



Responsible Minerals and Conflict Minerals Policy

Purpose

Atmosic Technologies is committed to conducting business ethically, responsibly, and in compliance with applicable laws, regulations, and industry standards governing the sourcing of minerals and raw materials used in electronic products.

Atmosic supports global efforts to prevent the direct or indirect financing of armed conflict, human rights abuses, forced labor, child labor, environmental harm, and other unlawful activities associated with mineral extraction, processing, and trade.

As a fabless semiconductor company, Atmosic Technologies does not own or operate mines, smelters, refiners, foundries, assembly facilities, or other upstream production operations. Nevertheless, Atmosic recognizes its responsibility to promote transparency, traceability, and responsible sourcing practices throughout its global supply chain.

Scope

This policy applies to all suppliers, subcontractors, contract manufacturers, wafer foundries, assembly and test service providers, distributors, logistics providers, and other business partners that provide products, materials, components, or services to Atmosic Technologies.


The policy covers all minerals and materials subject to responsible sourcing due diligence and reporting requirements, including:

Conflict Minerals (CMRT)

The following minerals are commonly referred to as "3TG" and are reported through the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT):

- Tin (Sn)
- Tantalum (Ta)
- Tungsten (W)
- Gold (Au)

Extended Minerals (EMRT)

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The following materials are covered by the Responsible Minerals Initiative (RMI) Extended Minerals Reporting Template (EMRT):

- Cobalt (Co)
- Mica

Additional Atmosic Responsible Minerals Requirements

In support of evolving customer, regulatory, environmental, and supply chain expectations, Atmosic also requires responsible sourcing due diligence and disclosure for:

- Copper (Cu)
- Nickel (Ni)

and any additional minerals, metals, or raw materials identified by applicable laws, regulations, customer requirements, industry standards, or recognized responsible sourcing initiatives.


Atmosic expects suppliers to maintain transparency and traceability for all covered minerals and materials throughout their supply chains and to provide complete and accurate declarations upon request.

Policy Statement

Atmosic Technologies is committed to sourcing materials from responsible sources and expects suppliers to implement effective due diligence processes designed to prevent the use of minerals that directly or indirectly:

- Finance armed conflict;
- Support human rights abuses;
- Contribute to forced labor or child labor;
- Violate applicable environmental or labor regulations; or
- Originate from sources that do not meet recognized responsible sourcing standards.

Atmosic seeks to ensure that covered minerals contained in its products originate from smelters, refiners, and processors that have been independently assessed through recognized industry programs such as the Responsible Minerals Assurance Process (RMAP) or equivalent responsible sourcing programs.

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Supplier Requirements

Atmosic Technologies requires all suppliers to:

Responsible Sourcing Program


1. Establish and maintain a documented responsible minerals compliance program consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
2. Maintain effective due diligence processes to identify, assess, mitigate, and manage sourcing risks throughout their supply chains.

Supply Chain Transparency

3. Identify and disclose the smelters, refiners, and processors associated with covered minerals contained in products supplied to Atmosic.
4. Maintain records supporting the origin, chain of custody, and due diligence activities associated with covered minerals.
5. Provide complete, accurate, and timely declarations using:
 - o The current Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT);
 - o The current Responsible Minerals Initiative (RMI) Extended Minerals Reporting Template (EMRT); and
 - o Any additional responsible sourcing documentation reasonably requested by Atmosic Technologies.

Responsible Sourcing Expectations

6. Source covered minerals from smelters, refiners, and processors that are validated through the Responsible Minerals Assurance Process (RMAP) or equivalent recognized responsible sourcing programs whenever possible.
7. Investigate and address any sourcing risks identified within their supply chains.
8. Cooperate fully with Atmosic requests for responsible minerals information, audits, corrective actions, or supporting documentation.

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Supplier Supply Chain Control Requirement

Atmosic Technologies will only conduct business with suppliers that demonstrate effective control and oversight of their own supply chains regarding responsible minerals compliance.

Suppliers must have documented processes and management systems that ensure their subcontractors, material suppliers, foundries, assembly providers, test providers, and other upstream suppliers comply with responsible sourcing requirements.

At a minimum, suppliers are expected to:

- Flow responsible minerals requirements to all relevant suppliers and subcontractors.
- Obtain conflict minerals and responsible minerals declarations from applicable suppliers.
- Verify the use of responsible and conformant smelters, refiners, and processors.
- Monitor supplier compliance and address identified risks.
- Maintain documented evidence demonstrating supply chain oversight and due diligence activities.
- Implement corrective actions when deficiencies or non-conformances are identified.


Atmosic reserves the right to request evidence demonstrating supplier control over upstream sourcing activities.

Non-Conforming Sources and Corrective Actions

If a supplier identifies that covered minerals may originate from sources associated with armed conflict, human rights abuses, forced labor, child labor, sanctioned entities, or other unacceptable practices, the supplier must:

- Promptly notify Atmosic Technologies;
- Conduct an investigation;
- Implement a documented risk mitigation plan;
- Execute corrective actions within an agreed timeframe; and
- Provide evidence of remediation efforts.

Atmosic may suspend new business awards, require additional corrective actions, place suppliers on probationary status, or terminate supplier relationships where suppliers fail to demonstrate adequate control, transparency, or compliance with this policy.

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Atmosic Responsibilities

Atmosic Technologies will:

- Communicate this policy to suppliers and relevant stakeholders.
- Incorporate responsible minerals requirements into supplier qualification, approval, and management processes.
- Conduct reasonable due diligence on supplier declarations and disclosures.
- Maintain records supporting compliance activities.
- Support customer and regulatory reporting requirements.
- Promote responsible sourcing awareness within its supply chain.
- Continuously improve responsible minerals management practices.

Compliance


Atmosic expects full cooperation from suppliers in supporting conflict minerals and responsible minerals compliance obligations.

Suppliers that fail to provide requested information, demonstrate effective supply chain controls, submit accurate declarations, or comply with the requirements of this policy may be subject to corrective action requests, supplier disqualification, suspension of procurement activities, or termination as an approved supplier.

Governance

Responsibility for implementation and oversight of this policy resides with Atmosic Technologies' Supply Chain, Quality, and Compliance organizations.

The policy shall be reviewed periodically and updated as necessary to reflect changes in regulations, customer requirements, industry standards, and business operations.

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