



# Winbond Responsible Minerals Due Diligence Report

## 衝突礦產盡職調查報告

**winbond**  
We Deliver

## 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 fab, which is a factory with high levels of smart technology and automation, is located in Taichung 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.



## Responsible sourcing of Minerals Policy

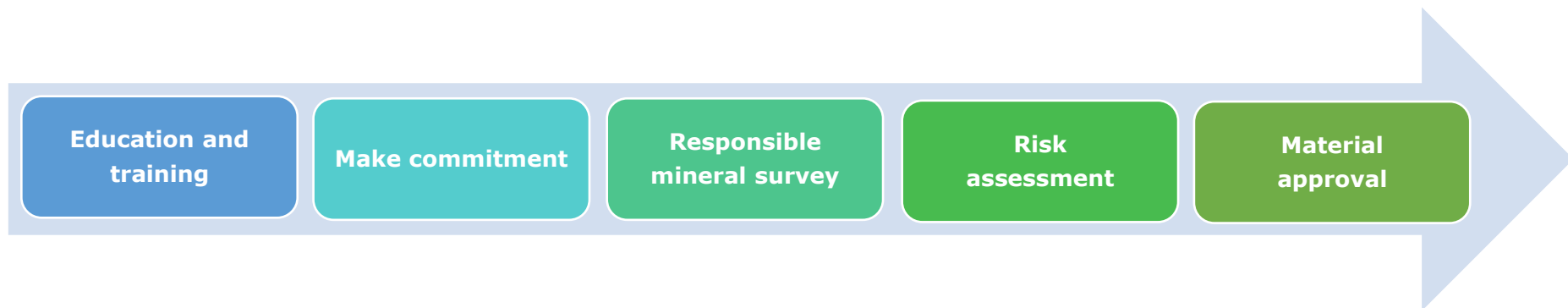
Winbond Follows RMI (Responsible Minerals Initiative) due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold, cobalt, mica in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation 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 2022, all (163)



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

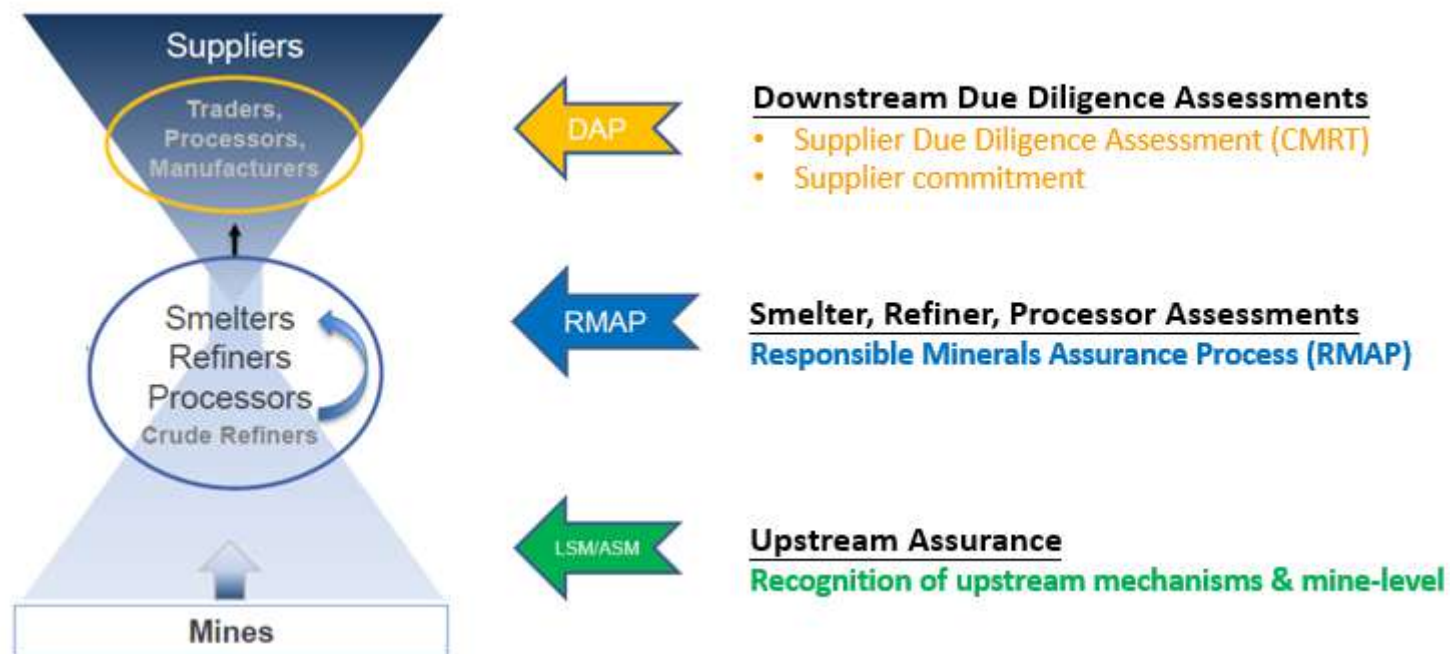
- Released a public responsible minerals policy in (Responsible Business Alliance - Responsible Business Alliance - Winbond)
- Winbond require all suppliers to sign Winbond's SUPPLIER CODE OF CONDUCT COMMITMENT LETTER.
- Winbond has been conducting 3TG surveys on suppliers since 2014, and conducts regular 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 the active list or NOT in the 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 (166

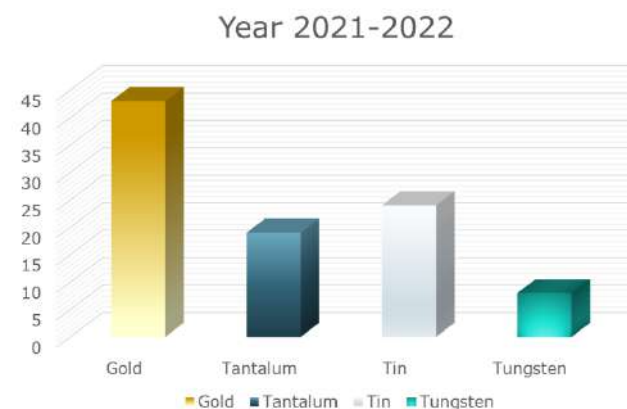


suppliers in total) have signed the Winbond Supplier Code of Conduct Commitment Letter, and we have also formally declared to our suppliers our policy of not using conflict minerals through public declarations on our official website and advocacy letters.

Winbond investigated conflict minerals on 18 of our suppliers (9 raw materials suppliers and 9 outsourcers). All of these suppliers were found to be compliant with related rules, and in 2021~2022, no products were prohibited from being sold to Winbond.

- Appendix I: Conflict Minerals--Countries of Origin

Mineral	Year 2021-2022
Gold	43
Tantalum	19
Tin	24
Tungsten	8
<b>Total</b>	<b>94</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--Countries of Origin

Countries of Origin/ Conflict Minerals	Gold	Tantalum	Tin	Tungsten
AUSTRALIA	v			
BELGIUM	v		v	
BOLIVIA			v	
BRAZIL	v		v	
CANADA	v			
CHINA	v	v	v	v
ESTONIA		v		
GERMANY	v	v		
INDIA		v		
INDONESIA			v	
ITALY	v			
JAPAN	v	v	v	
KAZAKHSTAN		v		
KOREA	v			
MALAYSIA			v	
MEXICO	v			
PERU			v	
POLAND			v	
SINGAPORE	v			
SWEDEN	v			
SWITZERLAND	v			
TAIWAN, PROVINCE OF CHINA	v			
THAILAND		v	v	
TURKEY	v			
UNITED STATES OF AMERICA	v	v	v	v

