

Policy statement Conflict minerals

Siltronic position paper on due diligence obligations with responsible minerals sourcing in the supply chain

1. Our position on responsible minerals

Siltronic AG and its subsidiaries have committed themselves to the principles of responsible and sustainable corporate business conduct. This includes the establishment of fair-trading practices, also with regard to conflict minerals.

We recognize that minerals such as tin, tantalum, tungsten, and gold (3TG), as well as cobalt and mica are essential to semiconductor manufacturing. However, their extraction and trade can contribute to armed conflict, human rights abuse, and environmental harm. This policy outlines our commitments to responsible sourcing in line with the OECD Due Diligence Guidance, US Dodd-Frank-Act, EU Regulation 2017/821 on conflict minerals, RBA Code of Conduct and German LkSG.

Relevance for Siltronic

Siltronic's list of raw materials used in its products does not include any of the minerals commonly classified as conflict minerals. Although Siltronic does not source these minerals directly, the company is aware that conflict minerals can occur in the supply chain. Siltronic therefore requires its suppliers to comply with all applicable laws worldwide and to adhere to the principles set out in its Code of Conduct. In addition, suppliers must ensure that they source or provide minerals exclusively from certifiable conflict-free areas.

Scope

This policy applies to all Siltronic subsidiaries and operations globally and to all suppliers and contractors providing materials or components, involving 3TG minerals, or cobalt and mica, including smelters and refiners in the supply chain.

Our commitments

Regulatory Compliance

We comply with all applicable laws and regulations, including SEC and EU conflict minerals disclosure requirements.

Responsible Sourcing

We commit to proactive elimination of conflict minerals, avoiding suppliers that contribute to conflict, human rights abuse, or environmental degradation. We actively monitor our supplier practices to assess risks exposure associated with conflict minerals and require disclosure to ensure responsible sourcing.

Human Rights & Sustainability

We uphold international human rights standards, including the UN Guiding Principles on Business and Human Rights, and integrate sustainability considerations into mineral sourcing risks assessment of our supply chain.

Continuous Improvement

We regularly review and strengthen our conflict minerals program, expand its scope to all conflict affected and high-risk areas worldwide, and report on risk mitigation measures and policy implementation progress in our annual report.

2. Approach to eliminate conflict minerals

Siltronic has established and documented an internal procedure for the procurement of conflict-free minerals, the Conflict Minerals Procedure, which defines the requirements for a due diligence-related risks assessment of the supply chain:

- Every supplier that we invite to register in our supplier system must provide mandatory information on the use or procurement of conflict minerals.
- Questions on conflict materials are included in our criteria catalog for supplier audits. We carry out supplier audits ourselves or via certified third parties, for example as part of the VAP audits of the Responsible Business Alliance (RBA).
- We engage with our suppliers about the risks relating to conflict minerals both during audits and via our Code of Conduct.

Procurement decisions may only be made on the basis of this due diligence review of the supply chain. Compliance with the Conflict Minerals Procedure is mandatory for Siltronic and its suppliers.

Governance and Managerial Responsibilities

Oversight of the Conflict Minerals Policy rests with the company's Executive Board supported by the Strategic Procurement and Corporate Responsibility departments. Operational implementation is managed by the Strategic Procurement department, responsible for monitoring supplier practices, conducting due diligence, and ensuring compliance with applicable regulations.

Engagement and capacity building

To ensure effective implementation of our conflict minerals policy as part of sustainability commitments, we invest in education and capacity building across our organization and supply chain to raise awareness for our Conflict Minerals Policy.

Public Policy Engagement

Through our membership in the Responsible Business Alliance (RBA), we actively contribute to shaping public policy and standards for responsible mineral sourcing.

Detecting and dealing with violations

All employees must report violations or suspicious circumstances to the local Compliance Officer or the Legal Department that could indicate a possible violation of the law or the Conflict Minerals Procedure. Suppliers or third parties, who have concerns are encouraged to contact the appropriate Siltronic Compliance Hotline: www.siltronic.integrityline.com

If we identify a risk relating to conflict minerals in our supply chain, we will take appropriate measures immediately. We conduct a thorough incident investigation to determine the root cause and assess the severity of the issue. Based on the results, corrective actions are defined and implemented.

Munich, March 2026

The Executive Board

Siltronic AG