

CONFLICT MINERALS: SEMTECH'S POLICY, PROGRAM AND EXPECTATIONS

1. PURPOSE	1
2. SCOPE	1
3. REQUIREMENTS	1
4. SUPPORT DOCUMENTS AND FILES	1
5. EICC CMRT AND SAR DEFINITIONS	2
6. SEMTECH CONFLICT MINERAL POLICY	6
7. SEMTECH SUSTAINED REPORTING POLICY	6
8. SEMTECH SUPPLY CHAIN / CFSI EXPECTATIONS	7
9. SEMTECH EXPECTATIONS (COMPLIANCE & RESPONSE FROM SUPPLIERS)	8
10. EICC CONFLICT MINERAL TEMPLATE RESPONSE GUIDANCE	8
11. REQUEST FOR SEMTECH'S CMRT DECLARATION	9
12. PROCESS PROCEDURE	9
13. SEMTECH CORPORATION CONFLICT MINERAL DECLARATION TO SEC	10
14. QUALITY RECORD	11

1. PURPOSE

- 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. REQUIREMENTS

- 3.1. 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).
- 3.2. Semtech personnel must be familiar with excel and formula configuration.
- 3.3. Semtech personnel must verify access to EICC Conflict Minerals portal for the latest CMRT

4. SUPPORT DOCUMENTS AND FILES

- 4.1. Semtech Conflict Mineral Policy Statement
- 4.2. Semtech Conflict Mineral Reporting Statement

- 4.3. Conflict Mineral Master Table:
<http://plm.semnet.dom/Agile/PLMServlet?fromPCClient=true&module=ItemHandler&requestUrl=module%3DItemHandler%26opcode%3DdisplayObject%26classid%3D9000%26objid%3D39620342%26tabid%3D11%26>
- 4.4. Supplier Action Request Form (SAR):
<http://plm.semnet.dom/Agile/PLMServlet?fromPCClient=true&module=ItemHandler&requestUrl=module%3DItemHandler%26opcode%3DdisplayObject%26classid%3D9000%26objid%3D46079165%26tabid%3D0%26>
- 4.5. EICC Conflict Mineral Reporting Template

5. EICC CMRT AND SAR DEFINITIONS

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.
CFSP Compliant Smelter List	<p>The Conflict- Free Smelter Program (CFSP) Compliant Smelter List is a published list of smelters and refiners that have undergone assessment through the CFSP, a program of the Conflict-Free Sourcing Initiative (CFSI) or industry equivalent program (such as Responsible Jewellery 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 CFSP assessment or is not in compliance with the CFSP protocol.</p> <p>A list of smelters and refiners which have been validated to be compliant to the CFSP can be found at www.conflictreesourcing.org.</p>
Conflict-Free Smelter Program (CFSP)	The Conflict-Free Smelter Program (CFSP) is a program developed by the EICC and GeSI to enhance company capability to verify the responsible sourcing of metals. Further details of the CFSP can be found here: http://www.conflictreesourcing.org/conflict-free-smelter-program/ .
Conflict-Free Sourcing Initiative	Founded in 2008 by members of the Electronic Industry Citizenship Coalition and the Global e-Sustainability Initiative, the Conflict-Free Sourcing 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 CFSI today, contributing to a range of tools and resources including the Conflict-Free Smelter Program, the Conflict Minerals Reporting Template, Reasonable Country of Origin Inquiry data and a range of guidance documents on conflict minerals sourcing. The CFSI 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 http://www.conflictreesourcing.org .

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 http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)</p>
Covered Country(ies)	<p>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.</p>
Declaration Scope or Class	<p>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.</p>
Dodd-Frank	<p>2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 (“Dodd-Frank”) (http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)</p>
DRC	<p>Democratic Republic of Congo</p>
DRC conflict-free	<p>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 (http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf)</p>
EICC	<p>Electronic Industry Citizenship Coalition (www.eicc.info)</p>
GeSI	<p>Global e-Sustainability Initiative (www.gesi.org)</p>
Gold (Au) refiner (smelter)	<p>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 CFSP audit protocol for this metal for a complete description: http://www.conflictreesourcing.org/audit-protocols-procedures/.</p>
Independent Third-Party Audit Firm	<p>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 CFSP 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.</p>

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 agree 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>
IPC	<p>IPC (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.</p>
IPC-1755 Conflict Minerals Data Exchange Standard	<p>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.</p>
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	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. Minerals partially processed, unprocessed or byproducts from other ores are not included in the definition of recycled metal.
SEC	U.S. Securities and Exchange Commission (www.sec.gov)
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 CFSI assigns to companies that have been reported by members of the supply chain as smelters or refiners, whether or not they have been verified to meet the characteristics of smelters or refiners as defined in the CFSP 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 CFSP audit protocol for this metal for a complete description at: http://www.conflictreesourcing.org/audit-protocols-procedures/ .
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 CFSP audit protocol for this metal for a complete description: http://www.conflictreesourcing.org/audit-protocols-procedures/ .

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 CFSP audit protocol for this metal for a complete description: http://www.conflictreesourcing.org/audit-protocols-procedures/ .
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: http://plm.semnet.dom/Agile/PLMServlet?fromPCClient=true&module=ItemHandler&requestUrl=module%3DItemHandler%26opcode%3DdisplayObject%26classid%3D9000%26objid%3D46079165%26tabid%3D0%26

6. SEMTECH CONFLICT MINERAL POLICY

- 6.1. Semtech Corporation is very aware of and sympathetic to the plight surrounding the areas commonly referred to as “conflict areas” as identified by the Electronic Industry Citizenship Coalition (EICC), the Global e-Sustainability Initiative (GeSI), and the recently enacted Dodd-Frank Act.
- 6.2. Semtech Corporation is committed to taking positive measures to seek to ensure, to the extent reasonably practicable in light of existing supply chain validation and auditing capabilities, that the products within our supply chain are not fabricated nor assembled with metals whose origin traces back to an area within these “conflict areas”.
- 6.3. Semtech Corporation continues to seek to secure assurances from all of our suppliers, in which suppliers confirm that the metals procured for use within our product, such as, gold (Au), tantalum (Ta), tungsten (W), and tin (Sn) were not obtained from sources who’s own business practices are not in-line with and supportive of the avoidance and non-use of conflict area minerals. Given the very real world challenges faced by our industry at this time in tracing the origin of materials (see for example the April 2010 report “Tracing a Path Forward” A Study of the Challenges of the Supply Chain for Target Metals Used in Electronics”, available at <http://www.resolv.org/eiscm/>), we cannot provide any absolute guarantee at this time that all sources of supply are free of “conflict area” minerals.
- 6.4. Semtech Corporation will continue to undertake due diligence and continuously monitor the procurement activities of our suppliers as they relate to the fabrication and assembly of our product, to ensure compliance with our policy. In addition, Semtech Corporation will continue to actively monitor and stay informed of relevant activities, reports, and proposals for supply chain improvements by organizations such as EICC and GeSI, and others, as our industry continues to work toward a supply chain that is reliably and verifiably free of “conflict area” minerals.
- 6.5. URL to PLM Policy statement;
<http://plm.semnet.dom/Agile/PLMServlet?fromPCClient=true&module=ItemHandler&requestUrl=module%3DItemHandler%26opcode%3DdisplayObject%26classid%3D9000%26objid%3D45505299%26tabid%3D0%26>

7. SEMTECH SUSTAINED REPORTING POLICY

- 7.1. Semtech Corporation is very aware of and sympathetic to the plight surrounding the areas commonly referred to as “conflict areas” as identified by the Electronic Industry Citizenship Coalition (EICC), the Global e-Sustainability Initiative (GeSI), and the Dodd-Frank Act.

- 7.2. Semtech Corporation sustains a multi-tier supply chain structure which houses over 100 suppliers with which Semtech must survey for RCOI (Reasonable Country of Origin) for their sourcing of 3TG using the CMRT (Conflict Minerals Reporting Template). As we survey each supplier, they are also required to survey their supply chain, complete the CMRT and submit that survey back to Semtech. The survey process requires each tier supplier to survey their supply chain all the way down to smelter. That smelter must be referenced on the EICC CFS listing.
- 7.3. 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 metals used on our product are smelted at CFS registered sources according to the EICC. This process should be repeated everytime EICC updates the CFS listing.
- 7.4. This process of re-surveying our suppliers requires a fair amount of time and resources which Semtech Corporation is limited. As the CMRT is 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 EICC. If the update is minimal in nature such as an update to the CFS, Semtech Corporation will suspend the survey process.
- 7.5. Semtech Corporation will re-survey our supply chain twice a year, February and August, using the most up to date CMRT on line with the EICC. Additionally, every new supplier added to our supply chain will be surveyed using the most current CMRT available.
- 7.6. Although there is no set deadline mandated by law to complete the CMRT, Semtech will actively pursue its completion within 15 days of issuing a CMRT request or Supplier Action Request to our suppliers.
- 7.7. 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.
- 7.8. URL to PLM Reporting Policy statement;
<http://plm.semnet.dom/Agile/PLMServlet?fromPCClient=true&module=ItemHandler&requestUrl=module%3DItemHandler%26opcode%3DdisplayObject%26classid%3D9000%26objid%3D45505299%26tabid%3D0%26>

8. SEMTECH SUPPLY CHAIN / CFSI EXPECTATIONS

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

- 8.1. Source only from validated (compliant as defined in 8.2 and 8.3 below) smelters within our supply chain
- 8.2. Only active smelters participating in EICC CFSI undergoing validation and audit will be accepted
- 8.3. Only smelters certified through EICC CFSP as compliant to the guidelines governing CFSI will be accepted in our final report
- 8.4. Achieve 100 percent reporting of our suppliers
- 8.5. Achieve 100 percent of all smelters identified and reported
- 8.6. Submit correct identification of smelter names and information (such as metal, country, etc.)
- 8.7. Provide conflict minerals policy (for 3TG suppliers)
- 8.8. Confirm and address business unit and or product specific declaration information within the scope
- 8.9. Confirm scope addresses all production facilities / manufacturers, sub-contractors
- 8.10. Within every CMRT declaration period, track and follow up with smelters' auditing body before smelters' compliance lapses
- 8.11. 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 this documentation to customers who ask.

9. SEMTECH EXPECTATIONS (COMPLIANCE & RESPONSE FROM SUPPLIERS)

- 9.1. 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 EICC.
- 9.2. Semtech Corporation requires its suppliers and vendors to respond to a CMRT declaration within 15 days of receipt.
- 9.3. Semtech Corporation requires its suppliers and vendors to utilize certified and compliant smelters pursuant to latest Conflict Free Sourcing Initiative (CFSI) listing.
- 9.4. Semtech Corporation requires its suppliers and vendors to comply with the Semtech Supply Chain / CFSI Expectations noted above.
- 9.5. 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 compliant smelters in good standing (not expired) with CFSP.
- 9.6. Semtech Corporation requires suppliers and vendors who are categorized as 'Undetermined' or 'Non-Compliant' to respond to Semtech's Supplier Action Request with a valid action plan to become compliant to Semtech's expectations.

10. EICC CONFLICT MINERAL TEMPLATE RESPONSE GUIDANCE

- 10.1. 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 EICC. The following is additional guidance based on issues and trends found in supplier responses.
- 10.2. 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 compliant' to CFSP in good standing (not expired).
 - 10.2.1. A No answer can be verified by checking the submitted Smelter List tab and comparing against the CFSP List of compliant smelters listing.
 - 10.2.2. Any inconsistencies will result in a Supplier Action Request for an action plan to remove non-compliant smelters from their supply chain.
- 10.3. Question 5; Have you received data/information for each 3TG from all relevant suppliers? A Yes answer indicates that due diligence has been taken and verified that the smelter listing are 'certified and compliant' to CFSP in good standing (not expired).
 - 10.3.1. A No answer can be verified by checking the submitted Smelter List tab and comparing the declared listing against the CFSP List of compliant smelters listing.
 - 10.3.2. Any inconsistencies will result in a Supplier Action Request for an action plan to remove non-compliant smelters from their supply chain and an action plan to achieve 100% supply chain response.
- 10.4. Questions A – I: Semtech expects a 'Yes' answer to these questions. A 'No' answer will require an explanation or justification within the comments field.
 - 10.4.1. 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.
 - 10.4.2. 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.

- 10.5. Question J: Are you subject to SEC Conflict Minerals rule? This question requires a response 'Yes' or 'No'. Refer to the definition section above for additional guidance. No explanation or justification is necessary.

11. REQUEST FOR SEMTECH'S CMRT DECLARATION

- 11.1. 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.
- 11.2. Semtech Corporation will only issue business unit specific declarations based on the Semtech part numbers identified in the customer request relationship tab.
- 11.3. 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"**
- 11.4. 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).
- 11.5. In all customer requests, the Smelter List tab shall be 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 verified from CFSP listing, certified and compliant in good standing (not expired).

12. PROCESS PROCEDURE

- 12.1. 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'.
- 12.1.1. A review meeting is held with Corporate Quality, CMR Team members, Corporate Operations to review the supplier listing in the table. And confirm the email addresses for those suppliers and SQE members.
- 12.1.2. Update the business unit called out for the suppliers identified in the table.
- 12.1.3. Pull the latest CMRT from EICC and review any changes, questions and Smelter reference listing.
- 12.1.4. Pull the latest 'certified and compliant' smelter listing from CFSP Listing, <http://www.conflictreesourcing.org/conflict-free-smelter-program/>. Click on the Conflict Free Smelter Program. From the drop down menu select Compliant Smelter & Refiner Lists. This will take to a webpage showing the 3TG and the number of compliant smelters. CMR team member will need to print this webpage. Click on one of the 3TG, 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 compliant 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 listing to verify smelter references identified within supplier responses to validate whether the smelters are 'certified and compliant' current and not expired.
- 12.2. 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.
- 12.2.1. Attach this procedure to the email.
- 12.2.2. Attach the latest version of the CMRT from EICC
- 12.2.3. 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.
- 12.2.4. Update the CMRT Master Table applicable columns for surveyed, date surveyed, revision of CMRT. Leave all remaining information unless directed otherwise from Corporate Quality Manager.

- 12.2.5. 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. Transfer those areas corresponding to questions.
- 12.2.6. 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 CFSP listing of 'certified and compliant' smelters.
 - 12.2.6.1. Any inconsistencies shall require a SAR to be generated identifying the inconsistency and recommended action. Refer to section 5 for SAR definition.
 - 12.2.6.2. The CMR Team member shall include this and all response information in the weekly reporting template to the Corporate Quality Manager every Friday.
- 12.3. 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.
- 12.4. 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.
- 12.5. 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 member, Director of Subcon Operations and Executive VP of Q&R for further action.
- 12.6. 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.

13. SEMTECH CORPORATION CONFLICT MINERAL DECLARATION TO SEC

- 13.1. 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.
- 13.2. Semtech Corporation must file a Form SD specialized disclosure report according to the [Final Rule](#) (pages 343-356).
- 13.3. The form is to be filed on [EDGAR](#) 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.
- 13.4. While the SEC provides some guidance in the [SEC Form SD General Instructions](#), 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.
- 13.5. This information includes, but is not limited to (See Item 1.01 on page 346):
 - 13.5.1. 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.
 - 13.5.2. 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." **If an issuer cannot determine that its supply chain is "DRC conflict free," a Conflict Minerals Report is required.**
- 13.6. Information in the Conflict Minerals Report must also be publicly available on the Semtech Corporation website and should include, but is not limited to:

- 13.6.1. A brief introduction of company (size, structure, number of products, etc.)
- 13.6.2. A clear statement of the company's conflict minerals policy
- 13.6.3. Due diligence efforts performed. Due diligence efforts must conform to EICC Conflict Free Smelter Assessment Program (CFSP). [EICC®-GeSI Conflict-Free Smelter \(CFS\) Assessment Program](#).
- 13.6.4. Description of products not found to be "DRC conflict free"
- 13.7. Further information may be obtained by accessing [SEC Form SD General Instructions »](#)

14. QUALITY RECORD

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