

CONFLICT MINERALS: SEMTECH'S POLICY, PROGRAM AND EXPECTATIONS

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1. OBJECTIVE

- 1.1. To define a set of guidelines and expectations for Semtech's suppliers, Semtech's Conflict Minerals program and policy.
- 1.2. To define a set of expectations when responding to Semtech's request for Conflict Minerals Reporting Template (CMRT) declarations
- 1.3. To define a set of guidelines for the yearly declaration and reporting to the Security and Exchange Commission, SEC.

2. SCOPE

- 2.1. Applies to all Semtech business units who develop product, manufacture or oversee the manufacture of Semtech product.
- 2.2. Applies to the fabrication and assembly suppliers who procure metals used in the fabrication or assembly of Semtech product or within the processing of such product. These metals are gold (Au), tantalum (Ta), tungsten (W), and tin (Sn) and are commonly referred to as the "3TG".
- 2.3. "Conflict Minerals Disclosure," report the results of the Reasonable Country of Origin Inquiry (RCOI) as performed in good faith regarding those conflict minerals required for Semtech Corporation and applicable suppliers within its supply chain.

3. HIERARCHY OF DOCUMENTS

- 3.1. Unless otherwise specifically agreed to or approved by the Corporate Quality Manager, in the event of any conflict between the provisions of this procedure, forms, guidelines or requirements, the order of precedence is as follows: (i) this procedure and any Addendum or any Appendices thereto; (ii) and then Semtech Corporate Quality Manual (iii) any applicable approved customer requirement contract or agreement (iiii) as applicable the ISO, AS, IATF, or OHSAS standard.

4. ADJUNCT PROCEDURE OR SPECIFICATION

- 4.1. Typically, no adjunct procedure or specification is needed or required in place of this procedure. If a local site has an established process or procedure exceeding, not circumventing, the guidelines and requirements of this procedure, then such an adjunct procedure may be authorized keeping the guidelines below in mind.
- 4.2. Exception to this procedure or specification at the local site level requires a local adjunct procedure outlining the exception, approved and controlled within PLM document management system and approved by both the site Quality Manager and the Corporate Quality Manager. Furthermore, an exception clause must be inserted in their applicable local Supplemental Quality Manual.
- 4.3. When an exception is documented and approved, the Supplemental Quality Manual shall be identified within the Relationship tab of the relevant local adjunct procedure.

5. DEFINITIONS (TERMS, ACRONYMS AND ABBREVIATIONS)

The terms and acronyms identified below are typical in their use within Semtech's quality management system, Semtech's environmental management system and not solely for the use within this document.

- 5.1. PLM: Product Lifecycle Management
- 5.2. CEO: Chief Executive Officer
- 5.3. QAM: Quality Assurance Manager
- 5.4. Q&R: Quality and Reliability
- 5.5. APQP: Advanced Product Quality Planning
- 5.6. PPAP: Production Part Approval Process
- 5.7. CAPA: Corrective Action, Preventive Action
- 5.8. CAR: Corrective Action Request
- 5.9. PAR: Preventive Action Request
- 5.10. SCAR: Supplier Corrective Action Request
- 5.11. NA: Not Applicable
- 5.12. NS: Not Scored
- 5.13. QC: Quality Control
- 5.14. HR: Human Resources
- 5.15. LMS: Learning Management System
- 5.16. OFI: Opportunity for Improvement
- 5.17. ORT: On-going Reliability Testing
- 5.18. EICC: Electronic Industry Citizen Coalition
- 5.19. CMRT: Conflict Mineral Reporting Template
- 5.20. SAR: Supplier Action Request
- 5.21. CFSI: Conflict Free Sourcing Initiative
- 5.22. CFSP: Conflict Free Smelter Program
- 5.23. CR: Customer Request
- 5.24. ECO: Engineering Change Order
- 5.25. MCO: Manufacturing Change Order

- 5.26. AVL: Approved Vendor List
- 5.27. QMS: Quality Management System
- 5.28. SFDC: Sales Force Dot Com
- 5.29. ERP: Enterprise Resource Planning
- 5.30. SAP: Systems Applications and Products (in Data Processing)
- 5.31. MRB: Material Review Board
- 5.32. NCMR: Non-Conforming Material Review
- 5.33. CF: Counterfeit / Fraudulent
- 5.34. OCM: Original Contract Manufacturer
- 5.35. OEM: Original Equipment Manufacturer
- 5.36. RMA: Return Material Authorization
- 5.37. COD: Certificate of Destruction
- 5.38. EMS: Environment Management System
- 5.39. DMR: Design Modification Record
- 5.40. PCN: Process or Product Change Notification
- 5.41. EOL: End of Life
- 5.42. RoHS: Restriction on Hazardous Substances
- 5.43. REACH: Registration, Evaluation, Authorization and restriction of Chemicals
- 5.44. WEEE: Waste Electrical and Electronic Equipment
- 5.45. 3TGs: Tungsten, Tantalum, Tin and Gold. Metals pertaining to conflict mineral program.
- 5.46. IATF: International Automotive Task Force
- 5.47. SMD: Surface Mount Device
- 5.48. MSL: Moisture Sensitivity Level
- 5.49. IMDS: International Material Data System
- 5.50. RBA: Responsible Business Alliance (formally, EICC)
- 5.51. RMI: Responsible Minerals Initiative
- 5.52. EMRT: Extended Minerals Reporting Template
- 5.53. RLI: Responsible Labor Initiative (formally, EICC Code of Conduct)
- 5.54. RRA: Risk Readiness Assessment
- 5.55. RMAP: Responsible Mineral Assessment Process
- 5.56. CTQ: Critical to Quality
- 5.57. CTF: Critical to Function
- 5.58. CTS: Critical to Safety
- 5.59. ADAS: Advanced Driver Assistance System
- 5.60. EMRT- Extended Materials Reporting Template
- 5.61. LiDAR: Light Detection and Ranging

6. RELATED DOCUMENTS

- 6.1. Related documents noted below and throughout this document are applicable to the extent noted herein.
- 6.2. The documents listed below and referenced throughout this document provide further background information and guidance. Within such referenced document there may contain listed applicable documents which must also be considered.
- 6.3. Undated Documents
 - 6.3.1. User is responsible to verify current or applicable revision level within PLM Document Management System prior to use.
- 6.4. External Reference Documents
 - 6.4.1. ISO 9001
 - 6.4.2. ISO 14001
 - 6.4.3. IATF 16949
 - 6.4.4. OHSAS 45001
 - 6.4.5. <https://mneguidelines.oecd.org/mining.htm>
- 6.5. Internal Reference Documents
 - 6.5.1. SFBN-4MRP6X: Corporate Quality Manual
 - 6.5.2. PSAZ-5AFU9J: Change Control Procedure
 - 6.5.3. KFID-4KWSAP: Control of Quality Records
 - 6.5.4. SEMDOC004964: Risk Management

7. REQUIREMENTS

- 7.1. Semtech personnel must be trained in PLM Basic, and verify proficiency in File Folder maintenance, and search techniques. PLM Basic training must be documented and posted within individual training records in Cornerstone Learning Management System (LMS).
- 7.2. Semtech personnel must be familiar with excel and formula configuration.
- 7.3. Semtech personnel must verify access to RBA Conflict Minerals portal for the latest CMRT, RMAP listing and smelter reports.

8. SUPPORT DOCUMENTS AND FILES

- 8.1. Semtech Conflict Mineral Policy Statement
- 8.2. Semtech Conflict Mineral Reporting Statement
- 8.3. Conflict Mineral Master Table: link [here](#)
- 8.4. Supplier Action Request Form (SAR): link [here](#)
- 8.5. RBA Conflict Mineral Reporting Template

9. RBA CMRT AND SAR DEFINITIONS

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| 3TG | Tantalum, tin, tungsten, gold |
| Authorizer | This field identifies the person responsible for the content of the declaration. The authorizer may be a different individual from the contact person. It is not correct to use the words “same” or similar identification to provide the name of the authorizer. |
| RMAP Conformant Smelter List | <p>The Responsible Minerals Assurance Process (RMAP) Conformant Smelter List is a published list of smelters and refiners that have undergone assessment through the RMAP, a program of the Responsible Minerals Initiative (RMI), or industry equivalent program (such as Responsible Jewelry Council or London Bullion Market Association) and have been validated to be in compliance with the protocols. If a smelter or refiner is not on the list, it has either not completed a RMAP assessment or is not in compliance with the RMAP protocol.</p> <p>A list of smelters and refiners which have been validated to be conformant to the RMAP can be found at www.conflictreesourcing.org.</p> |
| Responsible Minerals Assurance Process (RMAP) | The Responsible Minerals Assurance Process (RMAP) is a program developed by the RBA and GeSI to enhance company capability to verify the responsible sourcing of metals. Further details of the RMAP can be found here |
| Conflict-Free Sourcing Initiative (currently known as Responsible Minerals Initiative) | Founded in 2008 by members of the Electronic Industry Citizenship Coalition (currently known as Responsible Business Alliance) and the Global e-Sustainability Initiative, the Conflict-Free Sourcing Initiative (currently known as Responsible Minerals Initiative) has grown into one of the most utilized and respected resources for companies addressing conflict minerals issues in their supply chains. Over 150 companies from seven different industries participate in the RMI today, contributing to a range of tools and resources including the Conflict-Free Smelter Program (currently known as Responsible Minerals Assurance Process), the Conflict Minerals Reporting Template, Reasonable Country of Origin Inquiry data and a range of guidance documents on conflict minerals sourcing. The RMI also runs regular workshops on conflict minerals issues and contributes to policy development and debates with leading civil society organizations and governments. Additional information is available at, link here |
| Conflict Mineral | <p>As defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4):</p> <p>CONFLICT MINERAL. —The term “conflict mineral” means— (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. (available at here)</p> |
| Covered Country(ies) | Covered Country(ies) as defined by the United States Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These countries include the Democratic Republic of the Congo and the nine countries with which it shares an internationally recognized border: Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia. |

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| Declaration Scope or Class | For the purposes of this template, “scope” describes the applicability of the information provided by the reporting company. The scope may encompass the entirety of a company’s services and/or products, or at a company’s discretion, the template may be used to report on a specific product (or products), or be ‘User defined’. The ‘User defined’ scope selection or class may be used to describe any subset of a company’s operation or product portfolio. |
| Dodd-Frank | 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (“Dodd-Frank”). See link here |
| DRC | Democratic Republic of Congo |
| DRC conflict-free | Products that do not contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Source: 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502. Link here |
| RBA | Responsible Business Alliance (formally known as the Electronic Industry Citizenship Coalition) (see link here) |
| GeSI | Global e-Sustainability Initiative (https://gesi.org/) |
| Gold (Au) refiner (smelter) | A gold refiner is a metallurgical operation that produces fine gold with a concentration of 99.5% or higher from gold and gold-bearing materials with lower concentrations. Refer to the RMAP audit protocol for this metal for a complete description, see protocol here |
| Independent Third- Party Audit Firm | With respect to smelter audits, an “Independent Third-Party Audit Firm” is a private sector organization competent in evaluating the smelter or refiner’s materials traceability against the standards of the RMAP or equivalent audit protocols. To maintain neutrality and impartiality, such organization and its audit team members must have no conflicts of interest with the auditee. |
| Intentionally added | <p>Intentionally added is commonly known as the deliberate use of a substance, or in this case metal, in the formulation of a product where continued presence is desired to provide a specific characteristic, appearance or quality.</p> <p>While the SEC does not define the phrase “intentionally added” in the final rule*, the rule’s preamble states: “[W]e agrees that being intentionally added, rather than being a naturally occurring by-product, is a significant factor in determining whether a conflict mineral is “necessary to the functionality or production’ of a product. This is true regardless of who intentionally added the conflict mineral to the product as long as it is contained in the product. Determining whether a conflict mineral is considered “necessary” to a product should not depend on whether the conflict mineral is added directly to the product by the issuer or whether it is added to a component of the product that the issuer receives from a third party. Instead, the issuer should ‘report on the totality of the product and work with suppliers to comply with the requirements.’ Therefore, in determining whether a conflict mineral is “necessary” to a product, an issuer must consider any conflict mineral contained in its product, even if that conflict mineral is only in the product because it was included as part of a component of the product that was manufactured originally by a third party.” *(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)</p> |

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| IPC | IPC (https://www.ipc.org/) is a global industry association based in Bannockburn, Ill., dedicated to the competitive excellence and financial success of its 3,400 member companies which represent all facets of the electronics industry, including design, printed board manufacturing, electronics assembly and test. As a member-driven organization and leading source for industry standards, training, market research and public policy advocacy, IPC supports programs to meet the needs of an estimated \$2.0 trillion global electronics industry. IPC maintains additional offices in Taos, N.M.; Washington, D.C.; Stockholm, Sweden; Moscow, Russia; Bangalore, India; Bangkok, Thailand; and Shanghai, Shenzhen, Chengdu, Suzhou and Beijing, China. |
| IPC-1755 Conflict Minerals Data Exchange Standard | This IPC standard establishes the requirements for exchanging conflict minerals data between suppliers and their customers. To meet the needs of a broad range of users, this standard provides flexibility in the scope of the products covered within a single declaration. This standard is not a compliance guide. |
| Necessary for the Functionality of a Product | <p>The SEC does not provide a formal definition of this phrase in the final rule*, however it provides some guidance: A conflict mineral will be considered to be necessary to its functionality of a product if it meets the following: 1) is intentionally added to the product or any component of the product and is not a naturally-occurring byproduct; 2) is necessary to the product's generally expected function, use or purpose; and 3) is incorporated for the purpose of ornamentation, decoration, or embellishment, whether the primary purpose of the product is ornamentation or decoration.</p> <p>NOTE: The conflict mineral must be contained in the product to be applicable.</p> <p>*(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)</p> |
| Necessary for the Production of a Product | <p>The SEC does not provide a formal definition of this phrase in the final rule*; however, it provides some guidance: A conflict mineral will be considered to be necessary to the production of a product when: 1) it is intentionally included in the product's production process, other than if it is included in a tool, machine, or equipment used to produce the product (such as computers or power lines); 2) it is included in the product (MUST be contained in the product to be applicable); and 3) it is necessary to the product.</p> <p>*(56296 Federal Register / Vol. 77, No. 177 / Wednesday, September 12, 2012 / Rules and Regulations)</p> |
| OECD | Organization for Economic Co-operation and Development |
| Product | A company's Product or Finished good is a material or item which has completed the final stage of manufacturing and/or processing and is available for distribution or sale to customers. |
| Recycled or Scrap Sources | <p>Recycled or scrap sources are recycled metals, that are reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials that contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and/or gold.</p> <p>Minerals partially processed, unprocessed or byproducts from other ores are not included in the definition of recycled metal.</p> |
| SEC | U.S. Securities and Exchange Commission (https://www.sec.gov/) |

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| Smelter | A smelter or refiner is a company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts. The terms “smelter” and “refiner” are used interchangeably throughout various publications. |
| Smelter Identification Number | A unique identification number the RMI assigns to companies that have been reported by members of the supply chain as smelters or refiners, whether they have been verified to meet the characteristics of smelters or refiners as defined in the RMAP audit protocols. |
| Tantalum (Ta) smelter | A tantalum smelter (also known as a processor) is defined as a company that converts Ta-containing ores, concentrates, slags or secondary materials into tantalum intermediate products or other tantalum containing products for direct sales or further processing into Ta-containing products, such as Ta powders, Ta components, Ta oxides, alloys, wires, sintered bars, etc. Refer to the RMAP audit protocol for this metal for a complete description: see protocol here |
| Tin (Sn) smelter | Primary [tin] smelters are companies with one or more facilities treating tin containing ore concentrates in order to produce tin metal. Secondary [tin] smelters are companies with one or more facilities that treat secondary materials by reduction for the production of crude or higher-grade tin or tin product such as solder. A smelter as referred to within this audit protocol may operate as either one or both types of business operation. Refer to the RMAP audit protocol for this metal for a complete description: see protocol here |
| Tungsten (W) smelter | A company with one or more facilities that converts W-containing ores (such as wolframite and scheelite), W concentrates, or W-bearing scrap (secondary material) into tungsten containing intermediates such as Ammonium Para-Tungstate (APT), Ammonium Meta-Tungstate (AMT), ferrotungsten, and tungsten oxides for direct sales or further processed into W-containing products (such as W powder or W-carbide powder). Refer to the RMAP audit protocol for this metal for a complete description, see protocol here |
| Supplier Action Request (SAR) | A Semtech Corporation generated form used for the sole purpose of identifying issues with supplier Conflict Mineral declarations (CMRT). The Supplier Action Request will also list recommendations To bring the CMRT declaration into compliance. Supplier response to a Supplier Action Request is 15 days from date of SAR. Refer to the URL below for the PLM controlled SAR form |

10. SEMTECH DUE DILIGENCE IN-LINE WITH OCED FRAMEWORK

10.1. Establish strong company management systems.

10.1.1. Conflict Minerals Policy Statement. Semtech Corporation is committed to responsible sourcing of minerals and supports the goals of the Dodd-Frank Act and OECD Guidance. We do not knowingly procure 3TG minerals (Tantalum, Tin, Tungsten, and Gold) originating from conflict-affected or high-risk areas (CAHRAs) that finance or benefit armed groups.

10.1.2. Internal Control Systems

10.1.2.1. Responsibility is assigned to the Corporate Quality and Conflict Minerals Reporting (CMR) Team.

10.1.2.2. Policies and procedures are documented in PLM and are reviewed annually.

10.1.2.3. Due diligence measures are integrated into company-level management systems.

10.1.3. Supplier Engagement

- 10.1.3.1. Suppliers are required to comply with Semtech's Conflict Minerals Policy.
- 10.1.3.2. Suppliers must submit up-to-date Conflict Minerals Reporting Templates (CMRT's) and Extended Minerals Reporting Templates (EMRT's).
- 10.1.3.3. Suppliers are expected to use smelters/ refiners that are validated as conformant by an independent third-party audit program (e.g. RMI RMAP, LBMA, RJC).

10.1.4. Grievance Mechanism

- 10.1.4.1. Semtech maintains a dedicated email (conflictfree@semtech.com) for reporting grievances related to mineral sourcing.

10.2. IDENTIFY AND ASSESS RISKS IN THE SUPPLY CHAIN

10.2.1. Supply Chain Mapping

- 10.2.1.1. Semtech conducts supply chain surveys down to the smelter/refiner level.
- 10.2.1.2. All suppliers are required to disclose smelter information and scope details.

10.2.2. Risk Identification

- 10.2.2.1. Risks identification includes the following steps:
- 10.2.2.2. Identify direct suppliers that supply products to Semtech that may contain conflict minerals/.
- 10.2.2.3. Conducting a supply-chain survey with direct suppliers using the CMRT to identify the smelters and refiners which contribute refined conflict minerals to Semtech's products.
- 10.2.2.4. Reviewing Semtech direct supplier responses for completeness and accuracy.
- 10.2.2.5. Comparing the smelters and refiners identified by direct suppliers via the supply-chain survey against the list of smelter and refiner facilities which have received an RMAP Conformant designation as a result of the independent third-party smelter audit conducted pursuant to RMI's Responsible Minerals Assurance Process ("RMAP").
- 10.2.2.6. Each facility that meets the RMI definition of a smelter or refiner of a Conflict Minerals is assessed according to red flag indicators defined in the OECD Guidance. To determine the level of risk that each smelter posed to the supply chain, we should assess the following criteria: geographic proximity to the Covered Countries, known mineral source country of origin, RMAP audit status, credible evidence of unethical or conflict sourcing, and peer assessments conducted by credible third-party sources.
- 10.2.2.7. Reviewing other information provided by direct suppliers with respect to their investigations regarding smelters and refiners within their supply chain.
- 10.2.2.8. Evaluating direct suppliers on the strength of their internal Conflict Minerals programs as reflected in their CMRTs. When direct suppliers met or exceeded the below criteria (that is, responsible "yes" to all four questions listed below), they were deemed to have a strong program. When they responded "No" to any one or more of the questions, they are deemed to have a weak program. The criteria used to evaluate the strength of their programs are based on these four questions in the CMRT:
- 10.2.2.9. Have you established a conflict minerals sourcing policy?
- 10.2.2.10. Have you implemented due diligence measures of conflict -free sourcing?
- 10.2.2.11. Do you review due diligence information received from your suppliers against your company's expectations?
- 10.2.2.12. Does your review process include corrective action management?

10.2.3. Some of the Risk Indicators and Red Flags are listed below:

- 10.2.3.1. Sourcing from or transit through high-risk areas
- 10.2.3.2. Use of non-conformant or uncertified smelters.
- 10.2.3.3. Lack of transparency or refusal to disclose supply chain information
- 10.2.3.4. Conflict mineral program strength of supplier.
- 10.3. Design and implement a strategy to respond to identify risks:
 - 10.3.1. Providing direct suppliers with feedback through Supplier Action Requests (SARs) on responses containing errors, red flags, inconsistencies or incomplete information and encouraged them to resubmit a valid response within defined timelines (5–15 days).
 - 10.3.2. Maintaining an escalation plan in the event that we have to address non-responsive suppliers and/or to contact suppliers that provided incomplete or inaccurate supply chain information.
 - 10.3.3. Requesting direct suppliers to remove specific smelters or refiners from their supply chain that are deemed to be high risk.
 - 10.3.4. Non-compliant cases are escalated to executive leadership (EVP or Q&R, VP of Legal, and SVP or Operations).
 - 10.3.5. Risk assessment is documented through internal records such as Management Review Reports and PLM entries.
 - 10.3.6. Suppliers must provide evidence that non-conformant smelters have been transitioned out of the supply chain.
- 10.4. Carry out independent third-party audits of smelter/ refiner due diligence practices
 - 10.4.1. Smelter Verification
 - 10.4.1.1. Smelters must be validated under RMI's RMAP or equivalent schemes (e.g. LBMA, RJC).
 - 10.4.1.2. Semtech uses the most recent RMAP smelter list to verify all supplier-declared smelters.
 - 10.4.2. Encouragement of Third-Party Audits
 - 10.4.2.1. Suppliers are encouraged to engage in downstream audits under the RMI or other recognized audit protocols.
 - 10.4.2.2. Semtech may initiate spot audits to validate due diligence compliance.
- 10.5. Report annually on supply chain due diligence:
 - 10.5.1. Semtech will disclose further information about our supply chain due diligence is disclosed in the Semtech Policy regarding Conflict Metals Procured from Conflict Area which is posted on our website at [Metals-Procured-from-Conflict-Areas-Policy.pdf](#) and our Conflict Minerals Policy which is posted on our website at [SEMDOC004328-Conflict-Minerals-Semtech-Policy-Program-Expectations.pdf](#) also reported supply chain smelter information in [Conflict Minerals Report.pdf](#)

11. SEMTECH SUPPLY CHAIN / RMI EXPECTATIONS

The following are Semtech's requirements for conflict mineral reporting.

- 11.1. Source only from validated (conformant as defined below) smelters within our supply chain
- 11.2. Suppliers must only source from Semtech approved smelters and refiners within Semtech's supply chain. Semtech approved smelters and refiners are defined as meeting all the following requirements:
- 11.3. Only active smelters participating in RBA RMI undergoing validation and audit and are so identified with the RMAP listing will be accepted
- 11.4. Only smelters certified through RBA RMAP as conformant to the guidelines governing RMI will be

accepted in our final report

- 11.5. Achieve 100 percent reporting of our suppliers with full compliance to RMI / RMAP conformant smelter listing
- 11.6. Achieve 100 percent of all smelters identified and conformant to RMAP smelter listing as reported
- 11.7. Submit correct identification of smelter names and information (such as metal, country, etc.)
- 11.8. Provide conflict minerals policy (for 3TG suppliers)
- 11.9. Confirm and address business unit and or product specific declaration information within the scope
- 11.10. Confirm scope addresses all production facilities / manufacturers, sub-contractors
- 11.11. Within every CMRT declaration period, track and follow up with smelters' auditing body before smelters' compliance lapses thru RBA CSP smelter listing
- 11.12. 3TG smelters and refiners must be in compliance with an approved independent third-party audit program - i.e., an RMI conformant program, the London Bullion Market Association Gold Good Delivery List ("LBMA"), or the Responsible Jewellery Council Chain of Custody Program ("RJC").
- 11.13. Smelters and refiners must meet Semtech's Responsible Sourcing Standard.
- 11.14. Provide documentation confirming non-reported smelters were transitioned out of the supply chain or evidence showing they were never in Semtech's supply chain for the entire reporting period and provide applicable documentation to customers who ask.

12. SEMTECH EXPECTATIONS (COMPLIANCE & RESPONSE FROM SUPPLIERS)

- 12.1. Semtech Corporation expects its suppliers and vendors who procure metals for use in the manufacturing process or within the product itself to respond to our request for CMRT declaration utilizing the latest released version of the template from RBA.
- 12.2. Semtech Corporation requires its suppliers and vendors to respond to a CMRT declaration within 15 days of receipt.
- 12.3. Semtech Corporation requires its suppliers and vendors to utilize certified and conformant smelters pursuant to latest Responsible Minerals Initiative (RMI) listing.
- 12.4. Semtech Corporation requires its suppliers and vendors to comply with the Semtech Supply Chain / RMI Expectations noted above. Refer to Section 11 above.
- 12.5. Semtech Corporation requires its suppliers and vendors to conduct due diligence in verifying the smelters identified within their own supply chain and declared in the CMRT response are certified conformant smelters in good standing (not expired) with RMAP.
- 12.6. Semtech Corporation requires suppliers and vendors who are categorized as 'Undetermined' or 'Non-Conformant' to respond to Semtech's Supplier Action Request with a valid action plan to become compliant to Semtech's expectations.
- 12.7. Semtech Corporation requires suppliers and vendors who are issued a Semtech Supplier Action Request to respond within 15 days of issuance.

13. RBA CONFLICT MINERAL TEMPLATE RESPONSE GUIDANCE

- 13.1. Semtech Corporation requires its suppliers and vendors to respond to its request for conflict mineral reporting utilizing the latest up to date template provided by RBA. The following is additional guidance based on issues and trends found in supplier responses.

Question 1: Is any 3TG intentionally added or used in the product(s) or in the production process? Yes or No answer means that due diligence has been taken through product testing or process verification to determine material content or not.

- 13.2. Question 2: Does any 3TG remain in the product(s)? Yes or No answer means that due diligence has been taken through product testing or process verification to determine material content or not.
- 13.3. Question 3; Do any of the smelters in your supply chain source the 3TG from the covered countries? A Yes answer means that due diligence has been taken and verified that these smelters are 'certified and conformant' to RMAP in good standing (not expired).
- 13.3.1. A No answer can be verified by checking the submitted Smelter List tab and comparing against the RMAP List of conformant smelters listing.
- 13.3.2. The CMR Team shall verify, locate and review the posted smelter reports indicating policy and process. Such reports will indicate that the smelter sources its 3TG metals from within a conflict area.
- 13.3.3. Any inconsistencies will result in a Supplier Action Request for an action plan to reevaluate and reconsider their answer for question 3 or remove non-conformant smelters from their supply chain and revise their declaration.
- 13.4. Question 4: Does 100 percent of the 3TG (necessary to the functionality of the products) originate from recycled or scrap sources? Yes, No or Unknown answer is acceptable.
- 13.4.1. Although an answer of Unknown holds minimal risk, review of smelter audit reports typically reports compliance to laws and rarely contains information surrounding 'recycled or scrap sources or metals smelted in a valid and conformant smelter located within a 'covered country'.
- 13.5. Question 5; What percentage of relevant suppliers have provided a response to your supply chain survey? An answer of 100% indicates that due diligence in supply chain response was received.
- 13.5.1. An answer < 100% is unacceptable and requires a comment with action plan to achieve 100% response from supply chain.
- 13.5.2. Any inconsistencies will result in a Supplier Action Request for an action plan to achieve 100% supply chain response.
- 13.6. Question 6: Have you identified all of the smelters supplying the 3TGs to your supply chain? A Yes answer is expected.
- 13.6.1. A No answer is unacceptable and requires a comment with action plan to achieve complete supply chain response to identify all smelters within your supply chain.
- 13.6.2. Any inconsistencies will result in a Supplier Action Request for an action plan to achieve full compliance in smelter identification.
- 13.7. Question 7: Has all the applicable smelter information received by your company been reported in this declaration? A yes answer is expected.
- 13.7.1. A No answer is unacceptable and requires a comment with action plan to achieve complete compliance and full disclosure of smelter information.
- 13.7.2. Any inconsistencies will result in a Supplier Action Request for an action plan to achieve compliance and full disclosure of smelter information.
- 13.8. Question 8: Has all applicable smelter information received by your company been reported in this declaration?
- 13.8.1. A No answer is unacceptable and requires a comment with action plan to achieve complete supply chain response to identify all smelters within your supply chain have been reported.
- 13.8.2. Any inconsistencies will result in a Supplier Action Request for an action plan to achieve compliance and full disclosure of smelter information.
- 13.9. Questions A – H: Semtech expects a 'Yes' answer to these questions. A 'No' answer will require an explanation or justification within the comments field.
- 13.9.1. A 'No' answer without an explanation or justification comment will result in a SAR to the supplier for an action plan to resolve the issue and bring the response to a 'Yes' answer. Refer to section 5 for SAR definition.
- 13.9.2. Question B: Is your conflict mineral sourcing policy available on your website? A 'Yes' answer requires the URL to be placed in the comments field.

- 13.10. Question H: Is your company required to file an annual conflict minerals disclosure with the SEC? This question requires a response 'Yes' or 'No'. Refer to the definition section above for additional guidance. No explanation or justification is necessary.

14. REQUEST FOR SEMTECH'S CMRT DECLARATION

- 14.1. In response to a customer request for Semtech's Conflict Mineral declaration, Semtech's Conflict Mineral Reporting team should expect Semtech's Inside Sales team to provide such requests utilizing the Customer Request process through PLM as outlined in SEMDOC000724.
- 14.2. Semtech Corporation will only issue business unit specific declarations based on the Semtech part numbers identified in the customer request relationship tab.
- 14.3. In preparation of Semtech's declaration, the CMR team member will ensure the scope reads **"The scope of the declaration applies to the product associated with Semtech's < list specific business unit > business unit"**
- 14.4. At times, customers may request a CMRT declaration for a specific part number(s). In such cases, the scope is amended as listed above. Additionally, within the Product List tab of the declaration, the CMR team member shall enter the full Semtech part number(s) and product name (from the RoHS table or from the product data sheet).
- 14.5. In all customer requests, the Smelter List tab shall contain a listing of smelters identified from within those specific supplier declarations that support that business unit or specific part number(s). The smelters identified must be validated from the RMAP listing as certified and conformant in good standing (not expired).

15. PROCESS PROCEDURE

- 15.1. In preparation for the gathering of data supporting conflict minerals, the CMR team member shall pull the CMRT Master table from PLM, FLDR-507244. This file must be 'Checked Out'.
- 15.1.1. A review meeting is being held with Corporate Quality, CMR Team members, Corporate Operations (as required) to review the supplier listing in the table. And confirm the email addresses for those suppliers and SQE members.
- 15.1.2. Update the business unit called out for the suppliers identified in the table.
- 15.1.3. Pull the latest CMRT from RBA and review any changes, questions and Smelter reference listing.
- 15.1.4. Pull the latest 'certified and conformant' smelter listing from RMAP Listing, can be found [here](#). Click on the Conflict Free Smelter Program. From the drop-down menu select Conformant Smelter & Refiner Lists. This will take to a webpage showing the 3TG and the number of conformant smelters. CMR team members will need to print this webpage. Click on one of the 3TGs, YOU MUST ACCEPT THE TERMS AND CONDITIONS. Once you accept, click on one of the 3TGs again and scroll down the page. You will see the conformant smelter listing for that mineral along with Last Audit Date and Valid Until date. Print the full listing for each mineral. IMPORTANT: The CMR Team member will use this list to verify smelter references identified within supplier responses to validate whether the smelters are 'certified and conformant' current and not expired.
- 15.2. Once the review is complete, the CMR Team member shall generate a cover email to suppliers listed in the table of our request for their CMRT declaration. Include a response due date as 15 days from date of issuance.
- 15.2.1. Attach this procedure to the email.
- 15.2.2. Attach the latest version of the CMRT from RBA

- 15.2.3. Send the email to the email addresses listed in the CMRT Master table. Copy the SQE team members as identified for those suppliers as well.
- 15.2.4. Update the CMRT Master Table applicable columns for surveyed, date surveyed, revision of CMRT. Leave all remaining information unless directed otherwise from the Corporate Quality Manager.
- 15.2.5. As suppliers reply and respond to Semtech's request for CMRT declaration, the CMR Team member shall update the CMRT Table for response and responses to CMRT questions. Transferring supplier responses to the applicable questions.
- 15.2.6. Verify smelter information from supplier by matching the metal called out in the smelter tab against the metals identified in questions 1 & 2 of the declaration. Then, verify the smelter listing against the RMAP listing of 'certified and conformant' smelters.
 - 15.2.6.1. Any inconsistencies shall require a SAR to be generated identifying the inconsistency and recommended action. Refer to section 5 for SAR definition.
 - 15.2.6.2. The CMR Team members shall include this and all response information in the weekly reporting template to the Corporate Quality Manager every Friday.
- 15.3. If the review identifies no issues, concerns or inconsistencies and the supplier response meets the requirements of this procedure, indicate a YES in the far-right column. This will trigger a 'Compliant' rating for this supplier.
- 15.4. Suppliers who respond, but do not meet the requirements of this procedure and fail to address the SAR are identified with a NO in the far-right column. This will trigger a 'Non-Compliant' rating for this supplier. Executive VP of Q&R, VP of Legal, and Sr. VP of Worldwide Operations are duly informed of this rating. It is the responsibility of this group of executive management to determine the next course of action.
- 15.5. Suppliers who have not responded to Semtech's repeated request for CMRT declaration shall have a NO in the 'Responded' column of the CMRT Master Table. This will trigger an 'Undetermined' rating. Escalate the CMRT declaration to SQE team members, Director of Subcon Operations and Executive VP of Q&R for further action.
- 15.6. At the end of each weekday the CMR Team member shall save and 'Check In' the CMRT Master Table adding the date of the last update to the File Folder, FLDR-507244. Add the Corporate Quality Manager to the Routing Slip tab.

16. SMELTER VERIFICATION

- 16.1. Semtech's CMR Team share review and confirm weekly the RBA RMAP listing and that the smelters identified by Semtech suppliers in their CMRT declaration have not changed, ensuring that those smelters are still conformant.
- 16.2. In the event that a smelter is removed from the RBA RMAP listing, fails their audit or re-audit, listed as active but not conformant, Semtech's CMR Team shall identify the Semtech suppliers who identified this smelter and identify the relevant Semtech business units impacted.
 - 16.2.1. Using this information, the CMR Team shall issue a SAR to all suppliers affected regarding the status and condition of the smelter identified.
 - 16.2.2. Semtech Corporation expects the affected supplier(s) to take immediate action to purge their supply chain, update and re-submit their CMRT declaration on the latest RBA CMRT template to Semtech Corporation.
 - 16.2.3. As with all submitted CMRT declarations, any revised or re-submitted CMRT declarations shall be reviewed for compliance per the instructions and requirements noted in this document.
 - 16.2.4. The CMR Team shall generate an ECO to post the revised CMRT declaration and rebuild the affected business unit CMRT declaration.
- 16.3. Semtech's CMR Team shall send notification to Semtech's worldwide Inside Sales Team of the issue and correction so that the ISR team can notify and send the updated business unit CMRT declaration to the

affected customers.

- 16.3.1. A simple search in PLM by Customer Request, business unit, with CMRT in the Description of Change will give a listing of affected customers who requested and received CMRT declarations.

17. EXPECTED TURN AROUND TIME & FOLLOW UP FOR SUPPLIERS

- 17.1. CMRT Request: Semtech Corporation expects all suppliers notified to address Conflict Mineral declarations to respond with a current, completed and compliant declaration within 15 days of notification.
- 17.1.1. Semtech's CMRT team will follow up and escalate notifications immediately if the response is not met as defined above.
- 17.1.2. Escalation shall involve the regional SQE manager, Operations and Corporate Quality as a minimum.
- 17.2. SAR Request – Administrative Issue: Semtech Corporation expects all suppliers who are issued a SAR for an Administrative Issue to respond with an updated or revised compliant declaration within 5 days of notification.
- 17.2.1. Semtech's CMRT team will follow up and escalate notifications immediately if the response is not met as defined above.
- 17.2.2. Escalation shall involve the regional SQE manager, and Corporate Quality as a minimum.
- 17.3. SAR Request – Smelter Issue: Semtech Corporation expects all suppliers who are issued a SAR for a Smelter Issue to respond with an updated or revised compliant declaration within 15 days of notification.
- 17.3.1. Semtech's CMRT team will follow up and escalate notifications immediately if the response is not met as defined above.
- 17.3.2. Escalation shall involve the regional SQE manager, Operations and Corporate Quality as a minimum.
- 17.4. Lack of responses after repeated attempts to address Semtech's request for conflict mineral declaration or an update or revision to address administrative or smelter issues notification shall be forwarded to Corporate Quality Manager who will direct additional notifications, i.e., EVP Q&R, SVP WW Operations, SVP Corporate Legal.
- 17.4.1. Risk Assessment should be addressed to identify potential impact to Semtech customers, Semtech product and new or sustaining business. The media used for such an assessment can be Management Review report, weekly report, CAR, meeting minutes, PLM Discussions...etc.
- 17.5. Semtech Corporation will respond to all Conflict Mineral declaration requests within 1 full working day.
- 17.5.1. Product specific CMRT requests may take an additional day depending on the listing of associated products or response classification of applicable suppliers.

18. DUE DILIGENCE AUDITS

- 18.1. Suppliers and downstream partners will be subject to validation audits of their materials reporting and responsible sourcing programs:
- 18.2. Audits are conducted by an independent third-party vendor on Semtech's behalf.
- 18.3. Suppliers are encouraged to undergo RMI's downstream audit. Please notify Semtech directly if you are engaged to complete this additional due diligence step.
- 18.4. There may be cases where spot audits are initiated by Semtech as part of our due diligence process.
- 18.4.1.

NON-CONFORMANCE & NON-COMPLIANCE

- 18.5. If a supplier is at risk of not meeting Semtech's deadline or requirements, Semtech should be contacted immediately (prior to submitting a CMRT) at ConflictFree@semtech.com.
- 18.6. To avoid escalation, suppliers must take immediate action to resolve all outstanding issues and communicate their action plan and timeline for remediating any noncompliance.
- 18.7. Consequences for providing inaccurate data to Semtech: suppliers must obtain updated CMRTs from upstream reporting suppliers before submitting a consolidated, updated CMRT to Semtech (failing to do so is considered falsification).
- 18.8. **IMPORTANT:** Any falsification of information may result in a core violation and probationary terms, up to and including termination of the supplier's business relationship with Semtech.

19. SEMTECH CORPORATION CONFLICT MINERAL DECLARATION TO SEC

- 19.1. As a public company, Semtech Corporation shall declare and report its conflict minerals program to the Securities and Exchange Commission, SEC, yearly by May 31st.
- 19.2. Semtech Corporation must file a Form SD specialized disclosure report according to the EDGAR Filer Manual (Manual can be found [here](#))
- 19.3. The form is to be filed on website link [here](#) by May 31th after the previous calendar year, unless this date falls on a Saturday, Sunday or holiday, in which the deadline is moved to the next business day.
- 19.4. While the SEC provides some guidance (guidance can be found [here](#)) -, it is not to be used as a blank form to be filled in and filed. Instead, Semtech Corporation must customize their Form SD, incorporating all the necessary information outlined by the rule, and this is performed by the Semtech Legal Department.
- 19.5. This information includes but is not limited to (See Item 1.01 on page 346):
 - 19.5.1. The cover page that includes the exact name of the registrant as specified in its charter, State or other jurisdiction of incorporation or organization Commission File Number, IRS Employer Identification No. address of principal executive officers, zip code, and name and telephone number, including area code, of the person to contact in connection with the report.
 - 19.5.2. Under a separate heading entitled "Conflict Minerals Disclosure," report the results of the Reasonable Country of Origin Inquiry (RCOI) as performed in good faith regarding those conflict minerals. This information must also be publicly available on the Semtech Corporation Internet website under the heading "Conflict Minerals Disclosure."
 - 19.5.3. If an issuer cannot determine that its supply chain is "DRC conflict free", a Conflict Mineral Report is required.
- 19.6. Information in the Conflict Minerals Report must also be publicly available on the Semtech Corporation website and should include, but is not limited to:
 - 22.6.1. A brief introduction to the company (size, structure, number of products, etc.)
 - 22.6.2. A clear statement of the company's conflict minerals policy. Due diligence efforts must conform to RBA Responsible Minerals Assurance Process ([RMAP](#)).
 - 22.6.3. Description of products not found to be "DRC conflict free".
- 19.7. Further information may be obtained by accessing, Dodd-Frank Consumer Protection Act FAQ [here](#)

20. QUALITY RECORD

This procedure and its forms are considered quality records as defined in KFID-4KWSAP.

21. REVISION RECORD

| DOCUMENT HISTORY | | | |
|------------------|----------|------------|--|
| REV. NUMBER | DATE | ORIGINATOR | COMMENTS |
| 07 | Sept2024 | E. Bakke | <ol style="list-style-type: none"> 1. Updated Semtech logo 2. Updated 5.53 Removed obsolete RRMI. Added EMRT: Extended Minerals Reporting Template 3. Updated 6.4 from OHSAS 18001 to OHSAS 45001 4. Removed 6.4.2 AS 9100 5. Updated 11.5 from twice a year to once annually. Added EMRT 6. Updated 15. RBA Conflict Mineral Template Response Guidance to include additional Question 8. 7. Updated 17.1.1. Changed to say 'as required' 8. Updated 18.1 added share review and confirm weekly. Added ensuring that those smelters are still conformant. 9. Updated 22.4 And this is performed by the Semtech Legal Department 10. Added 24. REVISION RECORD |
| 08 | May2025 | E. Bakke | <ol style="list-style-type: none"> 1. Change REV 7 to REV 8 for document. 2. Merged previous REV7 sections 10 <i>Semtech Conflict Minerals Policy</i>, 11. <i>Semtech Sustained Reporting Policy</i>, 12. <i>Red Flags & Risks</i> into REV 8 section 10. Renamed: <i>Semtech Due Diligence In-Line With OCED Framework</i>. 3. Updated content table page numbers to correctly list renumbered sections. 4. Updated 11.5 from July to Q3. |