歌尔股份有限公司供应链负责任矿产采购政策

Policy of Goertek Inc. on Responsible Mineral Sourcing for the Supply Chain

歌尔股份有限公司（下文简称“歌尔股份”“公司”）高度重视自身及供应链的可持续发展，致力于提高供应链负责任矿产管理水平及负责任矿产风险意识。歌尔股份充分认识到公司有尊重人权、不助长冲突、不对环境和社会产生不利影响的义务，采纳《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责调查指南（第三版）》（以下称《OECD 指南》、《多德-弗兰克华尔街改革和消费者保护法》中关于钨、锡、钽、金等矿物在受武装冲突影响地区和高风险地区[1]的管理条例，以及《中国负责任矿产供应链尽责管理指南》，并将其纳入与供应商签订的合同或协议之中。本政策适用范围为歌尔股份有限公司及其分、子公司（以下统称“歌尔股份”）的钨、锡、钽、金、钴、云母等矿产供应链。

Goertek Inc. (hereinafter referred to as "Goertek" or "the Company") attaches great importance to the sustainable development of itself and its supply chain, and is committed to enhancing responsible mineral management and risk awareness across the entire supply chain. The Company fully acknowledges its obligation to respect human rights and social rights, avoid contributing to conflicts, and prevent adverse environmental impacts. It adopts the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)* (hereinafter referred to as the "OECD Guidelines"), relevant provisions regarding tungsten, tin, tantalum, gold and other minerals from conflict-affected and high-risk areas under the *Dodd-Frank Wall Street Reform and Consumer Protection Act* [1], and the *Chinese Due Diligence*

注：[1]受冲突影响和高风险区域：存在武装冲突、最恶劣形式的童工雇佣、强迫劳动和贩卖人口、严重侵犯人权的行为或根据合理客观判断存在高风险活动(包括严重的健康与安全风险及环境负面影响)的区域，包括刚果民主共和国及其毗邻国家的受冲突影响和高风险区域。Conflict-affected and high-risk areas: Areas where armed conflicts exist, the most severe forms of child labor employment, forced labor and human trafficking, serious human rights violations, or high-risk activities (including serious health and safety risks and negative environmental impacts) are judged reasonably and objectively, including conflict-affected and high-risk areas in the Democratic Republic of the Congo and its neighboring countries.

Guidelines for Responsible Mineral Supply Chains [redacted]

into contracts or agreements with its suppliers. This policy applies to the supply chains of tungsten, tin, tantalum, gold, cobalt, mica, and other minerals of Goertek Inc., its subsidiaries, and branches (hereinafter collectively referred to as "Goertek").

歌尔股份承诺不采购也不支持使用任何直接或者间接资助或支持受武装冲突影响地区和[redacted]的冲突矿产。歌尔股份建立了负责任矿产采购管理体系，在矿产供应链中开展定期尽职调查，以验证冶炼厂/精炼厂的合规性。为确保产品和供应链中的矿产来源合法合规，歌尔股份要求供应商做到：

Goertek Inc. undertakes not to purchase or support the use of any conflict minerals that directly or indirectly fund or support armed conflict-affected areas and high-risk areas. Goertek has established a responsible mineral procurement management system and conducts regular due diligence in its mineral supply chain to verify the compliance of smelters and refiners. To ensure that the mineral sources in its products and supply chain [redacted] Goertek requires its suppliers to:

1.在经营和采购活动中必须履行社会、环境责任；

Fulfill social and environmental responsibilities in their operations and procurement activities;

2.确保提供歌尔股份的产品不使用源于受冲突影响和高风险区域的冲突矿产[redacted]无冲突矿产承诺书》；

Ensure that the products provided to Goertek do not contain conflict minerals sourced from conflict-affected and high-risk areas, and sign the Conflict-Free Minerals Commitment Letter;

3.支持并配合歌尔股份负责任矿产采购要求，定期使用CMRT、[redacted]报告模版向歌尔股份如实申报产品中的矿产使用情况和来源信息，若供应商上游冶炼厂及精炼厂（以下称

SORs）未取得RMAP认证，要求供应商推动并确保这些SORs在规定时间内取得RMAP认证或从其供应链中移除，确保公司供应链不涉及冲突矿产；

Support and cooperate with Goertek's requirements for responsible mineral procurement. Regularly use reporting templates such as CMRT (Conflict Minerals Reporting Template) and EMRT (Extended Minerals Reporting Template) to truthfully report information on mineral usage and sources in products to Goertek. If suppliers' direct upstream smelters and refiners (hereinafter referred to as "SORs") have not obtained RMAP (Responsible Minerals Assurance Process) certification, the supplier shall promote and ensure that such SORs obtain RMAP certification or exit from its supply chain within the specified time, and shall further ensure that no conflict minerals are involved in its own supply chain;

4.按照《OECD 指南》，建立负责任矿产采购管理体系与问责机制，追溯所有产品中所含的钨、锡、钽、金、钴、云母等矿物来源，并定期对矿物来源和产销监管链进行尽职调查；

In accordance with the OECD Guidelines, establish a responsible mineral procurement management system and an accountability mechanism, trace the sources of minerals such as tungsten, tin, tantalum, gold, cobalt, and mica contained in all products, and conduct regular due diligence on mineral sources and chain of custody;

5.将上述政策传递至为其提供产品制造材料的所有分包商和供应商。

Communicate the above policies to all subcontractors and suppliers that provide manufacturing materials for its products.

原则/ Principle：

一、严重侵权行为与应对/Serious Infringements and Response

歌尔股份不会容忍也不会以任何方式获利于、帮助或便利任何一方实施如下行为：

Goertek will not tolerate or in any way benefit from, assist or facilitate any party in

carrying out the following actions:

1）任何形式的酷刑，残忍、不人道以及有辱人格的待遇；

[redacted]

2）任何形式的强迫劳动，以惩罚作为威胁榨取个人非[redacted]

Any form of forced labor, including exploiting [redacted] provide involuntarily under the threat of punishment;

3）最恶劣形式的童工；

The worst forms of child labor;

4）其他严重侵犯和践踏人权的行为，如性暴力行为；

Other serious violations and abuses of human rights, for example sexual violence;

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。

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

风险缓解策略/Risk Mitigation Strategy

若歌尔股份有合理理由认为此类[redacted]

何一方进行采购或与该方有关联，歌尔股份将立即中止或终止与该供应商的合作。

If Goertek [redacted] i.e., an upstream supplier has made purchases from, or is associated with, any party that has committed the aforementioned serious infringements—Goertek will immediately suspend or terminate its cooperation with such a supplier.

二、支持非国家武装团体与应对/ Support to Non-State Armed Groups and Response

歌尔股份[redacted] 为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括但不限于从非国家武装团体或其关联方购买矿产、向其进行付款或以

其他方式为其提供后勤支援或设备等。

Goertek will not tolerate any direct or indirect support rendered to non-state armed groups through mineral mining, transportation, trade, processing, or export activities. The provision of "direct or indirect support" to non-state armed groups via mineral mining, transportation, trade, processing, or export includes, but is not limited to: purchasing minerals from non-state armed groups or their affiliates; making payments to such groups or affiliates; or providing them with logistical support, equipment, or other forms of assistance.

这些武装团体或关联方可能存在如下侵权行为：

Such armed groups or their affiliates may have engaged in the following infringing acts:

1）非法控制矿址或以其他方式控制运输路线、矿产交易点以及供应链上游行为主体；

[illegible] upstream entities in the supply chain;

2）在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产；

Illegally collecting taxes, extorting money, or expropriating minerals at mine entrances, along transportation routes, or at mineral trading points;

3）对中间商、出口企业、或国际贸易商非法征税或勒索。

Illegally imposing taxes on or extorting money from middlemen, export enterprises, or international traders.

风险缓解策略/Risk Mitigation Strategy

若歌尔股份有合理[illegible]何一方进行采购或与之存在关系，歌尔股份将立即中止或终止与该供应商的合作。

If Goertek has reasonable grounds to believe that an upstream supplier purchases

from, or maintains a relationship with, any party that provides direct or indirect support to non-state armed groups, Goertek will immediately suspend or terminate cooperation with such supplier.

三、安全武装与应对/ Security Armament and Response

歌尔股份杜绝向中间商、出口企业或国际贸易商的非法征税或进行勒索的公共或私人安全武装提供任何形式的直接或间接支持。歌尔股份仅认可企业向其经营所在国政府支付的法定税费和/或特许开采费等合法形式支持。

Goertek strictly prohibits the provision of any form of direct or indirect support to public or private security forces that illegally impose taxes on, or extort money from, middlemen, export enterprises, or international traders. Goertek only recognizes legal forms of support, such as statutory taxes, fees, and/or concessionary mining fees, which are paid by enterprises to the governments of the countries where they operate.

风险缓解策略/Risk Mitigation Strategy

若歌尔股份发现上游供应商在一定程度上存在此类风险，将根据供应商在供应链上所处的具体角色，立即制定、采纳和实施上游供应商及其他利益相关方的风险管理计划，以预防或减轻公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。若风险管理计划实施六个月未起作用，歌尔股份将暂时中止或终止与该上游供应商的合作。

If Goertek identifies that upstream suppliers are exposed to such risks to a certain extent, it will immediately develop, adopt, and implement risk management plans for upstream suppliers and other stakeholders based on the specific role of the suppliers in the supply chain. These plans aim to curb or mitigate the risks of providing direct or indirect support to public or private security forces. If the risk management plan fails to take effect within six months of its implementation, Goertek will temporarily suspend or terminate its cooperation with the relevant upstream supplier.

四、行贿受贿及矿产原产地的欺诈性失实陈述与应对/ Bribery, Accepting Bribes and Fraudulent False Statements regarding the Origin of Mineral Resources and Response

歌尔股份不会提出、承诺、进行或索要任何贿赂，不会为了掩盖或伪造矿产原产地、虚报矿产开采、贸易、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。

Goertek shall not offer, promise, make, or demand any bribes. Furthermore, Goertek shall not offer bribes to conceal or falsify the origin of mineral resources, and shall not falsely declare the taxes, fees, and concession fees that are required to be paid to the government in connection with mineral mining, trade, processing, transportation, export, and other related activities.

歌尔股份不会容忍也不会以任何形式获利于因开采、贸易、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交易地进行的非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，歌尔股份将支持或采取措施，为有效消除洗钱风险做出贡献。

Goertek shall not tolerate, nor derive any form of profit from, money laundering risks that arise from or are associated with the illegal taxation or extortion of minerals—where such minerals are obtained through mining, trading, processing, transportation, or export—at the entrances of mining sites, along transportation routes, or at mineral transaction locations of upstream suppliers. Goertek shall provide support or take measures to contribute to the effective elimination of such money laundering risks.

险区域矿石开采、贸易、出口相关的合法税收、费用和特许费。

Goertek shall ensure that all legal taxes, fees, and concession fees related to the mining, trade, and export of minerals in conflict-affected and high-risk areas are paid to the relevant government authorities.

风险缓解策略/Risk Mitigation Strategy

若歌尔股份发现上游供应商在一定程度上存在此类风险，歌尔股份要求供应商在合理的时间跨度内采取具有实质性的措施来预防或降低有负面影响的风险，并对绩效进行改善或跟踪。若风管理计划六个月内未取得明显效果，此类风险未能得到遏制或降低，歌尔股份将暂时停止或中断与供应商的合作三个月及以上，并要求供应商在暂时中止合作期内对风险管理计划进行修订，阐明贸易关系恢复之前改进工作所应达到的绩效目标。风险降低措施未起作用的，歌尔股份将暂时中止或终止与该上游供应商的合作。

If Goertek identifies that an upstream supplier is exposed to such risks to a certain extent, Goertek shall require the supplier to take substantial measures within a reasonable timeframe to prevent or mitigate the adverse impacts of such risks, and to enhance and monitor its performance in this regard. If the risk management plan fails to achieve substantial results within six months, and such risks remain uncontrollable or unmitigable, Goertek shall temporarily suspend or discontinue cooperation with the supplier for a period of three months or longer. During the temporary suspension of cooperation, Goertek shall require the supplier to revise its risk management plan to clearly define the performance targets that must be met through improvement efforts before the resumption of the business relationship. If the risk mitigation measures prove ineffective, Goertek shall temporarily suspend or terminate its cooperation with the relevant upstream supplier.

五、职业健康安全危害与应对/ Occupational Health and Safety Hazards and Response

歌尔股份不会容忍也不会以任何形式获利于、帮助、协助、便利任何为其直接或间接雇员或在其生产经营活动中提供劳务的工作环境中，存在强迫劳动或违反适用法律关于禁止强迫劳动规定的任何个人或组织，并不与其存在任何关联。

Goertek shall not tolerate, and by any means benefit from, assist, aid, or facilitate

any party that provides a life-threatening working environment for its direct or indirect employees or any personnel at its production sites. Furthermore, Goertek shall not purchase goods or services from such parties, nor maintain any form of association with them.

风险缓解策略/Risk Mitigation Strategy

若歌尔股份在合理理由认为上游供应商提供的职业环境有威胁到员工的　　、健康安全的风险，或从有该情况的任何一方采购或与之存在关联，歌尔股份将立即中止或中断与该上游供应商的合作。

If Goertek has reasonable grounds to believe that the occupational environment provided by an upstream supplier poses risks to the life, health, and safety of employees, or that Goertek is purchasing goods or services from, or maintaining any form of association with, any party in such a situation, Goertek shall immediately temporarily suspend or discontinue cooperation with the relevant upstream supplier.

六、环境失责与应对/ Environmental Negligence and Response

歌尔股份不会容忍也不会以任何形式获利于、帮助、协助、便利任何严重违反当地法律、法规的重大环境违法行为/事件，包括但不限于对生态环境介质（包括大气、土壤及水体）产生显著污染后果的任何一方，且不会从该方采购或与之存在任何关联。

Goertek shall not tolerate, by all means benefit from, assist, aid, or facilitate any major environmental violation or incident that seriously violates local laws and regulations—including, but not limited to, any party that causes significant pollution to ecological media (including air, soil, and water bodies). Furthermore, Goertek shall not purchase goods or services from such parties, nor maintain any form of association with them.

风险缓解策略/Risk Mitigation Strategy