



SemiLEDs Corporation Conflict Minerals Policy

Introduction

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Section 1502”) seeks to dissuade companies from using certain “Conflict Minerals” that, directly or indirectly, finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (“Covered Countries”). “Conflict Minerals” include columbite-tantalite (coltan), cassiterite, wolframite and their derivatives, which are limited to tin, tantalum and tungsten, and gold (“3TG”).

SemiLEDs is required to comply with reporting obligations under Section 1502, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission, including the requirement that SemiLEDs conduct inquiries into the source of 3TG that are included in its products.

Our commitment

SemiLEDs is committed to avoiding the use of Conflict Minerals that, directly or indirectly, finance or benefit armed groups in the Covered Countries. SemiLEDs has adopted a due diligence process with respect to use of Conflict Minerals that is designed to conform to the framework established by the Organization for Economic Co-Operation and Development (OECD).

Supplier requirements

SemiLEDs expects its suppliers to similarly exercise due diligence on the sources of 3TG used in products that they supply to SemiLEDs. Suppliers will be required to declare that all products supplied to SemiLEDs do not contain 3TG that originated in Covered Countries. SemiLEDs will review this declaration from its suppliers at least annually. SemiLEDs will evaluate its relationships with its suppliers on an ongoing basis to ensure continued compliance with this policy.

As adopted on July 14, 2014