“ ” “ ”

[1] UNGC

“ OECD ” OECD

Huaqin Technology Co., Ltd. (hereinafter referred to as "Huaqin Technology" or the "Company") is committed to promoting responsible mineral sourcing practices across its global supply chain. We recognize that mineral extraction and trade involved in the electronics supply chain may be associated with significant issues including human rights, armed conflict financing, environmental and social responsibility, particularly mining activities in conflict-affected and high-risk areas. As such, we are committed to adhering to internationally recognized standards and frameworks, including the United Nations Global Compact (UNGC) and the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (hereinafter referred to as the "OECD Guidance"). We conduct conflict minerals management in alignment with OECD guidelines,

[1] ( )

Conflict-affected and high-risk areas: Areas where there are armed conflicts, the worst forms of child labor,

ensuring that neither our operations nor our supply chain involve conflict minerals or human rights abuses in our business and procurement activities.

1.

1. Scope of Application

This Policy applies to Huaqin Technology and all its subsidiaries, branches, and operational sites, as well as all tiers of suppliers in the Company's supply chain (including Tier 1, Tier 2, and Tier 3 suppliers).

2.

2. Minerals Types

This Policy covers the following mineral categories:

Category	Minerals	Template
3TG 3TG Core	Tin, Tantalum, Tungsten, Gold	CMRT
Extended	Cobalt, Copper, Graphite, Lithium, Mica, Nickel	EMRT
Additional	/ Aluminum, Chromium, Indium, Silver, Iron/Steel, Zinc	

3TG

Although Huaqin Technology does not directly procure or use raw mineral ores, the materials and components essential to our production may potentially contain minerals such as 3TG, cobalt, and mica. Huaqin Technology hereby solemnly commits to:

3.1

3.1 Compliance Commitment

- UNGP OECD

- Strictly comply with the UN Guiding Principles on Business and Human Rights (UNGP), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and all applicable laws and regulations.

3.2

3.2 Zero Tolerance for Conflict Minerals

- CAHRA

3TG

- The Company does not support or use conflict minerals from conflict-affected and high-risk areas (CAHRA), and does not support or use 3TG, cobalt, mica, or other mineral materials of unknown origin.

3.3

3.3 Zero Tolerance for Forced Labor

-

- The Company strictly prohibits any form of forced labor, debt bondage, prison labor, and human trafficking in the supply chain, including systemic forced labor risks targeting specific regions or groups.

3.4

3.4 Responsible Sourcing Commitment

•, • RMAP

OECD

The Company establishes a due diligence management system covering all tiers of the supply chain, based on the OECD five-step due diligence framework:

Step 1: Establish Management Systems

-

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- SRM
- Develop and continuously update the *Huaqin Technology Conflict Minerals Management System* and the *Responsible Mineral Sourcing Policy*.
- Embed conflict minerals management requirements into the full supplier lifecycle, including onboarding, evaluation, risk management, auditing, capacity building, and exit.
- Realize digital management of conflict minerals data through the SRM (Supplier Relationship Management) system.

Step 2: Identify and Assess Risks

- CMRT EMRT AMRT

- RMAP /
- SOR
-

- Conduct annual investigations through CMRT, EMRT, and AMRT templates targeting all suppliers potentially involved with relevant minerals.
- Cross-check supplier responses against the RMAP conformant smelter/refiner list.
- Conduct comprehensive risk identification of smelters and refiners (SORs) in the supply chain.
- Audit and conduct targeted assessments of high-risk suppliers (those located in labor-intensive regions or industries with systemic labor risks).

Step 3: Design and Implement Risk Response

- / /
-
-
- If a supplier is found using non-conforming smelters/refiners, the supplier shall be required to immediately cease procurement/use and provide valid evidence along with corrective and preventive measures.
- If the supplier refuses to cooperate in remediation or fails to achieve the expected results within a reasonable period, cooperation shall be terminated in accordance with the supplier exit procedure.
- A list of non-conforming smelters shall be published and online training courses shall be assigned.

Step 4: Independent Third-Party Verification

- 2028 IPSA
-
- GRI
-

- Cooperate with Huaqin Technology annually in conducting conflict minerals due diligence through the SRM system.
- Ensure that the products and raw materials supplied are conflict-free.
- Truthfully report any changes in smelters/refiners.
-

- The Company organizes an annual Partner Sustainability Conference with dedicated capacity-building sessions on conflict minerals.
- A digital course titled H*uaqin Technology Supplier Conflict Minerals Management Specialized Training* shall be launched online.
- One-on-one coaching shall be offered to suppliers with limited management capabilities.

7.

7. Supply Chain Traceability

7.1 /

7.1 SOR Identification and Management

- / SOR
- SOR SOR
- SOR RMAP

- The Company requires suppliers to fully disclose the list of smelters/refiners (SORs) involved in their supply chain.
- SOR information shall be cross-checked item by item against the conformant smelter list to identify non-conforming SORs.
- For non-conforming SORs, suppliers shall be required to either drive them toward RMAP certification or remove them from the supply chain within a specified timeframe.

7.2

7.2 Country of Origin Traceability

- 3TG

- RCOI RMAP 3TG

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- The Company commits to achieving 100% country of origin traceability for all 3TG-related raw materials in all products.
- The Company traces and analyzes 3TG sources by combining the Reasonable Country of Origin Inquiry (RCOI) tool with RMAP audit results.
- Country of origin distribution information by mineral type shall be disclosed in the annual report.

7.3 /

7.3 Supplier/Material Conflict-Free Certification

- 3TG 100% RMAP

- 100%
- SOR
- The Company requires that 100% of all 3TG-related suppliers obtain Responsible Minerals Assurance Process (RMAP) certification.
- The Company commits to achieving 100% external conflict-free certification for all products.
- The Company shall continuously track supplier progress on SOR certification and mineral traceability efforts.

8.

8. Forced Labor and Human Rights Risk Management

8.1

8.1 Forced Labor Risk Screening

- CSR

-

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- The Company incorporates forced labor risk as an independent

- CSR

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- 48

The Company has established a multi-level, multi-

HQ), t0 dedicat-22grievance2email address q0 q0 G[ )]TJETO EMC 4/Span <MCID 3/Lang (en-US)>BDC q0.0

	100%	100%

conflict-free certification

- Non-conformities identified during due diligence and corrective actions;
- Total number of supplier audits and audit coverage rate.

10.

10. Non-Compliance Response

- /
-
-
- ESG

- Suppliers found using non-conforming smelters/refiners: immediate cessation is required, with corrective actions to be completed within a specified timeframe;
- Suppliers that refuse to take corrective actions or fail to meet requirements within a reasonable period: cooperation shall be terminated in accordance with the supplier exit procedure;
- Suppliers found to be involved in forced labor or severe human rights violations: immediate termination of cooperation, with referral to legal proceedings where necessary;
- Managers who fail to fulfill supervisory duties: such cases shall be reported to the ESG Executive Committee, which will determine the appropriate measures.

11.

11. Continuous Improvement

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- The Company reviews the implementation of this policy annually

Appendix 2: Glossary

Term	Definition
3TG	Tin, Tantalum, Tungsten, Gold
CAHRA	Conflict-Affected and High-Risk Areas
CMRT	Conflict Minerals Reporting Template
EMRT	Extended Minerals Reporting Template
AMRT	Additional Minerals Reporting Template
RMAP	Responsible Minerals Assurance Process
SOR	Smelters and Refineries

RCOI

Version history

2025

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2026

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