冲突矿物管理制度
Conflict Minerals Management System

1.0 目的 Purpose

为了践行社会责任及满足客户对负责任矿产采购管理的要求，防止刚果民主共和国或周边国家/地区内的冲突矿产用于我司的原材料或产品上，以缓解刚果民主共和国及其周边国家/地区的冲突区域及其它高风险地区出产的矿产引发的人权灾难和降低供应链的管理风险。

The purpose is to uphold social responsibility and meet customer demands for responsible mineral procurement management, preventing the use of conflict minerals from the Democratic Republic of the Congo or neighboring countries/regions in our company's raw materials or products. This aims to mitigate human rights disasters caused by minerals produced in conflict areas of the Democratic Republic of the Congo and its surrounding regions, as well as reduce supply chain management risks.

2.0 适用范围 Scope of Application

本程序适用于广东领益智造股份有限公司下属各集团公司及其子公司/孙公司、控股子公司/孙公司、并向其提供产品及物料的供应商。

This program is applicable to all subsidiary companies of LINGYI iTECH (Guangdong) COMPANY including their subsidiary/affiliate companies, holding subsidiary/affiliate companies, as well as suppliers providing products and materials to them.

3.0 定义 Definitions

3.1 冲突矿物：包括但不限于：锡石（锡）、钴、铌钽锰矿（钶钽铁矿）(钽)、金色（黄金）、钨锰铁矿(钨)、云母及其他矿物

Conflict Minerals: This includes but is not limited to tin (Sn), cobalt (Co), niobium-tantalum manganese ore (coltan) (Ta), gold (Au), tungsten manganese ore (W), mica, and other minerals.

3.2 冲突矿物报告模板（CMRT）：责任矿产倡议组织(Responsible Minerals Initiative,RMI)制定的标准化报告模板，可帮助在供应链内传达有关矿物锡、钽、钨和黄金相关原产国/地区和当前使用的冶炼厂和精炼厂的信息

Conflict Minerals Reporting Template (CMRT): A standardized reporting template developed by the Responsible Minerals Initiative (RMI) to help convey information within the supply chain about the origin countries/regions and current usage of minerals such as tin, tantalum, tungsten, and gold.

3.3 钴和云母报告模板（EMRT）:RMI制定的标准化报告模板，可帮助在供应链内传达有关使用的钴和云母冶炼厂和精炼厂的信息

Cobalt and Mica Reporting Template (EMRT): A standardized reporting template also developed by RMI to facilitate the communication of information within the supply chain regarding the use of cobalt and mica smelters and refineries.

4.0 管理职责 Management Responsibilities

4.1 开发部(研发部)/工程部： 供应商送样时负责对原材料是否有冲突矿物进行初步的评估

Development Department (R&D): Responsible for conducting initial assessments of whether conflict minerals

are present in raw materials when samples are received from suppliers.

4.2 品保部（SQE）： 按照经合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（简称《经合组织指南》），及认可的第三方组织和国际标准要求,调查披露及报告有关产品内使用的锡，钽（钶钽铁矿），金，钨的情况及其来源。

Supplier Quality Engineer (SQE): In accordance with the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas (referred to as the "OECD Guidance"), as well as requirements from recognized third-party organizations and international standards, investigate, disclose, and report on the use and sources of tin, tantalum (coltan), gold, and tungsten within the products.

4.3 采购部：依据材料采购需求选择合适的供应商，并协助品保部要求供应商对供应材料进行是否使用冲突矿物及冲突矿物来源的尽责调查，签署《非冲突矿产承诺书》，填回《RMI CMRT（锡、钽、钨和黄金冲突）矿物报告》或《RMI EMRT（钴、云母）冲突矿物报告》

Procurement Department: Select appropriate suppliers based on material procurement requirements and assist the Quality Assurance Department in requesting suppliers to conduct due diligence investigations on the use of conflict minerals and their sources in the supplied materials. This includes signing the "Non-Conflict Minerals Commitment" and completing the "RMI CMRT (Tin, Tantalum, Tungsten, and Gold) Conflict Minerals Report" or the "EMRT RMI (Cobalt Mica)Conflict Minerals Report."

4.4 PM部：每年至少1-2次,通知客户关于供应链调查和尽职调查报告；还包含发现与锡、钽、钨、金、钴或其他指定相关矿物或相关材料，有关的任何警告风险及任何变更、新信息，或例外情况会影响之前提供的与供应链和风险调查的信息，或会影响例行年度报告期内提交的已识别风险报告

Project Management Department (PM): Notify customers at least 1-2 times per year about supply chain and due diligence investigation reports. This notification should also include any warning risks related to tin, tantalum, tungsten, gold, cobalt, or other specified minerals or materials. Additionally, inform customers of any changes, new information, or exceptional circumstances that may affect the information provided regarding supply chain and risk investigations or impact risk reports submitted during routine annual reporting periods.

5.0 工作程序 Work Procedures

5.1 按照《经合组织指南》，制定建立尽职调查管理制度应包括：风险识别、风险预防和缓解、针对供应链尽职调查的第三方验证或审核、报告相关风险的机制

Develop and establish a due diligence management system in accordance with the OECD Due Diligence Guidance. This system should include risk identification, risk prevention and mitigation, third-party verification or audits of supply chain due diligence, and mechanisms for reporting relevant risks.

5.2 指定高级管理人员负责执行尽职调查计划

Appoint senior management personnel responsible for executing the due diligence plan.

5.3 供应商政策传达 Supplier Policy Communication

5.3.1 供应商指客户产品中使用的所有分包商和供应商，及其采购人员和管理团队。

Define suppliers as all subcontractors and vendors involved in the production of customer products, including their procurement personnel and management teams.

5.3.2 将采购要求纳入与供应商签订的书面协议和/或合同中。

Incorporate procurement requirements into written agreements and/or contracts with suppliers.

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5.4 至少每年进行一次供应链尽职调查,内容包括但不限于:

Conduct a supply chain due diligence at least once a year, including but not limited to:

5.4.1 每家供应商的与相关矿物和相关材料有关的所有分包商和供应商的身份和位置信息

Identifying the identity and location information of all subcontractors and suppliers related to the relevant minerals and related materials for each supplier.

5.4.2 相关矿物和相关材料的加工厂的识别信息

Identifying information about processing facilities for relevant minerals and related materials.

5.4.3 所有相关矿物和相关材料的原产国/地区

Identifying the countries/regions of origin for all relevant minerals and related materials.

5.5 应每年主动调查识别，供应链中的特定风险以及需要优先处理的风险；判断原产国/地区、运输国/地区是否为高风险区域；判断相关矿物或相关材料的来源或根源是否是高风险实体；完成认可的风险评估以收集相关风险的信息

Actively investigate and identify specific risks in the supply chain that need prioritized attention on an annual basis. Determine whether the countries/regions of origin and transportation are high-risk areas and assess whether the sources or origins of relevant minerals or related materials are high-risk entities. Conduct recognized risk assessments to gather information on these identified risks.

5.6 根据《经合组织尽职调查指南》减轻已识别的任何风险，包括在风险缓解措施失败时暂停或终止与供应商的业务关系。

Mitigate any identified risks, including suspending or terminating business relationships with suppliers in case risk mitigation measures fail.

5.6.1 解决已识别的风险Address identified risks.

5.6.2 跟踪和报告未解决已识别风险而采取的措施

Track and report on actions taken for unresolved identified risks.

5.6.3 终止与不配合供应商的业务关系 Terminate business relationships with non-cooperative suppliers.

5.6.3.1不愿参与必要的供应链风险调查、不愿采取高风险解决措施以及不愿进行验证或审核

Suppliers unwilling to participate in necessary supply chain risk investigations, unwilling to take high-risk mitigation measures, or unwilling to undergo verification or audits.

5.6.3.2存在警告风险，但没有及时采取适当的措施来缓解相应的风险

Suppliers with warning risks who have not taken appropriate measures to mitigate corresponding risks in a timely manner.

5.7 第三方对供应链尽责调查的验证或审核：使用和/或采购相关矿物的供应商应通过认可的第三方组织对"负责任的采购"方面的验证或审核，或已经完成相应验证或审核

Third-party verification or audits of supply chain due diligence: Suppliers using and/or procuring relevant minerals should undergo verification or audits related to "Responsible Sourcing" by recognized third-party organizations, or have already completed such verification or audits.

5.8 制定报告相关风险的机制.对于相关矿物，每年应根据《经合组织指南》发布有关其尽职调查的信息，并应向客户提供合理的文件证据，证明其遵循了该标准；

Establish mechanisms for reporting relevant risks. For relevant minerals, provide information on due diligence annually as per the OECD Guidance and furnish reasonable documentary evidence to demonstrate compliance with the standard to customers.

5.9 每年对矿物冲突管理程序和执行记录进行内审、管理评审，以确保遵守并实施已确定的流程改进

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Conduct internal audits and management reviews of the mineral conflict management program and its execution records annually to ensure compliance and implement identified process improvements.

6.0 相关文件及记录 Relevant Documents and Records

冲突矿物报告模板（CMRT） Conflict Minerals Reporting Template (CMRT)

非冲突矿产承诺书 Non-Conflict Minerals Commitment

扩展矿物报告模板（EMRT RMI) Expand Minerals Reporting Template