

David Mead
Holt Integrated Circuits
101 Columbia
Aliso Viejo, CA 92656



RE: Holt's successful know-your-customer and due diligence policies

May 4, 2023

Dear Mr. Mead,

We write to you as [B4Ukraine](#), a coalition of Ukrainian and international civil society organizations working to curtail the financial resources enabling the Russian invasion of Ukraine. We would like to openly discuss the measures that Holt Integrated Circuits has taken to successfully avoid support of the Russian war machine.

The Russian military, although hampered by Ukrainian resistance, Western sanctions and Western support, continues to function. A significant amount of Russian ammunition, drones and other military equipment are made using imported components. In September 2022, POLITICO reported on a Russian "shopping list" of components the Kremlin had identified as needing to sustain its war effort, including three components classified as "Priority 1 / of critical importance" made by Holt.¹

Russia has been able to exploit different circumvention schemes to continue importing components, including from the majority of the companies listed on the "shopping list". However, our internal research shows that Holt's components have not been found or reported in Russian weapons used in Ukraine. This is a significant accomplishment and an outlier in the technology and microchips industry.

B4Ukraine works with an extensive network of supply chain and due diligence specialists to identify and promote best practices among corporations to limit Russia's ability to maintain and repair its military. We would very much welcome the opportunity to go over the matter with you and discuss what our team, as well as other companies, could learn from Holt and its know-your-customer and due diligence policies.

Please do get in contact with B4Ukraine at contact@b4ukraine.org and we will arrange a meeting.

We look forward to working with you.

Sincerely,

The B4Ukraine Coalition

¹ Politico, "The chips are down: Putin scrambles for high-tech parts as his arsenal goes up in smoke" <https://www.politico.eu/article/the-chips-are-down-russia-hunts-western-parts-to-run-its-war-machines/>