

## Annual Report pursuant to Article 7(3) of Regulation (EU) 2017/821

### Nexperia Germany GmbH - Reporting Year 2025

#### 1. Introduction

Nexperia Germany GmbH is the German subsidiary of Nexperia B.V., a global semiconductor manufacturer headquartered in Nijmegen, the Netherlands. Nexperia develops and produces essential semiconductor components, including diodes, transistors, MOSFETs, logic devices, and protection components used in automotive, industrial, mobile, and consumer applications worldwide.

In Germany, Nexperia Germany GmbH operates major manufacturing and R&D facilities, including one of the company's largest wafer fabrication plants in Hamburg, as well as design and sales operations in Munich. These activities play an important role in semiconductor production and innovation in Europe.

This report is published in accordance with Article 7(3) of Regulation (EU) 2017/821 of the European Parliament and of the Council ("the Regulation"), which requires Union importers of minerals or metals to publicly report on their supply chain due diligence policies and practices for responsible sourcing on an annual basis.

For the reporting year 2025, Nexperia Germany GmbH has been identified as a Union importer of metals containing gold and tungsten above the volume thresholds set out in Annex I to the Regulation.

#### 2. Management System (Article 4)

##### 2.1 Supply Chain Policy

Nexperia has adopted a supply chain policy for minerals and metals potentially originating from conflict-affected and high-risk areas. This policy is communicated to suppliers and the public through:

- The "Statement on Responsible Sourcing of Minerals", publicly available at [nexperia.com/about/corporate-social-responsibility/environment](https://nexperia.com/about/corporate-social-responsibility/environment)
- The Nexperia Supplier Code of Conduct, section "Responsible Sourcing of Minerals", publicly available at [nexperia.com/about/terms-and-policies/supplier-code-of-conduct](https://nexperia.com/about/terms-and-policies/supplier-code-of-conduct)
- The Nexperia Responsible Minerals Sourcing webpage at [nexperia.com/about/corporate-social-responsibility/responsible-minerals-sourcing](https://nexperia.com/about/corporate-social-responsibility/responsible-minerals-sourcing)

Our supply chain policy is consistent with the standards set out in the model supply chain policy in Annex II to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Due Diligence Guidance").

##### 2.2 Internal Management System

Nexperia has established an internal management system to support supply chain due diligence, documented in our internal standard NDS-00324 "Responsible Minerals Assurance Process". Senior management oversight is ensured through monthly reporting to key stakeholders and senior management representatives from Procurement, Environmental Health & Safety, Legal (Trade Compliance), Sustainability, and Corporate Affairs. These monthly reviews cover the status of smelter and refiner performance, including identification and follow-up of non-conformant facilities.

Nexperia has been a member of the Responsible Minerals Initiative (RMI) since 2017 and adheres to RMI standards and the Responsible Minerals Assurance Process (RMAP).

### 2.3 Supplier Engagement

Nexperia's Supplier Code of Conduct requires all direct suppliers to adopt policies and perform due diligence regarding the origin and chain of custody of metals in supplied materials and products. The Supplier Code of Conduct is a mandatory prerequisite for entering into a business relationship with Nexperia; compliance is verified as part of the supplier onboarding procedure before vendor code creation. Suppliers of in-scope substances are required to provide reporting data using RMI-developed templates, including the Conflict Minerals Reporting Template (CMRT).

### 2.4 Grievance Mechanism

In accordance with Article 4(e) of the Regulation, Nexperia maintains a grievance mechanism as an early-warning risk-awareness system, allowing any interested party — including external stakeholders and whistleblowers — to voice concerns regarding the circumstances of extraction, trade, and handling of minerals in our supply chain. Details on our grievance mechanism are available on our Code of Conduct page ([nexperia.com/about/terms-and-policies/code-of-conduct](https://nexperia.com/about/terms-and-policies/code-of-conduct)) or linked on the Nexperia Responsible Minerals Sourcing webpage at [nexperia.com/about/corporate-social-responsibility/responsible-minerals-sourcing](https://nexperia.com/about/corporate-social-responsibility/responsible-minerals-sourcing).

Reports can be submitted via:

- Email: [code.compliance@nexperia.com](mailto:code.compliance@nexperia.com)
- The Nexperia SpeakUp System (country-specific hotlines accessible via [nexperia.com/about/terms-and-policies/code-of-conduct](https://nexperia.com/about/terms-and-policies/code-of-conduct))

Reports may be made anonymously. Nexperia protects reporters from retaliation.

During the reporting year 2025, no grievances related to the extraction, trade, or handling of minerals in Nexperia's supply chain were received through these channels.

### 2.5 Supply Chain Traceability

Nexperia operates a supply chain traceability system in accordance with Article 4(g) of the Regulation. For gold and tungsten imports, this system provides:

- A description of the metals, including trade names and types
- Names and addresses of direct suppliers
- Names and addresses of smelters and refiners in the supply chain, identified through the CMRT
- Evidence of conformity with the Responsible Minerals Assurance Process (RMAP), a supply chain due diligence scheme recognized by the European Commission pursuant to Article 8 of the Regulation (Commission Implementing Decision (EU) 2025/2071)

The current CMRT is publicly available at [nexperia.com/about/corporate-social-responsibility/responsible-minerals-sourcing](https://nexperia.com/about/corporate-social-responsibility/responsible-minerals-sourcing).

### 3. Risk Management (Article 5)

Nexperia's supply chain due diligence risk management is conducted in accordance with the company's enterprise risk management framework (internal policy NDS-00390 "Risk Management"), which provides the overarching principles and processes for identifying, assessing, and mitigating material risks across the organization.

#### 3.1 Risk Identification and Assessment

Nexperia identifies and assesses risks in its metal supply chain based on the RMAP conformance status of smelters and refiners reported through CMRTs collected from in-scope suppliers — that is, suppliers that provide tin, tungsten, tantalum, and/or gold in the products or materials they supply to Nexperia for incorporation into final Nexperia products. All thereby reported smelters and refiners are verified against the RMI database, which provides conformance status, audit history, and eligibility information.

During the reporting year 2025, 19 company-level CMRTs issued between 13 August 2024 and 4 December 2025 were used to reflect Nexperia's smelter and refiner inputs for tin, tungsten, tantalum, and gold. Cumulatively across all CMRTs, 134 unique smelter and refiner facilities were identified in the gold and tungsten supply chain, comprising 99 gold smelters and 35 tungsten smelters. As of 4 December 2025 (the last CMRT release in the reporting year), the active supply chain comprised 118 facilities (86 gold, 32 tungsten).

#### 3.2 Risk Mitigation

Non-conformant smelters and refiners identified through the CMRT review process trigger a defined risk mitigation procedure. Nexperia's Procurement team engages with the relevant supplier(s) to request the removal of non-conformant facilities from the supply chain. Progress is monitored and reported through the monthly senior management review cycle.

During the reporting year 2025, a total of 10 non-conformant, non-eligible, or unresponsive facilities (8 gold, 2 tungsten) were identified through the CMRT review process and subsequently removed from the supply chain. A further 6 conformant facilities were removed due to supply chain changes unrelated to due diligence concerns.

As of 31 December 2025, of the 118 facilities in the active supply chain:

- Gold: 85 of 86 smelters (98.8%) held RMAP Conformant status. One smelter (Oegussa, Austria) held "Active" status, indicating an ongoing initial RMAP assessment.
- Tungsten: 32 of 32 smelters (100%) held RMAP Conformant status.

Overall, 117 of 118 facilities in the active supply chain (99.2%) were RMAP Conformant at year-end. Including all 134 facilities reported during the year, 123 (91.8%) held Conformant status as of 31 December 2025.

### 4. Third-Party Audit (Article 6)

In accordance with Article 6(2) of the Regulation, Union importers of metals may be exempted from the obligation to carry out third-party audits provided they make available substantive evidence demonstrating that all smelters and refiners in their supply chain comply with the Regulation. The Responsible Minerals Assurance Process (RMAP) has been officially recognized by the European Commission as a supply chain due diligence scheme pursuant to Article 8 of the Regulation. As described in Section 3.2, 117 of 118 smelters and refiners (99.2%) in Nexperia Germany GmbH's supply chain

held RMAP Conformant status at year-end 2025, with the remaining facility holding "Active" status in an ongoing RMAP assessment.

As this is Nexperia Germany GmbH's first reporting year under the Regulation, no third-party audit pursuant to Article 6(1) has been conducted to date. Nexperia is planning to commission an independent third-party audit covering its supply chain due diligence practices in 2026.

## **5. Conclusion**

Nexperia Germany GmbH is committed to responsible sourcing of minerals and metals used in its products. Through membership in the Responsible Minerals Initiative, an established internal management system, and active risk management processes, Nexperia continuously works to ensure that smelters and refiners in the supply chain operate in conformity with internationally recognized due diligence standards. Nexperia will continue to enhance due diligence practices, including the planned commissioning of an independent third-party audit, and will publish updated reports annually in accordance with Article 7(3) of the Regulation.

## Annex: Smelters and Refiners in the Supply Chain

The following tables list all smelters and refiners identified in the gold and tungsten supply chain of Nexperia Germany GmbH, based on all vendor CMRTs that contributed to Nexperia's company-level CMRTs valid during the reporting year 2025. Facilities marked with a dagger (†) were removed from the supply chain during the reporting year and are not included in the year-end CMRT of 4 December 2025.

**Table 1: Gold Smelters (99)**

CID	Smelter/Refiner Name	Country	RMAP Status *
CID000082	ASAHI METALFINE, Inc.	Japan	Conformant
CID002708	Abington Reldan Metals, LLC	United States of America	Conformant
CID000015	Advanced Chemical Company	United States of America	Conformant
CID000035	Agosi AG	Germany	Conformant
CID000019	Aida Chemical Industries Co., Ltd.	Japan	Conformant
CID002760	Albino Mountainho Lda.	Portugal	Outreach Required †
CID003500	Alexy Metals	United States of America	Non Conformant †
CID000041	Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan	Conformant
CID000058	AngloGold Ashanti Corrego do Sitio Mineracao	Brazil	Conformant
CID000077	Argor-Heraeus S.A.	Switzerland	Conformant
CID000924	Asahi Refining Canada Ltd.	Canada	Conformant
CID000920	Asahi Refining USA Inc.	United States of America	Conformant
CID000090	Asaka Riken Co., Ltd.	Japan	Conformant
CID000113	Aurubis AG, Hamburg	Germany	Conformant
CID002863	Bangalore Refinery	India	Conformant †
CID000128	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines	Conformant
CID000157	Boliden Mineral AB (Ronnskar)	Sweden	Conformant
CID000176	C. Hafner GmbH + Co. KG	Germany	Conformant
CID000233	Chimet S.p.A.	Italy	Conformant
CID000264	Chugai Mining	Japan	Conformant
CID004010	Coimpa Industrial LTDA	Brazil	Conformant
CID000359	DSC (Do Sung Corporation)	Korea, Republic of	Conformant
CID000401	Dowa	Japan	Conformant
CID000425	Eco-System Recycling Co., Ltd. East Plant	Japan	Conformant
CID003424	Eco-System Recycling Co., Ltd. North Plant	Japan	Conformant
CID003425	Eco-System Recycling Co., Ltd. West Plant	Japan	Conformant
CID004755	Elite Industech Co., Ltd.	Taiwan, Province of China	Conformant
CID004506	GG Refinery Ltd.	Tanzania, United Republic of	Conformant
CID000185	Glencore Canada Corporation - CCR Refinery	Canada	Conformant
CID002030	Gold Corporation - The Perth Mint	Australia	Conformant
CID003641	Gold by Gold Colombia	Colombia	Conformant
CID000651	Guoda Safina High-Tech Environmental Refinery Co., Ltd.	China	Not Applicable †
CID000694	Heimerle + Meule GmbH	Germany	Conformant
CID000711	Heraeus Germany GmbH Co. KG	Germany	Conformant
CID000707	Heraeus Metals Hong Kong Ltd.	China	Conformant
CID000801	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	China	Conformant
CID000807	Ishifuku Metal Industry Co., Ltd.	Japan	Conformant
CID000814	Istanbul Gold Refinery	Turkey	Conformant
CID002765	Italpreziosi	Italy	Conformant
CID000937	JX Advanced Metals Corporation	Japan	Conformant
CID000823	Japan Mint	Japan	Conformant
CID000855	Jiangxi Copper Co., Ltd.	China	Conformant

CID002511	KGHM Polska Miedz Spolka Akcyjna	Poland	Conformant
CID000957	Kazzinc Ltd	Kazakhstan	Conformant
CID000969	Kennecott Utah Copper LLC	United States of America	Conformant
CID000981	Kojima Chemicals Co., Ltd.	Japan	Conformant
CID002605	Korea Zinc Co., Ltd.	Korea, Republic of	Conformant
CID002762	L'Orfebvre S.A.	Andorra	Non Conformant †
CID001078	LS MnM Inc.	Korea, Republic of	Conformant
CID000689	LT Metal Ltd.	Korea, Republic of	Conformant
CID001352	MKS PAMP SA	Switzerland	Conformant
CID002509	MMTC-PAMP India Pvt., Ltd.	India	Conformant
CID001113	Materion	United States of America	Conformant
CID001119	Matsuda Sangyo Co., Ltd.	Japan	Conformant
CID003575	Metal Concentrators SA (Pty) Ltd.	South Africa	Conformant
CID001149	Metalor Technologies (Hong Kong) Ltd.	China	Conformant
CID001152	Metalor Technologies (Singapore) Pte., Ltd.	Singapore	Conformant
CID001147	Metalor Technologies (Suzhou) Ltd.	China	Conformant
CID001153	Metalor Technologies S.A.	Switzerland	Conformant
CID001157	Metalor USA Refining Corporation	United States of America	Conformant
CID001161	Metalurgica Met-Mex Penoles S.A. De C.V.	Mexico	Conformant
CID001188	Mitsubishi Materials Corporation	Japan	Conformant
CID001193	Mitsui Mining and Smelting Co., Ltd.	Japan	Conformant
CID003189	NH Recytech Company	Korea, Republic of	Conformant
CID003690	NOBLE METAL SERVICES	United States of America	Outreach required †
CID001220	Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey	Conformant
CID001236	Navoi Mining and Metallurgical Combinat	Uzbekistan	Conformant
CID001259	Nihon Material Co., Ltd.	Japan	Conformant
CID002779	Oegussa Oesterreichische Gold- und Silber-Scheideanstalt Gesm.b.	Austria	Active
CID001325	Ohura Precious Metal Industry Co., Ltd.	Japan	Conformant
CID001397	PT Aneka Tambang (Persero) Tbk	Indonesia	Conformant
CID001498	PX Precinox S.A.	Switzerland	Conformant †
CID002919	Planta Recuperadora de Metales SpA	Chile	Conformant
CID002582	REMONDIS PMR B.V.	Netherlands	Conformant
CID001512	Rand Refinery (Pty) Ltd.	South Africa	Conformant †
CID001534	Royal Canadian Mint	Canada	Conformant
CID002290	SAFINA A.S.	Czechia	Conformant
CID001585	SEMPSA Joyeria Plateria S.A.	Spain	Conformant
CID002973	Safimet S.p.A	Italy	Non Conformant †
CID001916	Shandong Gold Smelting Co., Ltd.	China	Conformant
CID001622	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China	Conformant
CID001736	Sichuan Tianze Precious Metals Co., Ltd.	China	Conformant
CID001761	Solar Applied Materials Technology Corp.	Taiwan, Province of China	Conformant
CID001798	Sumitomo Metal Mining Co., Ltd.	Japan	Conformant
CID002918	SungEel HiMetal Co., Ltd.	Korea, Republic of	Conformant
CID002580	T.C.A S.p.A	Italy	Conformant †
CID002615	TOO Tau-Ken-Altyn	Kazakhstan	Conformant
CID001875	Tanaka Kikinzoku Kogyo K.K.	Japan	Conformant
CID001938	Tokuriki Honten Co., Ltd.	Japan	Conformant
CID001955	Torecom	Korea, Republic of	Non Conformant †
CID001980	Umicore S.A. Business Unit Precious Metals Refining	Belgium	Conformant
CID001993	United Precious Metal Refining, Inc.	United States of America	Conformant
CID002003	Valcambi S.A.	Switzerland	Conformant
CID003615	WEEEREFINING	France	Non Conformant †
CID002778	WIELAND Edelmetalle GmbH	Germany	Conformant
CID002100	Yamakin Co., Ltd.	Japan	Conformant



CID002129	Yokohama Metal Co., Ltd.	Japan	Conformant
CID002224	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China	Conformant
CID002243	Zijin Mining Group Gold Smelting Co. Ltd.	China	Conformant †

\* RMAP conformance status as of 31 December 2025, based on records in the RMI Facility Database.

† Facility removed from the supply chain during the reporting year.

**Table 2: Tungsten Smelters (35)**

CID	Smelter/Refiner Name	Country	RMAP Status *
CID000004	A.L.M.T. Corp.	Japan	Conformant
CID002502	Asia Tungsten Products Vietnam Ltd.	Viet Nam	Conformant
CID002641	China Molybdenum Tungsten Co., Ltd.	China	Conformant
CID000258	Chongyi Zhangyuan Tungsten Co., Ltd.	China	Conformant
CID003468	Cronimet Brasil Ltda	Brazil	Conformant
CID003609	Fujian Xinlu Tungsten Co., Ltd.	China	Conformant
CID002315	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China	Conformant
CID002494	Ganzhou Seadragon W & Mo Co., Ltd.	China	Conformant
CID000568	Global Tungsten & Powders LLC	United States of America	Conformant
CID000218	Guangdong Xianglu Tungsten Co., Ltd.	China	Conformant
CID002541	H.C. Starck Tungsten GmbH	Germany	Conformant
CID003417	Hubei Green Tungsten Co., Ltd.	China	Conformant
CID000766	Hunan Chenzhou Mining Co., Ltd.	China	Not Applicable †
CID002513	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten P	China	Non Conformant †
CID000825	Japan New Metals Co., Ltd.	Japan	Conformant
CID002551	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	China	Conformant
CID002321	Jiangxi Gan Bei Tungsten Co., Ltd.	China	Conformant
CID002318	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	China	Conformant
CID002317	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	China	Conformant
CID002316	Jiangxi Yaosheng Tungsten Co., Ltd.	China	Conformant
CID004619	KENEE MINING VIETNAM COMPANY LIMITED	Viet Nam	Conformant
CID000966	Kennametal Fallon	United States of America	Conformant
CID000105	Kennametal Huntsville	United States of America	Conformant
CID003407	Lianyou Metals Co., Ltd.	Taiwan, Province of China	Conformant
CID004397	Lianyou Resources Co., Ltd.	Taiwan, Province of China	Conformant
CID002319	Malipo Haiyu Tungsten Co., Ltd.	China	Conformant
CID002543	Masan High-Tech Materials	Viet Nam	Conformant
CID002589	Niagara Refining LLC	United States of America	Conformant
CID002827	Philippine Chuangxin Industrial Co., Inc.	Philippines	Conformant †
CID004430	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	China	Conformant
CID002542	TANIOBIS Smelting GmbH & Co. KG	Germany	Conformant
CID003993	Tungsten Vietnam Joint Stock Company	Viet Nam	Conformant
CID002044	Wolfram Bergbau und Hutten AG	Austria	Conformant
CID002320	Xiamen Tungsten (H.C.) Co., Ltd.	China	Conformant
CID002082	Xiamen Tungsten Co., Ltd.	China	Conformant

\* RMAP conformance status as of 31 December 2025, based on records in the RMI Facility Database.

† Facility removed from the supply chain during the reporting year.