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冲突矿产政策管理程序 Conflict Minerals Management Procedures

- 1、目的：为防止刚果民主共和国及其毗邻地区的冲突矿产用于我司的原材料上，执行公司对冲突矿产的政策，及改善电子供应链的条件，支持区域采购计划，使得刚果（金）及其周边毗邻国家未来有合法贸易。

Purpose: To prevent conflict minerals from the Democratic Republic of the Congo and its neighboring regions from being used in our company's raw materials, implement the company's policy on conflict minerals, improve conditions in the electronics supply chain, support regional sourcing programs, and enable legitimate trade in the Democratic Republic of the Congo and its surrounding neighboring countries in the future.

- 2、范围:适用于公司所有原材料的无“冲突矿产”成份调查

Scope: Applicable to the investigation of all raw materials of the company for the absence of "conflict minerals" components

- 3、公司对冲突矿产政策： 不支持、不使用来自武装冲突、非法采矿与低劣工作环境中采矿而来的金属即所谓“冲突矿产”供应商应调查其产品中含、金（Au）、钽（Ta）、锡（Sn）、钨（W）、钴（Cobalt）、云母（Mica）等金属，并确认这些金属来源。

Company Policy on Conflict Minerals: The Company does not support or use metals mined from areas of armed conflict, illegal mining operations, or those involving poor working conditions—referred to as "conflict minerals." Suppliers shall investigate the presence of metals including gold (Au), tantalum (Ta), tin (Sn), tungsten (W), cobalt, and mica in their products and verify the sources of such metals.

- 4、定义 Definition

4.1 冲突矿产：在刚果（金）及其周围国家和地区境内的锡石、黑钨、钨钼、铁矿和黄金等稀有金属开采已造成严重的人权与环境问题。这些地区的大部分采矿活动与冲突的武装组织有关（资助）导致该地区长期不稳定，所以被称为“冲突矿产”，这些国家包括：DRC 刚果（金）、Rwanda（卢旺达）、Uganda（乌干达）、Burundi（布隆迪）、Tanzania（坦桑尼亚）、Kenya（肯尼亚）。

Conflict Minerals: The mining of rare metals such as cassiterite, wolframite, coltan, iron ore and gold in the Democratic Republic of the Congo (DRC) and its surrounding countries and regions has caused severe human rights and environmental problems. Most mining activities in these areas are associated with (funding) armed groups involved in conflicts, leading to long-term instability in the region, hence they are referred to as "conflict minerals". These countries include: the Democratic Republic of the Congo (DRC), Rwanda, Uganda, Burundi, Tanzania and Kenya.

- 4.2 毗邻国家：国际公认与刚果民主共和国共享边境的国家注解：无冲突冶炼厂评估项

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目也将肯雅列为毗邻的国家

Neighboring countries: Internationally recognized countries that share a border with the Democratic Republic of the Congo. Note: The Conflict-Free Smelter Program also lists Kenya as a neighboring country.

4.3 刚果民主共和国无冲突金属: 不含矿产冲突的产品并且不直接或间接融资给刚果民主共和国或相邻国家的武装部队。

Conflict-free minerals of the Democratic Republic of the Congo: Products free of conflict minerals and that do not directly or indirectly finance armed forces in the Democratic Republic of the Congo or neighboring countries.

4.4 冲突金属调查表, 最新版本如下链接下载, 或者根据客户发出的模板进行填写
<https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>
CMRT & EMRT & Full conformant Smelter List 调查表导出路径 (注意: 需要页面最下方 I Accept)。

Conflict Minerals Reporting Template. The latest version can be downloaded via the link below, or may fill it out using the template issued by customer:
<https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>
Export path for CMRT & EMRT & Full conformant Smelter List questionnaires
(Note: You need to click "I ACCEPT" at the bottom of the page)

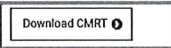
The screenshot shows the RMI website navigation menu. The 'REPORTING TEMPLATES' dropdown is open, listing: CMRT, MRPRO, Extended Minerals Reporting Template, Additional Minerals Reporting Template, Smelter Reference Lists, Country of Origin Data, Public Reporting, Conflict Minerals Compliance Tools, and Company Identification Questionnaires (CIQs). The background features a banner for 'RMI Releases Environmental' with a 'Learn More' button.

Conflict Minerals Reporting Template

The Conflict Minerals Reporting Template (CMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an assessment via the RMI's Responsible Minerals Assurance Process (RMAP).

Download the CMRT Template

Download the latest version of the CMRT (version 6.5) below. Click [here](#) for a downloadable version of the most up-to-date Smelter Reference List and [here](#) for the revision history. The RMI recommends using CMRT v. 6.4 or higher for the Reporting Year.



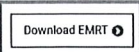
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Extended Minerals Reporting Template

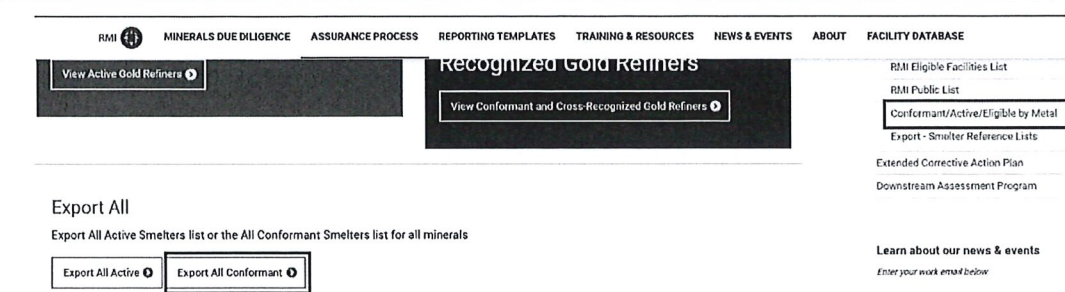
The Extended Minerals Reporting Template (EMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative to identify pinch points and collect due diligence information in the cobalt and mica supply chains. This is a template that was formally launched on October 20, 2021. The RMI recommends using EMRT v. 2.0 for the Reporting Year.

Download the Template

Download the latest version of the EMRT (version 2.0) below.



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4.5 《无冲突金属调查表》包含如下两个报告 The "Conflict-Free Metals Questionnaire" contains the following two reports:
《冲突矿产报告 CMRT》《扩展矿物报告模版 EMRT》
Conflict Minerals Reporting Template (CMRT)
Extended Minerals Reporting Template (EMRT)

5、职责 Responsibilities

5.1 Sourcing: 依据材料采购需求选择合适的供应商,供应商送样承认时负责对新增原材料是否含有冲突矿产进行初步的评估。

Sourcing: Select appropriate suppliers in accordance with material procurement requirements, and conduct a preliminary assessment on whether newly added raw materials contain conflict minerals when suppliers submit samples for approval.

5.2 品管部: 响应 EICC 和 GeSI (全球电子可持续发展倡议) 联合工作组的承诺改善电子供应链的条件, 不接受可以助长冲突的采矿活动, 及《多德 - 弗兰克保护法》条例要求披露及报告有关产品内所使用的锡, 钽 (钶钽铁矿), 金, 钨的情况及其来源。

Quality Department: In response to the commitment of the joint working group of EICC and GeSI (Global e-Sustainability Initiative) to improve conditions in the electronics supply chain, we do not accept mining activities that may fuel conflicts. In addition, in accordance with the provisions of the Dodd-Frank Act, we are required to disclose and report on the use and sources of tin, tantalum (coltan), gold, and tungsten contained in the products.

5.3 采购: 每年对现有供应商供应物料进行是否使用冲突矿产及冲突矿产来源的调查。
Purchasing Dept.: Conduct an annual investigation into whether the materials supplied by existing vendors involve conflict minerals and the sources of such conflict minerals.

6、作业流程 Work instruction

6.1 新供应商导入 New supplier introduction

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6.1.1 研发部根据实际产品的需要，将所需材料的规格等相关要求传递给采购，要求采购寻找合适的供应商送样承认。默认所有材料不可使用冲突地区的冲突矿物质。

Based on the actual needs of the products, the Engineering Department communicates the specifications and other relevant requirements of the required materials to the Supply Chain Department, requesting the latter to source suitable suppliers for sample submission and approval. By default, all materials shall not use conflict minerals from conflict zones.

6.1.2 Sourcing 部针对研发部对材料的规格及品质要求选择适合的供应商，要求供应商送样确认，对于新增原材料的产品需要同时将《无冲突金属调查表》《FM10-06-A Non-use conflict minerals compliance》转交给供应商对所送样的物料进行冲突矿产的信息调查并对材料做出承诺保证。

The Sourcing Department selects suitable suppliers in accordance with the material specifications and quality requirements put forward by the Engineering Department, and requires suppliers to provide samples for confirmation. For products involving new raw materials, the Conflict-Free Metals Questionnaire and FM10-06-A Non-use conflict minerals compliance shall be forwarded to the suppliers simultaneously, so that they can conduct conflict minerals information surveys on the sampled materials and issue a commitment and guarantee regarding the materials.

6.1.3 Sourcing 部必须要求供应商于样品交样前将新增物料的《无冲突金属调查表》《FM10-06-A Non-use conflict minerals compliance》调查完毕，将调查的结果回传公司，并判定材料中是否符合刚果民主共和国无冲突金属的要求。

The Sourcing Department must require suppliers to complete the surveys for the newly added materials, namely the Conflict-Free Metals Questionnaire and FM10-06-A Non-use conflict minerals compliance, before submitting the samples. Suppliers shall send the survey results back to the company, and a determination shall be made as to whether the materials meet the conflict-free metals requirements for the Democratic Republic of the Congo.

6.1.4 调查的结果如果是符合刚果民主共和国无冲突金属的要求的，Sourcing 部则将此信息传递给采购部保存。If the results of the investigation meet the requirements for conflict-free metals in the Democratic Republic of the Congo, the Sourcing Department shall forward this information to the Purchasing Department.

6.1.5 调查的结果如果是材料中有使用刚果（金）及其周边的冲突矿产的，则要求供应商提供书面的解析并立即停止采购及使用刚果（金）及其周边的冲突矿产，重新选择新的矿产来源并提供有效的证据证明新的矿产是符合刚果民主共和国无冲突金属要求的及制定相应的改善、预防措施，以符合刚果民主共和国无冲突金属要求。

If the investigation results indicate that conflict minerals from the Democratic Republic of the Congo (DRC) and its surrounding regions are used in the materials, the supplier shall be required to provide a written explanation, immediately cease the procurement and use of conflict minerals from the DRC and its surrounding regions, select new mineral sources, present valid evidence proving that the new minerals meet the

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requirements for conflict-free metals of the Democratic Republic of the Congo, and formulate corresponding improvement and preventive measures to comply with the requirements for conflict-free metals of the Democratic Republic of the Congo.

6.2 合格供应商定期调查 Regular investigation of Qualified Suppliers

6.2.1 对于合格供应商需定期每年 12 月对其进行《无冲突金属调查表》《FM10-06-A Non-use conflict minerals compliance》《冲突矿产报告 CMRT》《扩展矿物报告模版 EMRT》调查并签署合约以保证采购物料符合要求。

Qualified suppliers shall be investigated with the Conflict-Free Metals Questionnaire, FM10-06-A Non-use conflict minerals compliance, Conflict Minerals Reporting Template (CMRT), and Extended Minerals Reporting Template (EMRT) every December on a regular basis, and contracts shall be signed to ensure that purchased materials meet the requirements.

6.2.2 当客户标准及相关标准都有变更的情况下，采购部对应窗口人员确认内容后修订《无冲突金属调查表》和《FM10-06-A Non-use conflict minerals compliance》，并重新对供应商进行调查及合约的签署。

When both customer standards and relevant standards are changed, the corresponding contact person of the Procurement Department shall revise the Conflict-Free Metals Questionnaire and FM10-06-A Non-use conflict minerals compliance after confirming the contents, and conduct new investigations with suppliers and sign contracts accordingly.

7、惩罚措施 Punishment Measures

7.1 对于冲突矿产问题经过两次以上沟通无响应的供应商，要进行升级程序，并通知到 Sourcing 负责人，对此类供应商新项目报价进行暂停，直至完成冲突矿产的相关调查，并符合要求；

For suppliers who fail to respond after more than two communications regarding the conflict minerals issue, an escalation procedure shall be initiated, and the Sourcing lead shall be notified. New project quotations from such suppliers shall be suspended until the relevant investigations on conflict minerals are completed and the requirements are met.

7.2 调查的结果材料中有使用刚果（金）及其周边的冲突矿产的，则要求供应商提供书面的解析并立即停止采购及使用刚果（金）及其周边的冲突矿产，重新选择新的矿产来源并提供有效的证据证明新的矿产是符合刚果民主共和国无冲突金属要求的及制定相应的改善、预防措施，以符合刚果民主共和国无冲突金属要求。

If the materials of the survey results indicate the use of conflict minerals from the Democratic Republic of the Congo (DRC) and its surrounding areas, suppliers shall be required to provide a written explanation, immediately cease the procurement and use

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of conflict minerals from the DRC and its surrounding areas, select new mineral sources, provide valid evidence proving that the new minerals comply with the conflict-free metal requirements of the Democratic Republic of the Congo, and formulate corresponding improvement and preventive measures to meet the conflict-free metal requirements of the Democratic Republic of the Congo.

8、投诉渠道 Complaint channel

允许员工、供应商、第三方机构等对冲突矿产调查进行投诉，对于进行善意投诉的个人，公司不允许进行任何形式的打击报复或骚扰。但是，恶意投诉或被证实为虚假投诉的，则将会对举报人采取纪律处分，投诉网址：<http://www.clearviewconnects.com>

Employees, suppliers, third-party institutions and other parties shall be permitted to file complaints regarding conflict minerals investigations. The company shall not engage in any form of retaliation or harassment against individuals who file complaints in good faith. However, disciplinary action will be taken against whistleblowers who submit malicious complaints or complaints proven to be false.

Complaint website: <http://www.clearviewconnects.com>

9、相关文件 Relevant Documents

《FM10-06-A Non-use conflict minerals compliance》

Conflict Minerals Reporting Template (CMRT)

Extended Minerals Reporting Template (EMRT)

10.修改记录 Revision Record

Date	Version	Page	Content
2022-11-29	A	1-3	New WI
2025-7-8	B	1-3	Update 4.4, Export path of the questionnaire
2026-4-22	C	1-8	Update 4.4 Export Full conformant Smelter list

Established by: Emily 20.4.22
SC purchasing Spuv. Date:

Approved by: Vanesa 26.4.22
PMC & Material Control Manager

