

Conflicts Minerals Policy

Introduction

In certain conflict areas around the world, such as the Democratic Republic of the Congo and adjoining countries, the trade of certain minerals and derivative metals can be used to support corruption, money laundering and human rights abuses. In order to eradicate such behavior, we have adopted this Conflicts Minerals Policy.

Our Products

Our products are generally assembled from “shelf products” we purchase from our suppliers, which are under their sole manufacturing responsibility. Occasionally some customizations are made per customers’ requests.

The components, subassemblies, and modules necessary for the manufacture or integration of our hardware products are obtained, in general, from a limited group of suppliers. Check Point does not procure metals directly, however we take actions to ensure that the manufacturers and suppliers we work with comply with the relevant regulation. Our goal is that all materials used in our products will originate from socially and environmentally responsible sources.

Our Commitments and Requirements

In order to reach the goals we set, that align with our values to keep and ensure human rights and labor practices, business ethics and environmental responsibility, we take the following steps and measures:

- We support projects that facilitate responsible sourcing of conflict minerals in high-risk regions.
- We strive to follow procurement practices that support the community and the economies in the affected areas.
- We require from our suppliers to meet the regulatory requirements on conflict minerals and to provide us with evidence of such compliance. In particular:
 - Our suppliers and manufacturers are required to comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, and corresponding applicable regulations regarding conflict minerals (such as - Section 1502 of the Dodd-Frank Act).

- Our Suppliers and manufacturers are required to provide us with reports and declarations on the sourcing of materials and their compliance with the applicable laws and regulations. Specifically, our suppliers are required to report to us on the use of conflict minerals in the production process, in accordance with the Responsible Mineral Initiative's Conflict Minerals Reporting Template (CMRT).
- Our Suppliers are expected to demand from their sub-suppliers to refuse to use conflict minerals from affected areas and follow "minerals conflict free" requirement".
- Suppliers and manufacturers that do not comply with this Policy bear the risk that we terminate our business relationships with them.

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