



Tongwei Co., Ltd.

Conflict Minerals Commitment and Policy

Conflict Minerals¹ Commitment

Tongwei Co., Ltd (hereinafter referred to as "Tongwei" or the "Company") is committed to upholding both commercial value and social responsibility, and is dedicated to conducting business with higher ethical standards. It is the responsibility of Tongwei to purchase mineral raw materials like tantalum, tin, tungsten, and gold (3TG) from proper sources in strict compliance with the United Nations Global Compact, the Due Diligence Guidelines for Responsible Supply Chains of Minerals in Conflict-Affected and High-Risk Areas (issued by OECD), Responsible Minerals Initiative (RMI), and others international conventions and industrial initiatives.

Conflict Minerals Procurement Management Policy

Tongwei earnestly conducts due diligence on suppliers while establishing the management mechanism for conflict minerals under the Due Diligence Guidelines for Responsible Supply Chains of Minerals in Conflict-Affected and High-Risk Areas by OECD. In specific,

- Development of the policy for the purchase of conflict-free minerals for suppliers. Tongwei requires suppliers to complete *Conflict Minerals Survey*, assessing suppliers on the involvement of disputed purchases in question in the on-site investigation.
- Annual supplier inspection. Tongwei evaluates suppliers on their purchase or usage of conflict minerals. Any supplier that violates the Company's regulations will be delisted from the pool.
- Identification and analysis of risks on purchase. Tongwei supports suppliers to establish management and supervision mechanisms for conflict minerals.
- While staying conflict-free, Tongwei requires suppliers to call for responsible purchase to their respective superior level.

¹ Conflict Minerals refer to tantalum, tin, tungsten, gold (3TG), and other minerals from the Democratic Republic of Congo and its neighboring countries, where the armed groups use forced labor, human right abuses, and other illegal means to mine, sell and fund weapons, causing regional unrest.

To protect the labor, human rights, health, and environment in the minerals manufacturing countries and regions, Tongwei commits to purchasing conflict-free minerals from the supply chain and only using "conflict-free minerals" from reliable sources. In addition to gold, tin, tantalum, and tungsten (3TG), Tongwei requires suppliers to incorporate more minerals (e.g., cobalt and mica) into the scope of inspection in Conflicted-Affected and High-Risk Areas (CAHRAs) as an effort under the responsible purchase program of Tongwei.

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Remarks:

- 1.The company encourages and supports suppliers and partners to adopt and implement additional principles and policies, provided that they do not conflict with this policy.
- 2.The company's business operations strictly comply with the local laws and regulations. In the absence of specific local legal requirements, this policy shall be followed.
- 3.This document is interpreted and revised by Tongwei Co., Ltd. The company will update the document in a timely manner based on domestic and international policies, regulatory requirements, and industry developments. In the event of any inconsistencies between the Chinese and English versions of this document, the Chinese version shall prevail.