

Last Modified: February 21, 2025

## **Responsible Minerals Policy**

Sandisk strongly disapproves of the violence, unsafe working conditions and child labor in the Democratic Republic of Congo (DRC), adjoining countries and other conflict-affected or high-risk areas. Sandisk is committed to supporting responsible sourcing of conflict minerals (gold, columbite-tantalite (also known as coltan), cassiterite, and wolframite, as well as their derivatives, tin, tantalum and tungsten (collectively 3TG)), cobalt and other minerals from the DRC region (including conformant smelters within the DRC) and other conflict-affected or high-risk areas. Sandisk is committed to source responsibly and will consider suspending or discontinuing engagement with suppliers where it identifies a reasonable risk. Sandisk conducts due diligence in line with OECD Guidance.

Sandisk expects its suppliers to comply with its requirements relating to conflict minerals and responsible sourcing. This means (1) any 3TG necessary to the functionality and production of supplied materials do not directly or indirectly: (a) finance armed groups through mining or mineral trading in the DRC, adjoining countries or other conflict-affected or high-risk areas, or (b) contribute to child labor, human rights abuses or environmental pollution; or (2) any 3TG in supplied materials are from recycled or scrap sources. Sandisk also expects its suppliers to responsibly source all minerals, including cobalt, from the DRC, adjoining countries and other conflict-affected or high-risk areas. Sandisk further expects its suppliers to adopt policies based on OECD Guidance with respect to 3TG, cobalt and other minerals in support of this policy and, throughout the supply chain, to require their suppliers to adopt similar policies. Sandisk works with other stakeholders, collaborating with industry working groups, customers and suppliers to drive and align on the responsible sourcing of minerals more broadly.

Sandisk's major production parts suppliers and contract manufacturers must meet additional requirements, including undergoing a Validated Assessment Program audit conducted by the Responsible Business Alliance. Sandisk requires contract provisions in support of this policy with its suppliers and contract manufacturers, which govern their relationships with refiners and smelters that contribute to Sandisk products. Sandisk also has an <a href="Ethics Helpline">Ethics Helpline</a> that is available for employees, suppliers and other stakeholders in the supply chain to raise concerns. Sandisk's Board of Directors oversees the company's corporate responsibility and sustainability program, including with respect to human rights.

For additional information on Sandisk's policies and procedures, including due diligence, see the <u>Conflict Minerals Report</u> and the <u>Sustainability Report</u>.

## Responsible Minerals Due Diligence Program

We have established and maintain a responsible supply chain due diligence program designed to ensure responsible sourcing of 3TG used in our products. This includes ongoing communication and engagement with our global production parts suppliers to ensure sustained due diligence in the sourcing of minerals used in our products. We are also active members of the Responsible Minerals Initiative (RMI) and we participate in various working groups dedicated to advancing responsible minerals sourcing. More information about RMI and its programs is available at <a href="https://www.responsiblemineralsinitiative.org/">https://www.responsiblemineralsinitiative.org/</a>.