1. **目的 Purpose**

   为防止刚果民主共和国及其毗邻地区的冲突矿产或未通过责任矿产倡议(RMI) 认证的冶炼厂或精炼厂用于我司的原材料上，执行公司对冲突矿产的政策，确保所有供应商采购矿物时采用负责任的做法，尊重受冲突地区人的人权和环境，以符合社会责任系统之要求。

   To prevent the democratic republic of Congo (DRC) and its adjacent areas of conflict minerals or the smelter and refinery not conformant with responsibility mineral initiative from being used in our raw materials, implement company policy concerning conflict minerals, ensure that all suppliers purchase minerals with a responsible practice, and respect for human rights and the environment of the conflict areas to meet the requirements of social responsibility system.

2. **适用范围 Scope of application**

   适用于本公司所有原材料的采购及成份调查。

   Applicable to all raw materials purchasing and material investigation.

3. **定义 Definition**

   3.1 冲突矿产定义 Definition of conflict minerals

   3.1.1　来自于刚果民主共和国非政府军事团体或非军事派别所控制冲突地区，或依据联合国经济合作暨发展组织（OECD）受冲突影响地区和高风险地区之流程评估的定义。特点是存在武装冲突、大范围暴力活动或其他有害于民众的风险、广泛侵犯人权和违反国际国内法律，此类地区的矿物产品除刚果民主共和国(DRC)外，还包括但不限于卢旺达(Rwanda)、乌干达(Uganda)、布隆迪(Burundi)、坦桑尼亚(Tanzania)、肯亚(Kenya) 等联合国安全理事会认定的矿脉之矿物，这些矿物包含金（Au），钽（Ta），钨（W），锡（Sn）和钴（Co）等金属矿物，简称 3TG。

   From conflict areas controlled by non-government military groups or factions in the Democratic Republic of the Congo, or as defined in the OECD process assessment of conflict-affected and high-risk areas. Characterized by armed conflict, widespread violence or other risks harmful to the population, widespread human rights violations, and violations of international and domestic laws, The United Nations recognized these mineral products, including Gold, Tantalum, Tungsten,Tin and Cobalt (short for 3TG), from various regions, including Rwanda, Uganda, Burundi, Tanzania, and Kenya, in addition to the Democratic Republic of the Congo (DRC).

   3.2 冲突矿产的政策 Conflict minerals policy

   3.2.1　在原材料采购政策的实施中，通力遵守责任矿产倡议(RMI)和联合国和经合组织（OECD）《OECD 受冲突影响地区和高风险地区矿物负责任的供应链尽职调查指南》，所有供应商不采购也不支持使用任何直接或者间接资助或支持受武装冲突影响的地区的冲突矿产，确保所有供应商采购矿物时采用负责任的做法，尊重受冲突地区人的人权和环境，所有供应商采购的物料的冶炼厂和精炼厂需要符合 OECD 尽职调查指南或 RMI 认证。没有通过 RMAP 认证或不符合相关要求的冶炼厂和精炼厂必须从供应链中移除，并承若依经合组织(OECD)要求履行尽职调查。

   冲突矿产政策在公司网址进行公告,公告地址: http://www.tonlyele.com/channel.aspx?id=111

   Tonly will comply with the Responsible Minerals Initiative (RMI) and the OECD Guidelines on Responsible Supply Chain Due diligence for Minerals in Conflict-affected and High-risk Areas in the progress of raw material procurement, All suppliers do not procure or support the use of any conflict minerals that directly or indirectly finance or support the areas affected by armed conflict, and ensure that all suppliers procure minerals in a responsible manner that respects the human rights and the environment in areas affected by conflict, All the

smelters and refineries used by materials suppliers are required to comply with OECD due diligence guidelines or RMI certification. Smelters and refineries that are not certified by RMI or do not meet the relevant requirements must be removed from the supply chain and subject to due diligence as required by the Organization for Economic Co-operation and Development(OECD).

Conflict minerals policy post at company website, URL: http://www.tonlyele.com/channel.aspx? id=111

3.3 供应商要求 Requirements for suppliers

3.3.1   如果有冲突矿产用于提供通力的产品时，请立即告知并采取替代方案，并按照我司要求实施相关整改措施，经确认整改完成后才能继续供货，以确保完全符合无冲突要求，涉及冲突矿产的相关产品材料按照不合格品进行处理。

If there are products that contain conflict minerals are supplied to Tonly, please inform of Tonly immediately and take alternatives, and carry out relevant corrective actions according to our requirements, only completion of the improvement can continue to supply, ensure full compliance with conflict-free requirements, the products related to conflict minerals shall be treated as rejected goods per corresponding processes.

3.3.2   要求供应商与供应链每年进行商业上合理的尽责调查，以保证提供给通力的产品中使用的矿产并不来源于冲突矿产。供应商或供应链冲突矿产冶炼厂和精炼厂信息的变更(包括新增或移除)，作为主要变更管理，如有发生也需要通过冲突矿产报告模板（RMI-CMRT）或其他符合 IPC-1755 冲突矿产数据交换标准要求的报告，并立即通知通力。

Suppliers are required to conduct annual commercial responsible due diligence surveys in the supply chains to ensure that the minerals used in the products supplied to Tonly are not derived from conflict minerals. the information changes of smelters and refineries of suppliers or supply chain (including adding or removing) shall be as a major change management, if occurring, Tonly shall be notified immediately through the Conflict Minerals Reporting Template (RMI-CMRT) or other reports in compliance with IPC-1755 Conflict Minerals Data Exchange Standards.

3.3.3   供应链中供应商、矿物加工者、矿业公司或源头的原矿均需要按照经济合作与发展组织(OECD)和本标准的要求制订冲突矿产之相关政策及管理流程。

Supply chains including suppliers, mineral processors, mining companies, or sources of raw minerals are required to develop conflict minerals policies and management procedures following the requirements of OECD and this Standard.

4. **职责 Responsibility**

4.1 SQA 部 SQA department:

4.1.1   制定公司冲突矿产管理政策和声明

Establish company conflict minerals management policies and statements

4.1.2   负责对供应商部品是否含有冲突矿产进行调查

Responsible for investigating whether conflict minerals are present in the products delivered by suppliers

4.1.3   每季度在 RMI 网站对合格供应商使用的冶炼厂进行验证

Smelters used by qualified suppliers are validated quarterly through the RMI website

4.1.4   负责对识别到有使用不在 RMI 合格或激活清单内的冶炼厂的供应商深入调查

Responsible for in-depth investigation on suppliers who are identified to be using smelters that are not on the RMI conformant list or active list

4.1.5   归档无冲突矿产物最终报告

Archiving the final report of conflict-free product

4.1.6　　建立内部的冲突矿产管理组织，并对组织内部进行冲突矿产培训

Establish internal conflict minerals management organization chart and conduct internal training on conflict minerals

4.2　采购部：

Purchasing department:

4.2.1　　传达并执行公司的冲突矿产政策和要求

Communicate and implement the company's conflict minerals policy and requirements

4.2.2　　协助 SQA 部对供应物料进行是否使用冲突矿产及冲突矿产来源的调查

Assist SQA in investigating whether the supplying materials containing conflict minerals and the source of conflict minerals

4.3　研发部：

Research and Development Department(R&D):

4.3.1　　负责定期更新和输出 BOM

Responsible for regularly updating and outputting BOM

4.3.2　　负责创建物料的规格信息

Responsible for creating material's specifications

4.4　管理工程部：

Engineering Management Department:

4.4.1　　对外发布公司冲突矿产管理情况

Publicize the company's management on conflict minerals

4.4.2　　协助验证 SQA 部完成的供应商原物料冲突矿产调查

Assist in validating the raw material conflict mineral survey report finished by SQA

5. 工作流程 Workflow

5.1 供应商冲突矿产调查：

Supplier conflict minerals survey:

5.1.1　　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。并同步将对此物料规格信息披露给 SQA。

According to the actual product demands, R&D department will release the required material specifications and other related requirements to the procurement department, and ask the procurement department to source the appropriate suppliers for sample approval. The information of material specifications shall be disclosed to SQA simultaneously.

5.1.2　　采购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，同时 SQA 将《RMI_CMRT》调查表及需签署的《社会责任协议》分发给提供材料用于产品生产的所有分包商和供应商进行冲突矿产的信息调查。

The procurement department selects appropriate suppliers according to the specifications and quality requirements of the R&D department for the materials and requires suppliers to send samples for confirmation. Meanwhile, SQA releases the RMI_CMRT questionnaire and the Social Responsibility Agreement to be signed by all subcontractors and suppliers and execute the conflict minerals survey of the materials.

5.1.3　　SQA 对供应商&分包商所提供 RMI-CMRT 信息及风险进行识别(有效性、真实性、符合

性),与 RMI 合格清单及客户要求进行比对确认,确认 OK 的资料汇总整理。

SQA will identify the RMI-CMRT information and risks provided by suppliers and subcontractors (validity, authenticity, and compliance), compare and confirm with the RMI conformant list and customer requirements, then file the confirmed data.

5.1.4 每年至少安排一次向供应商发出《RMI-CMRT》调查表调查冲突矿产情况.

The RMI-CMRT questionnaire should be sent to suppliers at least once a year to investigate the situation of conflict minerals.

5.1.5 SQA 每季度对合格供应商&分包商所提供 RMI-CMRT 信息及风险进行识别(有效性、真实性、符合性),与 RMI 合格清单及客户要求进行比对确认。

SQA will quarterly identify the RMI-CMRT information and risks provided by suppliers and subcontractors (validity, authenticity and compliance), compare and confirm with the RMI conformant list and customer requirements.

5.2 客户冲突矿产资料收集:Conflict mineral data collection required by customers:

5.2.1 依客户需求,选择对应调查范围,如依产品范围进行调查,SQA 确定所交对应客户的产品清单,验证对应研发部提供 BOM 表信息,并结合研发部输出的物料规格信息,初步判断对应物料中是否存在 3TG 矿物质,对有使用 3TG 的物料汇总清单,依此对厂商进行冲突矿产调查。

Under customer requirements, to select the corresponding scope of investigation, such as the product scope investigation, SQA to determine the relevant customer product lists, verify the BOM information provided by R&D department, and preliminarily determine whether there are 3TG minerals in the materials based on the material specification information output by the R&D department, summarize the 3 TGs material lists which will be used to conduct conflict minerals investigation to the related suppliers.

5.2.2 SQA 对供应商&分包商所提供 CMRT 信息及风险进行识别(有效性、真实性、符合性进行审查),与 RMI 合格清单及客户要求进行比对确认,确认 OK 的资料汇总整理,有异常的则依 5.3 异常处理流程进行处理。

SQA shall identify the CMRT information and risks provided by suppliers and subcontractors (validity, authenticity, conformance), compare and confirm with the RMI conformant list and customer requirements, summarize and sort out the conformant data, and abnormity handling according to 5.3 abnormal handling process.

5.3 异常处理流程:Abnormal handling process:

5.3.1 如冶炼厂不在 RMI 合格清单中或激活清单中或不符合客户要求时,SQA 发出不符合说明到厂商并要求厂商对此进行进一步确认,并同时通知通力内部 SQA、研发部、采购部,依实际状况要求厂商采取相对应的风险缓解计划,处理措施包括但不限于:

If the smelters are not in the RMI conformant list or active list or do not conform to the requirements of customers, SQA will release non-conformance notifications to the manufacturers and vendors to further confirm, meanwhile, inform of internal SQA, R&D department, purchasing department of Tonly for visibility, the suppliers shall take corresponding risk mitigation measures based on the identified situation, including but not limited to:

a) 移除不符合要求的冶炼厂

Remove the smelters that do not meet the requirements

b) 冶炼厂重新认证取得许可,认证期间可与客户沟通是否可继续交货

The Smelters shall undergo recertify to obtain permission, and get in touch with customers to determine whether to continue delivery during the process.

c) 如所给出的风险缓解不可行或无效则采取暂停交货或终止合作

Suspension of delivery or termination of business with the suppliers if the risk mitigation provided is not unfeasible or ineffective

d) 已交货的物料按照不合格产品处理

Delivered materials will be treated as rejected products

针对厂商回复风险缓解措施，SQA 对此进行确认，确保厂商如实履行相应措施并做到尽职调查。

SQA confirms the risk mitigation measures submitted by the manufacturer and ensures that the manufacturers faithfully implement the measures and conduct due diligence survey.

5.4 每年至少一次组织采购、SQA、研发等相关单位进行冲突矿产培训并保存培训记录

Hold conflict mineral training to procurement, SQA, R&D, and other relevant departments at least once a year and keep training records