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## Semtech: Conflict Minerals Reporting Policy

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July 25, 2025

Semtech Corporation is very aware of and sympathetic to the plight surrounding the areas commonly referred to as "conflict areas" as identified by the Responsible Business Alliance (RBA), the Global e-Sustainability Initiative (GeSI), and the Dodd-Frank Act.

Semtech Corporation recognizes the serious humanitarian and ethical concerns associated with regions commonly referred to as 'conflict-affected and high-risk areas,' as defined by the Responsible Business Alliance (RBA), the Global e-Sustainability Initiative (GeSI), and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

Semtech Corporation maintains a multi-tier supply chain structure which includes over 400 suppliers with which Semtech must survey for RCOI (Reasonable Country of Origin) for their sourcing of 3TG using the CMRT (Conflict Minerals Reporting Template) and Cobalt, Lithium, Mica using the EMRT (Extended Minerals Reporting Template). As we survey each supplier, they are also required to survey their supply chain, complete the CMRT and EMRT and submit that survey back to Semtech. The survey process requires each tier supplier to survey their supply chain all the way down to the smelter level. That smelter must be referenced on the RBA Responsible Minerals Initiative (RMI) smelter listing as valid and compliant.

Semtech Corporation does not source 3TG directly from smelters and we are removed from them by multiple tiers. Semtech acknowledges the need to ensure that the 3TG, Cobalt, Lithium, and Mica metals used in our products are smelted at Responsible Minerals Assurance Process (RMAP) registered sources according to the RBA. Our Supplier Code of Conduct reinforces this policy with our suppliers. We require our suppliers that use 3TG, Cobalt, Copper, Graphite, Lithium, Mica, and Nickel metals to verify in writing that they have procedures in place to demonstrate that those metals they procure are sourced in accordance with our policy and RBA/RMI CMRT procedure.

This process of re-surveying our suppliers requires a fair amount of time and resources which are limited. Semtech has partnered with a 3rd party compliance vendor to assist in the supply chain survey and collection process. As the CMRT and EMRT templates are updated or revised, Semtech Corporation reviews the update and makes a conscious decision to resurvey our supply chain based on the extent of the update implemented by the RBA. If the update is minimal in nature such as an update to the RMI or RMAP definition or instructions, Semtech Corporation may adjust the survey process accordingly. Semtech and our 3rd party compliance partner perform our supply chain campaign annually. We survey our suppliers with the latest version of CMRT and EMRT in Q3. Additionally, every new supplier added to our supply chain will be surveyed using the most current CMRT and EMRT available.

As RBA releases updated versions of the Active & Conformant list, Semtech continues to work with our suppliers actively, throughout the year, to remove non-conformant SOR's from our supply chain. Our current CMRT and EMRT declarations are valid and available upon request. Semtech and our 3rd party compliance partner will actively pursue supplier CMRT and EMRT declaration(s) within 25 days of issuing a CMRT/EMRT request or Supplier Action Request to our suppliers.

**Aligned with the RBA Code of Conduct and OECD Due Diligence Guidance****Purpose**

Semtech Corporation is committed to ethical business practices and compliance with applicable laws and regulations, including Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act. This policy outlines Semtech's commitment to responsible sourcing of minerals and defines expectations for our suppliers regarding the sourcing of conflict minerals, namely tin, tantalum, tungsten, and gold (3TG) as well as cobalt and mica, which are included under the Extended Minerals Reporting Template (EMRT).

**Policy Statement**

Semtech Corporation is dedicated to ensuring that the products we manufacture do not directly or indirectly contribute to human rights abuses in conflict-affected and high-risk areas (CAHRAs), particularly the Democratic Republic of the Congo (DRC) and adjoining countries. In alignment with the Responsible Business Alliance (RBA) Code of Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, Semtech:

- Expects its suppliers to only source minerals from smelters and refiners that have been validated as conformant by recognized independent third-party audit programs such as the Responsible Minerals Assurance Process (RMAP), London Bullion Market Association (LBMA), or Responsible Jewellery Council (RJC).
- Conducts annual due diligence and risk assessments using the Conflict Minerals Reporting Template (CMRT) for 3TG and the Extended Minerals Reporting Template (EMRT) for cobalt and mica.
- Require suppliers to survey their upstream supply chains and submit accurate and complete CMRT and EMRT data annually and upon request.
- Require suppliers to implement their own due diligence practices in line with the OECD Guidance and the RBA Code of Conduct.

**Supplier Expectations**

To comply with this policy, **Semtech's suppliers must:**

1. Establish and maintain a conflict minerals policy consistent with the RBA Code of Conduct and OECD Guidance.
2. Submit complete and accurate CMRTs (for 3TG) and EMRTs (for cobalt and mica) using the most current versions published by the **Responsible Minerals Initiative (RMI)**.
3. Source only from smelters and refiners that are validated as conformant by an approved third-party audit program like RMAP (Responsible Minerals Assurance Process)
4. Identify and mitigate risks associated with conflict minerals in their supply chains and respond to any identified red flags or Supplier Action Requests (SARs) from Semtech.
5. Cooperate with Semtech's due diligence efforts, including responding to follow-up questions, participating in supplier assessments, and undergoing spot checks or audits when requested.



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### **Grievance Mechanism**

Semtech maintains a grievance mechanism whereby employees, suppliers, or external stakeholders can report concerns related to conflict mineral sourcing. Reports can be submitted confidentially via [ConflictFree@semtech.com](mailto:ConflictFree@semtech.com) and [QualityAssuranceTeam@semtech.com](mailto:QualityAssuranceTeam@semtech.com) one of our Conflict Minerals Team will respond within 1-2 business days.

This policy is publicly available on Semtech's corporate website and communicated to all relevant internal and external stakeholders, including our suppliers

Semtech Corporation appreciates your support and patience, as we continue to strive for complete validation and compliance with industry standards in procuring metals from non-conflict areas. We look forward to a continued and successful business relationship.

Sincerely

**Randy Biddle**

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