

Huaqin Technology Co., Ltd.

Responsible Minerals Sourcing Report

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1.0 Company Overview

Huaqin Technology Co., Ltd. (hereinafter referred to as “Huaqin Technology”) was founded in 2005 and is headquartered in Shanghai, China. It is a global intelligent hardware platform enterprise. Huaqin Technology operates five major R&D centers in Shanghai, Wuxi, Xi'an, Nanchang, and Dongguan; two domestic manufacturing bases in Nanchang and Dongguan; and three overseas manufacturing bases in Vietnam, Mexico (planned), and India. Our products and services are distributed across more than 100 countries and regions worldwide, serving over 100 global operators, and providing hundreds of millions of intelligent terminal products each year to hundreds of millions of consumers worldwide, including smartphones, tablets, computers, smart wearables, AIoT products, data center products, and automotive electronics.

To fulfill corporate social responsibility and better achieve sustainable development, Huaqin Technology is committed to responsible sourcing and business practices across social, environmental, and ethical dimensions with respect to products, employees, and suppliers. For a comprehensive understanding of Huaqin Technology, including its products, culture, and management, please visit the Company's official website: www.huaqin.com.

The annual conflict minerals report of Huaqin Technology Co., Ltd. complies with the requirements of the Responsible Minerals Initiative. This report outlines the process by which Huaqin Technology sources mineral raw materials for its products, ensuring that minerals are sourced in a humane manner and do not involve child labor, human trafficking, or slavery.

Huaqin Technology commits to not supporting or using conflict minerals or minerals of unknown origin, including tin, tantalum, tungsten, gold, cobalt, and mica, and supports the actions of the Responsible Business Alliance (RBA) and the Global e-Sustainability Initiative (GeSI) on conflict minerals. With reference to the guidelines of the Organisation for Economic Co-operation and Development (OECD) and the RBA on conflict minerals, we have carried out responsible supply chain sourcing through Reasonable Country of Origin Inquiry (RCOI) and Due Diligence (DD). These initiatives represent internationally recognized industry standard practices and form the design framework of our conflict minerals program.

2.0 Definitions / Terminology

Definitions

Conflict Minerals (CM) refer to metallic minerals such as gold (Au), tantalum (Ta), tungsten (W), and tin (Sn) (collectively referred to as 3TG) that are produced from mines located in conflict areas controlled by non-governmental military groups or non-military factions in the Democratic Republic of the Congo. The trade of these minerals may finance conflict activities in the Democratic Republic of the Congo or its adjoining countries, thereby giving rise to risks such as human rights abuses and environmental degradation.

Glossary of Terms

- CMRT – Conflict Minerals Reporting Template
- EMRT – Cobalt & Mica Reporting Template
- CC – Covered Countries (also referred to as countries adjoining the Democratic Republic of the Congo)
- DD – Due Diligence (verification/inspection)
- DRC – Democratic Republic of the Congo
- OECD – Organisation for Economic Co-operation and Development (www.oecd.org)
- RBA – Responsible Business Alliance (www.responsiblebusiness.org)
- RCOI – Reasonable Country of Origin Inquiry (investigation/inquiry)
- RMAP – Responsible Minerals Assurance Process
- RMI – Responsible Minerals Initiative (www.responsiblemineralsinitiative.org)
- SET – Smelter Engagement Team
- SOR – Smelter or Refiner
- 3TG – Tin, Tantalum, Tungsten, and Gold

3.0 Reasonable Country of Origin Inquiry (RCOI)

As tin, tantalum, tungsten, and gold are commonly used in electronic manufacturing, Huaqin Technology considers all its hardware products to be within the scope of this report. Therefore, it is not necessary to maintain a specific product list.

Huaqin Technology has conducted a Reasonable Country of Origin Inquiry (RCOI) to determine whether conflict minerals originate from the Democratic Republic of the Congo (DRC) or Covered Countries (CC). We apply the Conflict Minerals Reporting Template (CMRT), which is widely used across the industry, and utilize the Responsible Minerals Initiative (RMI) program of the Responsible Business Alliance (RBA) for the purposes of RCOI. We also require our suppliers to use the CMRT with their upstream suppliers.

As part of our RCOI, we surveyed 100% of our suppliers and achieved a 100% response rate. Upon receipt of the responses, we carefully review the completeness and consistency of the information provided and directly verify suppliers' conflict minerals policies during this process. Any CMRTs that are incomplete or contain inconsistencies are returned to suppliers for correction and are deemed invalid until resubmitted..

4.0 Commitment to Conflict-Free Minerals

Based on the efforts undertaken through the RCOI, Huaqin Technology has reasonable grounds to believe that the conflict minerals used do not originate from the Democratic Republic of the Congo or Covered Countries. Accordingly, we conducted due diligence on the sources of the minerals.

Huaqin Technology has completed surveys covering 100% of its suppliers to verify that the metals used in the supply chain do not originate from the Democratic Republic of the Congo or Covered Countries. Huaqin Technology applies the CMRT survey to all its suppliers, not solely to those identified as supplying “in-scope products”. We believe that reporting all smelters and refiners (SORs) in our supply chain, regardless of whether they supply materials used in our products, enables further due diligence as needed and reflects our commitment to social responsibility.

5.0 Implementation of the OECD Due Diligence Guidance

Huaqin Technology adopts the guidelines of the Organisation for Economic Co-operation and Development (OECD) and uses the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (hereinafter referred to as the “Guidance”) to guide the management of mineral sourcing.

In accordance with the Guidance, we must clearly identify our position within the overall minerals supply chain. As a company that sells technology, products, and

services to brand customers, Huaqin Technology is positioned as a “downstream company” in the minerals supply chain, between smelters/refiners and retailers. For most of the materials we purchase, Huaqin Technology has no direct influence over their composition or quality. As many of these materials are industry-standard products, we typically negotiate with suppliers only on commercial and legal terms (such as pricing), rather than on the specific composition or sourcing of the materials used in their products. For example, apart from restricting hazardous substances, we do not instruct suppliers of CPUs, memory, tablets, batteries, or other electronic components regarding the parts, materials, or components used in their products.

Huaqin Technology does not directly purchase ore or refined minerals in the Democratic Republic of the Congo (DRC), Covered Countries (CC), or any other countries. Nor does it have any direct channels to obtain information on upstream ore, buyers/sellers/integrators/intermediaries, transportation routes, or smelters or refiners (SOR). Huaqin Technology’s supply chain is not only many tiers removed from the mine of origin, but also many tiers removed from the SOR.

To date, Huaqin Technology is neither a manufacturer nor a party that “contracts to manufacture” as defined under the Dodd-Frank Act. The majority of our procurement expenditures are allocated to final assembly and testing operations, while our suppliers more often act in the role of distributors or retailers. Across the entire supply chain, Huaqin Technology serves as an “outsourced manufacturing channel” for downstream brand customers, while acting as a “sales channel” for upstream suppliers. In summary, many of our key components are industry-standard components that are indistinguishable from those supplied to our suppliers’ other customers. Nevertheless, Huaqin Technology has conducted conflict minerals due diligence covering 100% of our procurement expenditures.

As a result, there are specific and complex challenges related to data accuracy, coverage, reporting year, confidentiality, data scope, language/communication/translation, and the lack of any direct business relationships that would enable direct transparency into the supply chain. Consequently, once ores are smelted and refined, it is extremely challenging for a downstream company like Huaqin Technology to determine the precise origin of the minerals.

The *Guidance* explicitly acknowledges this complexity and further states that:

Downstream companies should make their best efforts to identify and assess the due diligence practices of smelters and refiners in their supply chains and to evaluate whether such entities comply with the due diligence measures set out in the *Guidance*. Downstream companies may participate in the establishment of industry mechanisms that assess smelters’ and refiners’ compliance with the *Guidance*, and may use the information provided by such mechanisms to help implement the recommendations of the *Guidance*.

This distinction between upstream and downstream companies reflects the fact that internal control systems based on tracing minerals owned by enterprises are generally no longer feasible after minerals have been smelted, because refined metals entering consumer markets constitute only a small portion of the various components of end products. In light of these practical difficulties, downstream companies should establish internal controls with respect to their direct suppliers, and may coordinate collective industry initiatives to influence sub-tier suppliers, overcome practical challenges, and effectively implement the due diligence recommendations set out in the *Guidance*.

6.0 Actions Taken by Huaqin Technology

The following measures have been taken by Huaqin Technology to comply with the requirements of the OECD, the Dodd-Frank Act, and the Responsible Business Alliance (RBA), and to prevent the use of conflict minerals.

6.1 Establishment of a Strong Management System

- We have established a formal and publicly accountable sourcing policy.
- Huaqin Technology has established a formal organizational structure for sustainability and conflict minerals management. An ESG governance framework is in place, under which corporate social responsibility is included, and a dedicated social responsibility team is responsible for implementing conflict minerals programs, actions, and reporting.
- We have established a transparent supply chain control system within Huaqin Technology to identify smelters and refiners (SORs) associated with conflict minerals. First, we have internally disclosed the *Conflict Minerals Use Management Procedure*, which defines conflict minerals, responsibilities, and workflows. Second, we use the Conflict Minerals Reporting Template (CMRT) to survey our supply chain, which serves as the primary mechanism for identifying smelters and refiners supplying 3TG to components in our supply chain and for assessing risks related to 3TG. All records are retained in the SRM system database. Finally, after collecting smelter and refiner data from suppliers, Huaqin Technology utilizes the RMI Responsible Minerals Assurance Process (RMAP) to preliminarily determine whether smelters participate in the RMAP.
- We have taken a number of measures to establish and continuously strengthen supplier engagement.
- ✓ We have established long-term partnerships with most suppliers to build influence and enhance compliance. The majority of our procurement expenditures are sourced from an approved vendor list (AVL), resulting in a high level of control.

- ✓ We have established standards and policies and, through formal communication, entered into social responsibility agreements with suppliers. We also maintain a formal Supplier Code of Conduct that further incorporates our requirements.
- ✓ We assess our suppliers' compliance with the RBA Code of Conduct, which includes conflict minerals due diligence requirements. We have raised expectations for suppliers and require them to cease using non-conformant smelters.
- ✓ Huaqin Technology actively participates in RMI programs. RMI tools and guidance documents help Huaqin Technology address risks related to responsible minerals sourcing. We also seek to invest human resources by participating in RMI China Smelter Engagement Teams (SETs) and serving as Single Points of Contact (SPOCs) for Asian 3TG and cobalt SORs, to promote the participation of Chinese smelters.
- ✓ Responsible sourcing has been embedded into Huaqin Technology's supply chain management business processes. Our supplier social responsibility audit checklist includes indicators for suppliers' compliance with our conflict minerals expectations. This checklist provides critical information for business decision-making.
- ✓ If a supplier is identified as engaging in human trafficking, slavery, or child labor, or as using conflict minerals and fails to take corrective actions, we will cease purchasing its goods or services.
- Huaqin Technology has multiple grievance mechanisms for company- or industry-related concerns. Internally, we have company policies (the Employee Handbook). Externally, we have the Human Rights Policy of Huaqin Technology Co., Ltd. (available on the Company's official website).

6.2 Identification and Assessment of Risks

Given the many complex risks associated with ensuring a conflict-free supply chain, and recognizing that the *Guidance* acknowledges the difficulty for downstream companies to identify upstream actors, Huaqin Technology aims to use standard, industry-wide programs to identify SORs in the supply chain in order to determine whether conflict minerals originate from the Democratic Republic of the Congo or neighboring countries.

The principal risks arising from this include:

- Whether SORs are located in the Democratic Republic of the Congo or surrounding countries;
- Whether SORs source ores from the DRC or Covered Countries;
- Whether the information provided by SORs and at each tier of the supply chain is sufficiently accurate;
- Whether basic engagement with smelters/refiners (such as emails, telephone calls, internet surveys, on-site investigations, or visits) provides sufficient confidence that conflict is not being financed;

- Given the global nature of the supply chain, whether materials processed by most SORs pose risks in their respective locations;
- Even if SORs are reported in our supply chain, whether we can be certain that the minerals are present in our products.

6.3 Design and Implementation of Risk Mitigation Strategies

Accordingly, Huaqin Technology's strategic objective for effectively addressing and controlling risks is to understand all SORs in our supply chain, regardless of whether their materials are present in our products, and to either ensure their compliance or ultimately cease using them. To advance this objective, Huaqin Technology's risk response strategies include:

- Smelter/Refiner Certification

- ✓ We continue to utilize the RMAP to ensure that only conformant smelters are used, and leverage Smelter Engagement Teams (SETs) to address non-conformant and invalid SORs.

- Smelter/Refiner Disengagement

- ✓ As hundreds of companies and many RBA/RMI members share many of the same SORs, our strategy is to leverage collective industry influence to drive positive change. If such efforts are unsuccessful, Huaqin Technology will work with industry partners to cease using smelters that refuse to undergo audits and certification.

- ✓ It should be noted that there are significant challenges in actually removing verified SORs from the supply chain. Merely requiring the removal of non-conformant SORs (sometimes viewed as a 'negative' approach) may not itself guarantee their effective exclusion from the supply chain, thereby undermining confidence in the outcome. Huaqin Technology recognizes that positive efforts are beneficial to all stakeholders over the long term.

- Internal Reporting and Awareness

- ✓ Project Status: Report the initiation and completion status of the annual CMRT survey.

- ✓ Communications: Monthly updates on key news, events, focus areas, and key links.

- ✓ Education: Conduct an annual training program for all employees.

- ✓ Quarterly Metrics: Quarterly reporting on project status and recent developments.

- External Reporting

- ✓ Public responsible minerals sourcing policies and reports.

- ✓ Public disclosure through our sustainability reports, annual reports, and official website.

✓ Provide our due diligence measures to customers and external stakeholders upon request.

✓ Maintain our public policy on conflict minerals.

• OECD Due Diligence *Guidance*

✓ Huaqin Technology will continue to actively promote compliance with the *Guidance*, take measures to integrate the five-step framework into our management systems, and ensure the widest possible dissemination of the *Guidance* requirements.

Huaqin Technology does not limit or selectively conduct due diligence only on SORs whose minerals are present in our products in order to improve reporting statistics. We take action on all SORs reported in our supply chain, regardless of whether their materials are present in our products. We believe that reporting all SORs in our supply chain and conducting due diligence on them in a consistent manner demonstrates a higher level of social responsibility.

6.4 Public Disclosure of Due Diligence Reports

As described above, Huaqin Technology publicly discloses our due diligence policies and the results of their implementation. We also provide information on social and environmental responsibility on our website and in our annual sustainability reports.

This report and all other sustainability initiatives of Huaqin Technology are available on the Company's official website.

7.0 Additional Actions to Be Taken

Huaqin Technology will take further actions in the future to enhance our contributions to promoting conflict-free minerals and to sustain the achievements already made.

We will:

- Continue to work closely with suppliers to obtain necessary information on the sources of 3TG used in materials or components of products.
- Increase staffing resources for further program development.
- Adopt professional methods, such as third-party data verification or cross-referencing, to validate the accuracy of conflict minerals information provided by suppliers.

8.0 Key Smelter/Refiner Metrics

Through Huaqin Technology's RCOI and due diligence processes, we have identified the Smelters and Refiners (SORs) in our supply chain and work to confirm their compliance with conflict-free standards.

- Supplier CMRT response rate: 100%
- Smelter/Refiner conformance rate: 100%

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- 100% of our suppliers use the CMRT with their own suppliers and require them to comply with our responsible sourcing requirements
 - Non-conformant SORs: 0
 - Reporting: Status reports provided to the procurement team on a quarterly basis
 - Education: Annual training provided to all relevant personnel

9.0 Countries of Origin and Smelter/Refiner Lists

9.1 Countries of Origin

The Dodd-Frank Act requires issuers to identify and disclose the mine or location of origin of conflict minerals. At the same time, the Dodd-Frank Act recognizes the OECD requirements, which allow downstream companies certain limitations in determining the mine or location of origin. Accordingly, our efforts to determine mineral origins include:

- Identifying SORs and their locations in our supply chain through the CMRT
- Determining mine names and locations as provided in the CMRT
- Verifying legitimate SORs provided by the RMI, including those recognized by highly credible industry organizations (such as LBMA, RJC, and TI-CMC)
- Auditing and certifying SORs through the RMAP, which provides limited mineral origin and classification methodologies:
 - ✓ L1 — Countries not identified as conflict-affected areas or as potential sources of smuggling or illicit export
 - ✓ L2 — Countries suspected of smuggling or exporting 3TG
 - ✓ L3 — The Democratic Republic of the Congo or neighboring countries (Covered Countries)
 - ✓ Democratic Republic of the Congo

9.2 Smelter and Refiner Lists

Metal	Smelter	Country	Identification	Assessment Status
Tungsten	A.L.M.T. Corp.	JAPAN	CID000004	Conformant
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CID000019	Conformant
Gold	Agosi AG	GERMANY	CID000035	Conformant
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CID000041	Conformant
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	CID000058	Conformant
Gold	Argor-Heraeus S.A.	SWITZERLAND	CID000077	Conformant
Gold	ASAHI METALFINE, Inc.	JAPAN	CID000082	Conformant
Gold	Asaka Riken Co., Ltd.	JAPAN	CID000090	Conformant
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	CID000105	Conformant
Gold	Aurubis AG	GERMANY	CID000113	Conformant
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID000128	Conformant
Gold	Boliden Ronnskar	SWEDEN	CID000157	Conformant
Gold	C. Hafner GmbH + Co. KG	GERMANY	CID000176	Conformant
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CID000185	Conformant
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID000218	Conformant
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	CID000228	Conformant
Gold	Chimet S.p.A.	ITALY	CID000233	Conformant
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID000258	Conformant
Gold	Chugai Mining	JAPAN	CID000264	Conformant
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	CID000291	Conformant
Tin	Alpha Assembly Solutions Inc	UNITED STATES OF AMERICA	CID000292	Conformant
Tin	PT Premium Tin Indonesia	INDONESIA	CID000313	Conformant
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CID000359	Conformant
Gold	Dowa	JAPAN	CID000401	Conformant
Tin	Dowa	JAPAN	CID000402	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	CID000425	Conformant
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)	CID000438	Conformant
Tin	Estanho de Rondonia S.A.	BRAZIL	CID000448	Conformant
Tantalum	F&X Electro-Materials Ltd.	CHINA	CID000460	Conformant
Tin	Fenix Metals	POLAND	CID000468	Conformant
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CID000538	Conformant
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA	CID000568	Conformant
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA	CID000616	Conformant
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF	CID000689	Conformant
Gold	Heimerle + Meule GmbH	GERMANY	CID000694	Conformant
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	CID000707	Conformant
Gold	Heraeus Germany GmbH Co. KG	GERMANY	CID000711	Conformant
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	CID000801	Conformant
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CID000807	Conformant
Gold	Istanbul Gold Refinery	TURKEY	CID000814	Conformant
Gold	Japan Mint	JAPAN	CID000823	Conformant
Tungsten	Japan New Metals Co., Ltd.	JAPAN	CID000825	Conformant
Gold	Jiangxi Copper Co., Ltd.	CHINA	CID000855	Conformant
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID000914	Conformant
Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	CID000917	Conformant
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	CID000920	Conformant
Gold	Asahi Refining Canada Ltd.	CANADA	CID000924	Conformant
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID000937	Conformant
Gold	Kazzinc	KAZAKHSTAN	CID000957	Conformant
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	CID000966	Conformant
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	CID000969	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CID000981	Conformant
Tin	China Tin Group Co., Ltd.	CHINA	CID001070	Conformant
Tantalum	AMG Brasil	BRAZIL	CID001076	Conformant
Gold	LS MnM Inc.	KOREA, REPUBLIC OF	CID001078	Conformant
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID001105	Conformant
Gold	Materion	UNITED STATES OF AMERICA	CID001113	Conformant
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CID001119	Conformant
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	CID001142	Conformant
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	CID001147	Conformant
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID001149	Conformant
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID001152	Conformant
Gold	Metalor Technologies S.A.	SWITZERLAND	CID001153	Conformant
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	CID001157	Conformant
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	CID001161	Conformant
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	CID001163	Conformant
Tin	Mineracao Taboca S.A.	BRAZIL	CID001173	Conformant
Tantalum	Mineracao Taboca S.A.	BRAZIL	CID001175	Conformant
Tin	Minsur	PERU	CID001182	Conformant
Gold	Mitsubishi Materials Corporation	JAPAN	CID001188	Conformant
Tin	Mitsubishi Materials Corporation	JAPAN	CID001191	Conformant
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001192	Conformant
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001193	Conformant
Tantalum	NPM Silmet AS	ESTONIA	CID001200	Conformant
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	CID001220	Conformant
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	CID001236	Conformant
Gold	Nihon Material Co., Ltd.	JAPAN	CID001259	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID001277	Conformant
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID001314	Conformant
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID001325	Conformant
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)	CID001337	Conformant
Gold	MKS PAMP SA	SWITZERLAND	CID001352	Conformant
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID001397	Conformant
Tin	PT Mitra Stania Prima	INDONESIA	CID001453	Conformant
Tin	PT Prima Timah Utama	INDONESIA	CID001458	Conformant
Tin	PT Timah Tbk Kundur	INDONESIA	CID001477	Conformant
Tin	PT Timah Tbk Mentok	INDONESIA	CID001482	Conformant
Gold	PX Precinox S.A.	SWITZERLAND	CID001498	Conformant
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID001512	Conformant
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	CID001522	Conformant
Gold	Royal Canadian Mint	CANADA	CID001534	Conformant
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA	CID001539	Conformant
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	CID001585	Conformant
Gold	Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	CHINA	CID001622	Conformant
Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	CID001736	Conformant
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	CID001761	Conformant
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID001798	Conformant
Tantalum	Taki Chemical Co., Ltd.	JAPAN	CID001869	Conformant
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID001875	Conformant
Tantalum	Telex Metals	UNITED STATES OF AMERICA	CID001891	Conformant
Tin	Thaisarco	THAILAND	CID001898	Conformant
Gold	Shandong Gold Smelting Co., Ltd.	CHINA	CID001916	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CID001938	Conformant
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID001969	Conformant
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CID001980	Conformant
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	CID001993	Conformant
Gold	Valcambi S.A.	SWITZERLAND	CID002003	Conformant
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	CID002030	Conformant
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	CID002036	Conformant
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	CID002044	Conformant
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CID002082	Conformant
Gold	Yamakin Co., Ltd.	JAPAN	CID002100	Conformant
Gold	Yokohama Metal Co., Ltd.	JAPAN	CID002129	Conformant
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID002158	Conformant
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA	CID002180	Conformant
Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID002224	Conformant
Gold	Gold Refinery of Zijin Mining Group Co., Ltd.	CHINA	CID002243	Conformant
Gold	SAFINA A.S.	CZECHIA	CID002290	Conformant
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID002315	Conformant
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	CID002316	Conformant
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	CID002317	Conformant
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID002318	Conformant
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CID002319	Conformant
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CID002320	Conformant
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID002321	Conformant
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	CID002468	Conformant
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID002492	Conformant
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID002494	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	CID002502	Conformant
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CID002503	Conformant
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	CID002504	Conformant
Tantalum	FIR Metals & Resource Ltd.	CHINA	CID002505	Conformant
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	CID002506	Conformant
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	CID002509	Conformant
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	CID002511	Conformant
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	CID002512	Conformant
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA	CID002513	Conformant
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID002517	Conformant
Tantalum	KEMET de Mexico	MEXICO	CID002539	Conformant
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	CID002541	Conformant
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY	CID002542	Conformant
Tungsten	Masan High-Tech Materials	VIET NAM	CID002543	Conformant
Tantalum	TANIOBIS Co., Ltd.	THAILAND	CID002544	Conformant
Tantalum	TANIOBIS GmbH	GERMANY	CID002545	Conformant
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA	CID002548	Conformant
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN	CID002549	Conformant
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY	CID002550	Conformant
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID002551	Conformant
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	CID002557	Conformant
Tantalum	Global Advanced Metals Aizu	JAPAN	CID002558	Conformant
Gold	T.C.A S.p.A	ITALY	CID002580	Conformant
Gold	REMONDIS PMR B.V.	NETHERLANDS	CID002582	Conformant
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	CID002589	Conformant
Tin	PT Rajehan Ariq	INDONESIA	CID002593	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	CID002605	Conformant
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	CID002615	Conformant
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA	CID002641	Conformant
Tin	PT Cipta Persada Mulia	INDONESIA	CID002696	Conformant
Tin	Resind Industria e Comercio Ltda.	BRAZIL	CID002706	Conformant
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	CID002707	Conformant
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	CID002708	Conformant
Tin	Super Ligas	BRAZIL	CID002756	Conformant
Gold	Italpreziosi	ITALY	CID002765	Conformant
Tin	Aurubis Beerse	BELGIUM	CID002773	Conformant
Tin	Aurubis Berango	SPAIN	CID002774	Conformant
Tin	PT Bangka Prima Tin	INDONESIA	CID002776	Conformant
Gold	WIELAND Edelmetalle GmbH	GERMANY	CID002778	Conformant
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	CID002827	Conformant
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	CID002842	Conformant
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	CID002844	Conformant
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	CID002918	Conformant
Gold	Planta Recuperadora de Metales SpA	CHILE	CID002919	Conformant
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	CID003116	Conformant
Gold	NH Recytech Company	KOREA, REPUBLIC OF	CID003189	Conformant
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	CID003190	Conformant
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	CID003325	Conformant
Tin	Luna Smelter, Ltd.	RWANDA	CID003387	Conformant
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	CID003397	Conformant
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID003407	Conformant
Tungsten	Hubei Green Tungsten Co., Ltd.	CHINA	CID003417	Conformant

Metal	Smelter	Country	Identification	Assessment Status
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	CID003424	Conformant
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	CID003425	Conformant
Tin	PT Mitra Sukses Globalindo	INDONESIA	CID003449	Conformant
Tungsten	Cronimet Brasil Ltda	BRAZIL	CID003468	Conformant
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL	CID003486	Conformant
Tin	CRM Synergies	SPAIN	CID003524	Conformant
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA	CID003575	Conformant
Tantalum	RFH Yancheng JinYE New Material Technology Co., Ltd.	CHINA	CID003583	Conformant
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINA	CID003609	Conformant
Gold	Gold by Gold Colombia	COLOMBIA	CID003641	Conformant
Tin	PT Putera Sarana Shakti (PT PSS)	INDONESIA	CID003868	Conformant
Tungsten	Tungsten Vietnam Joint Stock Company	VIET NAM	CID003993	Conformant
Gold	Coimpa Industrial LTDA	BRAZIL	CID004010	Conformant
Tantalum	PowerX Ltd.	RWANDA	CID004054	Conformant
Tin	Mining Minerals Resources SARL	CONGO, DEMOCRATIC REPUBLIC OF THE	CID004065	Conformant
Tungsten	Lianyou Resources Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID004397	Conformant
Tin	Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	JAPAN	CID004403	Conformant
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	CHINA	CID004430	Conformant
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	MALAYSIA	CID004434	Conformant
Tin	Woodcross Smelting Company Limited	UGANDA	CID004724	Conformant
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	CID000015	Conformant

The smelter and refiner list and their status are subject to dynamic updates. The data contained in this report were last updated in July 2025.

It should be noted that some of the listed SORs are not actually present in Huaqin Technology's final products. However, regardless of whether SOR materials are contained in our products, our objective is to establish and provide an accurate SOR list and to require such SORs to be verified as conflict-free through the RMAP.

The Huaqin Technology SOR list represents the most current information available as of the stated date and includes, without limitation, all information provided therein, and is for reference purposes only. As obtaining an accurate list is a complex and dynamic process, Huaqin Technology shall not be responsible for any inaccuracies or omissions in the list. The decision as to whether to use, or how to use, all or any part of the information contained in the list shall be made by the user at its own discretion and risk.

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If any provision or any part of any provision of this report is held to be invalid or unenforceable under applicable law, such provision or part thereof shall be deemed invalid only to the extent of such invalidity or unenforceability and shall not affect the remaining provisions of the report.

The user agrees to the foregoing terms and conditions and reads and uses the Huaqin Technology SOR list with full consideration thereof.

10.0 Due Diligence on Cobalt & Mica

The extraction of cobalt and mica is associated with the risks identified in Annex II of the OECD *Guidance*. Huaqin Technology has implemented OECD sourcing due diligence and expects suppliers to participate in our due diligence procedures for cobalt and mica.

Similar to 3TG, responsible sourcing of cobalt and mica is a complex issue that requires industry-wide collaboration. Huaqin Technology fully supports the RMI’s efforts to address materials beyond 3TG. Since 2021, we have formally adopted the EMRT (Cobalt & Mica Reporting Template) obtained via the RBA website to conduct comprehensive supply chain due diligence for cobalt and mica. This effort covered 100% of suppliers and achieved a 100% response rate.

List of Cobalt & Mica Smelters and Refiners:

Mineral	Smelter	Country	Identification	Assessment Status
Cobalt	Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINA	CID003209	Conformant
Cobalt	Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA	CID003210	Conformant
Cobalt	Zhuhai Kelixin Metal Materials Co., Ltd.	CHINA	CID003211	Conformant
Cobalt	Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINA	CID003212	Conformant
Cobalt	Guangxi Yinyi Advanced Material Co., Ltd.	CHINA	CID003213	Conformant
Cobalt	Tianjin Maolian Science & Technology Co., Ltd.	CHINA	CID003215	Conformant
Cobalt	Zhejiang Huayou Cobalt Company Limited	CHINA	CID003225	Conformant
Cobalt	Umicore Finland Oy	FINLAND	CID003226	Conformant
Cobalt	Umicore Olen	BELGIUM	CID003228	Conformant
Cobalt	Dynatec Madagascar Company	MADAGASCAR	CID003232	Conformant
Cobalt	Port Colborne Refinery	CANADA	CID003239	Conformant
Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA	CID003255	Conformant
Cobalt	Kamoto Copper Company	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003261	Conformant
Cobalt	Chemaf Etoile	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003264	Conformant
Cobalt	Societe pour le Traitment du Terril de Lubumbashi (STL)	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003266	Conformant
Cobalt	La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol S.A.)	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003275	Conformant
Cobalt	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN	CID003278	Conformant
Cobalt	Compagnie de Tifnout Tiranimine	MOROCCO	CID003280	Conformant

Mineral	Smelter	Country	Identification	Assessment Status
Cobalt	Guangdong Jiana Energy Technology Co., Ltd.	CHINA	CID003291	Conformant
Cobalt	Jiangsu Xiongfeng Technology Co., Ltd.	CHINA	CID003293	Conformant
Cobalt	Mutanda Mining SPRL	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003301	Conformant
Cobalt	SungEel HiTech Co., Ltd.	KOREA, REPUBLIC OF	CID003338	Conformant
Cobalt	Jingmen GEM Co., Ltd.	CHINA	CID003378	Conformant
Cobalt	Ganzhou Highpower Technology Co., Ltd.	CHINA	CID003384	Conformant
Cobalt	NORILSK NICKEL HARJAVALTA OY	FINLAND	CID003390	Conformant
Cobalt	Zhejiang New Era Zhongneng Technology Co., Ltd.	CHINA	CID003398	Conformant
Cobalt	Hunan Yacheng New Energy Co., Ltd.	CHINA	CID003404	Conformant
Cobalt	Murrin Murrin Nickel Cobalt Plant	AUSTRALIA	CID003406	Conformant
Cobalt	Hunan CNGR New Energy Science & Technology Co., Ltd.	CHINA	CID003411	Conformant
Cobalt	Tenke Fungurume Mining SA	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003429	Conformant
Cobalt	Uranus Chemicals	TAIWAN, PROVINCE OF CHINA	CID003473	Conformant
Mica	Yamaguchi Mica	JAPAN	CID003512	Conformant
Cobalt	Zhejiang Greatpower Cobalt Materials Co., Ltd.	CHINA	CID003526	Conformant
Cobalt	Mechema Taiwan Plant 2	TAIWAN, PROVINCE OF CHINA	CID003534	Conformant
Cobalt	Harima Refinery, Sumitomo Metal Mining	JAPAN	CID003577	Conformant
Cobalt	Vale - Long Harbour Processing Plant (LHPP)	CANADA	CID003584	Conformant
Cobalt	Guizhou CNGR Resource Recycling Industry Development Co., Ltd.	CHINA	CID003610	Conformant
Cobalt	Anhui Hanrui New Material Co., Ltd.	CHINA	CID003927	Conformant
Mica	Yamaguchi Mica Co., Ltd. Toyohashi Factory	JAPAN	CID003970	Conformant
Mica	Yamaguchi Mica Co., Ltd. Shinshiro Factory	JAPAN	CID003971	Conformant
Cobalt	Jiangxi Miracle Golden Tiger Cobalt Co. Ltd.	CHINA	CID004003	Conformant

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