

### Mica Supply Chain Responsible Management Policy

Recognizing the potential significant adverse impacts associated with engaging in mineral resource extraction, trading, processing, and export activities in "conflict-affected and high-risk areas," and acknowledging our obligation to respect human rights, refrain from contributing to conflicts, and avoid adverse impacts on the environment and society, Goode EIS (Suzhou) Co., Ltd. commits to adopting and widely disseminating the content of the OECD Guidelines on Responsible Supply Chain Due Diligence for Minerals from Conflict-affected and High-risk Regions, including the 5 steps framework outlined in Appendices 1, as part of a comprehensive due diligence policy. This policy will be incorporated into contracts and agreements with suppliers, serving as a reference for conflict-sensitive procurement activities and encouraging suppliers to raise awareness of risks throughout the entire mineral supply chain. We commit to refraining from engaging in any activities that would fund conflicts, adhering to relevant United Nations sanctions resolutions, or, where applicable, complying with domestic laws enforcing such resolutions. The materials covered by this policy include: mica and mica-containing materials.

This policy applies to Goode and our mica supply chain suppliers.

## Chapter 1: Risks Related to Human Rights and Risk Mitigation Strategies

# Article 1: Risk of Serious Infringement Related to Mineral Mining, Transportation, or Trade

When conducting procurement or business activities in conflict-affected and high-risk areas, we will neither tolerate nor in any way profit from, assist, facilitate, or enable any party involved in:

- 1. Any form of torture, cruel, inhuman, or degrading treatment;
- 2. Any form of forced or compulsory labor. Forced or compulsory labor refers to



any work or service extracted under the threat of punishment, which is not voluntarily provided by the individual;

- 3. The worst forms of child labor;
- 4. Other serious violations and abuses of human rights, such as widespread sexual violence;
- 5. War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

### **Article 2: Risks of Child Labor**

When conducting procurement or business activities in conflict-affected and high-risk areas, we will not hire, profit from, assist, or facilitate the employment of children below the minimum working age set by the host country's laws or regulations, nor engage in transactions with entities employing such children or associated with them. If there are no relevant laws or regulations in the host country, the minimum working age is set at 16 years old.

### **Article 3: Risk Mitigation Strategies Related to Human Rights**

If we have reasonable grounds to believe that such risks exist, meaning that upstream suppliers are procuring from or associated with any party engaged in the aforementioned serious violations, we will immediately suspend or terminate our cooperation with such suppliers.

### Chapter 2: Risks Related to Conflict and Risk Mitigation Strategies

## Article 1: Risks Related to Direct or Indirect Support for Non-state Armed Groups

We will not tolerate any direct or indirect support provided to non-state armed groups through mineral extraction, transportation, trade, processing, or export. Providing "direct or indirect support" to non-state armed groups through mineral extraction, transportation, trade, processing, or export includes, but is not limited to,



purchasing minerals from non-state armed groups or their affiliates, making payments to them, or providing logistical support or equipment in other ways.

These armed groups or their affiliates may engage in the following violations:

- 1. Illegally controlling mining sites or otherwise controlling transportation routes, mineral trading points, and upstream actors in the supply chain.
- 2. Illegally taxing or extorting money or minerals at mining site entrances, along transportation routes, or at mineral trading points.
- 3. Illegally taxing or extorting intermediaries, export companies, or international traders.

## Article 2: Risk Environment Strategies that Directly or Indirectly Support Non-state Armed Groups

If we have reason to believe that upstream suppliers are procuring from or associated with any party providing direct or indirect support to non-state armed groups, we will immediately suspend or terminate our cooperation with such suppliers.

### Article 3: Risks Related to Public or Private Security Armed Forces

We strictly prohibit providing direct or indirect support to public or private security forces illegally controlling mining sites, transportation routes, or upstream actors in the supply chain, engaging in illegal taxation or extortion of money or minerals at mining site entrances, along transportation routes, or at mineral trading points, or engaging in illegal taxation or extortion of intermediaries, export companies, or international traders.

We recognize that the role of public or private security forces in or around mining sites or along transportation routes is solely to uphold the rule of law, including safeguarding human rights, protecting miners, equipment, and facilities, and ensuring that lawful mining and trade are not disrupted.

In cases where we or any enterprise in our supply chain enters into contracts with public or private security forces, we commit to or shall stipulate that such security



forces must adhere to internationally recognized standards and guidance documents for the handling of public or private security forces. In particular, we will support or take measures to implement screening policies to ensure that individuals or security force units known to have perpetrated serious human rights violations are not hired.

We will support or take measures to collaborate with central or local governments, international organizations, and civil society organizations to find feasible solutions for improving the transparency, proportionality, and accountability of public security force security expenses.

We will support or take measures to engage with local governments, international organizations, and civil society organizations to avoid or minimize the negative impacts of public or private security forces stationed at mining sites, especially on vulnerable groups, particularly artisanal miners.

### Article 4: Risk Mitigation Strategies for Public or Private Security Armed Forces

If we have reasonable grounds to believe that such risks exist within the supply chain, we will, depending on the specific position of the enterprise in the supply chain, immediately develop, adopt, and implement risk management plans for upstream suppliers and other stakeholders to contain or mitigate the risk. If the risk management plan fails to take effect within six months, we will temporarily suspend or terminate cooperation with upstream suppliers.

# Chapter 3: Risks Related to Governance and Risk Mitigation Strategies

# Article 1: Risks of Bribery, Corruption, and Fraudulent Misrepresentation of Mineral Origins

We will not offer, promise, give, or solicit any bribes, and we resist temptation. We will not engage in bribery to cover up or falsify the origin of minerals or to bribe



government officials for taxes, fees, and royalties due on mineral extraction, trade, processing, transportation, export, or other activities.

### **Article 2: Risks of Money Laundering**

If we have reason to believe that there are money laundering risks associated with minerals obtained through illegal taxation or extortion at mining site entrances, along transportation routes, or at mineral trading points by mining, trade, processing, transportation, or export, we will support or take measures to contribute to the effective elimination of money laundering activities.

## Article 3: Risks Related to Taxes, Fees, and Franchise Fees Paid to the Government

We will ensure the payment of all legal taxes, fees, and licensing fees related to mining, trade, and export of minerals in conflict affected and high-risk areas to the government, and promise to disclose such payments in accordance with the requirements of the country where the enterprise is located in the supply chain and the disclosure of tax information paid to government departments.

### **Article 4: Risk Mitigation Strategies Related to Governance**

Based on the specific location of the enterprise in the supply chain, we promise to cooperate with suppliers, central or local government agencies, international organizations, civil society, and affected third parties as appropriate, with the aim of taking significant measures to prevent or reduce risks with negative impacts within a reasonable time span, to improve or track performance. If the risk reduction measures are not effective, we will temporarily suspend or terminate our cooperation with upstream suppliers. Enterprises should conduct additional risk assessments for the risks that need to be reduced after adopting a risk management plan. If the risk management plan fails to achieve significant results within six months, and the risks of bribery, bribery, fraudulent misrepresentation of mineral production areas, money laundering, and payment of taxes, fees, franchise fees to the government are not



curbed or reduced, the enterprise should temporarily suspend or interrupt cooperation with suppliers for at least three months, and revise the risk management plan while temporarily suspending cooperation, Clarify the performance goals that should be achieved in the improvement work before the resumption of trade relations.

## Chapter 4: Risks and Environmental Strategies Related to Environmental Protection and Occupational Health and Safety

#### **Article 1: Environmental Protection**

When purchasing or producing in conflict affected and high-risk areas, we will not benefit, assist, or facilitate any party that causes significant adverse effects on the surrounding soil, air, and water conditions, seriously violates local laws and regulations, or purchases from or is associated with them.

### **Article 2: Occupational Health**

When conducting procurement or production in conflict affected and high-risk areas, we will not benefit, assist, or facilitate any party who provides an occupational health and safety environment that affects the physical and mental health of miners, direct and indirect employees, and/or any personnel on their production sites, or procure from or be associated with such party.

### **Article 3: Risk Mitigation Strategies**

If we have reasonable grounds to believe that the above risks exist in the supply chain, we will immediately develop, adopt, and implement risk management plans for upstream suppliers and other stakeholders, in order to curb or reduce the risks. If the risk management plan is not effective after six months of implementation, we will temporarily suspend or terminate our cooperation with upstream suppliers.









**Chapter 5: Appeal Channels** 

Any internal and external stakeholders may provide opinions, suggestions, or

appeals regarding human rights violations, conflicts, governance, environmental

protection, and occupational health and safety issues related to the extraction, trade,

processing, and export of mica covered by this policy in the company's products.

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December 30, 2023

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