

OMNIVISION Group

CONFLICT MINERALS POLICY

Conflict minerals refer to tantalum, tungsten, tin, and gold originated in the Democratic Republic of the Congo (DRC) and its neighboring countries. There are concerns that the conflict minerals fund armed forces of the Covered Countries causing many deaths of their own people and infringement of human rights in the course of mineral excavation such as forced labor and abuse of women and children.

Will Semiconductor Co., Ltd. Shanghai together with its subsidiaries (hereafter referred to as the “OMNIVISION Group” or the “Company”) are committed to corporate social responsibility, resolutely not to use conflict minerals directly or indirectly supplied from the Democratic Republic of the Congo and its adjacent countries.

The Company expects our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing conflict minerals are DRC conflict free. We have implemented and continue to refine due diligence processes to determine whether the materials provided by our suppliers contain conflict minerals, and we engage with our suppliers to promote responsible sourcing practices and to promote the use of conflict-free minerals in our supply chain.

To accomplish this goal, the Company will:

- (i) identify the sources of such materials.
- (ii) require all suppliers not to use conflict minerals in products for OMNIVISION Group.
- (iii) require suppliers to provide questionnaires to proactively declare the source of minerals to ensure that conflict minerals are not used.
- (iv) continue work with suppliers with respect to this matter.