



義隆電子股份有限公司
ELAN MICROELECTRONICS CORP.

2025 Elan Electronics Conflict Minerals Policy

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1. Company Profile

Elan Electronics is headquartered in Hsinchu Science Park, Taiwan, and was listed on the Taiwan Central Market in March 2001. In response to the increasingly fierce competition in the global electronics industry, in order to strengthen its global layout, it has established a module factory in Zhonghe District, New Taipei City, specializing in the design, development and production of notebook computer products; R&D bases have been established in Kaohsiung Software Park and Tainan; business and after-sales service centers have been set up in Shenzhen, Shanghai, Suzhou, and Chongqing in mainland China, and a shipping and customer service center has been established in Hong Kong; and a business strategy planning center has been established in the United States. The company's business base is set up in China to create local employment opportunities. In response to the rapid growth of performance, the number of employees of Elan Group has reached 1,071 by the end of 2023, and the main sales markets are Taiwan, mainland China, Hong Kong, the United States, Japan, etc.

2. definition

- 2.1 RMI : Responsible Mineral Initiative ◦
- 2.2 RBA: Responsible Business Alliance, RBA ◦
- 2.3 RMAP: Responsible Minerals Assurance Process ◦
- 2.4 RCOI: Reasonable Country of Origin Inquiry ◦



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- 2.5 CMRT: Conflict Minerals Report Template, CMRT。
- 2.6 EMRT: Extended Minerals Reporting Template。
- 2.7 3TGs: Ta(Tantalum)、Sn(Tin)、W(Tungsten)、Au(Gold)。
- 2.8 OECD: Organization for Economic Cooperation and Development。

2.9 LBMA: London Bullion Market Association, LBMA。

2.10 RJC: Responsible Jewelry Council, RJC。

2.11 Covered country: Neighboring countries refer to Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia and other countries adjacent to the Democratic Republic of Congo.

3. Elan Electronics Conflict Minerals Overview

Elan Electronics complies with the requirements of the Responsible Business Alliance (RBA) and should fulfill its corporate social responsibility. In addition to complying with the RBA Code of Conduct, due to current industry needs, most electronic product functional operating materials use tantalum (Ta), tin (Sn), tungsten (W), gold (Au), cobalt (Co) and mica (Mica) minerals. In order to ensure that the purchased minerals are conflict-free, Elan Electronics has also formulated a conflict-free mineral procurement policy, actively investigating the sources of the minerals and smelters used, and will also confirm the reasons and necessity for the use of conflict minerals with relevant internal units and suppliers. If it is not necessary, suppliers are required to gradually reduce procurement or purchase alternative minerals and stop using conflict minerals. In order to encourage suppliers to pay attention to the conflict minerals issue, Elan Electronics follows the due diligence framework of the "Due Diligence Guidelines for Mineral Supply Chains from Conflict-Affected and High-Risk Areas" issued by the Organization for Economic Cooperation and Development (OECD), formulates Elan Electronics' conflict minerals investigation management process, formulates relevant documents and publishes policies,



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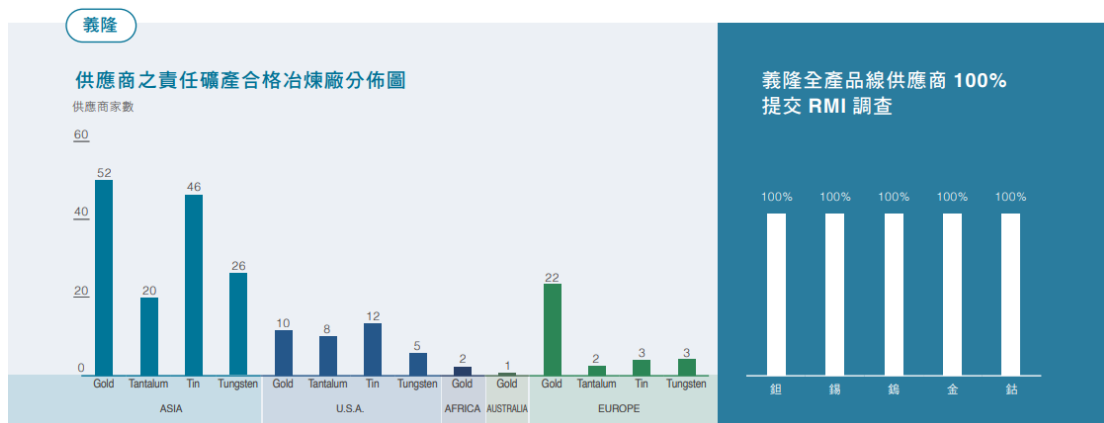
investigates supplier partners (including headquarters factories, agents and their global supply chains), and requires suppliers to sign and promise not to use the metals mined and sold in the above-mentioned mining areas controlled by armed groups. It is hoped that through the self-requirements and constraints of the industry supply chain, a positive impact will be exerted on the conflict minerals issue. In 2018, Elan Electronics formally formulated a conflict minerals policy, and has conducted conflict minerals investigations on suppliers since that year. After the case was closed, it continued to track the list of qualified smelters of the Responsible Minerals Initiative (RMI), and continued to cooperate with suppliers and conduct layer-by-layer checks. In the same year, Elan Electronics also actively promoted its non-conflict minerals policy on its official website and required suppliers to comply with its regulations. It also encouraged suppliers to purchase from non-conflict smelters that have passed the Responsible Minerals Assurance Program (RMAP) or other equivalent independent third-party audit programs to ensure that the products use minerals from reliable sources. In 2019, RMI began to include cobalt in the scope of conflict minerals investigation. Elan Electronics also launched due diligence on "Cobalt" in the same year and "Mica" in 2020, and included "Cobalt" and "Mica" in the declaration of non-conflict minerals. This reporting period covers the period from January 1, 2023 to December 31, 2023. Elan Electronics uses the CMRT and EMRT templates established by the Responsible Minerals Initiative (RMI) to investigate the sources of 3TG, cobalt (Cobalt) and mica (Mica) smelters for Elan Electronics' direct trading suppliers, and regularly reviews the list of qualified smelters released by RMI to ensure the compliance of smelters.

4. Mineral Origin Country Investigation



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Elan Electronics conducts the following procedures to conduct due diligence on the country of origin of minerals (RCOI) to comprehensively investigate the country sources of tantalum (Ta), tin (Sn), tungsten (W), gold (Au), cobalt (Co) and mica in the products produced and sold by suppliers to Elan Electronics. Conflict minerals occur in the Democratic Republic of the Congo ("DRC") and its neighboring countries ("Covered countries") where minerals are produced. To ensure that products do not come from armed conflict areas, Elan Electronics uses RMI to establish CMRT and EMRT templates. In 2025, the AMRT template will be expanded to investigate the source countries of smelters used by suppliers, and the scope of the investigation will cover suppliers of direct transactions. The supply chain investigation recovery rate in 2023 is 100%. For the list of qualified smelters or refineries, please refer to the RMI official website announcement. Smelters and refineries are encouraged to obtain third-party mechanisms recognized by the OECD due diligence, including RMI Responsible Minerals Certification Program (RMAP), LBMA, RJC certification. In 2023, Elan Electronics' smelters or refineries are mainly located in Asia, followed by the Americas as shown in Table 1 below

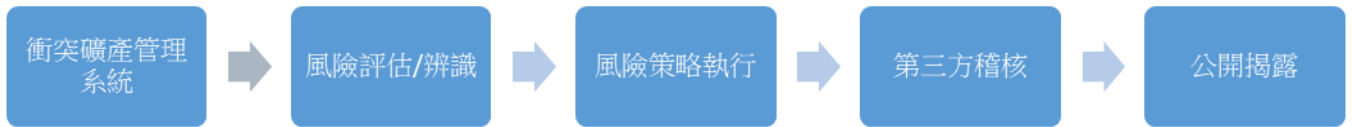


(table 1)

5. Elan Electronics' Conflict Minerals Due Diligence Management Process Elan Electronics follows the OECD's



"Guidelines for Responsible Supply Chain Due Diligence for Minerals from Conflict or High-Risk Areas" to establish a conflict minerals management mechanism.



5.1 Establish a management system

Elan Electronics has formulated a conflict mineral policy since 2018, and will conduct CMRT & EMRT conflict mineral surveys on the supply chain in 2023, with a recovery completion rate of 100%. Elan Electronics Conflict Mineral Policy: 1. Do not purchase conflict minerals from conflict areas. 2. Formulate a conflict mineral policy and strongly require suppliers to not use conflict minerals directly or indirectly in the raw materials provided, and must comply with the requirements of conflict-free minerals. 3. Expect suppliers to fully use recognized qualified smelters or require existing smelters to conduct relevant verification. If conflict minerals are found in suppliers' products, necessary measures will be taken to stop using such conflict minerals. For more details, please refer to Elan Electronics Conflict Mineral Policy:

<https://www.emc.com.tw/emc/en/csr/mineral>

5.2 Risk Assessment/Identification

We identify the source of 3TG smelters of suppliers through the Conflict Minerals Questionnaire (CMRT) from time to time every year, and require suppliers to sign a declaration to confirm compliance with Elan Electronics' Conflict Minerals Policy. We continue to track the list of qualified smelters of the Responsible Minerals Initiative (RMI) after the investigation, actively evaluate and manage the supply chain to ensure that the minerals in the supply chain do not use conflict minerals from armed conflict areas, and update the list of qualified smelters of the RMI to end customers from time to time to ensure



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that customers' products are not negatively affected by conflict minerals.

5.3 Risk Strategy Execution

Elan Electronics takes the following active measures to ensure the safety of minerals in the supply chain. 1. Require suppliers to sign a declaration to confirm compliance with the conflict minerals policy 2. Actively respond to the RMI plan and promote important RMI updates at the annual supplier conference. 3. In conjunction with the latest list of smelters published by RMI, regularly review suppliers. Once a non-compliant smelter is found, a "Notice of Banning Non-Compliant Smelters" will be sent, requiring the supplier to respond and improve within a time limit, and recommending that the supplier stop using conflict minerals and re-select new mineral sources. If the supplier cannot propose improvement measures, we will discuss reducing the number of new projects accepted by the supplier or reducing the existing purchase volume. Those with serious circumstances will be removed from the list of compliant suppliers. 4. Establish long-term cooperative relationships with most suppliers to improve regulatory compliance.

5.4 Third-party Audit

Elan Electronics encourages suppliers to purchase from non-conflict smelters that have passed RMAP or other equivalent independent third-party audit program inspections, and encourages suppliers to provide relevant verification. 5.5 Public Disclosure In 2023, Elan Electronics conducted a conflict minerals survey on its supply chain, set a target of 100% questionnaire response rate and achieved it. Suppliers were reviewed based on the questionnaire responses, including minerals, smelter names and countries of origin, to gain control of mineral source management and tracking, and a smelter distribution list was disclosed to customers.



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6. List of smelters and refiners The following is a list of all smelters and refiners responded to by Elan Electronics Supply Chain, and is reviewed in accordance with the latest smelter announcement list announced on July 7, 2025. Elan Electronics will update the following list based on the latest situation. For the latest smelter announcement list, please visit the RMI Responsible Minerals Initiative website:

<https://www.responsiblemineralsinitiative.org>

Metal	Smelter or Refiner Facility Name	Smelter Country
Tungsten	A.L.M.T. Corp.	JAPAN
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA
Gold	Agosi AG	GERMANY
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN
Tin	Alpha Assembly Solutions Inc	UNITED STATES OF AMERICA
Tantalum	AMG Brasil	BRAZIL
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	ASAHI METALFINE, Inc.	JAPAN
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Asaka Riken Co., Ltd.	JAPAN
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM
Gold	Aurubis AG	GERMANY
Tin	Aurubis Beerse	BELGIUM
Tin	Aurubis Berango	SPAIN
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES



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Gold	Boliden Ronnskar	SWEDEN
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Gold	Chimet S.p.A.	ITALY
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA
Tin	China Tin Group Co., Ltd.	CHINA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Gold	Chugai Mining	JAPAN
Gold	Coimpa Industrial LTDA	BRAZIL
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL
Tin	CRM Synergies	SPAIN
Tungsten	Cronimet Brasil Ltda	BRAZIL
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Gold	Dowa	JAPAN
Tin	Dowa	JAPAN
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN
Gold	Elite Industech Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Estanho de Rondonia S.A.	BRAZIL
Tantalum	F&X Electro-Materials Ltd.	CHINA
Tin	Fenix Metals	POLAND
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA



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Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Gold	GG Refinery Ltd.	TANZANIA, UNITED REPUBLIC OF
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA
Gold	Gold by Gold Colombia	COLOMBIA
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Gold	Heimerle + Meule GmbH	GERMANY
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA
Gold	Heraeus Germany GmbH Co. KG	GERMANY
Gold	Heraeus Metals Hong Kong Ltd.	CHINA
Tungsten	Hubei Green Tungsten Co., Ltd.	CHINA
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Istanbul Gold Refinery	TURKEY
Gold	Italpreziosi	ITALY
Gold	Japan Mint	JAPAN
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Gold	Jiangxi Copper Co., Ltd.	CHINA
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA



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Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kazzinc	KAZAKHSTAN
Tantalum	KEMET de Mexico	MEXICO
Tungsten	KENEE MINING VIETNAM COMPANY LIMITED	VIET NAM
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tungsten	Lianyou Resources Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Gold	LS MnM Inc.	KOREA, REPUBLIC OF
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF
Tin	Luna Smelter, Ltd.	RWANDA
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	MALAYSIA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Masan High-Tech Materials	VIET NAM



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Gold	Materion	UNITED STATES OF AMERICA
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Tin	Mineracao Taboca S.A.	BRAZIL
Tantalum	Mineracao Taboca S.A.	BRAZIL
Tin	Mining Minerals Resources SARL	CONGO, DEMOCRATIC REPUBLIC OF THE
Tin	Minsur	PERU
Gold	Mitsubishi Materials Corporation	JAPAN
Tin	Mitsubishi Materials Corporation	JAPAN
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	MKS PAMP SA	SWITZERLAND
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN
Gold	NH Recytech Company	KOREA, REPUBLIC OF
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Gold	Nihon Material Co., Ltd.	JAPAN
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA



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Tantalum	NPM Silmet AS	ESTONIA
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES
Gold	Planta Recuperadora de Metales SpA	CHILE
Tantalum	PowerX Ltd.	RWANDA
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA
Tin	PT Arsed Indonesia	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	PT Bangka Prima Tin	INDONESIA
Tin	PT Cipta Persada Mulia	INDONESIA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	PT Mitra Sukses Globalindo	INDONESIA
Tin	PT Premium Tin Indonesia	INDONESIA
Tin	PT Prima Timah Utama	INDONESIA
Tin	PT Putera Sarana Shakti (PT PSS)	INDONESIA
Tin	PT Rajehan Ariq	INDONESIA
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Gold	PX Precinox S.A.	SWITZERLAND
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	REMONDIS PMR B.V.	NETHERLANDS
Tin	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CHINA
Gold	Royal Canadian Mint	CANADA
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Gold	SAFINA A.S.	CZECHIA
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	Shandong Gold Smelting Co., Ltd.	CHINA



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Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	CHINA
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF
Tin	Super Ligas	BRAZIL
Gold	T.C.A S.p.A	ITALY
Tin	Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	JAPAN
Tantalum	Taki Chemical Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Tantalum	TANIOBIS Co., Ltd.	THAILAND
Tantalum	TANIOBIS GmbH	GERMANY
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tin	Thaisarco	THAILAND
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Gold	Tokuriki Honten Co., Ltd.	JAPAN
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN
Tungsten	Tungsten Vietnam Joint Stock Company	VIET NAM
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	SWITZERLAND
Gold	Western Australian Mint (T/a The Perth	AUSTRALIA



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	Mint)	
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Gold	WIELAND Edelmetalle GmbH	GERMANY
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA
Tin	Woodcross Smelting Company Limited	UGANDA
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA
Gold	Yamakin Co., Ltd.	JAPAN
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Gold	Yokohama Metal Co., Ltd.	JAPAN
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA