

华勤技术负责任矿产采购政策

华勤技术股份有限公司（以下简称“华勤技术”或“公司”）致力于在全球供应链中推动负责任的矿产采购实践。我们认识到电子产品供应链中涉及的矿产开采和贸易可能涉及人权、武装冲突资助、环境和社会责任等重大问题，特别是冲突地区和高风险地区¹的矿产开采活动。因此，我们承诺遵守联合国全球契约（UNGC）及《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》（以下简称“OECD 指南”）等国际公认的标准和准则，遵循 OECD 指导方针，开展冲突矿产管理，确保我们的经营和采购活动中，自身及供应链不涉及冲突矿产或侵犯人权的行为。

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 冲突地区和高风险地区：存在武装冲突、最恶劣形式的童工雇佣、强迫劳动和贩卖人口、严重侵犯人权的行为或根据合理客观判断存在高风险活动(包括严重的健康与安全风险及环境负面影响)的区域，包括刚果民主共和国及其毗邻国家的受冲突影响和高风险区域。

Conflict-affected and high-risk areas: Areas where there are armed conflicts, the worst forms of child labor, forced labor and human trafficking, gross human rights violations, or areas where, based on reasonable and objective assessment, there are high-risk activities (including serious health and safety risks and adverse environmental impacts), including conflict-affected and high-risk areas in the Democratic Republic of the Congo and its adjoining countries.

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

1. 适用范围

1. Scope of Application

本政策适用于华勤技术及其所有子公司、分公司、运营场所以及公司供应链中所有层级的供应商（包括一级、二级及三级供应商）。

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. 涵盖矿产

2. Minerals Types

本政策涵盖以下矿产类别：

This Policy covers the following mineral categories:

类别 Category	矿产 Minerals	适用模板 Template
3TG 核心矿产 3TG Core	锡、钽、钨、金 Tin, Tantalum, Tungsten, Gold	CMRT
扩展矿产 Extended	钴、铜、石墨、锂、云母、镍 Cobalt, Copper, Graphite, Lithium, Mica, Nickel	EMRT
附加矿产 Additional	铝、铬、镉、银、铁/钢、锌 Aluminum, Chromium, Indium, Silver, Iron/Steel, Zinc	AMRT

3. 政策承诺

3. Policy Commitment

尽管华勤技术不直接采购和使用矿产原石，但是我们生产必需的材料、部件中可

能潜在含有 3TG、钴、云母等矿产。华勤技术郑重承诺：

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 合规承诺

3.1 Compliance Commitment

- 严格遵守联合国工商企业与人权指导原则（UNGP）、经合组织（OECD）《负责任矿产供应链尽职调查指南》及所有适用法律法规。
- 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 冲突矿产零容忍

3.2 Zero Tolerance for Conflict Minerals

- 公司不支持、不使用来自冲突影响地区和高风险地区（CAHRA）的冲突矿产，不支持、不使用来源不明的 3TG、钴、云母等矿产原料。
- 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 强迫劳动零容忍

3.3 Zero Tolerance for Forced Labor

- 公司严禁供应链中任何形式的强迫劳动、债役劳动、监狱劳动和人口贩卖，包括针对特定地区或群体的系统性强迫劳动风险。
- 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 负责任采购承诺

3.4 Responsible Sourcing Commitment

- 公司承诺优先选择具有责任矿产保证程序（RMAP）认证、无冲突采购倡议（CFS）认证等资格的供应商和冶炼厂/精炼厂（SOR）。
- The Company commits to prioritizing suppliers and smelters/refineries (SORs) that hold certifications such as the RMAP and CFS Initiative certifications.

4. 治理架构

4. Governance Structure

华勤技术运行由董事会领导和监督的“董事会—战略与可持续发展委员会—ESG 执行委员会—ESG 办公室和五大模块”的四级可持续管理体系，由董事长、CEO 担任 ESG 执行委员会主席，董事、联合创始人担任执行委员和首席可持续发展官（CSO）。负责任矿产管理由 CSR 模块负责，由质量管理部负责 CSR 制度更新、供应商赋能及冲突矿产管理；资源开发部负责供应商准入评价与持续改进；SQE 部实施质量与 CSR 稽核。

Huaqin Technology operates a four-level sustainability management system led and overseen by the Board of Directors: "Board of Directors — Strategy and Sustainability Committee — ESG Executive Committee — ESG Office and Five Modules." The Chairman and CEO serve as Chair of the ESG Executive Committee, while Directors and Co-founders serve as Executive Committee members and Chief Sustainability Officer (CSO). Responsible mineral management falls under the CSR module. The Quality Management Department is responsible for CSR policy updates, supplier capacity building, and conflict minerals management; the Resource Development Department is responsible for supplier onboarding evaluation and continuous improvement; and the SQE Department conducts quality and CSR audits.

3 尽职调查框架

5. Due Diligence Framework

公司依据 OECD 五步尽职调查框架，建立覆盖供应链全层级的尽责管理体系：

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

第一步：建立管理体系

Step 1: Establish Management Systems

- 制定并持续更新《华勤技术冲突矿产使用管理制度》《负责任矿产采购政策》；
- 将冲突矿产管理要求嵌入供应商准入、评估、风险管理、审核、赋能和退出全流程；
- 依托 SRM（供应商关系管理）系统实现冲突矿产数据数字化管理。
- 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.

第二步：识别和评估风险

Step 2: Identify and Assess Risks

- 每年通过 CMRT、EMRT 和 AMRT 模板向所有可能涉及相关矿产的供应商发起调查；
- 将供应商反馈信息与 RMAP 合格冶炼厂/精炼厂清单进行交叉比对；
- 对供应链中的冶炼厂和精炼厂（SOR）进行全面风险识别；
- 对高风险供应商（位于劳动力密集型地区、行业存在系统性劳工风险的供应商）进行审核和专项评估。

- 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).

第三步：设计和实施风险应对策略

Step 3: Design and Implement Risk Response

- 若发现供应商使用不合格冶炼厂/精炼厂，要求其立即停止采购/使用，并提供有效证据和改善预防措施；
- 若拒不配合整改或在合理期限内未达预期效果，依据供应商退出程序终止合作；
- 发布不合格冶炼厂清单并推送线上培训课程。
- 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.

第四步：独立第三方核查

Step 4: Independent Third-Party Verification

- 公司承诺至 2028 年通过独立第三方核查（IPSA）对冲突矿产尽职调查进行验证；
- 鼓励供应商接受第三方审核机构对其矿产采购合规性进行核查；
- 公司逐年发布《可持续发展报告》，其关键绩效及 GRI 标准符合性，逐年委托第三方机构进行独立鉴证。
- The Company commits to verifying its conflict minerals due diligence through an Independent Private Sector Audit (IPSA) by 2028.
- Suppliers are encouraged to undergo audits by third-party audit bodies to verify their mineral sourcing compliance.
- The Company publishes its *Sustainability Report* annually; key performance indicators and compliance with GRI Standards therein shall be subject to independent assurance by a third-party organization on an annual basis.

第五步：公开报告

Step 5: Public Reporting

- 每年公开发布《华勤技术有限责任矿产采购报告》，公开披露供应链中 3TG 和钴的来源国分布、冶炼厂/精炼厂合规状态及纠正措施；
- 每年公开发布的《可持续发展报告》中专门章节披露冲突矿产尽职调查结果。
- Annually publish the *Huaqin Technology Responsible Mineral Sourcing Report*, publicly disclosing the country of origin distribution of 3TG and cobalt in the supply chain, the compliance status of smelters/refiners, and corrective actions taken.
- Disclose conflict minerals due diligence results in a dedicated section of the publicly released annual *Sustainability Report*.

6. 供应商要求

6. Supplier Requirements

6.1 准入要求

6.1 Admission Requirements

所有新进原材料供应商须满足以下条件：

All new raw material suppliers shall meet the following requirements:

- 签署《质量协议》，其中有专门的 CSR 管理章节，约定承诺不采购或使用冲突矿物和来源不明的矿产原料，并要求其下级供应商不得采购冲突矿物；
- 优先提供具有 RMAP 认证资格的冶炼厂/精炼厂清单；
- 配合完成 CMRT/EMRT/AMRT 调查并提交完整信息。
- Sign the *Quality Agreement*, which includes a dedicated CSR management chapter, committing not to purchase or use conflict minerals or mineral raw materials of unknown origin, and requiring their sub-tier suppliers to refrain from purchasing conflict minerals.
- Prioritize providing a list of smelters/refiners with RMAP certification qualifications.
- Cooperate in completing CMRT/EMRT/AMRT investigations and submit complete information.

6.2 持续合规要求

6.2 Ongoing Compliance Requirements

- 每年配合华勤技术通过 SRM 系统开展冲突矿产尽职调查；
- 确保所供应产品及原材料不涉及冲突矿产；
- 如实报告冶炼厂/精炼厂变更情况；
- 所有产品中涉及的 3TG 原材料须 100%完成原产国追溯；
- 所有产品中涉及的 3TG 原材料须 100%来自经 RMAP 认证的冶炼厂/精炼厂。

- 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.
- 100% of 3TG-related raw materials in all products shall have country of origin traceability completed.
- 100% of 3TG-related raw materials in all products shall be sourced from RMAP-certified smelters/refiners.

6.3 扩展矿产覆盖要求

6.3 Extended Mineral Coverage Requirements

公司要求供应商逐步扩展矿产调查范围：

The Company requires suppliers to progressively expand the scope of mineral investigations:

- 基础品类（CMRT）：覆盖锡、钽、钨、金
- 拓展品类（EMRT）：覆盖钴、铜、石墨、锂、云母、镍
- 新增品类（AMRT）：覆盖铝、铬、铟、银、铁/钢、锌
- Base minerals (CMRT): covering tin, tantalum, tungsten, and gold
- Extended minerals (EMRT): covering cobalt, copper, graphite, lithium, mica, and nickel
- Additional minerals (AMRT): covering aluminum, chromium, indium, silver, iron/steel, and zinc

6.4 供应商能力建设

6.4 Supplier Capacity Building

- 公司每年组织合作伙伴可持续发展大会，设置冲突矿产专门赋能课程；
- 上线《华勤技术供应商冲突矿产管理专项培训》数字课程；
- 对管理能力薄弱的供应商提供一对一辅导。

- The Company organizes an annual Partner Sustainability Conference with dedicated capacity-building sessions on conflict minerals.
- A digital course titled *Huaqin 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. 供应链可追溯性

7. Supply Chain Traceability

7.1 冶炼厂/精炼厂识别与管理

7.1 SOR Identification and Management

- 公司要求供应商完整披露其供应链中涉及的冶炼厂/精炼厂（SOR）清单；
- 将 SOR 信息与合格冶炼厂清单进行逐项比对，识别不合格 SOR；
- 对不合格 SOR 要求供应商限期推动其完成 RMAP 认证或将其从供应链中移除。
- 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 原产国追溯

7.2 Country of Origin Traceability

- 公司承诺所有产品中涉及 3TG 的原材料 100%完成原产国追溯；

- 结合合理原产国查询（RCOI）工具与 RMAP 审计结果，对 3TG 来源进行追溯与分析；
- 在年度报告中按矿种披露原产国分布信息。
- 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 供应商/材料认证

7.3 Supplier/Material Conflict-Free Certification

- 公司要求所有涉及 3TG 的供应商 100%通过责任矿产保证流程（RMAP）认证；
- 公司承诺所有产品获得无冲突外部认证比例达到 100%；
- 持续跟踪供应商 SOR 认证及矿物追溯工作的进展。
- 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. 强迫劳动与人权风险管控

8. Forced Labor and Human Rights Risk Management

8.1 强迫劳动风险筛查

8.1 Forced Labor Risk Screening

- 公司将强迫劳动风险纳入供应商 CSR 审核的独立评估模块；

- 对高风险地区（存在系统性劳工风险的地区）供应商进行专项审核和评估；
- 禁止供应商使用任何形式的强迫劳动、债役劳动、监狱劳动。
- The Company incorporates forced labor risk as an independent assessment module in supplier CSR audits.
- Targeted audits and assessments shall be conducted for suppliers located in high-risk regions (areas with systemic labor risks).
- Suppliers are prohibited from using any form of forced labor, bonded labor, or prison labor.

8.2 外籍劳工保护

8.2 Foreign Worker Protection

- 要求供应商确保外籍劳工与本地员工享有同等法定权益和保护；
- 要求供应商建立劳务中介准入和尽职调查程序，确保不向工人收取任何招聘费用；
- 要求供应商以外籍劳工可以理解的语言提供雇佣合同副本。
- Suppliers shall ensure that foreign migrant workers enjoy the same statutory rights and protections as local employees.
- Suppliers shall establish a labor intermediary accreditation and due diligence procedure to ensure that no recruitment fees are charged to workers.
- Suppliers shall provide copies of employment contracts in a language that foreign migrant workers can understand.

8.3 申诉与举报机制

8.3 Grievance and Whistleblowing Mechanism

公司建立多层次、多渠道举报体系，接受实名和匿名举报，详见《华勤技术供应商社会责任行为准则》第七章。

- 举报渠道包括：实体意见箱、华勤 CSR 委员会专用邮箱（HQCSR@huaqin.com）、申诉专用邮箱（esg@huaqin.com）、热线电话 021-80221108；
- 严格保护举报人身份信息，禁止任何形式的报复行为；
- 所有举报在 48 小时内确认受理，按严重等级分类处理。

The Company has established a multi-level, multi-channel reporting system that accepts both identified and anonymous reports. For details, please refer to Chapter 7 of the *Huaqin Supplier Code of Conduct on Social Responsibility*.

- Reporting channels include: physical suggestion boxes, the dedicated email address of the Huaqin CSR Committee (HQCSR@huaqin.com), the dedicated grievance email address (esg@huaqin.com), and the hotline 021-80221108.
- The identities of whistleblowers shall be strictly protected, and any form of retaliation is strictly prohibited.
- All reports shall be acknowledged and accepted within 48 hours and processed according to severity classification.

9. 目标与绩效 / Targets and Performance

9.1 量化目标 / Quantitative Targets

指标 Indicator	2025 实际 Actual	目标 Target	达成年限 Target Year
冲突矿产尽职调查覆盖率 Due diligence coverage	100%	100%	持续 Ongoing
3TG 原产国追溯比例 Country-of-origin traceability	100%	100%	持续 Ongoing
RMAP 认证比例 RMAP certification rate	100%	100%	持续 Ongoing

无冲突外部认证比例 conflict-free certification	100%	100%	持续 Ongoing
冲突矿产风险事件数 Risk incidents	0	0	持续 Ongoing
第三方独立核查（IPSA） Independent assurance	未通过 Not yet	通过 Achieved	2028

9.2 绩效跟踪

9.2 Performance Tracking

依托 SRM 系统建立冲突矿产数据电子台账，记录每家供应商的调查结果、SOR 合规状态和纠正措施进展。

An electronic ledger for conflict minerals data shall be established through the SRM system to record the investigation results, SOR compliance status, and corrective action progress for each supplier.

每年公开披露关键绩效数据，包括但不限于：

Key performance data shall be publicly disclosed on an annual basis, including but not limited to:

- 供应链中 3TG（锡、钽、钨、金）和钴的来源国分布；
- 冶炼厂/精炼厂合规状态（通过合规认证的比例）；
- 冲突矿产调查覆盖的供应商数量和调查回复率；
- 尽职调查过程中发现的不符合项及纠正措施；
- 供应商审计总次数和审计覆盖率。
- Country-of-origin distribution of 3TG (tin, tantalum, tungsten, gold) and cobalt in the supply chain;
- Compliance status of smelters/refineries (proportion certified);
- Number of suppliers covered by conflict minerals surveys and response rates;

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

10. 违规处理

10. Non-Compliance Response

- 发现供应商使用不合格冶炼厂/精炼厂：要求立即停止，限期整改；
- 供应商拒不整改或未在合理期限内达标：依据供应商退出程序终止合作；
- 发现供应商涉及强迫劳动或严重人权侵犯：立即终止合作，必要时移送法律程序；
- 管理者未履行监督职责：向 ESG 执行委员会报告，由委员会决定处理措施。
- 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. 持续改进

11. Continuous Improvement

- 公司每年对本政策的执行情况进行评审，根据法规变化、行业标准更新和利益相关方反馈进行修订；

- 公司持续关注行业组织发布的最新标准和工具，及时更新内部管理流程；
- 公司积极对标行业最佳实践，持续提升供应链矿产管理的透明度和有效性。
- The Company reviews the implementation of this policy annually and makes revisions based on regulatory changes, updates to industry standards, and stakeholder feedback;
- The Company continuously monitors the latest standards and tools published by industry organizations, and promptly updates internal management processes accordingly;
- The Company actively benchmarks against industry best practices to continuously enhance the transparency and effectiveness of mineral supply chain management.

12. 附录

12. Appendix

附录一：遵从或参考的法律法规、标准、公约及倡议

Appendix 1: Relevant Laws and Standards

- 经济合作与发展组织（OECD）《关于来自受冲突影响和高风险地区矿产供应链尽职调查指南》
- OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*
- 《多德-弗兰克法案》第 1502 条
- *Dodd-Frank Act Section 1502*
- 欧盟冲突矿产法规（EU 2017/821）
- EU Conflict Minerals Regulation
- OECD《负责任矿产供应链尽职调查指南》
- OECD *Due Diligence Guidance*

附录二：术语表

Appendix 2: Glossary

术语 Term	定义 Definition
3TG	锡、钽、钨、金 Tin, Tantalum, Tungsten, Gold
CAHRA	冲突影响地区和高风险地区 Conflict-Affected and High-Risk Areas
CMRT	冲突矿产报告模板 Conflict Minerals Reporting Template
EMRT	扩展矿产报告模板 Extended Minerals Reporting Template
AMRT	附加矿产报告模板 Additional Minerals Reporting Template
RMAP	责任矿产保证程序 Responsible Minerals Assurance Process
SOR	冶炼厂和精炼厂 Smelters and Refineries
RCOI	合理原产国查询 Reasonable Country-of-Origin Inquiry
IPSA	独立第三方核查 Independent Third-Party Assurance

附录三：潜在原产国信息²

Appendix 3: Glossary

通过 RCOI 进行合理的 3TG 矿产原产地调查，追溯产品中的 3TG 矿产原产地。经过 RCOI 原产地调查和数据库比对，我们识别供应链 3TG 矿物的原产国信息如下：

² 数据截至 2026 年 5 月。
Data is as of May 2026.

Through RCOI, a reasonable country of origin inquiry for 3TG minerals was conducted to trace the origin of 3TG minerals in our products. Based on the RCOI country of origin inquiry and database cross-referencing, we have identified the country of origin information for 3TG minerals in our supply chain as follows:

钨潜在原产国 Potential Countries of Origin for Tungsten	中国、越南、老挝、蒙古、巴西、德国、美国等 China, Vietnam, Laos, Mongolia, Brazil, Germany, United States, etc.
锡潜在原产国 Potential Countries of Origin for Tin	中国、缅甸、澳大利亚、尼日利亚、巴西、印度尼西亚等 China, Myanmar, Australia, Nigeria, Brazil, Indonesia, etc.
钽潜在原产国 Potential Countries of Origin for Tantalum	尼日利亚、中国、埃塞俄比亚、哈萨克斯坦、巴西等 Nigeria, China, Ethiopia, Kazakhstan, Brazil, etc.
金潜在原产国 Potential Countries of Origin for Gold	中国、瑞士、加拿大、南非、澳大利亚、智利、加纳、哈萨克斯坦等 China, Switzerland, Canada, South Africa, Australia, Chile, Ghana, Kazakhstan, etc.

华勤技术股份有限公司

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