

## Corporate Environmental Policy

### 1. Objective

This document outlines GSI Technology's Environmental and Safety Policy.

This procedure is not a substitute for requirements established by local regulatory agencies. Any applicable local laws, rules and regulations, which may be more stringent than this procedure must be complied with through appropriate management and operational controls.

### 2. Organization

Head of the GSI Technology Environmental Organization should report to the Executive staff the status and progress of the matters during management review on regular basis.

This policy shall be reviewed and maintained periodically to ensure it is in compliance with any applicable up-to-date local laws, rules and regulations.

### 3. Environmental Policy

GSI Technology core business is to develop and sell high performance, low power, environmental friendly SRAM product for telecom and consumer market. The company commits the following Environmental and Safety policies:

#### 3.1 Management and Evaluation of Suppliers

All GSI Technology Subcontract Manufacturers shall be ISO14001 registered, and suppliers are routinely reviewed to ensure continued compliance.

GSI Technology has also set out regulations for evaluating manufacturing subcontractor partners, evaluates them in accordance with environmental evaluation criteria, and obtains their cooperation in activities to reduce environmental risk. Such evaluations are part of the subcon/supplier audit, and are continued each year. A system is in place for providing feedback on evaluation results and areas requiring improvement. The Corporate Quality department has the responsibility to schedule additional audits as needed based on the importance of the activity and previous audit results.

## 3.2 RoHS Compliance

GSI Technology is committed to complying with all applicable environmental laws and regulations.

GSI Technology works closely with our customers and suppliers to identify and rapidly eliminate banned substances from our products.

With respect to the inclusion of hazardous substances in products, RoHS-compliant product design criteria provide the basis for product design, and products, parts and materials, and packaging materials are checked during purchasing for chemical substances to ensure in compliance with the RoHS Directive.

- Lead and its compounds 1,000ppm
- Mercury and its compounds 1,000ppm
- Cadmium and its compounds 100ppm
- Hexavalent chromium and its compounds 1,000ppm
- Polybrominated biphenyls (PBBs) 1,000ppm
- Polybrominated diphenyl ethers (PBDEs) 1,000ppm

Note:

Some products require non-compliant volumes of lead (Pb) to meet customer requirements. Products that contain a non-compliant volume of lead (Pb) are distinctly marked to indicate non-compliance with RoHS lead content guidelines.

## 3.3 REACH Regulation Compliance

GSI Technology is committed to providing safe products consistent with the improvement and protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances.

GSI Technology supports the requirement of REACH regulation and confirmed with our current suppliers regarding the non-use of 84 substances of very high concern (SVHC), as specified according to the Candidate list published by ECHA (European Chemical Agency) dated on June 18, 2012, in our products.

## 3.5 Change Control for Chemical Substances

GSI subcontractors shall submit the Advanced Change Notification along with the following document for the affected materials and parts to GSI in advance, to get GSI review and approval before implementation:

- Advanced Change Notification
- Certificate of Non-use of Hazardous Substances
- ICP data
- MSDS
- Chemical Ingredient List and any other document when applicable

## 3.6 Production

GSI Technology subcontractors must prevent all banned substances from being used for GSI products and must prevent any contamination during production.

- The subcontractors shall prevent non-verified materials from being mixed with verified purchased ones.
- In case of products produced for other companies containing banned substances, any contamination must be prevented either directly or indirectly.
- The subcontractors shall ensure all purchased goods or goods delivered from secondary suppliers are passed the incoming inspection before using in production.

## 3.7 Nonconforming Product Management

GSI Technology subcontractors must manage nonconforming products and non-verified products and prevent shipping those to GSI.

- The subcontractors shall be able to trace a nonconforming product from its shipment lot record back to its material lot record.
- The subcontractors shall define procedures for handling of nonconforming products.
- The subcontractors shall report immediately and issue a corrective action report to GSI when non-conforming products are, were, or could have been delivered to GSI.

## 3.8 Safety and Health

Successive generations of GSI Technology products achieve reductions in power consumption and raw materials.

GSI Technology facilities maintain aggressive recycling programs – paper, packaging, products, and chemicals, and make continuous efforts to prevent pollution and efficiently use all resources to improve employee's safety and health.

## 3.9 Employee Training and Communication

GSI Technology is continually reducing our impact on the natural environment through training and communication of company policy to our employees.

Regular seminars will be held on specific topics to increase the awareness as well as bring up to date information.

Training record lists the employee's participation in a given training session, and is signed by the employees who participated in the training. Supervisor/trainer shall submit such training records to Corporate HR for archiving.