2025 Winbond Responsible Minerals Due Diligence Report

Dec. 2025 Ver 1.0

winbond
We Deliver

Report Introduction

Winbond Electronics Corporation (Winbond) conducts responsible minerals due diligence to prevent the inadvertent use of tungsten, tantalum, tin, gold, and cobalt sourced from conflict-affected and high-risk areas (CAHRAs) in our manufacturing processes. Our program follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Responsible Minerals Initiative (RMI) Framework, and customer requirements to ensure compliance with applicable laws and regulations across our supply chain. Winbond is committed to avoiding activities that could harm society, the environment, or human rights.

Company Overview

Founded in September 1987 and listed on the Taiwan Stock Exchange in 1995, Winbond is headquartered in the Central Taiwan Science Park in Taichung, Taiwan. Our 12-inch (300 mm) fabs—equipped with advanced intelligent and automated technologies—are located in Taichung and the Kaohsiung Science Park. Winbond is a specialty memory IC company providing end-to-end solutions, from product design, R&D, and wafer fabrication to branded product marketing. Our major product lines include Code Storage Flash Memory, TrustME Secure Flash, Specialty DRAM, and Mobile DRAM. Winbond is the only company in Taiwan with in-house development capabilities for both DRAM and Flash. Our products serve handheld devices, consumer electronics, computer peripherals, and high-barrier, high-reliability applications such as automotive and industrial electronics.

Product Scope

Winbond has determined that certain minerals are necessary to the functionality or production of our products. This report covers 3TG (gold, tin, tantalum, tungsten), cobalt, mica, and nickel (added in 2025). The scope includes products manufactured by Winbond and those contracted to be manufactured for Winbond.

Winbond Worldwide

Japan
RD SALES

Winbond Electronics Corporation Japan
Atfields Manufacturing Technology Corporation
Miraxia Edge Technology Corporation

SALES

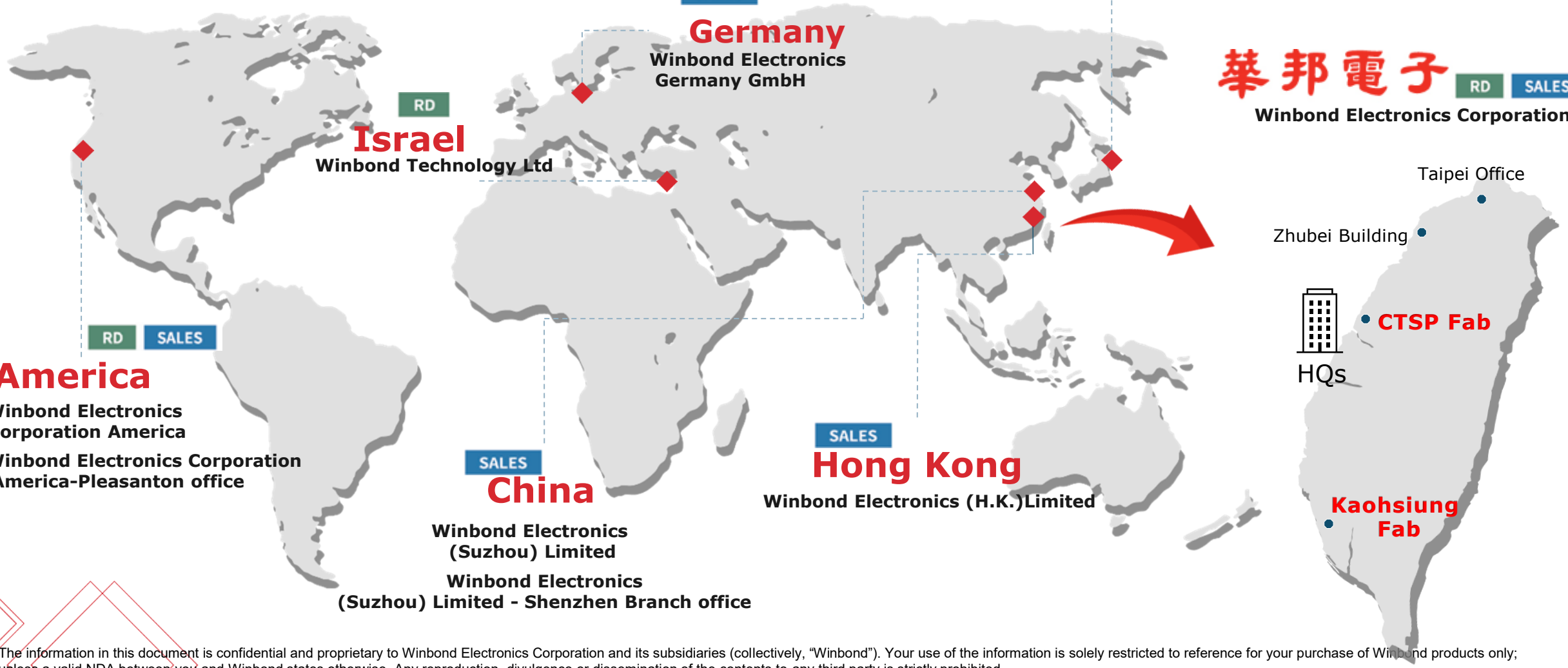
Germany
Winbond Electronics Germany GmbH

RD

Israel
Winbond Technology Ltd

華邦電子
RD SALES

Winbond Electronics Corporation



RD SALES

America
Winbond Electronics Corporation America

Winbond Electronics Corporation America-Pleasanton office

SALES

China
Winbond Electronics (Suzhou) Limited

Winbond Electronics (Suzhou) Limited - Shenzhen Branch office

SALES

Hong Kong
Winbond Electronics (H.K.)Limited

Responsible sourcing of Minerals Policy

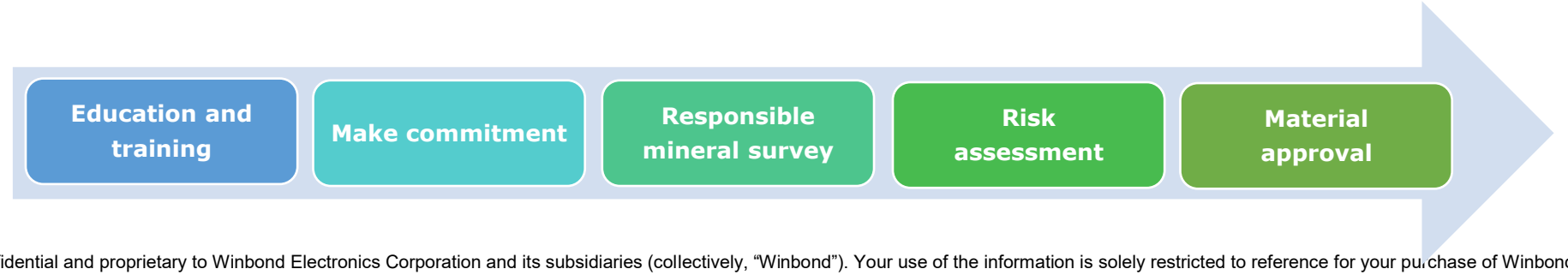
Winbond follows the OECD Due Diligence Guidance and the Responsible Minerals Initiative (RMI) framework to conduct due diligence on the source and chain of custody of minerals used in our products. The covered minerals are Gold (Au), Tin (Sn), Tantalum (Ta), Tungsten (W), Cobalt (Co), Mica, and Nickel (Ni).

- Winbond requires all suppliers to adhere to Winbond's Supplier Code of Conduct Commitment Letter and standards aligned with the Responsible Business Alliance (RBA), including policies on environmental protection and Hazardous Substance Free (HSF). Suppliers are expected to respect internationally recognized human rights principles, such as the Universal Declaration of Human Rights and the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy. Preference is given to vendors with strong ESG practices. Winbond classifies and grades suppliers for effective management of approved suppliers and conducts regular audits and responsible minerals investigations. In 2025, all raw-material suppliers signed the Winbond Code of Ethics and Integrity and the Winbond Supplier Code of Conduct Commitment Letter (including clauses on RBA compliance and the Conflict Minerals Declaration)

- Winbond prohibits sourcing from supply chains that may directly or indirectly finance non-state armed groups or unlawful military forces in the Democratic Republic of the Congo (DRC) and adjoining countries, or in other conflict-affected and high-risk areas (CAHRAs). Suppliers should avoid smelters/refiners that are not RMI RMAP Conformant.

- Suppliers must trace and disclose the sources of Gold, Tantalum, Tin, Tungsten, Cobalt, Mica, and Nickel using the latest RMI reporting templates—CMRT for 3TG, EMRT for Cobalt and Mica and Nickel. Submissions should identify all smelters/refiners and countries of origin and prioritize RMAP Conformant facilities to avoid financing armed groups.

- Suppliers shall cascade these requirements to their upstream suppliers and promptly notify Winbond of any changes in smelter/refiner usage.



The Framework of Due diligence

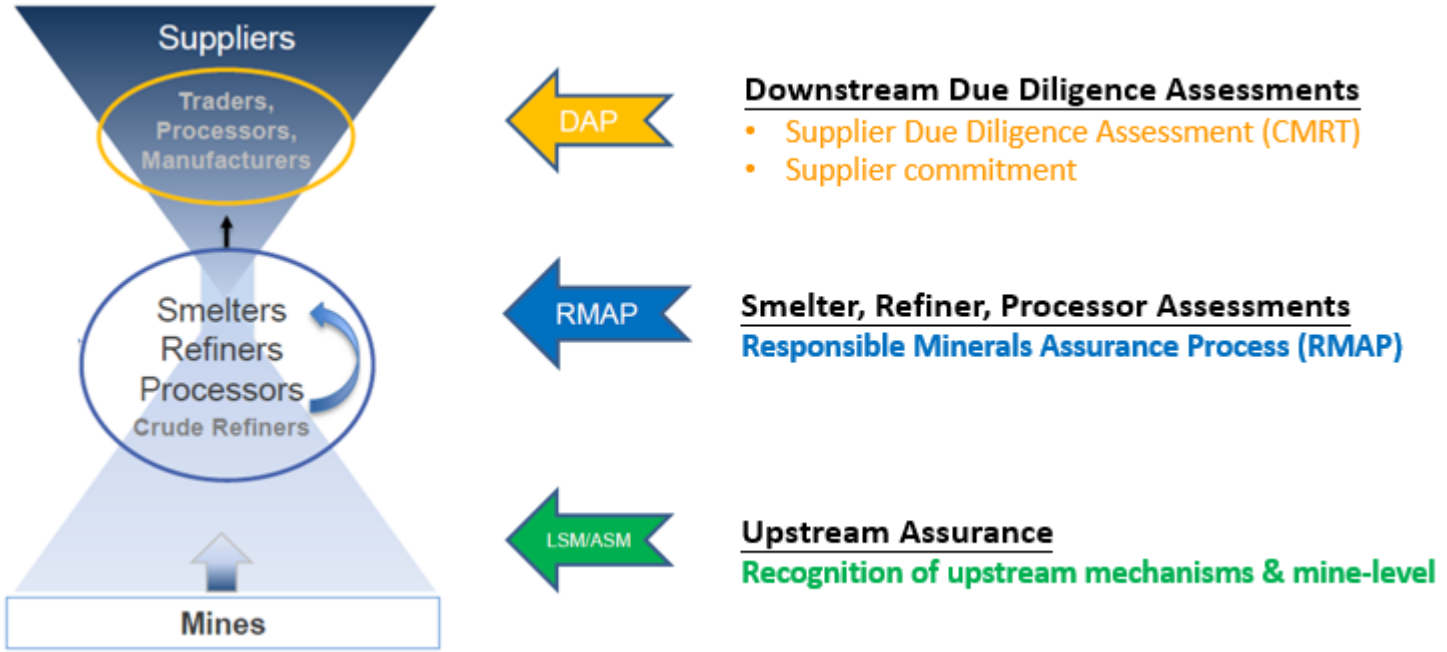
In accordance with the OECD Due Diligence Guidance, Winbond's due diligence measures on the source and chain of custody of covered minerals are designed and implemented as follows:

1. Establish strong company management systems

- Winbond has published a Responsible Minerals Policy on our website (Responsible Business Alliance - Responsible Business Alliance - Winbond)
- Winbond requires all suppliers to sign the Winbond Supplier Code of Conduct Commitment Letter.
- Winbond has conducted 3TG supplier surveys since 2014 and continues to survey at least semiannually, disclosing results based on the latest CMRT. Cobalt, Mica and Nickel are covered under EMRT.
- Winbond requires suppliers to use RMI's CMRT/EMRT to provide complete smelter/refiner information.
- Winbond manages materials according to our conflict minerals risk-level control table.
- Winbond have a grievance mechanism that enables any affected stakeholders or whistle-blowers to voice concerns regarding the circumstances of extraction, trade, handling and export of minerals. (Reporting Channel - Reporting Channel - Winbond)

2. Identify and assess risks in the supply chain

- Review CMRT/EMRT submissions to identify smelters/refiners and countries of origin; cross-check for gaps or inconsistencies.
- Analyze template data to identify potentially inconsistent or high-risk smelters/refiners.
- Confirm the RMI RMAP Conformant and Active lists at least every six months and process results per the risk management table.
- Identify and assess risks related to extraction, trading, handling, and export of minerals from CAHRAs using recognized CAHRAs references and third-party tools.



3. Design and implement a strategy to respond to identified risks

- If a supplier uses smelters/refiners that are Active or not Conformant, the supplier must submit a risk management plan. Measurable mitigation should achieve significant improvement within six months from plan adoption. If no measurable improvement is observed within six months, Winbond will suspend or discontinue engagement with the supplier for a minimum of three months.
- If credible risks of serious human rights abuses or direct/indirect support to non-state armed groups are identified, Winbond will immediately cease transactions related to the implicated smelter/refiner.
- Implement risk management plans, monitor mitigation progress, report performance to designated top management, and consider suspending or discontinuing trade with suppliers after failed mitigation.
- Maintain ongoing risk monitoring, evaluate mitigation effectiveness, and conduct additional fact-finding and risk assessments as required (e.g., following supply-chain changes).

4. Carry Out Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices

- Compare supplier-reported smelter/refiner data with RMI RMAP information to determine actual facilities and their status.
- Encourage suppliers to support non-conformant smelters/refiners in obtaining RMAP certification or equivalent independent audits.
- Require suppliers to provide updated CMRT/EMRT/BMRT versions whenever changes occur and maintain steady communication through the responsible sourcing platform.

5. Report Annually on Supply Chain Due Diligence

Winbond provides annual CMRT/EMRT results to customers and discloses relevant supply-chain information in our sustainability (ESG) report. The Responsible Minerals Policy and related information are publicly available on our website.

6. Due Diligence Results

In line with the RBA Code of Conduct and applicable regulations (including Dodd-Frank Act Section 1502, covering the DRC and adjoining countries), Winbond does not knowingly procure minerals that finance or benefit non-governmental armed groups or unlawful military forces. Prohibited minerals under this policy refer to Gold (Au), Tantalum (Ta), Tungsten (W), and Tin (Sn) when sourced from CAHRAs without appropriate due diligence. Cobalt, Mica, and Nickel are managed under equivalent due diligence frameworks. Winbond reviewed conflict minerals across 18 suppliers. All were found compliant with related requirements, and in 2025 no products were prohibited from being sold to Winbond.

- Appendix I: Conflict Minerals--Smelters & Refiners
- Appendix II: Conflict Minerals-- Countries of Origin

Mineral	Year 2025
Tantalum 鉭	19
Gold 金	17
Tin 錫	13
Tungsten 鎢	9
Cobalt 鈷	4
Copper 銅	4
Nickel 鎳	1
Mica 雲母	0
Total	67

Continuous Improvement

Winbond is committed to continuously improving its responsible minerals program to prevent the use of minerals associated with conflict or other high-risk contexts, protect human rights, health, and the environment in the regions where materials are sourced, and fulfill our corporate social responsibilities. We will:

1. Maintain compliance with applicable international regulations and standards, including the OECD Due Diligence Guidance, RMI RMAP, Dodd-Frank Act Section 1502, and relevant EU regulations
2. Strengthen the governance, processes, and internal controls of our responsible minerals management system through regular management reviews
3. Enhance supplier engagement by communicating requirements, cascading them upstream, and requiring timely CMRT/EMRT updates.
4. Continue to conduct ongoing due diligence, including at least semiannual reviews of RMAP Conformant/Active lists and CAHRAs screening, and implement corrective actions where necessary.
5. Publish an annual Responsible Minerals Due Diligence Report and increase transparency by disclosing smelter/refiner lists.

Appendix I: Conflict Minerals--Smelters & Refiners

Smelter ID	Metal	Standard Smelter Name	Country Location
CID003278	Cobalt	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN
CID003255	Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA
CID003225	Cobalt	Zhejiang Huayou Cobalt Company Limited	CHINA
CID003210	Cobalt	Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA
CID003878	Copper	Toyo Smelter & Refinery, Sumitomo Metal Mining	JAPAN
CID004729	Copper	LS MnM Inc.	KOREA, REPUBLIC OF
CID003996	Copper	JX Nippon Mining & Metals Co., Ltd. Hitachi	JAPAN
CID004249	Copper	Saganoseki Smelter & Refinery	JAPAN
CID000019	Gold	Aida Chemical Industries Co., Ltd.	JAPAN
CID000082	Gold	ASAHI METALFINE, Inc.	JAPAN
CID000707	Gold	Heraeus Metals Hong Kong Ltd.	CHINA
CID000807	Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
CID000924	Gold	Asahi Refining Canada Ltd.	CANADA
CID000937	Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
CID000981	Gold	Kojima Chemicals Co., Ltd.	JAPAN
CID001119	Gold	Matsuda Sangyo Co., Ltd.	JAPAN
CID001147	Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
CID001188	Gold	Mitsubishi Materials Corporation	JAPAN
CID001193	Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
CID001259	Gold	Nihon Material Co., Ltd.	JAPAN
CID001352	Gold	MKS PAMP SA	SWITZERLAND
CID001798	Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
CID001875	Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
CID001938	Gold	Tokuriki Honten Co., Ltd.	JAPAN
CID002030	Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA

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Smelter ID	Metal	Standard Smelter Name	Country Location
CID004055	Nickel	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN
CID002544	Tantalum	TANIOBIS Co., Ltd.	THAILAND
CID002549	Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
CID002550	Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
CID002545	Tantalum	TANIOBIS GmbH	GERMANY
CID001969	Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
CID002558	Tantalum	Global Advanced Metals Aizu	JAPAN
CID002504	Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
CID001163	Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
CID002557	Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
CID000914	Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
CID001522	Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
CID002506	Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
CID001192	Tantalum	Mitsui Mining & Smelting	JAPAN
CID000917	Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
CID001277	Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
CID000616	Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA
CID002492	Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
CID002842	Tantalum	Jiangxi Tuohong New Raw Material	CHINA
CID002548	Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA

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Smelter ID	Metal	Standard Smelter Name	Country Location
CID000468	Tin	Fenix Metals	POLAND
CID001105	Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
CID001173	Tin	Mineracao Taboca S.A.	BRAZIL
CID001182	Tin	Minsur	PERU
CID001337	Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
CID001477	Tin	PT Timah Tbk Kundur	INDONESIA
CID001482	Tin	PT Timah Tbk Mentok	INDONESIA
CID001898	Tin	Thaisarco	THAILAND
CID002517	Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
CID002773	Tin	Aurubis Beerse	BELGIUM
CID000538	Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
CID001191	Tin	Mitsubishi Materials Corporation	JAPAN
CID000402	Tin	Dowa	JAPAN
CID000004	Tungsten	A.L.M.T. Corp.	JAPAN
CID000258	Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
CID000825	Tungsten	Japan New Metals Co., Ltd.	JAPAN
CID002543	Tungsten	Masan High-Tech Materials	VIET NAM
CID002320	Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
CID002082	Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
CID002494	Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
CID002551	Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
CID000568	Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA

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AUSTRALIA	**CHINA**	**KAZAKHSTAN**	**POLAND**
BELGIUM	**GERMANY**	**KOREA, REPUBLIC OF**	**SWITZERLAND**
BOLIVIA (PLURINATIONAL STATE OF)	**INDIA**	**MALAYSIA**	**THAILAND**
BRAZIL	**INDONESIA**	**PERU**	**UNITED STATES OF AMERICA**
CANADA	**JAPAN**	**PHILIPPINES**	**VIET NAM**