

## **HKC's Policy on Responsible Sourcing of Raw Materials**

To respect human rights and fulfill corporate social responsibility obligations, HKC and its affiliated management platform companies commit that in the implementation of raw material procurement policies, they will abide by the "Due Diligence Guidelines for Responsible Mineral Supply Chains in Conflict and High-Risk Areas", and will not support the use of conflict minerals from the Democratic Republic of the Congo and other high-risk areas around the world. HKC does not support any indirect funding or support for conflict mineral mining activities. In this field, HKC has implemented the following programs and actions to reduce risks:

- Strengthen due diligence and conduct systematic due diligence in all business areas and high-risk regions in accordance with the "Due Diligence Guidelines for Responsible Mineral Supply Chains in Conflict and High-Risk Areas" formulated by the Organization for Economic Cooperation and Development (OECD). The process and results of due diligence are disclosed to the public every year.
- Leverage the OECD's due diligence guidance for responsible procurement from conflict and high-risk regions, and encourage our suppliers to also use this guidance.
- Complete the RBA certification and obtain the certification certificate, and fully implement the latest version of the "Responsible Business Alliance Code of Conduct", covering labor, health and safety, environment, ethics and management system requirements.
- We fully utilize RMI's Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT) to ensure that the minerals we use are acceptable sources for the industry.
- Encourage responsible and sustainable mineral trade and eliminate boycotts against countries and regions.

In addition, according to the contract, HKC requires all major suppliers:

- Comply with all environmental laws and restrictions on materials/minerals.
- Fully implement the latest version of the "Responsible Business Alliance Code of Conduct", covering labor, health and safety, environment, ethics and management system requirements.

- Formulate and submit a written conflict minerals policy to HKC, committing not to directly or indirectly fund armed conflicts, human rights violations or corrupt practices.
- Every year, CMRT/EMRT is used to complete the information disclosure of conflict minerals and extended minerals, and ensure that the data is true, complete and traceable.
- Require its upstream suppliers to also abide by the above obligations and incorporate conflict mineral requirements into the procurement contract and commercial terms.

We commit to only purchasing conflict-free minerals and only using minerals from smelters that have been reviewed and verified by RMAP or similar projects. HKC hopes that both itself and its suppliers can refrain from purchasing conflict minerals and further promote responsible mineral procurement management.

## 惠科（HKC）负责任原材料采购政策

为尊重人权、履行企业社会责任义务，惠科股份及旗下管理平台公司承诺，在原材料采购政策的实施中，遵守《冲突及高风险地区负责任矿产供应链尽职调查指南》，不支持使用来自刚果民主共和国和世界其他高风险地区的冲突矿产，不支持任何间接资助或支持冲突矿产开采活动，惠科在这一领域实施了以下方案和行动来降低风险：

- 加强尽职调查，依据经济合作与发展组织（OECD）制定的《冲突及高风险地区负责任矿产供应链尽职调查指南》，对全部业务区域及高风险地区开展系统化尽职调查。每年向社会公开披露尽职调查过程与结果。
- 利用经合组织的尽职调查指导从冲突和高风险地区的负责任采购，并鼓励我们的供应商也使用此项指导。
- 完成RBA认证并取得认证证书，全面执行最新版《责任商业联盟行为准则》，涵盖劳工、健康与安全、环境、道德及管理体系要求。
- 全面使用 RMI《冲突矿产报告模板》（CMRT）和《扩展矿物报告模板》（EMRT），来保证我们使用矿产是行业可接受的来源。
- 鼓励负责任的和可持续的矿产贸易，消除对国家和地区的抵制。

此外，根据合同，惠科要求各大供应商：

- 遵循所有环境法和材料/矿物方面的限制要求。

- 全面执行最新版《责任商业联盟行为准则》，涵盖劳工、健康与安全、环境、道德及管理体系要求。
- 制定并向惠科提交书面冲突矿产政策，承诺不直接或间接资助武装冲突、侵犯人权或腐败行为。
- 每年使用 CMRT/EMRT 完成冲突矿产及扩展矿物信息披露，并确保数据真实、完整、可追溯。
- 要求其上游供应商同样遵守上述义务，并将冲突矿产要求纳入采购合同与商业条款。

我们承诺只采购无冲突的矿物，只使用经过 RMAP 或经过类似项目审核和验证过的冶炼厂的矿物，惠科希望自己和供应商都能做到不采购冲突矿物，并进一步推动负责任矿物采购管理。