

Huaqin Technology Co., Ltd.

Responsible Minerals Sourcing Policy

Policy Statement

Huaqin Technology Co., Ltd. (hereinafter referred to as “Huaqin Technology” or the “Company”) is committed to promoting responsible minerals sourcing practices throughout its global supply chain. We recognize that mineral extraction may involve significant risks related to human rights, the environment, and social responsibility, particularly in conflict-affected and high-risk areas. Therefore, we commit to complying with internationally recognized standards and guidelines, 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* (the “OECD Guidance”), to ensure that neither our operations nor our supply chain involve conflict minerals or human rights abuses.

Scope of Application

This Policy applies to Huaqin Technology and all of its subsidiaries, suppliers, and business partners, and covers all minerals used in our products, with a particular focus on, but not limited to, tin (Sn), tantalum (Ta), tungsten (W), and gold (Au), which are identified as sensitive minerals under the *OECD Guidance*.

Policy Objectives

- 1. Compliance:** To comply with all applicable laws and regulations, including but not limited to Section 1502 of the *Dodd-Frank Wall Street Reform and Consumer Protection Act* and the *EU Conflict Minerals Regulation*.
- 2. Supply Chain Transparency:** To identify and obtain complete information on the sources of minerals throughout the supply chain, and to require suppliers to impose the same requirements on their upstream suppliers, thereby ensuring supply chain traceability.
- 3. Responsible Sourcing:** To give priority to sourcing minerals from initiatives or certification schemes recognized internationally, such as the Responsible Minerals Initiative (RMI), the Initiative for Responsible Mining Assurance (IRMA), or other equivalent programs.

- 4. Human Rights Protection:** To ensure that the minerals we use are not associated with child labor, forced labor, or any other human rights abuses during extraction or sourcing.
- 5. Environmental Protection:** To support the adoption of environmentally responsible mining and processing methods and to reduce damage to ecosystems.

Implementation Measures

1. **Supplier Due Diligence:** Conduct due diligence on all suppliers, require them to sign a *Commitment to Conflict-Free Minerals*, provide detailed information on mineral sources, and actively investigate and verify their supply chains, so as to ensure supply chain transparency and achieve responsible minerals sourcing objectives.
2. **Training and Awareness:** Provide training for employees and suppliers to enhance awareness of the importance of responsible minerals sourcing and to strengthen the capability to carry out related activities.
3. **Continuous Improvement:** Regularly assess and update this Policy to reflect the latest international standards and best practices.
4. **Risk Management:** Where Huaqin Technology has reasonable grounds to believe that there are risks related to responsible minerals sourcing in the supply chain, it shall immediately work with suppliers and/or other relevant stakeholders to develop, adopt, and implement a risk management plan to prevent or mitigate risks that may cause significant adverse impacts. If the risk management plan fails to achieve effectiveness within a reasonable timeframe, the Company shall suspend or terminate cooperation with the relevant supplier.

Communication and Reporting

Huaqin Technology will regularly report to stakeholders, including customers, investors, and the public, on progress and challenges related to responsible minerals sourcing. We encourage all stakeholders to provide feedback and suggestions.

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