

冲突矿产政策管理程序 Conflict Minerals Management Procedures**1、目的 Purpose**

为防止来源于受冲突影响及高风险地区（CAHRA）的冲突矿产应用于我司原材料，落实公司冲突矿产管理政策，改善电子产品供应链条件，支持矿产合法合规贸易，同时满足美国多德-弗兰克法案 1502 条款、欧盟冲突矿产条例、客户及 RMI 责任矿产倡议的合规要求。

To prevent conflict minerals originating from Conflict-Affected and High-Risk Areas (CAHRA) from being used in our company's raw materials, implement the company's conflict minerals policy, improve electronics supply-chain conditions, support legitimate mineral trade, and satisfy compliance requirements from Dodd - Frank Act Section 1502, EU Conflict Minerals Regulation, customer requirements and Responsible Minerals Initiative(RMI).

2、范围 Scope

适用于公司全部原材料、零部件、外协加工物料的冲突矿产调查管控。

Applicable to investigation and control of conflict-minerals components for all raw materials, components and outsourced processing materials of the company.

3、公司冲突矿产政策 Company Policy on Conflict Minerals

公司不支持、不采购、不使用来源于武装冲突、严重人权侵害、非法采矿、恶劣劳工环境开采的所谓“冲突矿产”。供应商须对产品中包含金 (Au)、钽 (Ta)、锡 (Sn)、钨 (W) (3TG)，以及钴 (Cobalt)、云母 (Mica) 等扩展矿产开展供应链尽职调查，核实矿产来源；优先选用 RMI-RMAP 认证合格冶炼 / 精炼厂；对上游多级供应商传递本政策要求。

The Company does not support, procure or use so-called "conflict minerals" mined from areas with armed conflict, severe human-rights violations, illegal mining or poor working conditions. Suppliers shall perform supply-chain due diligence for metals including gold (Au), tantalum (Ta), tin (Sn), tungsten (W) (3TG), as well as extended minerals cobalt and mica, and verify mineral origins. Suppliers shall prioritize RMAP-certified smelters/refiners and cascade down this policy requirement to multi-tier upstream suppliers.

4、定义 Definition**4.1 冲突矿产 Conflict Minerals**

来源于受冲突影响与高风险地区（CAHRA），开采、贸易直接或间接资助武装团体、引发严重人权、环境侵害的矿石及衍生金属。不限于刚果（金）及其周边，包含全球范围内符合 OECD CAHRA 定义的地区。原刚果（金）及周边国家（DRC、Rwanda、Uganda、Burundi、Tanzania、Kenya 等）为重点高风险区域，但风险评估需要覆盖全球 CAHRA 地区，不局限特定国家清单。

Conflict Minerals: Ores and derivative metals sourced from Conflict - Affected and High - Risk Areas (CAHRA), whose mining or trade directly/indirectly fund armed groups and cause severe human-rights and environmental harms. Risk scope is global per OECD CAHRA definition, not limited to DRC and its neighboring countries. Countries including DRC, Rwanda, Uganda, Burundi, Tanzania, Kenya are key high - risk focus regions.

4.2 受冲突影响和高风险地区 CAHRA (Conflict-Affected and High-Risk Areas)

指存在武装冲突、大规模暴力冲突、冲突后脆弱治理、治理失效、广泛系统性人权侵害的区域，可以是国家整体或国家内部部分地区，依据 OECD 指南、欧盟 CAHRA 指引动态更新。

Conflict-Affected and High-Risk Areas (CAHRA): Regions characterized by armed conflict, widespread violence, fragile post - conflict governance, state fragility or collapse, and systematic human - rights violations. This scope covers whole countries or sub-national regions and shall be dynamically updated

according to OECD guidance and EU CAHRA guidelines.

4.3 无冲突金属 Conflict-free minerals

矿产来源不来自 CAHRA，不会直接或间接资助武装组织，供应链经过尽职调查管控的金属物料。

Conflict-free minerals: Metals sourced outside CAHRA, whose supply chain has passed due-diligence control and do not directly or indirectly finance armed groups.

4.4 冲突矿产调查表模板 Reporting Templates

当前 RMI 官方最新版本（2026-04-17 发布）：CMRT 6.6（3TG）、EMRT 2.11（钴、云母等扩展矿产），禁止使用过期旧版本模板收集供应商资料，每次提供需提供官网最新版本。

下载地址：<https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>

下载页面需要勾选 “I ACCEPT” 进入下载。

Conflict Minerals Reporting Template(CMRT 6.6): For 3TG tin-tantalum-tungsten-gold.

Extended Minerals Reporting Template(EMRT 2.11): For extended minerals cobalt, mica etc.

Download link as above. Click “I ACCEPT” at page bottom before downloading. Each time, the latest version from the official website must be provided.

The screenshot shows the RMI website's 'Conflict Minerals Reporting Template' page. The main content area includes a description of the CMRT, a 'Download the CMRT Template' section with a 'Download CMRT' button, and information about the latest version (CMRT v. 6.6.1). A sidebar on the right lists various RMI resources, including 'MRT Introduction', 'Conflict Minerals Reporting Template', 'Extended Minerals Reporting Template', 'Additional Minerals Reporting Template', 'MRPRO', 'Smelter Reference Lists', 'Country of Origin Data', 'Public Reporting', 'Conflict Minerals Compliance Tools', and 'Company Identification'. The 'Conflict Minerals Reporting Template' link in the sidebar is highlighted with a red box.

responsiblemineralsinitiative.org/reporting-templates/cmrt/?

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Conflict Minerals Reporting Template

The Conflict Minerals Reporting Template (CMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an assessment via the RMI's Responsible Minerals Assurance Process (RMAP).

Download the CMRT Template

Download the latest version of the CMRT (version 6.6) below. Click [here](#) for a downloadable version of the most up-to-date Smelter Reference List and [here](#) for the revision history. The RMI recommends using CMRT v. 6.5 or higher for the Reporting Year.

Download CMRT

CMRT v. 6.6.1 is an unbranded version of CMRT v. 6.6 and is available for download [here](#). CMRT v. 6.6 and v. 6.6.1 are functionally identical.

The changes you will see in CMRT v. 6.6 (released April 17, 2026) include:

responsiblemineralsinitiative.org/reporting-templates/emrt/

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Extended Minerals Reporting Template

The Extended Minerals Reporting Template (EMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative to identify pinch points and collect due diligence information in the cobalt and mica supply chains. This is a template that was formally launched on October 20, 2021. The RMI recommends using EMRT v. 2.11 for the Reporting Year.

Download the Template

Download the latest version of the EMRT (version 2.11) below.

Download EMRT

EMRT v. 2.11.1 is an unbranded version of EMRT v. 2.11 and is available for download [here](#). EMRT v. 2.11 and EMRT v. 2.11.1 are functionally identical.

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FACILITY DATABASE

View Active Gold Refiners

Recognized Gold Refiners

View Conformant and Cross-Recognized Gold Refiners

RMI Eligible Facilities List

RMI Public List

Conformant/Active/Eligible by Metal

Export - Smelter Reference Lists

Extended Corrective Action Plan

Downstream Assessment Program

Export All

Export All Active Smelters list or the All Conformant Smelters list for all minerals

Export All Active

Export All Conformant

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4.5 RMI 责任矿产保证流程 RMAP (Responsible Minerals Assurance Process)

RMI 责任矿产保证流程，经过独立第三方审核的合格冶炼 / 精炼厂清单，公司用于比对供应商上报冶炼厂信息，识别高风险冶炼厂。

RMAP: Responsible Minerals Assurance Process, third - party audited conformant smelter/refiner list published by RMI, used by company to cross-check smelter data submitted by suppliers.

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The following list represents the RMI's latest smelter name / alias information. The presence of a smelter here is NOT a guarantee that it is currently Active or Conformant within the Responsible Minerals Assurance Process.

Please refer to the RMI [active](#) and [conformant](#) lists for the most current and accurate list of standard smelter names that are Active or Conformant.

CMRT Standard Smelter List

Gold	Dowa Kogyo K.k.	Dowa	JAPAN	CD0000401	Kosaka-machi, Kazu-gun	Akita
Gold	Dowa Metalline Co. Ltd.	Dowa	JAPAN	CD0000401	Kosaka-machi, Kazu-gun	Akita
Gold	Dowa Metals & Mining Co. Ltd.	Dowa	JAPAN	CD0000401	Kosaka-machi, Kazu-gun	Akita
Gold	DSC (Do Sung Corporation)	Do Sung Corporation (DSC)	KOREA, REPUBLIC OF	CD0000359	Gampo	Gyeonggi-do
Gold	Eco-System Recycling Co., Ltd. East Plant	Eco-System Recycling Co., Ltd. East Plant	JAPAN	CD0000425	Hirajo	Saitama
Gold	Eco-System Recycling Co., Ltd. North Plant	Eco-System Recycling Co., Ltd. North Plant	JAPAN	CD0000424	Kazuno	Akita
Gold	Eco-System Recycling Co., Ltd. West Plant	Eco-System Recycling Co., Ltd. West Plant	JAPAN	CD0000425	Okayama	Okayama
Gold	Ekaterinburg	JSC Ekaterinburg Non-Ferrous Metal Processing Plant	RUSSIAN FEDERATION	CD0000927	Vorzhnyaya Pyshma oblast	Sverdlovskaya oblast
Gold	Elite IndusTech Co., Ltd.	Elite IndusTech Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CD0004755	Kaohsiung City	Kaohsiung

The next version of the CMRT is anticipated to be released in the Spring of 2027.

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Assurance Process Links

- [RMI Assessments Introduction](#)
- [RMI Assessment Documents & Tools](#)
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- [Facilities Lists](#)
 - [RMI Eligible Facilities List](#)
 - [RMI Public List](#)
 - [Conformant/Active/Eligible by Metal](#)
 - [Export - Smelter Reference Lists](#)
- [Extended Corrective Action Plan](#)

5、职责 Responsibilities

5.1 Sourcing（采购开发）

依据材料采购需求选择合适的供应商,供应商送样承认时负责对新增原材料是否含有冲突矿产进行初步的评估。

Sourcing: Select appropriate suppliers in accordance with material procurement requirements, and conduct a preliminary assessment on whether newly added raw materials contain conflict minerals when suppliers submit samples for approval.

5.2 品管部

响应 EICC 和 GeSI（全球电子可持续发展倡议）联合工作组的承诺改善电子供应链的条件，不接受可以助长冲突的采矿活动，及《多德 - 弗兰克保护法》条例要求披露及报告有关产品内所使用的锡，钽（钨钽铁矿），金，钨的情况及其来源。

Quality Department: In response to the commitment of the joint working group of EICC and GeSI (Global e-Sustainability Initiative) to improve conditions in the electronics supply chain, we do not accept mining activities that may fuel conflicts. In addition, in accordance with the provisions of the Dodd-Frank Act, we are required to disclose and report on the use and sources of tin, tantalum (coltan), gold, and tungsten contained in the products.

5.3 采购部 Purchasing Dept.

每年对现有供应商供应物料进行是否使用冲突矿产及冲突矿产来源的调查。

Purchasing Dept.: Conduct an annual investigation into whether the materials supplied by existing vendors involve conflict minerals and the sources of such conflict minerals.

6、作业流程 Work instruction

6.1 新供应商导入 New supplier introduction

6.1.1 研发部输出产品物料规格需求给到 Sourcing, Sourcing 寻找合适供应商送样承认。默认所有物料禁止使用来自 CAHRA 的冲突矿产。

Based on product requirements, Engineering Department releases material specification requirements to

Sourcing for supplier sourcing and sample submission. By default, all materials shall avoid conflict minerals from CAHRA.

6.1.2 Sourcing 选择供应商, 要求供应商送样; 涉及新增原材料, 必须同步下发: FM10-06-A 《Non-use conflict minerals compliance》、CMRT 6.6、EMRT 2.11 调查表, 要求供应商完成上游多级供应链调查并签署承诺。

Sourcing selects qualified suppliers and requests sample submission. For new raw-material projects, Sourcing shall distribute FM10-06-A commitment form, CMRT 6.6 and EMRT 2.11 templates to suppliers, requiring multi-tier upstream supply-chain investigation and signed commitment.

6.1.3 供应商必须样品交样前完成调查表填写并回传; Sourcing 核对资料完整性, 比对 RMAP 冶炼厂清单, 判定物料冲突矿产合规状态。

Suppliers shall complete and return all questionnaires BEFORE sample delivery. Sourcing checks document completeness, cross-check with RMAP smelter list and judge compliance status.

6.1.4 调查结果判定为符合无冲突金属要求: Sourcing 将全部资料移交采购部归档保存。

If investigation result meets conflict-free requirements: Sourcing forwards full documents to Purchasing for filing.

6.1.5 调查识别存在来自 CAHRA 冲突矿产风险:

要求供应商提交书面原因解析, 立即停止该物料采购; 供应商需要重新溯源矿产来源, 提供有效证据证明新供应链符合无冲突要求, 并提交改善预防措施计划。未完成整改前不得导入为合格物料。

If CAHRA conflict-minerals risk is identified: Require supplier to submit written explanation, suspend procurement of this material immediately. Supplier shall re-trace mineral sources, provide valid evidence for compliant supply chain and submit corrective & preventive action plan. Material cannot be approved until rectification is completed.

6.2 合格供应商定期调查 Regular investigation of Qualified Suppliers

6.2.1 每年第一季度启动年度冲突矿产调查, 向合格供应商收集 FM10-06-A 承诺书、CMRT 6.6(官网最新版本)、EMRT 2.11(官网最新版本);

禁止接收旧版本 CMRT/EMRT。

Annual conflict-minerals investigation shall be launched in Q1 every year. Collect FM10-06-A commitment, CMRT 6.6 and EMRT 2.11 from qualified suppliers(Latest version of the official website). Obsolete template versions shall not be accepted.

6.2.2 当客户标准及相关标准都有变更的情况下, 采购部对应窗口人员确认内容后修订 《无冲突金属调查表》和《FM10-06-A Non-use conflict minerals compliance》, 并重新对供应商进行调查及合约的签署。

When both customer standards and relevant standards are changed, the corresponding contact person of the Procurement Department shall revise the Conflict-Free Metals Questionnaire and FM10-06-A Non-use conflict minerals compliance after confirming the contents, and conduct new investigations with suppliers and sign contracts accordingly.

7、惩罚措施 Punishment Measures

7.1 冲突矿产事项经过两次正式书面沟通仍无响应的供应商, 启动升级程序, 通知 Sourcing 负责人; 暂停该供应商新项目报价、新样品承认, 直至完成全部调查并满足合规要求。

For suppliers with no response after two formal written communications on conflict-minerals issues, trigger escalation procedure and notify Sourcing lead. Suspend new-project quotation and new-sample approval for such suppliers until full investigation is completed and compliance requirements are satisfied.

7.2 调查确认物料使用 CAHRA 冲突矿产: 要求供应商提交书面解析, 立即停止采购该物料; 供应商必须重新选择合规矿产来源, 提供有效证明材料, 提交改善预防措施。整改仍无法达标的, 启动限制订单直至取消合格供应商资格。

If CAHRA conflict-minerals usage is confirmed in materials: Require supplier to provide written explanation and suspend procurement of such material immediately. Supplier must switch to compliant mineral sources, provide valid supporting evidence and submit CAP. If rectification fails, restrict order volume or disqualify the supplier.

8、投诉渠道 Complaint channel

允许员工、供应商、第三方机构等对冲突矿产调查进行投诉, 对于进行善意投诉的个人, 公司不允许进行任何形式的打击报复或骚扰。但是, 恶意投诉或被证实为虚假投诉的, 则将会对举报人采取纪律处分, 投诉网址: <http://www.clearviewconnects.com>

Employees, suppliers, third-party institutions and other parties shall be permitted to file complaints regarding conflict minerals investigations. The company shall not engage in any form of retaliation or harassment against individuals who file complaints in good faith. However, disciplinary action will be taken against whistleblowers who submit malicious complaints or complaints proven to be false. Complaint website: <http://www.clearviewconnects.com>

9、相关文件 Relevant Documents

FM10-06-A Non-use conflict minerals compliance (供应商承诺书)

CMRT 6.6 Conflict Minerals Reporting Template (Latest version of the official website)

EMRT 2.11 Extended Minerals Reporting Template (Latest version of the official website)

RMI RMAP 合格冶炼厂清单 (RMI 官网下载)

10.修改记录 Revision Record

Date	Version	Page	Content
2022-11-29	A	3	New WI
2025-7-8	B	3	Update 4.4, Export path of the questionnaire
2026-4-22	C	8	Update 4.4 Export Full conformant Smelter list
2026-8-21	D	1-6	Update definition based on latest policy

11.批准纪录 Approval record

Established by: Emily
SC purchasing Spuv.

2026.8.26
Date:

Approved by: Vanessa
PMC & Material Control Manager

2026.8.26
Date:

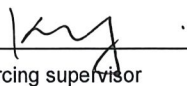
GALTRONICS

Document No: WI-SC-41 Rev: D
Document Name: 冲突矿产政策管理程序
Conflict Minerals Management Procedures

Standard Operating Procedure

Issuing date: 2026-8-21
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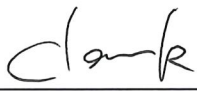
Approved by:


Sourcing supervisor

2026.8.26

Date:

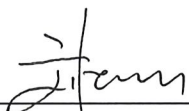
Approved by:


QA Manager

2026.8.26

Date:

Approved by:


GM

2026.8.26

Date: