

Renesas Electronics America Inc.
Corporate Social Responsibility (“CSR”) Policy

Renesas Electronics America Inc. (“REA”) is a world leader in the design and manufacture of high-performance analog, mixed-signal and power management semiconductors. Corporate Social responsibility consists of a commitment to the integration of economic, environmental and social perspectives in all of REA’s global operations.

SUSTAINABLE DEVELOPMENT

Sustainable development is the management and conservation of the natural (and human) resource base in such a manner as to ensure the attainment and continued satisfaction of human needs for the present and future generations. REA supports this initiative in all facets of its business operations, including:

Workplace: fair compensation and benefits; equal opportunity; health & safety; leadership; policies; ethics; working environment; employee development, compliance with labor laws.

Commerce: product quality, reliability, and safety; supply chain management; accurate reporting; business conduct; export compliance; sustainable manufacturing.

Environment: water use and disposal; energy use; CO₂ emissions; solid waste; air emissions; recycling; ozone depletion; toxins; packaging; GHG; compliance with global environmental laws and regulations.

Community: volunteerism; charitable contributions; gift matching; economic development; tax base; community activities.

UNITED NATIONS GLOBAL COMPACT PRINCIPLES

REA adheres to the ten United Nations Global Compact Principles affecting Environmental, Social, and Governance issues:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.
- Principle 2: Businesses should ensure that they are not complicit in human rights abuses.

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 4: Businesses should uphold the elimination of forced or compulsory labor.
- Principle 5: Businesses should uphold the effective abolition of child labor.
- Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation.
- Principle 7: Businesses should support a precautionary approach to environmental challenges.
- Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility.
- Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies.
- Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.

Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas

Regarding serious abuses associated with the extraction, transport or trade of minerals:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
 - i) any forms of torture, cruel, inhuman and degrading treatment;
 - ii) any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - iii) the worst forms of child labor;
 - iv) other gross human rights violations and abuses such as widespread sexual violence;
 - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party

committing serious abuses as defined in paragraph 1.

Regarding direct or indirect support to non-state armed groups:

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces:

5. We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces that illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are

extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding risk management of public or private security forces:

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.⁸ Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering:

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

In accordance with the SEC’s Final Rule Release #34-67716 issued on August 22, 2012, REA conducts a reasonable country of origin inquiry (“RCOI”) with its supply chain in accordance with REA’s Conflict Minerals Framework.¹ If REA subsequently learns that any conflict minerals used in REA products originated in the Covered Countries, it will then undertake due diligence as required by the SEC’s Final Rule and the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected or High-Risk Areas to determine if there is any direct or indirect finance of or benefit to armed groups unless such due diligence has already been performed, such as by Responsible Minerals Assurance Process (“RMAP”) conformant smelters.

It is REA’s policy to source conflict minerals only from smelters that have been “certified as being conflict-free”² by an industry-recognized organization, including without limitation the Responsible Minerals Initiative (“RMI”) and its Responsible Minerals Assurance Process (“RMAP”), the London Bullion Market Association (“LBMA”), and the Responsible Jewelry Council (“RJC”).

Renesas Electronics Corporation’s SCSS Department is responsible for oversight of REA’s conflict minerals management system. As part of that management system, REA commits to flow down this CSR Policy to its supply chain. Additionally, any concerns or grievances relating to REA’s conflict minerals policy or management system should be directed to <https://form.renesas.com/public/application/add/267> or by phone to +1 (408) 588-6000.

If any conflict minerals in REA products are determined to originate in the Conflict-Affected or High-Risk Areas and directly or indirectly benefit or finance armed groups, REA will require that supplier to only use a smelter certified as being conflict-free, or else REA will change suppliers if that is not done.

This CSR Policy, along with REA’s Code of Conduct, emphasizes our commitment to improve corporate citizenship for our employees, our stakeholders, and society at large.

¹ Control Document Specification Number 999102.

² This includes smelters that are either: (i) conformant with the Responsible Minerals Assurance Process (“RMAP”) assessment protocol, (ii) are in RMAP “active” status, or (iii) are members of the Tungsten Industry – Conflict Minerals Council (TI-CMC) and are progressing toward RMAP conformance.