



**1341 South Sunkist Street**  
Anaheim, CA 92806

## **ASAP SEMICONDUCTOR, LLC**

### **CONFLICT MINERALS POLICY**

#### **Policy**

ASAP Semiconductor is committed to conducting its business in a socially responsible manner and recognizes the importance of respecting human rights and contributing to the sustainable development of communities. In alignment with this commitment, ASAP Semiconductor hereby establishes the following Conflict Minerals Policy:

#### **1. Scope**

This policy applies to all products obtained for sale by ASAP Semiconductor that may contain conflict minerals sourced from the Democratic Republic of the Congo (DRC) or adjoining countries. Conflict minerals include tantalum, tin, tungsten, and gold, (also referred to as "3TG") as defined by the Dodd-Frank Wall Street Reform and Consumer Protection Act.

#### **2. Compliance with Dodd-Frank Act**

ASAP Semiconductor is dedicated to complying with all applicable laws and regulations. Section 1502 of the Dodd-Frank Act, which requires companies to disclose the use of conflict minerals originating from the DRC or adjoining countries in products, does not apply directly to ASAP Semiconductor. However, it does apply to many of ASAP Semiconductor's customers, and we endeavor to support them with their compliance obligations.

#### **3. Responsible Sourcing**

ASAP Semiconductor is committed to sourcing conflict minerals responsibly and ethically. We expect our suppliers to adhere to the following principles:

- Conduct due diligence to determine the origin of conflict minerals in their supply chain.
- Use conflict-free sources and avoid purchasing minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.
- Support initiatives aimed at improving transparency and traceability in the supply chain.

#### **4. Supplier Engagement**

ASAP Semiconductor will work collaboratively with its suppliers to ensure compliance with this policy. Suppliers from time-to-time may be required to provide accurate and complete information regarding the origin of conflict minerals in their products and demonstrate their commitment to responsible sourcing practices.

#### **5. Monitoring and Reporting**

ASAP Semiconductor will establish procedures to monitor and assess compliance with this policy. We will regularly review our supply chain practices and engage with suppliers to address any identified risks or non-compliance issues.

#### **6. Continuous Improvement**

ASAP Semiconductor is dedicated to continuously improving its conflict minerals management practices. We will seek opportunities to enhance transparency, traceability, and responsible sourcing throughout our supply chain.

#### **7. Communication and Training**

ASAP Semiconductor will communicate this policy to all relevant stakeholders, including employees, suppliers, and customers. We will provide training and support to ensure understanding and compliance with the requirements outlined in this policy.

#### **8. Stakeholder Engagement**

ASAP Semiconductor is committed to engaging with stakeholders to promote responsible sourcing practices and address concerns related to conflict minerals. We will actively participate in industry initiatives and collaborate with relevant stakeholders to drive positive change.

#### **Conclusion**

ASAP Semiconductor is dedicated to upholding the highest standards of ethical conduct and social responsibility. Through the implementation of this Conflict Minerals Policy, we reaffirm our commitment to respecting human rights, supporting responsible sourcing practices, and contributing to the sustainable development of communities affected by conflict minerals.