



Conflict Mineral Policy

Spectrum Semiconductor Materials, Inc. is committed to sourcing semiconductor packaging and assembly materials from companies that share our values regarding human rights, ethics and environmental responsibility. Although we are a small private company, we comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”). The process of determining the origin of the metals utilized in the manufacture of the products we distribute is a difficult and necessary undertaking to promote responsible sourcing of minerals.

Although Spectrum Semiconductor Materials, Inc. is not engaged in the procurement of metals directly, we have implemented a process of tracing our supply chain to avoid for any minerals that may be associated with conflict. We are encouraging our direct suppliers to purchase materials from smelters who are listed on the Conflict-Free Smelter Program Compliant Smelter List. Our suppliers disclose their due diligence to be “conflict free” through the Conflict-Free Smelter Program administered by the Electronic Industry Citizenship Coalition (“EICC”) and the Global e-Sustainability Initiative (“GeSI”).

As a global distributor of semiconductor assembly solutions, Spectrum Semiconductor Materials, Inc. is committed to ensuring the safety, health and protection of people and the environment worldwide. We continuously employ these principles and values in our business practices. Additionally, our ongoing communication initiative with our supplier base ensures that they are aware of our values and ethics regarding all people and the world we share.

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