

Conflict Minerals Policy

SemiGen is committed to responsible sourcing and to compliance with the requirements of the U.S. Conflict Minerals Rule. Under that Rule, we are required to engage in a reasonable country of origin inquiry to determine whether conflict minerals in our products originated in one of the covered countries. Additional compliance obligations are triggered to the extent the conflict minerals are from a covered country or we are unable to determine the source of the conflict minerals.

The European Union also has adopted a Conflict Minerals Regulation. SemiGen, Inc. is not required to comply with that Regulation; however, our general principles on responsible sourcing and human rights are aligned with the intent of the EU Conflict Minerals Regulation.

For purposes of this policy, "conflict minerals" include columbite-tantalite (coltan), cassiterite, gold, wolframite and the derivatives tantalum, tin and tungsten, without regard to their location of origin. In this policy, we sometimes refer to those minerals and derivative metals as "3TG." The covered countries contemplated by the U.S. Conflict Minerals Rule are the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia.

In meeting our compliance obligations under the U.S. Conflict Minerals Rule, we have developed strong management systems and a due diligence framework in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its related supplements. In addition, we leverage the work undertaken by the Responsible Minerals Initiative ("RMI") to validate mineral sources and use the standardized Conflict Minerals Reporting Template ("CMRT") developed by the RMI, which facilitates the transfer of information throughout our supply chain regarding mineral country of origin and the smelters or refiners ("SORs") being utilized.

SemiGen expects its suppliers to use responsibly sourced 3TG in the products they sell to SemiGen, and to put in place policies and procedures that support responsible sourcing of 3TG and otherwise are consistent with this policy. Furthermore, we expect that, except as required by law, our suppliers will not impose blanket embargos on 3TG sourcing from conflict-affected and high-risk areas and that, when possible, they will continue to use responsibly sourced 3TG from those areas.

Because SemiGen does not source directly from mines or SORs, we request all relevant suppliers to submit conflict minerals data, including SOR information, using the CMRT. We further request suppliers to ensure the SOR information is accurate, complete and only relevant to SemiGen's products. We also request that relevant suppliers seek to require all SORs in their supply chain engage with the RMI, with the eventual goal of becoming Responsible Minerals Assurance Process Conformant. Through the efforts outlined above, SemiGen attempts to ensure that the 3TG in its supply chain are responsibly sourced.

This policy statement is publicly available, can be found at <https://www.semigen.net/quality> and is sent to suppliers as part of our Reasonable Country of Origin Inquiry. For further information or to voice any concerns relevant to SemiGen, regarding Conflict Minerals, please contact us at business@semigen.net.

Sincerely,
Jeff Thibodeau,
Procurement Manager/Conflict Minerals Compliance