负责任矿物供应链政策及承诺

Responsible Minerals Supply Chain Policy and Commitment

（第五版修订Fifth Edition, Revised）

(a) 本公司在采购原材料的过程中，深刻认识到在冲突影响区域和高风险地区从事矿产开采、交易、处理和出口可能带来的重大负面影响风险。我们承诺秉持尊重人权、避免助长冲突、不对环境与社会产生负面影响的责任，并积极推行负责任采购政策，我们承诺采纳经济合作与发展组织（OECD）发布的《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》第三版（以下简称《经合组织指南》），依据该指南制定矿物供应链负责任采购政策。承诺根据《经合组织指南》附录一列明的五个步骤，我们将建立供应链尽职调查管理体系，识别并有效管理矿物供应链中的风险并开展尽职调查。此外，政策的制定还参考了《国际人权法案》及其相关公约、《联合国工商业与人权指导原则》、国际劳工组织的《关于多国企业和社会政策的三方原则宣言》以及《经合组织跨国企业准则》等国际标准。

(a) In the process of procuring raw materials, our company has deeply recognized the significant negative impact risks that may arise from mineral extraction, trading, processing, and export in conflict-affected and high-risk areas. We commit to upholding the responsibility to respect human rights, avoiding contributing to conflicts, and refraining from causing adverse impacts on the environment and society. We also pledge to actively implement responsible sourcing policies. We commit to adopting the third edition of 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") and to formulating a responsible sourcing policy for mineral supply chains in accordance with this guidance. We pledge to establish a supply chain due diligence management system based on the five-step framework outlined in Annex I of the OECD Guidance, to identify and effectively manage risks in the mineral supply chain and conduct due diligence. Furthermore, the development of this policy has also referenced international standards such as the "International Bill of Human Rights" and its related conventions, the "United Nations Guiding Principles on Business and Human Rights," the International Labour

Organization's "Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy," and the "OECD Guidelines for Multinational Enterprises."

本政策适用于云母及相关物料，涵盖云母供应链及冲突敏感采购活动，旨在为供应商提供明确的风险识别与管理指导。我司承诺：

1. 本政策适用于我司，我司子公司包括但不限于湖南荣泰新材料科技有限公司及所有涉及物料供应商及其供应链。

2. 本政策将传达至所有相关供应商，并公示于公司官网。

3. 供应商必须遵守该政策，并将其纳入与我司签署的合同和协议中。

4. 我司将不参与任何可能为冲突提供资助的活动，承诺严格遵守联合国相关制裁决议及适用的国内法律。

This policy applies to mica and related materials, covering the mica supply chain and conflict-sensitive procurement activities, aiming to provide suppliers with clear guidance on risk identification and management. Our company commits to:

1. This policy applies to our company, our subsidiaries including but not limited to Hunan Rongtai New Material Technology Co., Ltd., and all involved material suppliers and their supply chains.

2. This policy will be communicated to all relevant suppliers and published on the company's official website.

3. Suppliers must comply with this policy, and it shall be incorporated into the contracts and agreements signed with our company.

4. Our company will not participate in any activities that may finance conflicts and commits to strictly complying with relevant United Nations sanctions resolutions and applicable domestic laws.

同时我们承诺在商业活动中识别并避免以下风险：

Furthermore, we commit to identifying and avoiding the following risks in our business activities:

1. 严重侵犯人权的行为

我们既不容忍也不以任何方式获利于、助长、协助或便利任何一实施：

(1) 任何形式的酷刑，残忍、不人道和有辱人格的待遇；

(2) 任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务；

(3) 最恶劣形式的童工；

(4) 其他严重侵犯和践踏人权的行为，如普遍的性暴力行为；

(5) 战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪。

降低风险：如果我们有合理理由认为上游供应商从事有严重侵犯人权行为的任何一方采购或与之存在关联，我们将立即中止或中断与该供应商的合作。

1. Serious Human Rights Abuses

We neither tolerate nor in any way profit from, contribute to, assist, or facilitate the commission of any of the following acts:

(1) Any form of torture, cruel, inhuman, and degrading treatment;

(2) Any form of forced or compulsory labor. Forced or compulsory labor refers to any work or service that is exacted from any person under the threat of penalty and for which the said person has not offered themselves voluntarily;

(3) The worst forms of child labor;

(4) Other gross human rights violations and abuses, such as widespread sexual violence;

(5) War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

Risk Mitigation: If we have reasonable grounds to believe that an upstream supplier is sourcing from or is associated with any party involved in gross human rights abuses, we will immediately suspend or discontinue our cooperation with that supplier.

2. 直接或间接支持非法的有组织武装团体和公共或私人安全武装

我们不会容忍任何通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供直接或间接的支持。通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供“直接或间接的支持”包括且不限于从非法的有组织武装团体或其关联方购买资源，向其付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方：

(1) 非法控制矿产或以其他方式控制运输路线、矿产资源交易点以及供应链的上游行为主体；

(2) 在矿址入口、运输路线沿线或矿产资源交易点非法征税或者勒索钱财或矿产资源；

(3) 对中间商、出口企业、或国际贸易商非法征税或勒索。

我们将杜绝向非法控制矿址、运输路线以及供应链上游参与方，在矿址入口、运输路线沿线或矿产资源交易点非法征税或索要钱财或矿产资源，或者向中间商、出口企业或国际贸易商非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

我们认可，矿址、周边地区和运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受影响和干扰。

在我们或我们供应链上的任何企业或商业关系与公共或私人安全武装签订了合约的情况下，我们承诺或者将规定，这类安全武装需被公认的处理公共或私人安全武装的国际标准和指导性文件所认可。尤其是，我们将支持或采取措施，运用筛查政策，确保已知实施过侵权人权行为的个人或安全武装单位不被录用。

我们将支持或采取措施，与当地政府、国际组织和民间社会组织开展合作，共同制定提高公共安全武装安保费用的透明度、相称性和问责性的可行解决方案。

我们将支持或采取措施,与当地政府、国际组织和民间社会组织开展合作，供应链上的矿产资源通过小作坊或小规模采矿方式开采的，避免或最大限度地降低公共或私

人安全武装驻扎在矿址给弱势群体带来的不利影响，尤其是对小作坊矿工的不利影响。

降低风险：如果我们有合理理由认为上游供应商从向非国有的有组织武装团体提供直接或间接支持的任何一方进行采购或与之存在关联，我们将立即中止或中断与该供应商的合作。

我们将根据企业在供应链上所处的具体位置，立即与供应商及其利益相关方一起制定、采用和实施风险管理计划，从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。这些安全武装非法控制矿址、运输路线和供应链上游参与方，在矿址入口、运输线路或矿产交易点非法征税或勒索，我们有理由认为存在风险。在此情况下，如果风险管理计划实施六个月未奏效，我们将中止或中断与供应商的合作。

2. Direct or Indirect Support to Illegally Armed Organized Groups and Public or Private Security Forces

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of mineral resources. Providing "direct or indirect support" to non-state armed groups through these activities includes, but is not limited to, purchasing resources from, making payments to, or providing logistical support or equipment to illegal armed groups or their affiliates. These armed groups or their affiliates are characterized by:

(1) Illegally controlling mines or otherwise controlling transportation routes, mineral trading points, and upstream actors in the supply chain;

(2) Illegally taxing or extorting money or minerals at mine site entrances, along transportation routes, or at mineral trading points;

(3) Illegally taxing or extorting intermediaries, export companies, or international traders.

We will also eliminate direct or indirect support to public or private security forces who are complicit in these illegal activities. This applies to forces that illegally control mine sites, transportation routes, or upstream supply chain participants; those who illegally tax or

extort money or minerals at mine entrances, along transport routes, or at trading points; or those who illegally tax or extort intermediaries, export companies, or international traders.

We recognize that the legitimate role of public or private security forces at mine sites, in surrounding areas, and along transport routes is solely to uphold the rule of law. This includes safeguarding human rights, protecting the safety of miners, equipment, and facilities, and securing mine sites or transport routes to allow legal extraction and trade to proceed without hindrance or disruption.

In cases where our company, or any entity or business relationship within our supply chain, contracts with public or private security forces, we commit to stipulating that such forces must be recognized by, and operate in accordance with, internationally accepted standards and guidance for public and private security. Specifically, we will support or implement measures, including screening policies, to ensure that individuals or security units known to have committed human rights abuses are not hired.

We commit to supporting or implementing measures, in collaboration with local governments, international organizations, and civil society, to develop viable solutions that enhance the transparency, proportionality, and accountability of public and private security force expenditures.

Furthermore, where minerals in our supply chain are sourced through artisanal or small-scale mining, we commit to supporting or implementing measures—in collaboration with local governments, international organizations, and civil society—to avoid or minimize the adverse impacts that the presence of public or private security forces at mine sites may have on vulnerable populations, particularly artisanal miners.

Risk Mitigation:

If we have reasonable grounds to believe that an upstream supplier is sourcing from or is associated with any party providing direct or indirect support to non-state armed groups, we will immediately suspend or discontinue our cooperation with that supplier.

Depending on our specific position in the supply chain, we will work promptly with the supplier and relevant stakeholders to develop, adopt, and implement a risk management plan. This plan will aim to prevent or mitigate the risk of providing direct or indirect support to public or private security forces. This applies specifically where there are

reasonable grounds to believe such risks exist involving security forces that illegally control mine sites, transport routes, or upstream supply chain participants, or that illegally tax or extort at mine entrances, along transport routes, or at mineral trading points. In such cases, if the risk management plan does not prove effective within six months of implementation, we will suspend or discontinue our cooperation with the supplier.

3. 腐败、洗钱和向政府支付的各项费用

我们不提供、承诺、给予或索要任何贿赂，并且抵制腐败的诱惑，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

我们禁止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序；尽最大努力促进与所有业务伙伴间负责任的商业实践。

如果我们有理由认为，存在因开采、交易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产资源所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做贡献。

我们承诺采取有效措施，防止卷入洗钱或恐怖主义融资，例如：通过明确和发布供应商、客户身份和实际所有权等，监测异常或可疑活动的交易，尽量避免现金交易，如果无法避免需要提供可验证的交易文件货通过正式的银行途径，同时保留相关证明文件和/或记录文档需保留五年。

我们将确保向政府支付所有与受冲突影响和高风险区域矿产资源开采、交易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置，此类支付进行披露。

降低风险：根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响的风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时停止或中断与上游供应商的合作。

3. Anti-Corruption, Anti-Money Laundering, and Transparency of Government Payments

We do not offer, promise, give, or solicit any bribes, and we resist all forms of corruption. We will not engage in bribery to conceal or falsify the origin of mineral resources, or to misreport taxes, fees, and royalties payable to governments for the extraction, trade, handling, transport, or export of minerals.

We prohibit bribery in all our business activities and transactions, including bribery carried out by agents or other third parties acting on our behalf. We have established standards and approval procedures for the giving and receiving of gifts. We strive to promote responsible business practices with all our business partners.

If we have reason to believe that a risk of money laundering arises from, or is related to, the extraction, trade, handling, transport, or export of minerals obtained through illegal taxation or extortion at mine site entrances, along transport routes, or at mineral trading points of upstream suppliers, we will support or implement measures to contribute to the effective elimination of money laundering.

We commit to taking effective measures to prevent involvement in money laundering or terrorist financing. These measures include, but are not limited to: identifying and verifying the identity and beneficial ownership of our suppliers and customers; monitoring transactions for unusual or suspicious activity; avoiding cash transactions where possible, and if unavoidable, ensuring they are supported by verifiable transaction documents or conducted through formal banking channels; and retaining relevant supporting documents and/or records for a period of five years.

We will ensure that all legal taxes, fees, and royalties related to the extraction, trade, and export of minerals from conflict-affected and high-risk areas are paid to governments. Furthermore, we commit to disclosing such payments in accordance with our position in the supply chain.

Risk Mitigation:

Based on our specific position in the supply chain, we commit to collaborating, as appropriate, with suppliers, central or local governments, international organizations, civil society, and affected third parties. The purpose of this collaboration is to improve

performance or track progress over a reasonable timeframe, with the goal of preventing or mitigating the risk of adverse impacts. If risk mitigation measures do not prove effective, we will temporarily suspend or permanently discontinue cooperation with the upstream supplier.

4. 土地权利、排放和小作坊

我们不参与、不容忍、也不受益于在未获得当地人和土著人同意的土地上开采资源，包括持有法定所有权、租赁权、特许权或许可证的开采商。我们也不参与、不容忍、也不受益于当地人和土著人的文化和遗产未受尊重和保护，或损害当地传统文化的开采作业。我们不参与、不容忍、也不受益于在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源，我们确保避免给周围土壤、空气和水的状况造成重大污染，严重违反当地相关法律法规，包括制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质。

我们同意确保遵守有关化学品和有毒物质管理适用的法律法规的要求。避免制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质，其中包括按照最高国际标准严格控制砷和汞的排放，管理氰化物，确保在过程中无泄漏、无溢溅或以其他形式释放到环境中。

我们禁止在世界遗产地或法定保护区开采资源，以及由此给这些遗产的突出普遍价值造成威胁。

我们将密切关注小作坊和小规模采矿商可能存在的风险，包括是否存在强迫劳动，使用童工、不安全工作条件、不受控化学品的使用和其他重大环境影响的的风险，寻求与开采区的小作坊或小规模采矿商建立生产关系。

降低风险：如果我们有合理理由认为存在此类风险，我们将根据企业在供应链上所处的位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防止或降低诸如侵害土地权利、引发重大不利环境影响，或与小作坊和小规模采矿商相关的其他风险。

4. Land Rights, Emissions, and Artisanal and Small-Scale Mining (ASM)

We do not engage in, tolerate, or benefit from resource extraction on lands where the free, prior, and informed consent of local people and indigenous peoples has not been obtained, including from operators holding legal title, leases, concessions, or licenses. Furthermore, we do not engage in, tolerate, or benefit from mining operations where the culture and heritage of local and indigenous peoples are not respected or protected, or which harm local traditional cultures. We do not engage in, tolerate, or benefit from resource extraction on lands where legal title, leases, concessions, or licenses have been illegally obtained, or which violates domestic law. We are committed to ensuring that significant pollution of the surrounding soil, air, or water is avoided, and that serious violations of relevant local laws and regulations are prevented. This includes prohibitions on the manufacture, trade, and use of chemicals and hazardous substances subject to international bans due to their high toxicity to organisms, environmental persistence, or potential for irreversible ecological impact.

We agree to ensure compliance with applicable legal requirements concerning the management of chemicals and toxic substances. We will avoid the manufacture, trade, and use of chemicals and hazardous substances that are subject to international bans due to their high toxicity to organisms, environmental persistence, or potential for irreversible ecological impact. This includes strictly controlling emissions of arsenic and mercury in accordance with the highest international standards, and managing cyanide to ensure no leakage, spillage, or other release into the environment.

We prohibit resource extraction in World Heritage sites or legally protected areas, as well as any activities that threaten the Outstanding Universal Value of these sites.

We will pay close attention to potential risks associated with artisanal and small-scale miners. These risks include, but are not limited to, forced labor, child labor, unsafe working conditions, the use of uncontrolled chemicals, and other significant environmental impacts. We will seek to establish productive relationships with artisanal or small-scale mining operations in extraction areas.

Risk Mitigation:

If we have reasonable grounds to believe that such risks exist, depending on our specific position in the supply chain, we will work promptly with the supplier and other relevant stakeholders to develop, adopt, and implement a risk management plan. This plan will aim

to prevent or mitigate risks such as the infringement of land rights, the causation of significant adverse environmental impacts, or other risks associated with artisanal and small-scale miners.

5. 运输

我们将会严格遵守7类物质的国际运输标准，并且我们确保在危险物质的处置、储存、运输符合相关的法律法规的要求。我们保证在运输和生产过程中不会发生泄漏，从而防止对环境和人体造成不利影响。

降低风险：按照国际标准严格区分7类货物和非7类货物，如果是7类货物，我们将按此类物质进行包装、运输、申报，确保不泄漏，不对人体和环境造成危害。

5. Transport

We will strictly adhere to international transport standards for Class 7 materials. We ensure that the disposal, storage, and transport of hazardous materials comply with all relevant legal and regulatory requirements. We guarantee that no leakage will occur during transport and production processes, thereby preventing adverse impacts on the environment and human health.

Risk Mitigation:

We will strictly segregate Class 7 goods from non-Class 7 goods in accordance with international standards. For Class 7 goods, we will ensure they are packaged, transported, and declared in compliance with regulations for such materials. We will take all necessary measures to guarantee no leakage occurs, thereby preventing harm to human health and the environment.

6. 环境风险

我们将严格控制温室气体排放和其他空气污染物，以改善空气质量；负责任地使用水资源，防止水污染，同时关注海洋环境和水量问题，确保水资源的可持续利用；防止土壤污染和侵蚀，合理利用土地资源；保护生物多样性，避免破坏生态系统服务；确保产品和生产过程中不使用或释放危害环境和健康的物质；减少工厂运营产

生的噪声和振动，保护周围环境；遵守严格的安全标准，保障员工健康与安全；提高能源效率，减少能源消耗，推广可再生能源的使用；以及实施有效的废物减量和回收计划，减少对环境的影响。同时我们会将这项政策传达给供应商伙伴，与之共同努力，推动环境的可持续性，保护我们的地球。

降低风险：为了降低环境和社会风险，建立环境管理体系，投资节能减排技术，优化水资源管理，保护土壤和生物多样性，管理有害物质，控制噪声和振动，确保工厂安全，有效管理固体废弃物，履行社会责任，并严格管理供应链，以促进可持续发展并保护我们的地球。

6. Environmental Responsibility

We are committed to rigorously controlling greenhouse gas emissions and other air pollutants to improve air quality. We will use water resources responsibly, prevent water pollution, and pay close attention to marine environments and water quantity issues to ensure the sustainable utilization of water resources. We are dedicated to preventing soil pollution and erosion, and to utilizing land resources rationally. We will protect biodiversity and avoid disrupting ecosystem services. We ensure that no substances harmful to the environment or human health are used or released in our products and production processes. We will mitigate noise and vibration generated by plant operations to protect the surrounding environment. We adhere to strict safety standards to safeguard employee health and safety. We strive to improve energy efficiency, reduce energy consumption, and promote the use of renewable energy. Furthermore, we will implement effective waste reduction and recycling programs to minimize our environmental impact. We will communicate this policy to our supplier partners and work collaboratively with them to promote environmental sustainability and protect our planet.

Risk Mitigation:

To mitigate environmental and social risks, we are committed to establishing a robust environmental management system. Our mitigation strategies include: investing in energy conservation and emission reduction technologies; optimizing water resource management; protecting soil and biodiversity; rigorously managing hazardous substances; controlling noise and vibration; ensuring plant safety; effectively managing solid waste; fulfilling our social responsibilities; and strictly managing our supply chain. Through these

comprehensive measures, we aim to promote sustainable development and safeguard our planet.

7. 人权与社会

我们尊重和保护人权，确保职业健康与安全，禁止儿童劳动和强迫劳动，消除歧视，并保障工会自由。我们会提供一个安全、健康的工作环境，让所有员工在没有恐惧和歧视的情况下工作，并能够自由组织和参与工会活动。此外，我们关注土著人民的生活和权利，在运营过程中尊重土著社区的文化和生活方式，避免对其生活造成不利影响，并在可能的情况下积极支持土著社区的可持续发展。同时我们会将这项政策传达给供应商伙伴，致力于在社会责任方面的积极实践，确保供应链的社会责任得到有效履行，保护和尊重所有利益相关者，尤其是处于弱势地位的群体。

降低风险：强化职业健康与安全培训，预防非法劳动行为，特别是儿童劳动和强迫劳动，通过教育提升公众和雇主的意识。同时，严格执行非歧视政策，保障员工的工会自由，尊重并支持土著社区的文化和可持续发展。此外，对供应商进行社会责任评估，实施有效的风险管理措施，以保护人权，促进劳动关系的和谐，并尊重社区及土著人民的权利。

7. Human Rights and Social Responsibility

We respect and protect human rights, ensure occupational health and safety, prohibit child labor and forced labor, eliminate discrimination, and uphold the freedom of association. We are committed to providing a safe and healthy working environment where all employees can work without fear or discrimination, and where they are free to organize and participate in union activities.

Furthermore, we pay close attention to the lives and rights of indigenous peoples. During our operations, we respect the cultures and lifestyles of indigenous communities, avoid causing adverse impacts on their lives, and, where possible, actively support the sustainable development of these communities.

We will communicate this policy to our supplier partners and are committed to proactive practices in social responsibility. We will ensure that social responsibilities throughout our

supply chain are effectively fulfilled, protecting and respecting all stakeholders, particularly vulnerable groups.

Risk Mitigation:

To mitigate risks, we will strengthen occupational health and safety training and prevent illegal labor practices, especially child labor and forced labor, by enhancing awareness among the public and employers through education. Simultaneously, we will rigorously enforce our non-discrimination policy, safeguard employees' freedom of association, and respect and support the cultures and sustainable development of indigenous communities. Additionally, we will conduct social responsibility assessments of our suppliers and implement effective risk management measures to protect human rights, promote harmonious labor relations, and respect the rights of communities and indigenous peoples.

本负责任采购政策已在我公司官方网站（https://www.glorymica.com）上予以公告，并将本政策告知所有矿产供应链上下游商业伙伴，供应商需根据这些要求，签署负责任云母采购的供应商标准-附录1.

This Responsible Sourcing Policy has been publicly announced on our company's official website (https://www.glorymica.com). This policy has been communicated to all upstream and downstream business partners in our mineral supply chain. Suppliers are required to sign Appendix 1: Supplier Standards for Responsible Mica Sourcing based on these requirements.

浙江荣泰电工器材股份有限公司

日期：2025年06月17日