

## Conflict Minerals Policy

### 负责任矿物政策

CTIA GROUP LTD (hereinafter referred as CTIA or we), as a professional tungsten metal products supplier in China, is highly committed to offering best working environment and opportunity for the employees, providing excellent products and service to our customers, CTIA always dedicate to harmonious development with the society.

中钨智造（厦门）科技有限公司（以下简称中钨智造或我们）作为一家专业的钨产品供应商，长期以来一直致力于为员工提供最佳的工作环境和机会，为客户提供优质的产品和服务，与社会共谋和谐发展。

We condemn the unlawful exploitation of mineral resources from any locations in the world and we fully support the goal of ending violence, human rights violations, and environmental devastation in the Democratic Republic of the Congo (DRC), and its surrounding countries known as the “Conflict Region”. We are firmly committed to supporting a conflict-free not Congo-free supply chain. By that we mean responsible sourcing of conflict minerals (Tantalum, Tin, Tungsten, Gold “3TG” and Cobalt) from the region, provided that such minerals do not directly or indirectly finance or benefit armed groups. As part of this commitment, we have adopted a continuous improvement policy within our own organisation to only purchase materials that are guaranteed to be conflict-free and that meet all the relevant criteria stipulated by the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

我们谴责从世界任何地方非法开采矿产资源的行为，我们完全支持结束在刚果民主共和国 (DRC) 及其周边国家暴力、侵犯人权和环境破坏的目标，这些国家被称为“冲突地区”。我们坚定地致力于支持无冲突而非无刚果的供应链。我们支持负责任地采购冲突矿产（钽、锡、钨、黄金“3TG”和钴），前提是这些矿产不直接或间接资助或使武装团体受益。作为这一承诺的一部分，我们在组织内采用了持续改进政策，只购买保证无冲突且符合经济合作与发展组织 (OECD) 规定的所有相关标准的材料受冲突影响和高风险地区矿产负责任供应链尽职调查指南。

We acknowledge the final “Conflict Minerals Rule” issued by the U.S. Securities and Exchange Commission (“SEC”) issued under Section 1502 of the 2012 Dodd-Frank Wall Street Reform and Consumer Protection Act and we are committed to assisting our customers with their due diligence and disclosure requirements required to comply with the legislation. To this end, CTIA pledges to only source and procure metals from those companies who agree to prohibits human rights abuses including forced or compulsory labour, child labour and unethical practices.

我们承认美国证券交易委员会 (“SEC”) 根据 2012 年多德-弗兰克华尔街改革和消费者保护法第 1502 条发布的最终“冲突矿产规则”，我们致力于协助我们的客户履行遵守法律所需的尽职调查和披露要求。为此，中钨智造承诺仅从同意禁止包括强迫或强制劳动、童工和不道德行为在内的侵犯人权行为的公司采购。

In support of our Conflict Minerals Policy, CTIA undertakes to:

为支持我们的负责任矿物政策，中钨智造承诺：

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and encourage our suppliers in turn roll this out to their suppliers.

根据经合组织《受冲突影响和高风险地区矿产负责任供应链尽职调查指南》对相关供应商进行尽职调查，并鼓励我们的供应商推广给其供应商。

- Incorporate the principles of this Policy into our legally binding Purchase Contracts and monitor all transactions.

将本政策的原則纳入我们具有法律约束力的采购合同并监控所有交易。

- Provide, and expect our suppliers to co-operate in providing, due diligence information to confirm that any 3TG and cobalt materials in our supply chain are conflict free.

提供并期望我们的供应商合作提供尽职调查信息，以确认我们供应链中的任何 3TG 和钴材料均无冲突。

- Rely on industry initiatives, such as the Responsible Minerals Initiative (RMI), to validate that all metals we procure are from either a) conflict free smelters on the RMI approved smelter list or b) scrap/recycled sources.

依靠行业协会，例如 RMI，来验证我们采购的所有金属是否来自 a) RMI 批准的冶炼厂清单上的无冲突冶炼厂或 b) 废料/回收来源。

- Ensure that traceability data will be maintained and recorded by suppliers for 5 years and provided to CTIA upon request.

确保供应商数据记录可追溯 5 年，并根据要求提供给中钨智造。

- Collaborate with our suppliers and others on industry-wide solutions to enable products that are DRC conflict-free.

与我们的供应商和其他人合作开发全行业的解决方案，以实现无 DRC 冲突的产品。

- Publicly communicate our policy and progress via our corporate website, annual Corporate Responsibility Report and Supplier Code of Conduct.

通过我们的公司网站、年度企业责任报告和供应商行为准则公开传达我们的政策和进展。

- Strive to assist our customers and supply chain partners in implementing their own conflict minerals compliance programs.

努力协助我们的客户和供应链合作伙伴实施他们自己的冲突矿产合规计划。

- Require all of our suppliers to provide us with completed conflict minerals declarations using the RMI Conflict Minerals Reporting Template (CMRT)

要求我们的所有供应商使用 RMI 冲突矿产报告模板 (CMRT) 向我们提供冲突矿产声明。

- Commission 3rd party audit of CTIA's processes to assure our procurement processes remain conflict free.

委托第三方对中钨智造的流程进行审计，以确保我们的采购流程保持无冲突。

CTIA seeks to establish long-term relationships and work with suppliers to drive meaningful, lasting and sustainable improvements. Where risks in our supply chain are identified we will work with suppliers to assess and mitigate these risks in accordance with OECD Guidelines, and in particular "Annex II: Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas". We will cease trade relationships with any suppliers who are found to be in deliberate or persistent breach of our Sourcing Policy and OECD Guidelines.

中钨智造寻求建立长期关系并与供应商合作，以推动有意义和可持续的改进。如果我们的供应链中的风险被确定，我们将与供应商合作，根据经合组织指南评估和减轻这些风险，特别是“附件二：受冲突影响和高风险地区责任的全球矿产示范供应链政策”。我们将停止与任何被发现故意或持续违反我们的采购政策和经合组织准则的供应商的贸易关系。

CTIA GROUP LTD  
中钨智造（厦门）科技有限公司  
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