

NWF CONFLICT MINERALS POLICY

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1.0 INTRODUCTION

Social responsibility is a core business value for Newport Wafer Fab Limited and we are committed to respecting human rights within our own organisation as well as in our supply chain. NWF engages in sourcing responsibly and considers mining activities that fuel conflict as unacceptable. Our aim is to achieve and maintain “Conflict Free Status” for the four relevant metals Tin, Tantalum, Tungsten and Gold (3TG) and we expect that our suppliers shall use only smelters and refiners (SORs) in their supply chains that are conformant with the Responsible Minerals Assurance Process (RMAP) assessment protocols.

Proceeds from the mining of certain minerals in the Democratic Republic of Congo (the “DRC”) and countries adjoining it have been linked to violations of human rights through the funding of illegal armed groups. In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), the United States Securities and Exchange Commission (the “SEC”) requires publicly traded companies to report on the origin of these Conflict Minerals.

This policy is consistent with the Newport Wafer Fab Social Responsibility Business Code of Ethics which clearly states the strong commitment to ethical business principles by Newport Wafer Fab Ltd.

2.0 DEFINITIONS

- Conflict Minerals: Refers to Columbite-Tantalite (Coltan), Cassiterite, Gold, Wolframite, or their derivatives; or 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. Tantalum, Tin, Tungsten and Gold (3TG) are the widely accepted derivative metals to be of interest at present and are the current focus of the EICC-GeSI conflict free smelter certification program.
- DRC Adjoining Countries: Are countries that share an internationally recognised border with the Democratic Republic of the Congo.
- The following countries are currently recognised as “adjoining countries”: Angola, Burundi, Central African Republic, Congo Republic (a different nation than DRC), Rwanda, South Sudan, Uganda and Zambia.
- DRC Conflict Free: As defined in Section 1502 of the Dodd-Frank Act, “a product may be labelled as ‘DRC conflict free’ if the product does not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country.”
- Conflict Minerals obtained from recycled or scrap sources: Conflict Minerals obtained from recycled metals are reclaimed end-user or post-consumer products or scrap processed metals created during product manufacturing. Recycled metals include excess, obsolete, defective and scrap metal materials containing refined or processed metals that are appropriate to recycle in the production of Tin, Tungsten, Tantalum or Gold. Minerals partially processed, unprocessed or a bi-product from another ore are not included in this definition.

3.0 BUSINESS POLICY

NWF is committed to conducting its worldwide business operations in a manner that complies with applicable laws and regulations regarding conflict minerals. To accomplish this objective, we require full transparency regarding source and chain of custody of Conflict Minerals in our supply chain and to comply with these requirements, NWF is committed to:

- Inform suppliers of direct materials or silicon about this Conflict Minerals Policy and its relationship to the company's Supplier Manual and the Newport Wafer Fab Social Responsibility Business Code of Ethics.
- Work with its direct suppliers and sub-suppliers to understand the chain of custody for Conflict Minerals at least to the smelter or refiner level.
- Take measures to source parts and components from its direct suppliers and sub-suppliers that are DRC conflict-free. These measures may include adopting, disseminating and incorporating this policy in related purchase orders, contracts and other appropriate agreements with suppliers.
- Encourage direct suppliers to track and improve their performance in sourcing minerals from their suppliers and sub-suppliers that are validated as being DRC conflict-free in accordance with a national or internationally recognized due diligence framework.

4.0 CONFLICT MINERALS POLICY

NWF encourages its suppliers to:

- Assist NWF in complying with the SEC regulations and any other applicable regulations related to conflict minerals and provide all necessary declarations.
- Undertake reasonable due diligence within their supply chain via the use of the Conflict Minerals Reporting Template (CMRT) to determine the chain of custody and origin of the conflict minerals. Due diligence includes developing policies and management systems to use DRC conflict free minerals, including making these requirements apply to their direct suppliers and sub-tier suppliers and requiring them to do the same with lower tiers of suppliers.
- Take measures to purchase parts, components or materials from their direct suppliers and sub-tier suppliers who source minerals for their products from smelters or refiners validated as being DRC conflict free in accordance with a nationally or internationally recognized due diligence framework.
- Comply with information requests on the source and origin of conflict minerals in the parts, components or materials provided to NWF. Chain of custody data shall be maintained for five years and be provided to NWF upon request.
- Maintain records that document NWF's compliance with applicable laws and regulations regarding conflict minerals, including those related to conflict minerals due diligence, for a period of no less than five years.

5.0 COMPLIANCE

This policy applies to NWF's global business operations. Employees whose responsibilities relate to the supply or sourcing of parts, components and materials should be informed and are expected to comply with these requirements and associated legislation or regulation.

NON-COMPLIANCE

NWF will work with its suppliers to seek remedies for non-compliance with this policy. These remedies may include suspension or discontinuing engagement with the supplier.

REPORTING VIOLATIONS

Violations or potential violations of this policy should be reported by employees to their Manager or to the Company Compliance Officer

ADDITIONAL INFORMATION

Contact the Newport Wafer Fab Purchasing Manager for questions or concerns regarding compliance with this policy.