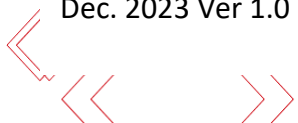




# Winbond Responsible Minerals Due Diligence Report

## 衝突礦產盡職調查報告



## Report Introduction

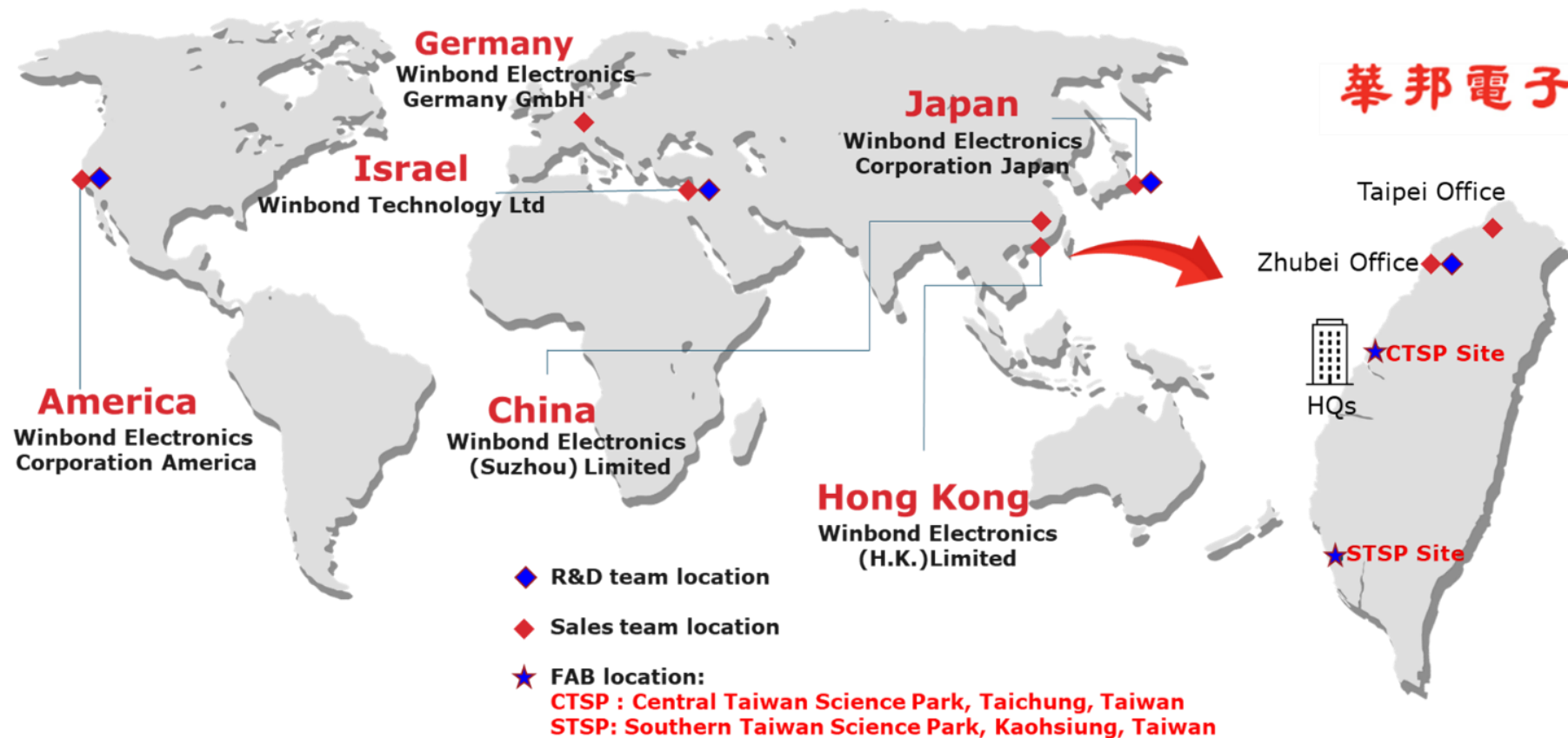
To prevent the unintentional use of tungsten, tantalum, tin, gold and cobalt minerals from conflict-affected and high-risk areas in the manufacturing process, Winbond Electronics Corp. (Winbond) performs responsible mineral procurement due diligence in accordance with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”, the RMI Framework and customer requirements to ensure that Winbond and its supply chain comply with international laws and regulations. Winbond committed not to engage in any activities that will cause the deterioration of society, environment and human rights, in order to fulfill the social responsibilities.

## Company Overview

Winbond was established in September 1987 and listed on Taiwan Stock Exchange in 1995, and is headquartered in Central Taiwan Science Park, Taichung, Taiwan. Winbond's 12-inch fabs, which are the factories with high levels of intelligent technology and automation, are located in Taichung and Kaohsiung Science Park.

Winbond is a Specialty memory IC company. From product design, research and development, and wafer fabrication to the marketing of brand name products, Winbond endeavors to provide its global clientele with total memory solutions. Winbond's major product lines include Code Storage Flash Memory, TrustME® Secure Flash, Specialty DRAM and Mobile DRAM. The Company is the only one in Taiwan with the ability to develop DRAM and FLASH products in-house. Our advantages of technological autonomy and prudent capacity strategies enable us to build a highly flexible production system and create synergy among product lines, which allows us to meet the diverse demands of customers while building our brand image. Winbond’s products are used extensively in handheld devices, consumer electronics, and computer peripherals. We also focus on high-barrier, high-quality applications, such automotive and industrial electronics. Winbond will continue to provide customer-oriented services. Furthermore, by leveraging the strength of our advanced semiconductor design and manufacturing know-how, observing the core values of "accountability, innovation and synergy" and incorporating the corporate spirit of "execution, innovation and passion" in all operational activities, Winbond will strive towards the goal of becoming a hidden champion in providing sustainable semiconductors technology to enrich human life.





## Product Scope

Winbond determines gold, tin, tungsten, or tantalum (“3TG”) are necessary to the production of a product manufactured or contracted to be manufactured. Winbond’s products are used extensively in handheld devices, consumer electronics, and computer peripherals and automotive and industrial electronics.



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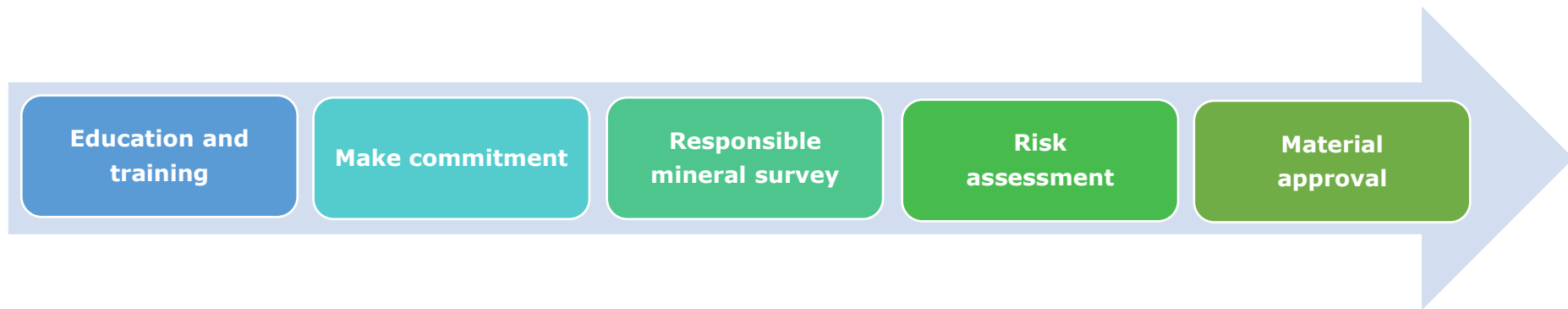
## Responsible sourcing of Minerals Policy

Winbond Follow RMI (Responsible Minerals Initiative) due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold, cobalt, mica in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

- Winbond requires all suppliers to conform to or sign onto the sustainability-related codes of conduct and ethics, Employee Code of Ethics, International Declaration of Human Rights, and International Labor Office Tripartite Declaration of Principles. They must have adopted policies on green products, environmental protection, and Hazardous Substance Free (HSF), or comply with the requirements set by the Responsible Business Alliance (RBA). Preference is given to vendors with ESG standards during the selection of new suppliers. Suppliers are classified and graded by Winbond for effective management and maintenance of approved suppliers. Regular supplier audits and conflict mineral investigations are also conducted. In 2023, all raw material suppliers had signed the Winbond Code of Ethics and Integrity, Winbond SUPPLIER CODE OF CONDUCT COMMITMENT LETTER (including clauses on compliance with RBA and Conflict Minerals Declaration)
- Ensure the absence of "responsible minerals from unqualified smelters" in Congo and surrounding countries and regions in their products, and adhere to the applicable regional and international laws for responsible minerals.



- Trace sources of all Gold (Au), Tantalum (Ta), Tin (Sn), Tungsten (W), Cobalt (Co), Mica, and other sources of responsible minerals published in the Responsible Minerals Initiative (RMI) in all products; while all suppliers should complete a connection report to confirm sources of related minerals and should use a list of RMI compliant smelters/refiners to avoid mines directly or indirectly financing armed groups in conflict-affected regions.
- Convey these requirements to their upstream suppliers.



## 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 have been designed and implemented on the following framework:



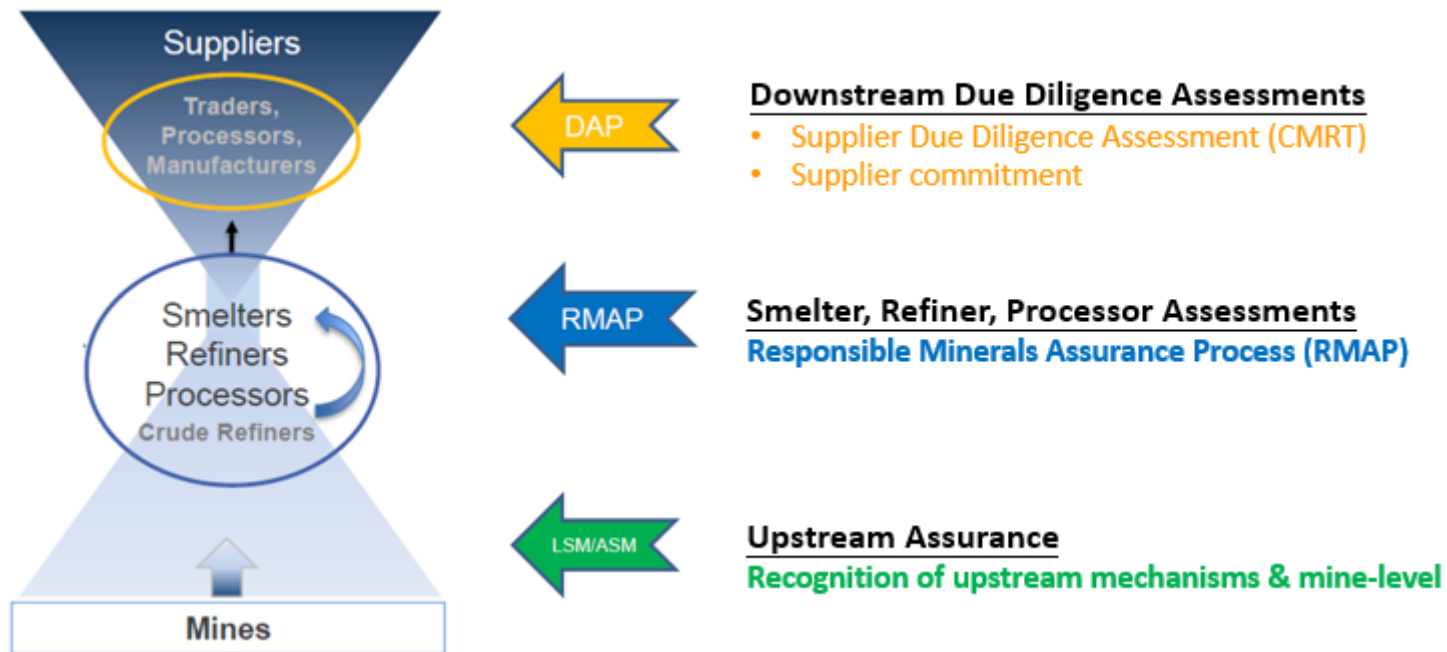
## 1. Establish strong company management systems

- Released a public responsible minerals policy in (Responsible Business Alliance - Responsible Business Alliance - Winbond)
- Winbond require all suppliers to sign Winbond's SUPPLIER CODE OF CONDUCT COMMITMENT LETTER.
- Winbond has been conducting 3TG surveys on suppliers since 2014, and conducts regular surveys at least twice a year and discloses the survey results based on the CMRT template version. Cobalt (Cobalt) and Mica (Mica) are also under EMRT investigation in the Winbond investigation system.
- Winbond require suppliers use RMI's CMRT (Conflict Minerals Reporting Template) and EMRT (Extended Minerals Reporting Template) to provide the smelters information.
- Winbond According to Winbond conflict minerals risk level control table to control materials.
- 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

- To identify materials SDS (Safety Data Sheet) to ensure whether content conflict minerals.
- To perform supplier surveys through CMRT to identify smelters and countries of origin for conflict minerals.
- To analyze data on CMRTs and EMRT to identify potentially inconsistent or high-risk smelters.
- To confirms the Conformant list and Active list announced on the RMI official website every six months. The confirmation results are processed according to the risk management table.
- To identify and assess risks on the circumstances of extraction, trading, handling and export of minerals from conflict-affected and high-risk areas.





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

- To confirm the Conformant list and Active list announced on the RMI official website every six months. The confirmation results are processed according to the risk management table.
- If a supplier used smelters in an active list or NOT in a conformant list, the supplier shall provide a risk management plan. Measurable risk mitigation should result in significant and measurable improvement towards eliminating the identified risks, other than serious abuses, within six months from the adoption of the risk management plan. If there is no such measurable improvement within six months, Winbond will suspend or discontinue engagement with the supplier for a minimum of three months.



- When a supplier of a smelter is at risk of seriously persecuting human rights or directly or indirectly supporting a non-state armed group, but the smelter does not immediately suspend or stop cooperation with its supplier, it should immediately take measures to stop trading with the smelter contacts.
- Implement the risk management plan, monitor risk mitigation and report performance to designated Top management, and consider suspending or discontinuing trade with a supplier after failed attempts at mitigation.
- Maintain ongoing risk monitoring, evaluate the effectiveness of risk mitigation efforts and undertake additional fact and risk assessments as required, for example following changes to the supply chain.

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

- Comparing supplier smelter data with RMI data to determine actual smelter origin with the Responsible Minerals Assurance Process (RMAP).
- Suppliers are encouraged to assist non-compliant smelters in obtaining RMAP certification, or other independent third-party audit programs.
- Require suppliers to provide an up-to-date version of any changes to their CMRT and maintain a steady line of communication through the Responsible Mining Platform.

#### 5. Report Annually on Supply Chain Due Diligence

Winbond provided smelters and refiners survey result in CMRT for our customers annually, and public the supply chain information in sustainability report (ESG report). The Responsible Mining Policy and related information are publicly available on our company website.

#### 6. Due Diligence Results

Following the provisions on conflict minerals in the Responsible Business Alliance's Code of Conduct, Winbond Electronics does not procure or utilize any minerals sourced from regions of the Democratic Republic of the Congo which are under the control of non-government or unlawful military groups. Prohibited minerals include gold (Au), silver (Ag), tantalum (Ta), Tungsten (W), and Tin (Sn). 100% of our main suppliers have



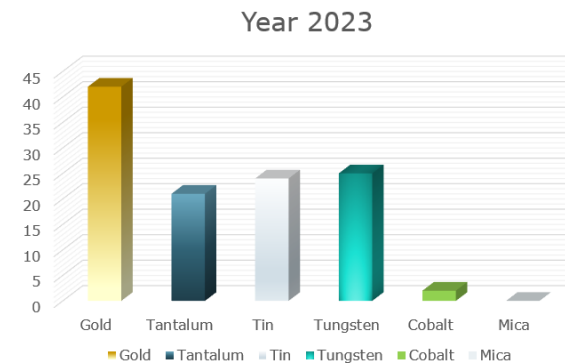


signed the Winbond Supplier Code of Conduct Commitment Letter, and we have also formally declared to our suppliers our policy of not using conflict minerals through public declarations on our official website and advocacy letters.

Winbond investigated conflict minerals on 17 of our suppliers. All of these suppliers were found to be compliant with related rules, and in 2023, no products were prohibited from being sold to Winbond.

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

Mineral	Year 2023
Gold	42
Tantalum	21
Tin	24
Tungsten	25
Cobalt	2
Mica	0
<b>Total</b>	<b>114</b>



## Continuous Improvement

Winbond will continue to conduct due diligence operations in accordance with Winbond policies to ensure that conflict minerals are not used, thereby protecting human rights, health and the environment in the production area where the material is sourced, and fulfilling corporate social responsibilities, including

1. Winbond will continue to comply with international laws and regulations related to conflict minerals
2. Winbond will continue to strengthen the conflict minerals management system
3. Winbond will continue to communicate with suppliers and require compliance with Winbond's conflict minerals policy
4. Winbond will continuous due diligence
5. Winbond will continue to issue annual due diligence report on conflict minerals



## Appendix I: Conflict Minerals--Smelters & Refiners

Smelter ID	Metal	Standard Smelter Name	Country Location
CID000019	Gold	Aida Chemical Industries Co., Ltd.	JAPAN
CID000035	Gold	Agosi AG	GERMANY
CID000058	Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
CID000077	Gold	Argor-Heraeus S.A.	SWITZERLAND
CID000082	Gold	Asahi Pretec Corp.	JAPAN
CID000090	Gold	Asaka Riken Co., Ltd.	JAPAN
CID000113	Gold	Aurubis AG	GERMANY
CID000157	Gold	Boliden Ronnskar	SWEDEN
CID000176	Gold	C. Hafner GmbH + Co. KG	GERMANY
CID000233	Gold	Chimet S.p.A.	ITALY
CID000401	Gold	Dowa	JAPAN
CID000425	Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
CID000694	Gold	Heimerle + Meule GmbH	GERMANY
CID000707	Gold	Heraeus Metals Hong Kong Ltd.	CHINA
CID000807	Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
CID000814	Gold	Istanbul Gold Refinery	TURKEY
CID000920	Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
CID000924	Gold	Asahi Refining Canada Ltd.	CANADA
CID000937	Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
CID000969	Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
CID000981	Gold	Kojima Chemicals Co., Ltd.	JAPAN



Smelter ID	Metal	Standard Smelter Name	Country Location
CID001078	Gold	LS MnM Inc.	KOREA, REPUBLIC OF
CID001119	Gold	Matsuda Sangyo Co., Ltd.	JAPAN
CID001147	Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
CID001149	Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
CID001152	Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
CID001153	Gold	Metalor Technologies S.A.	SWITZERLAND
CID001157	Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
CID001161	Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
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
CID001534	Gold	Royal Canadian Mint	CANADA
CID001761	Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
CID001798	Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
CID001875	Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
CID001938	Gold	Tokuriki Honten Co., Ltd.	JAPAN
CID001980	Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
CID001993	Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
CID002003	Gold	Valcambi S.A.	SWITZERLAND
CID002030	Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
CID000460	Tantalum	F&X Electro-Materials Ltd.	CHINA
CID000616	Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA



Smelter ID	Metal	Standard Smelter Name	Country Location
CID000914	Tantalum	Jiujiang JinXin Nonferrous Metals Co., Ltd.	CHINA
CID000917	Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
CID001163	Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
CID001192	Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
CID001200	Tantalum	NPM Silmet AS	ESTONIA
CID001277	Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA
CID001522	Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
CID001891	Tantalum	Telex Metals	UNITED STATES OF AMERICA
CID001969	Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
CID002492	Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
CID002505	Tantalum	FIR Metals & Resource Ltd.	CHINA
CID002506	Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
CID002544	Tantalum	TANIOBIS Co., Ltd.	THAILAND
CID002545	Tantalum	TANIOBIS GmbH	GERMANY
CID002549	Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
CID002550	Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
CID002557	Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
CID002558	Tantalum	Global Advanced Metals Aizu	JAPAN
CID002842	Tantalum	Jiangxi Tuohong New Raw Material	CHINA
CID000468	Tin	Fenix Metals	POLAND
CID000538	Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
CID001105	Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
CID001173	Tin	Mineracao Taboca S.A.	BRAZIL



Smelter ID	Metal	Standard Smelter Name	Country Location
CID001182	Tin	Minsur	PERU
CID001191	Tin	Mitsubishi Materials Corporation	JAPAN
CID001231	Tin	Jiangxi New Nanshan Technology Ltd.	CHINA
CID001337	Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
CID001399	Tin	PT Artha Cipta Langgeng	INDONESIA
CID001406	Tin	PT Babel Surya Alam Lestari	INDONESIA
CID001453	Tin	PT Mitra Stania Prima	INDONESIA
CID001458	Tin	PT Prima Timah Utama	INDONESIA
CID001460	Tin	PT Refined Bangka Tin	INDONESIA
CID001477	Tin	PT Timah Tbk Kundur	INDONESIA
CID001482	Tin	PT Timah Tbk Mentok	INDONESIA
CID001490	Tin	PT Tinindo Inter Nusa	INDONESIA
CID001898	Tin	Thaisarco	THAILAND
CID002158	Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
CID002503	Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
CID002773	Tin	Aurubis Beerse	BELGIUM
CID002835	Tin	PT Menara Cipta Mulia	INDONESIA
CID003205	Tin	PT Bangka Serumpun	INDONESIA
CID003325	Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
CID003381	Tin	PT Rajawali Rimba Perkasa	INDONESIA
CID000004	Tungsten	A.L.M.T. Corp.	JAPAN
CID000105	Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA



Smelter ID	Metal	Standard Smelter Name	Country Location
CID000218	Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
CID000258	Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
CID000568	Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA
CID000766	Tungsten	Hunan Chenzhou Mining Co., Ltd.	CHINA
CID000825	Tungsten	Japan New Metals Co., Ltd.	JAPAN
CID002044	Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
CID002082	Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
CID002315	Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
CID002316	Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
CID002317	Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
CID002318	Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
CID002319	Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
CID002320	Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
CID002321	Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
CID002494	Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
CID002513	Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA
CID002541	Tungsten	H.C. Starck Tungsten GmbH	GERMANY
CID002542	Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY
CID002543	Tungsten	Masan High-Tech Materials	VIET NAM
CID002551	Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
CID002589	Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
CID002645	Tungsten	Ganzhou Haichuang Tungsten Co., Ltd.	CHINA



Smelter ID	Metal	Standard Smelter Name	Country Location
CID003407	Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
CID003278	Cobalt	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN
CID003255	Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA





## Appendix II: Conflict Minerals-- Countries of Origin

AUSTRALIA	CANADA	INDONESIA	MALAYSIA	SWEDEN	UNITED STATES OF AMERICA
AUSTRIA	CHINA	ITALY	MEXICO	SWITZERLAND	VIET NAM
BELGIUM	ESTONIA	JAPAN	PERU	TAIWAN, PROVINCE OF CHINA	
BOLIVIA (PLURINATIONAL STATE OF)	GERMANY	KAZAKHSTAN	POLAND	THAILAND	
BRAZIL	INDIA	KOREA, REPUBLIC OF	SINGAPORE	TURKEY	

