



LIGHTRON Conflict-free Minerals & Cobalt Control Statement

LIGHTRON Fiber-Optic Devices INC. (“LIGHTRON”) supports the efforts to end the violence and human and rights violations **and child abuse** associated with the mining of conflict minerals in the Democratic Republic of the Congo (DRC) and surrounding countries. “Conflict minerals&Cobalt” include tin, tantalum, tungsten, and gold &Cobalt; also referred to as “3TG.” The U.S. Securities and Exchange Commission adopted final rules to implement reporting and disclosure related to conflict minerals, as directed by Section 1502 of the Dodd-Frank Act. The rule applies to public companies that manufacture or contract to manufacture products where “Conflict minerals&cobalt are necessary to the functionality or production” of the product.

At LIGHTRON, we are committed to complying with our reporting obligations and reasonable due diligence required by the SEC. In the manufacturing of products, LIGHTRON strives to have a “Conflict free” supply chain, including committing to supply chain initiatives and overall corporate social responsibility and sustainability efforts that work towards a conflict free supply chain. LIGHTRON supports preventing the use of conflict minerals&cobalt that directly or indirectly finance or benefit armed groups in the DRC or surrounding countries. Our conflict minerals&cobalt compliance process includes having our manufacturing suppliers provide written evidence concerning the use of any conflict minerals&cobalt in LIGHTRON manufactured products. Our manufacturing suppliers complete a reasonable country of origin inquiry according to which we obtain information about any conflict minerals &cobalt used to manufacture our products. The inquiry requests the origin of any conflict and identification of the smelters used in the processing of the minerals&cobalt, and seeks to determine whether the mining or processing of these minerals directly or indirectly benefited any armed groups in the DRC or surrounding countries. LIGHTRON does not source minerals directly from smelters and therefore we rely on our manufacturing suppliers’ responses for sourcing information regarding conflict minerals&cobalt.

The goal of the RCOI (Reasonable Country of Origin Inquiry) is to ensure that only “conflict&cobalt free” materials – conflict minerals&cobalt not benefiting any armed group or human rights violator in the DRC or surrounding countries – are used in our manufactured products. If information obtained through our inquiries suggests that conflict minerals&cobalt used in our products are not “conflict&cobalt free”, LIGHTRON will take appropriate actions to educate the manufacturer of the importance of a “conflict free” supply chain, dissuade the continued use of these minerals&cobalt, and evaluate our future sourcing decisions.