

Applied Optoelectronics, Inc.
Conflict Minerals Report
For The Year Ended December 31, 2024

This report for the year ended December 31, 2024 is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (the “Rule”). The Rule was adopted by the Securities and Exchange Commission (“SEC”) to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain Conflict Minerals which are necessary to the functionality or production of their products. Conflict Minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which under current guidance are limited to tin, tantalum, and tungsten (“3Ts”). These requirements apply to registrants whatever the geographic origin of the Conflict Minerals and whether or not they fund armed conflict.

1. Company Overview

This report has been prepared by the management of Applied Optoelectronics, Inc. (herein referred to as “AOI,” the “Company,” “we,” “us,” or “our”). The information includes the activities of all majority-owned subsidiaries.

AOI is a leading, vertically integrated provider of fiber-optic networking products, primarily for four networking end-markets: internet data center, cable television, or CATV, and fiber-to-the-home, or FTTH, and telecom. We design and manufacture a range of optical communications products at varying levels of integration, from components, subassemblies and modules to complete turn-key equipment. Conflict Minerals are necessary to the functionality or production of semiconductor and module products.

In designing products for our customers, we begin with the fundamental building blocks of lasers and laser components, which require the use of metals, including the 3Ts and gold (“3TG”). From these foundational products, we design and manufacture a wide range of products to meet our customers’ needs and specifications, and such products differ from each other by their end market, intended use and level of integration. We are primarily focused on the higher-performance segments within all four of our target markets, which increasingly demand faster connectivity and innovation. Therefore, the majority of our semiconductor and module products, as well as components that are part of those products, require the use of Conflict Minerals.

2. Supply Chain

The supply chain for 3TG consists of many supplier chain tiers. Before reaching AOI’s direct suppliers, 3TG will go from mines, to traders, exporters, smelters or refiners (referred to collectively as smelters), alloy producers and component manufacturers, and sometimes intermediate suppliers. Since one or more of the 3TG metals are contained in the majority of AOI’s products, a significant portion of AOI’s suppliers also use these metals in their products. AOI sources products and components from approximately 1184 first tier suppliers globally. First tier suppliers are those suppliers that AOI selected and with whom we have a direct

business relationship. These first tier suppliers select their suppliers (second tier suppliers), which in turn have their own group of suppliers (third tier), and so on. AOI works with and through its first tier suppliers to investigate the deeper levels of our supply chain, in order to determine the origin of 3TG metals contained in AOI products.

Because of our size, the complexity of our products, and the depth, breadth, and constant evolution of our supply chain, it is difficult to identify actors upstream from our direct suppliers. Accordingly, we participate in a number of industry-wide initiatives as described below.

3. Conflict Minerals Policy

AOI is committed to working with our global supply chain to ensure compliance with the SEC's conflict minerals rules. We have established a conflict minerals compliance program that is designed to follow the framework established by the Organization for Economic Co-operation and Development ("OECD").

Pursuant to our conflict minerals compliance program, our supplier contracts include conflict mineral due diligence and reporting requirements. Any direct sourcing by AOI of tin, tungsten, tantalum and gold is sourced with the goal that it only be from Democratic Republic of Congo Conflict-Free sources, as defined in the SEC's conflict minerals rule. As we become aware of instances where minerals in our supply chain potentially finance armed groups, as defined in the SEC's conflict minerals rule, we work with our suppliers to find alternate conflict-free sources.

Our policy is publicly available on our website at <https://ao-inc.com/legal/>

4. Due Diligence Overview

We conducted a survey of our supply chain by adopting the template developed by the Responsible Minerals Initiative ("RMI") Conflict Minerals Reporting Template ("CMRT"). The CMRT was developed to facilitate disclosure and communication of information regarding smelters that provide material to a company's supply chain. It includes questions regarding a company's conflict-free policy, engagement with its direct suppliers, and a listing of the smelters the company and its suppliers use. In addition, the template contains questions about the origin of conflict minerals included in their products, as well as supplier due diligence. Written instructions and recorded training illustrating the use of the tool is available on RBA's website. The CMRT is being used by many companies in their due diligence processes related to conflict minerals.

AOI does not engage directly with mines or smelters and thus AOI does not have information on 3TG country of origin. We rely on information from the Responsible Minerals Assurance Process ("RMAP"), a voluntary initiative managed by the RMI in which an independent third party audits the procurement activities of a smelter or refiner to determine, with reasonable confidence that the minerals it processes originated from conflict-free sources. Upon completion of a successful audit, the smelter or refiner is designated by the RMI as "Compliant."

5. Due Diligence Overview

AOI has established management systems and due diligence measures as a basis for supply-chain management and disclosure compliance relating to the Conflict Minerals necessary to the functionality or production of our products and required to be reported under the Rule. Our due diligence measures have been designed to conform, in all material respects, to the five step framework in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). The design of AOI's Conflict Mineral Process includes the following:

Step #1: Establish Strong Company Management Systems

- AOI's management is committed to sourcing conflict free materials. A conflict minerals policy was adopted and is available on our website at <https://ao-inc.com/legal/>.
- Our commitment is reflected in our Quality Objective, Purchasing Agreements, Purchasing Orders and SOPs.

Step #2: Identify and Assess Risk in the Supply Chain

- AOI requests that its suppliers complete in full the CMRT. The CMRT is used to provide AOI with information regarding its suppliers' practices with respect to the sourcing of conflict minerals to enable it to comply with its requirements under the Rule.
- AOI's legal, quality assurance and supply chain departments manage the collection of information reported on the CMRT by its suppliers.
- Once AOI receives CMRTs from our supply chain, we identify high risk vendors. High risk vendors are those that use non RMI-Compliant smelters or those that do not submit a completed CMRT.

Step #3: Design and Implement a Strategy to Respond to Identified Risks

- Once a high risk vendor has been identified, AOI will hold an internal stakeholders meeting to discuss corrective actions to be taken.
- Such corrective actions include, but are not limited to, disengaging in trade with the high risk vendor and finding alternate vendors.

Step #4: Carry Out Independent Third-Party Audit of Supply Chain Due Diligence at Identified Points in the Supply Chain

- Given that we do not have a direct relationship with the smelters and refiners that process the conflict minerals that are present in our products, we rely on the RMI to conduct third party audits of smelters and refiners.
- AOI relies on the RBA and GeSI initiative to validate supply chain due diligence.
- AOI expects our supply chain to adhere to all local, national and international laws and requirements.

Step #5: Report on Supply Chain Due Diligence

- As a publicly traded company in the United States, AOI will submit an annual SD Report to the SEC per the Securities and Exchange Act of 1934 Section 1502 as amended by the Dodd-Frank Act of 2010.

6. Due Diligence Performed

Annually, AOI requests CMRTs from our supply chain. It is the responsibility of our supply chain to provide AOI with a CMRT and to ensure their supply chains are conflict free. Once AOI receives the completed CMRT, AOI will review the submission for completeness and consistency. AOI will then compare smelter data, made available by the RMI, concerning the country of origin. If a vendor submits a CMRT that does not contain a non RMI-Compliant smelter, then no further action will be taken by AOI.

For vendors that do not submit a CMRT, AOI will follow up with the vendor and continue to request a completed CMRT. If the vendor does not submit a CMRT after multiple requests, then corrective actions, up to and including disengaging in trade, will be taken.

For vendors that submit a CMRT containing a non RMI-Compliant smelter, AOI will request that the vendor take corrective actions and become conflict free. If the vendor does not satisfactorily implement steps to become conflict free, then corrective actions, up to and including disengaging in trade, will be taken.

AOI works with and through its first tier suppliers to investigate the deeper levels of our supply chain, in an effort to determine the origin of 3TG metals contained in AOI products.

7. Due Diligence Results

The results of our due diligence indicates that the sources of Conflict Minerals are (1) from recycled or scrap materials, (2) from within the Democratic Republic of the Congo or adjoining countries (the “Covered Countries”), or (3) from outside the Covered Countries. From the responses we have received from our direct suppliers from our supply chain survey for 2024, 222 smelters and refiners were listed within their supply chains. All 222 have been designated as of December 31, 2024 as Active or Compliant under the RMAP. The complete list of smelters and refiners is attached in Exhibit A.

AOI does not engage directly with mines or smelters and thus AOI does not have information on 3TG country of origin.

8. Conflict-Free Sourcing Continuous Improvements

As part of AOI’s commitment to Conflict Minerals due diligence, AOI has taken, or will take, the following steps to further mitigate the risk that our Conflict Minerals benefit armed groups in the Covered Countries:

- Continue to engage with suppliers to obtain complete CMRTs;
- Encourage the development of supplier capabilities to perform conflict-minerals related due diligence;
- Review our supply chain quarterly to ensure new vendors are aware of the conflict-mineral free policy and to encourage existing vendors to submit their CMRTs timely;
- Provide ongoing training regarding emerging best practices and other relevant topics to legal, quality assurance and supply chain staff responsible for conflict mineral compliance.

9. Forward-looking Statements

Statements relating to due diligence improvements are forward-looking in nature and are based on our management's current expectations or beliefs. Forward-looking statements can also be identified by words such as "expects," "plans," "intends," "will," "may," and similar terms. These forward-looking statements are not a guarantee of performance and are subject to a number of uncertainties and other factors that may be outside of our control and that could cause actual events to differ materially from those expressed or implied by the statements made herein. Subsequent events may affect AOI's future determinations under Rule 13p-1.

10. Conflict Minerals Disclosure

This Conflict Minerals Report and our Conflict Minerals Policy are available on our web site at <https://ao-inc.com/legal/>.

Exhibit A:
List of Smelters and Refiners

Metal	Smelter Name	Smelter ID
Gold	Elite Industech Co., Ltd.	CID004755
Gold	Aida Chemical Industries Co., Ltd.	CID000019
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	CID000041
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	CID000058
Gold	Argor-Heraeus S.A.	CID000077
Gold	Asahi Pretec Corp.	CID000082
Gold	Asahi Refining Canada Ltd.	CID000924
Gold	Asaka Riken Co., Ltd.	CID000090
Gold	Aurubis AG	CID000113
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	CID000128
Gold	CCR Refinery - Glencore Canada Corporation	CID000185
Gold	T.C.A S.p.A	CID002580
Gold	NH Recytech Company	CID003189
Gold	Ogussa Osterreichische Gold- und Silber-Scheideanstalt GmbH	CID002779
Gold	Metalor USA Refining Corporation	CID001157
Gold	Materion	CID001113
Gold	JX Nippon Mining & Metals Co., Ltd.	CID000937
Gold	Valcambi S.A.	CID002003
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CID001622
Gold	Yokohama Metal Co., Ltd.	CID002129
Gold	Rand Refinery (Pty) Ltd.	CID001512
Gold	Royal Canadian Mint	CID001534
Gold	Ishifuku Metal Industry Co., Ltd.	CID000807
Gold	Italpreziosi	CID002765
Gold	Jiangxi Copper Co., Ltd.	CID000855
Gold	Metalor Technologies (Hong Kong) Ltd.	CID001149
Gold	Metalor Technologies (Suzhou) Ltd.	CID001147
Gold	Shandong Gold Smelting Co., Ltd.	CID001916
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CID001736
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CID002224
Gold	Nihon Material Co., Ltd.	CID001259
Gold	Agosi AG	CID000035
Gold	Boliden Ronnskar	CID000157
Gold	C. Hafner GmbH + Co. KG	CID000176
Gold	Chimet S.p.A.	CID000233
Gold	Dowa	CID000401
Gold	Eco-System Recycling Co., Ltd. East Plant	CID000425
Gold	Heimerle + Meule GmbH	CID000694

Gold	Heraeus Metals Hong Kong Ltd.	CID000707
Gold	Istanbul Gold Refinery	CID000814
Gold	Asahi Refining USA Inc.	CID000920
Gold	Kojima Chemicals Co., Ltd.	CID000981
Gold	LS MnM Inc.	CID001078
Gold	Matsuda Sangyo Co., Ltd.	CID001119
Gold	Metalor Technologies (Singapore) Pte., Ltd.	CID001152
Gold	Metalor Technologies S.A.	CID001153
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	CID001161
Gold	Mitsubishi Materials Corporation	CID001188
Gold	Mitsui Mining and Smelting Co., Ltd.	CID001193
Gold	Ohura Precious Metal Industry Co., Ltd.	CID001325
Gold	MKS PAMP SA	CID001352
Gold	Solar Applied Materials Technology Corp.	CID001761
Gold	Sumitomo Metal Mining Co., Ltd.	CID001798
Gold	Tanaka Kikinzoku Kogyo K.K.	CID001875
Gold	Tokuriki Honten Co., Ltd.	CID001938
Gold	Umicore S.A. Business Unit Precious Metals Refining	CID001980
Gold	United Precious Metal Refining, Inc.	CID001993
Gold	Western Australian Mint (T/a The Perth Mint)	CID002030
Gold	WIELAND Edelmetalle GmbH	CID002778
Gold	Tanaka Kikinzoku Kogyo K.K	CID000801
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CID002762
Gold	L'Orfebre S.A.	CID000015
Gold	Advanced Chemical Company	CID000264
Gold	Chugai Mining	CID000359
Gold	DSC (Do Sung Corporation)	CID000689
Gold	LT Metal Ltd.	CID000823
Gold	Japan Mint	CID000969
Gold	Kennecott Utah Copper LLC	CID001585
Gold	SEMPA Joyeria Plateria S.A.	CID000711
Gold	Heraeus Germany GmbH Co. KG	CID002100
Gold	Yamakin Co., Ltd.	CID001236
Gold	Navoi Mining and Metallurgical Combinat	CID001397
Gold	PT Aneka Tambang (Persero) Tbk	CID001955
Gold	Torecom	CID002243
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CID002290
Gold	SAFINA A.S.	CID002863
Gold	Bangalore Refinery	CID003424
Gold	Eco-System Recycling Co., Ltd. North Plant	CID003575
Gold	Metal Concentrators SA (Pty) Ltd.	CID002509
Gold	MMTC-PAMP India Pvt., Ltd.	CID002511

Gold	KGHM Polska Miedz Spolka Akcyjna	CID002919
Gold	Planta Recuperadora de Metales SpA	CID002605
Gold	Korea Zinc Co., Ltd.	CID002615
Gold	TOO Tau-Ken-Altyn	CID000957
Gold	Kazzinc	CID001220
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	CID001498
Gold	PX Precinox S.A.	CID002582
Gold	REMONDIS PMR B.V.	CID002708
Gold	Abington Reldan Metals, LLC	CID002918
Gold	SungEel HiMetal Co., Ltd.	CID003425
Gold	Eco-System Recycling Co., Ltd. West Plant	CID003641
Gold	Gold by Gold Colombia	CID000914
Gold	Kojima Kagaku Yakuhin Co., Ltd	CID000460
Gold	LS-NIKKO Copper Inc.	CID001277
Gold	Heraeus Ltd. Hong Kong	CID000616
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CID000917
Tantalum	F&X Electro-Materials Ltd.	CID001163
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CID001192
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CID002544
Tantalum	Jiujiang Tanbre Co., Ltd.	CID002545
Tantalum	Metallurgical Products India Pvt., Ltd.	CID002549
Tantalum	Mitsui Mining and Smelting Co., Ltd.	CID002550
Tantalum	TANIOBIS Co., Ltd.	CID001522
Tantalum	TANIOBIS GmbH	CID002548
Tantalum	TANIOBIS Japan Co., Ltd.	CID001969
Tantalum	TANIOBIS Smelting GmbH & Co. KG	CID002506
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CID001200
Tantalum	Materion Newton Inc.	CID001076
Tantalum	Mitsui Mining & Smelting	CID002508
Tantalum	Ulba Metallurgical Plant JSC	CID001508
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CID002842
Tantalum	NPM Silmet AS	CID001869
Tantalum	AMG Brasil	CID002492
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CID002505
Tantalum	QuantumClean	CID002512
Tantalum	Jiangxi Tuohong New Raw Material	CID002558
Tantalum	Taki Chemical Co., Ltd.	CID002707
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CID001175
Tantalum	FIR Metals & Resource Ltd.	CID001891
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CID002504
Tantalum	Global Advanced Metals Aizu	CID002539
Tantalum	Resind Industria e Comercio Ltda.	CID002557
Tantalum	Mineracao Taboca S.A.	CID003583

Tantalum	Telex Metals	CID000228
Tantalum	D Block Metals, LLC	CID000309
Tantalum	KEMET de Mexico	CID001070
Tantalum	Global Advanced Metals Boyertown	CID003116
Tantalum	RFH Yancheng JinYE New Material Technology Co., Ltd.	CID000402
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CID000538
Tin	PT Aries Kencana Sejahtera	CID001191
Tin	China Tin Group Co., Ltd.	CID001482
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CID001898
Tin	Dowa	CID001182
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CID002773
Tin	Mitsubishi Materials Corporation	CID000438
Tin	PT Timah Tbk Mentok	CID001477
Tin	Thaisarco	CID002036
Tin	Minsur	CID000468
Tin	Aurubis Beerse	CID001453
Tin	EM Vinto	CID001142
Tin	PT Timah Tbk Kundur	CID001173
Tin	White Solder Metalurgia e Mineracao Ltda.	CID002180
Tin	Fenix Metals	CID001105
Tin	PT Mitra Stania Prima	CID001337
Tin	Metallic Resources, Inc.	CID001539
Tin	Mineracao Taboca S.A.	CID002158
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CID001231
Tin	Malaysia Smelting Corporation (MSC)	CID000313
Tin	Operaciones Metalurgicas S.A.	CID000448
Tin	Rui Da Hung	CID001314
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CID002844
Tin	Jiangxi New Nanshan Technology Ltd.	CID003325
Tin	PT Premium Tin Indonesia	CID003387
Tin	Estanho de Rondonia S.A.	CID003449
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	CID003582
Tin	HuiChang Hill Tin Industry Co., Ltd.	CID003831
Tin	Tin Technology & Refining	CID002503
Tin	Luna Smelter, Ltd.	CID003868
Tin	PT Mitra Sukses Globalindo	CID002593
Tin	Fabrica Auricchio Industria e Comercio Ltda.	CID002706
Tin	DS Myanmar	CID002517
Tin	PT ATD Makmur Mandiri Jaya	CID003190
Tin	PT Putera Sarana Shakti (PT PSS)	CID003486
Tin	PT Rajehan Ariq	CID000292
Tin	Resind Industria e Comercio Ltda.	CID002468
Tin	O.M. Manufacturing Philippines, Inc.	CID002696

Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CID002756
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	CID002774
Tin	Alpha Assembly Solutions Inc	CID003524
Tin	Magnu's Minerais Metais e Ligas Ltda.	CID001460
Tin	PT Cipta Persada Mulia	CID001399
Tin	Super Ligas	CID001402
Tin	Aurubis Berango	CID001428
Tin	CRM Synergies	CID001458
Tin	PT Refined Bangka Tin	CID002835
Tin	China Yunnan Tin Co Ltd.	CID003205
Tin	Alpha	CID001406
Tin	PT Artha Cipta Langgeng	CID001421
Tin	PT Babel Inti Perkasa	CID001463
Tin	PT Bukit Timah	CID001468
Tin	PT Prima Timah Utama	CID001490
Tin	PT Menara Cipta Mulia	CID001493
Tin	PT Bangka Serumpun	CID002455
Tin	PT Babel Surya Alam Lestari	CID002570
Tin	PT Belitung Industri Sejahtera	CID002776
Tin	PT Sariwiguna Binasentosa	CID002816
Tin	PT Stanindo Inti Perkasa	CID003381
Tin	PT Tinindo Inter Nusa	CID004065
Tin	PT Tommy Utama	CID003397
Tin	CV Venus Inti Perkasa	CID003409
Tin	CV Ayi Jaya	CID001486
Tin	PT Bangka Prima Tin	CID002513
Tin	PT Sukses Inti Makmur (SIM)	CID000258
Tin	PT Rajawali Rimba Perkasa	CID000825
Tin	Mining Minerals Resources SARL	CID002082
Tin	Yunnan Tin Company, Ltd.	CID002320
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CID002494
Tin	Metallo Belgium N.V.	CID002541
Tin	Alpha Metals Korea Ltd.	CID002542
Tin	Yunnan Tin Company Limited	CID000004
Tin	Precious Minerals and Smelting Limited	CID002044
Tin	PT Timah Nusantara	CID000105
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CID000568
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CID000766
Tungsten	Japan New Metals Co., Ltd.	CID002551
Tungsten	Xiamen Tungsten Co., Ltd.	CID002317
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CID002321

Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CID002543
Tungsten	H.C. Starck Tungsten GmbH	CID002589
Tungsten	TANIOBIS Smelting GmbH & Co. KG	CID003407
Tungsten	A.L.M.T. Corp.	CID000218
Tungsten	Wolfram Bergbau und Hutten AG	CID002318
Tungsten	Kennametal Huntsville	CID002315
Tungsten	Global Tungsten & Powders LLC	CID002502
Tungsten	Hunan Chenzhou Mining Co., Ltd.	CID002316
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CID002319
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CID002641
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CID003417
Tungsten	Masan High-Tech Materials	CID003468
Tungsten	Niagara Refining LLC	CID003609
Tungsten	Lianyou Metals Co., Ltd.	CID000966
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CID002827