or production of a product. Conflict Minerals are tantalum, tin, tungsten and gold. This legislation was adopted in light of Conflict Minerals being used in the DRC and adjoining countries to finance or benefit armed groups.

Gilat shares these concerns and is committed to comply with this legislation and take steps towards implementation of due-diligence process in order to achieve transparency of its supply chain in this regard. Gilat’s process is designed based on the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#).

This Policy states Gilat’s commitment and its expectations for its products suppliers regarding actions to address Conflict Minerals.

### **Implementation of the Policy**

As a manufacturer and marketer of various products manufactured by hundreds of other companies located around the world, Gilat is many levels away from the beginning of the supply chain for the products it distributes.

Gilat Complies with the requirements of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, which requires companies to inquire into the origin of tantalum, tin, tungsten and gold in their supply chains and report on the reasonable inquiry or due diligence they conduct to determine whether their purchase supported armed groups in the DRC.

Gilat is committed to surveying its supply chain to obtain increased transparency regarding the origin of the aforementioned minerals contained in its products. Gilat has taken steps to create due diligence measures by taking into use the standardized Conflict Minerals Reporting Template provided by the Electronic Industry Citizenship Coalition (EICC) to map and to monitor our suppliers' commitment and activities and working with our suppliers to increase transparency in the supply chain.

### **Gilat’s Expectations from its Suppliers**

Gilat expects its suppliers who provide it products containing tin, tantalum, tungsten, and/or gold to commit to compliance with OECD guidance for sourcing those materials from environmentally and socially responsible sources. Suppliers are expected to define, implement and communicate to their sub-suppliers their own policy to undertake

reasonable due diligence to determine whether those minerals are originated from conflict-free smelters, outlining their commitment to responsible sourcing of these minerals, e.g. by using the EICC Minerals Reporting Template. Gilat reserves the right to request further evidence of the source of those materials when necessary. Reasonable traceability data shall be provided to Gilat upon request. Gilat uses the Conflict Free Smelter Program (CFSP) list of compliant smelters and refiners posted at [www.conflictreesourcing.org](http://www.conflictreesourcing.org) to determine which smelters are certified as conflict free.

May 8, 2014