



Conflict Minerals Policy

November 2020

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On August 22, 2012, SEC commissioners voted to approve the final rule of the Dodd-Frank Section 1502 Wall Street Reform and Consumer Protection Act concerning conflict minerals (the “Conflict Minerals Rule”). The purpose of the Conflict Minerals Rule is to deter violence and human rights violations in the Democratic Republic of Congo (“DRC”) and adjoining countries (together with DRC, the “Covered Countries”), by reducing a significant source of funding for armed groups that are committing human rights abuses in those countries.

The Conflict Minerals Rule requires publicly traded companies to disclose their use of Conflict Minerals and whether those minerals originated in the Covered Countries. These minerals – tin, tantalum, tungsten and gold – also known as 3TG, are used in a wide range of products across numerous industries. Regulators believe that by encouraging public disclosures regarding the source and movement of Conflict Minerals across the supply chain, companies will be prompted to procure minerals from credible and conflict-free sources. Buying from conflict-free sources will result in the cutting of funding of acts of violence and human rights violations that are being sponsored by revenues generated from the extraction of, and trade in, Conflict Minerals.

This policy reflects Radware’s commitment and its expectations of its product suppliers regarding actions to be taken to address Conflict Minerals.

As used in this Policy:

- the term “**Conflict Minerals**” means the 3TG minerals listed above or their derivatives or any other mineral or its derivatives determined by the United States Secretary of State to be financing conflict in Covered Countries; and

the term “**Covered Countries**” includes the above listed countries or any other country determined by the United States Secretary of State from time to time

references to “**we**,” “**us**,” “**our**,” the “**Company**,” and “**Radware**” are to Radware Ltd. and its subsidiaries.

1. Radware's Policy Statement

As reflected in [Radware's Labor Practice and Human Rights Policy](#), Radware supports and respects the protection of human rights for all, including the basic human rights of employees and workers. We aim to uphold the human rights of all those affected by our business activities, and in particular, of the workers engaged in our supply chain. Accordingly, we are committed to sourcing components and materials from suppliers that share our values regarding respect for human rights, integrity, and environmental responsibility and that comply with applicable legal standards and requirements. Radware acknowledges the existence and importance of human and environmental issues.

As a potential downstream user of products that may contain Conflict Minerals, Radware recognizes its added value in protecting human rights and in taking global steps to interrupt the funding of groups conducting crimes against humanity. As part of Radware's commitment to corporate responsibility and respecting human rights in our operations and in our global supply chain, it is Radware's goal to seek using tantalum, tin, tungsten and gold in our products, provided such minerals do not, directly or indirectly, finance or benefit armed groups in the Covered Countries ("DRC conflict free"), or in any conflict-affected and high-risk areas.

We are committed to complying with the requirements of the Conflict Minerals Rule applicable to us and implemented due diligence practices to identify the source of the Conflict Minerals in our supply chain. As Radware does not source Conflict Minerals directly from mines, smelters, or refineries and, in most cases, is several levels removed from companies that do, we require the cooperation of our suppliers (and their suppliers etc.) in the implementation of this policy and in enabling us to timely meet our obligations under the Conflict Minerals Rule.

2. Actions to Responsible Sourcing

In support of this policy Radware:

- Continues to develop internal and external communication plan regarding Conflict Minerals;
- Assesses the Company's products that are likely to contain Conflict Minerals;
- Continues to exercise a due diligence program with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk areas and the procedures provided by the Responsible Minerals Initiative (RMI) and encourages Radware's suppliers to do likewise with their suppliers;
- Continues to raise supplier awareness of Conflict Minerals and have our suppliers identify the smelters that process the minerals they purchase;
- Utilizes the Responsible Minerals Assurance Process (RMAP) and requires Radware's suppliers to provide us with completed Conflict Minerals declarations using the Conflict Minerals Reporting Template (CMRT) in its most up-to-date version;
- Provides and expects Radware's suppliers to cooperate in providing due diligence information used in Radware's supply-chain;

- Determines if identified smelters are DRC conflict free by using reliable information from industry associations (such as the RMAP Conformant List);
- Continues to review the information we collect and assess the need to take remedial actions based on our values articulated in this Policy and our legal obligations, and in accordance with our risk management strategy;
- Engages in dialogue and requires mitigation actions with suppliers inadvertently using Conflict Minerals that originate from Covered Countries, and that directly or indirectly, finance or benefit armed groups in the Covered Countries or not knowing their origin;
- Maintains and requires our suppliers to maintain traceability data as reasonably sufficient to allow review of past years;
- Incorporates the principles of this policy into our contractual Purchase Order Terms and Conditions;
- Makes this policy publicly available on our website.

3. Radware's Expectations from Its Suppliers

Radware expects the support of its suppliers in determining the origin of minerals used in their products, in using DRC conflict free minerals and in taking mitigating actions in case they discover they do use Conflict Minerals that do not qualify as DRC conflict free. To that end, Radware expects its suppliers (and enforce their own suppliers, etc.) to have in place policies and due diligence measures that will enable Radware to reasonably assure that products and components supplied to Radware containing minerals are DRC conflict free.

In furtherance of this policy Radware expects the following of its suppliers:

- **Supply "DRC Conflict Free" materials.** Radware expects its suppliers to supply materials that are DRC conflict free;
- **Adopt Conflict Minerals policies.** Suppliers to Radware must adopt a policy regarding Conflict Minerals consistent with Radware's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps;
- **Send surveys to their suppliers, and complete Radware's survey.** Radware's suppliers are expected to pass the CMRT to their suppliers and successively upstream until the smelter/refinery is identified. The survey information must then be passed back down through the levels of the supply chain to Radware's direct supplier, who then can complete such supplier's own Conflict Minerals Reporting Template;
- **Maintain Supporting Records.** Maintain reviewable business records supporting the course of conflict for a period reasonably sufficient to allow review of past years;
- **Provide Information.** From time to time, at Radware's request, provide to Radware written certifications and other information concerning the origin of Conflict Minerals included in products and components supplied by to Radware and supplier's compliance with this policy generally, and require their direct and indirect suppliers to do the same.

4. Grievance Mechanism and Reporting

Concerns or questions regarding this policy, or violations thereof, can be reported as follows:

- Write us at: Radware Ltd., Attn: Finance Department – Conflict Minerals Team, 22 Raoul Wallenberg Street, Tel Aviv, Israel 69710
- Email us at: conflictminerals@radware.com

Suppliers and other external parties are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this approach, or if they wish to report suspected abuse. They, and other external stakeholders, may also report problems or concerns to the above Radware Contact.

This Policy will be reviewed regularly and updated as needed.