

**InnoLight  
Technology**

**Conflict Minerals  
Report 2024**

December 2024

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## **1. Company Profile**

InnoLight Technology is a leading provider of high-speed optical interconnect solutions who specializes in optical modules and optical devices. Our products cater to various industries such as cloud computing data centers, wireless networks, and telecommunications, which allows for more efficient data transmission in the era of intelligent connectivity.

We are dedicated to respecting both human rights and the environment. To that end, we adhere to all relevant international conventions and standards, including the United Nations Global Compact. Our goal is to ensure that all materials used in our products are responsibly sourced and also take into account both social and environmental impacts. We maintain a zero-tolerance policy towards any involvement in activities that contribute to environmental degradation or human rights violations, especially those associated with conflict minerals. InnoLight Technology is committed to working closely with suppliers, industry peers, associations, and global authorities to address the challenges posed by conflict minerals.

## **2. Glossary**

RCOI - Reasonable Country of Origin Inquiry (investigation/inquiry)

3TG - Tin, Tantalum, Tungsten, and Gold

Co - Cobalt

DRC - Democratic Republic of the Congo

CC - Covered Countries (also referred to as countries neighboring the DRC)

SORs - Smelters or Refineries

CMRT - Conflict Minerals Reporting Template

EMRT - Extended Minerals Reporting Template

OECD - Organisation for Economic Co-operation and Development

RMAP - Responsible Minerals Assurance Process

RMI - Responsible Minerals Initiative

LBMA - London Bullion Market Association

RJC - Responsible Jewellery Council

RBA - Responsible Business Alliance

DDMS - Due Diligence Management System

SEC - United States Securities and Exchange Commission

GeSI - Global enabling Sustainability Initiative

ESG - Environmental, Social, and Governance

MSCI - Morgan Stanley Capital International

CAPs - Corrective Action Plans

CCCMC - China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters

CAICT - China Academy of Information and Communications Technology

RBI - Responsible Battery Initiative

RCI - Responsible Critical Mineral Initiative

### **3. Reasonable Country of Origin Inquiry (RCOI)**

Through material content analysis, we identified trace amounts of six different minerals (Tin, Tantalum, Tungsten, Gold, Cobalt, and Mica) in various components of our products. As a result, InnoLight Technology conducted a Reasonable Country of Origin Inquiry (RCOI) to determine whether these minerals originated from the Democratic Republic of the Congo (DRC) or other surrounding conflict-affected regions. One of the primary tools used for this inquiry was the Conflict Minerals Reporting Template (CMRT)/Extended Minerals Reporting Template (EMRT) developed by the Responsible Minerals Initiative (RMI). The lists of SORs collected through the Conflict Minerals Reporting Template (CMRT)/Extended Minerals Reporting Template (EMRT) was cross-checked against those certified as compliant by Responsible Minerals Initiative (RMI)/London Bullion Market Association (LBMA) to verify whether they are validated as conflict-free.

If the country of origin cannot be confirmed through these methods, InnoLight Technology do its due diligence and, amongst other actions, reach out directly to smelters or refineries (SORs) and utilize additional evaluation tools. Detailed results of the Reasonable Country of Origin Inquiry (RCOI) can be found in the *InnoLight Technology 2024 List of Countries of Origin and Smelters or Refineries (SORs)* section of this report.

### **4. Due Diligence**

InnoLight Technology has designed and developed a conflict mineral due diligence program to monitor and identify risks related to conflict minerals, thereby helping us avoid or at least mitigate involvement in conflicts related to responsible sourcing. We support and recognize smelters or refineries (SORs) that are certified under the Responsible Minerals Assurance Process (RMAP). Our conflict mineral due diligence efforts are based on the internationally recognized *Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (the "OECD Due Diligence Guidance"), which ensures accuracy and compliance. InnoLight Technology is committed to implementing the most accurate and thorough procedures for conflict mineral due diligence.

An overview of InnoLight Technology's Conflict Mineral Due Diligence Framework is as follows:

#### **1) Establishing a management system**

- ▷ We have created and publicly disclosed a formal Conflict Minerals Policy, which can be found on our website at:  
<https://www.zj-innolight.com/index/index/responsibility.html>
- ▷ We also have a *Supplier Social Responsibility Management Procedure* that supports the implementation of our Conflict Minerals Policy. This Procedure defines the roles and

responsibilities of all departments involved in managing conflict minerals and outlines the procurement requirements and the steps to engage in due diligence for conflict mineral suppliers.

- ▷ Internally, we have set up a transparent and controlled supply chain system that enables us to identify smelters or refineries (SORs) involved in conflict minerals. First, we follow the Responsible Business Alliance (RBA)'s Responsible Minerals Initiative (RMI) program and conduct a Reasonable Country of Origin Inquiry (RCOI) to identify smelters or refineries (SORs). Second, we perform an annual conflict minerals survey using the Conflict Minerals Reporting Template (CMRT), which is a primary tool for identifying smelters or refineries (SORs) within our supply chain and assessing the risks associated with Tin, Tantalum, Tungsten, and Gold (3TG) minerals. Finally, after gathering smelters or refineries (SORs) data from our supply chain, we use the Responsible Minerals Initiative (RMI)'s Responsible Minerals Assurance Process (RMAP) to preliminarily assess whether these smelters or refineries (SORs) are Responsible Minerals Assurance Process (RMAP)-compliant.
- ▷ We are continually enhancing our comprehensive supply chain management system by maintaining high standards for supplier management. Our *Supplier Social Responsibility Management Procedure* and *New Supplier Evaluation Procedure* establishes a comprehensive supplier screening system. It focuses on areas such as labor rights, occupational health and safety, business ethics, and environmental protection. These procedures define the mechanisms for supplier selection, onboarding, evaluation, and the management and resolution of violations. In addition, we require all suppliers to sign the *Procurement Agreement*, *Supplier Corporate Social Responsibility Agreements* well as the *Conflict-free Minerals Declaration* to ensure full compliance with our standards and regulations. Our conflict minerals requirements are explicitly stated in both procurement orders and specifications.
- ▷ We have obtained the Responsible Business Alliance (RBA)'s certification to demonstrate our commitment to responsible mineral sourcing and due diligence practices.
- ▷ We have developed long-term partnerships with the majority of our suppliers to enhance their regulatory compliance.
- ▷ In accordance with the Responsible Business Alliance (RBA)'s requirements, we have established our conflict minerals policy and incorporated its provisions into our *Procurement Agreement*.
- ▷ We actively engage with the Responsible Minerals Initiative (RMI) and utilize its tools and guidance to mitigate the risks related to responsible

sourcing.

## **2) Supply chain risk identification and assessment**

InnoLight Technology conducts annual due diligence on conflict minerals using both the Conflict Minerals Reporting Template (CMRT)/Extended Minerals Reporting Template (EMRT) and Supplier Conflict Minerals Management Survey. We require our direct suppliers to provide information on the smelters or refineries (SORs) they source from and also to disclose their conflict minerals management practices. The scope of the direct suppliers participating in the survey is determined by the supply chain and quality departments.

Upon receiving feedback, we consolidate suppliers' responses based on the types of conflict minerals used (i.e. Tin, Tantalum, Tungsten, and Gold (3TG)/Cobalt (Co)/Mica). After this, we compare the results with known lists of smelters or refineries (SORs) from the Responsible Minerals Assurance Process (RMAP) and other external sources to verify whether the smelters or refineries (SORs) or countries of origin have any link to conflict mineral

Given the complex risks involved in ensuring a conflict-free supply chain as well as the challenges downstream companies face in tracing the origins of refined mineral ores (as noted in the OECD Due Diligence Guidance), our goal is to use standardized industry programs to identify smelters or refineries (SORs) in the supply chain and, wherever possible, verify the origins of conflict minerals.

The main risks identified in this process include:

- ▷ Are the smelters or refineries (SORs) located in the Democratic Republic of the Congo (DRC) or surrounding countries?
- ▷ Do the smelters or refineries (SORs) source minerals from the covered countries?
- ▷ Is the information provided by the smelters or refineries (SORs) and throughout the supply chain sufficiently accurate?
- ▷ Does the communication with suppliers (via email, phone, online surveys, or site visits) adequately ensure that there are no conflict-related issues?
- ▷ Given the global nature of the supply chain, how do the locations of smelters or refineries (SORs) relate to their risks?
- ▷ Even if we identify the smelters or refineries (SORs) in our supply chain, can we confirm whether our products actually contain these minerals?



We consistently follow up with suppliers who have not responded and review the completeness and accuracy of their responses. If a supplier's response is found to be either incomplete or inaccurate, we provide feedback and ask that prompt corrective actions be taken.

### **3) Addressing identified risks**

Our ultimate goal in addressing and mitigating the risks of conflict minerals is to fully understand the smelters or refineries (SORs) involved in the products of our direct suppliers, regardless of whether these minerals are present in the products themselves. We require full compliance with these standards, and any supplier found to be in non-compliance will have their business relationship with us terminated. To achieve this goal, we will implement the following actions:

- ▷ SORs Certification
- ▷ We will continue to utilize the Responsible Minerals Assurance Process (RMAP) and exclusively engage with smelters or refineries (SORs) that meet the required standards. In addition, we will proactively conduct audits of smelters or refineries (SORs) that have not yet been audited.
- ▷ Suspension of smelters or refineries (SORs)
  - We will suspend relationships with smelters or refineries (SORs) that fail to meet the required standards and refuse to undergo any form of audit or certification. Although removing unaudited and uncertified smelters or refineries (SORs) from the supply chain presents significant challenges, we remain committed to this long-term effort. Should a supplier fail to cooperate or, after corrective actions, still not meet our requirements, necessary penalties will be enforced, potentially leading to termination of the business relationship. In 2024, InnoLight Technology did not discontinue cooperation with any suppliers over conflict mineral issues.
- ▷ Internal Reporting
  - We will initiate and complete the annual conflict minerals reporting template survey.
- ▷ External Reporting
  - We will continue to uphold our *Conflict Minerals Policy*.
  - We will do our due diligence in line with customer or stakeholder requirements.
- ▷ OECD Due Diligence Guidance
  - We will continue to adhere to the recommendations outlined in the OECD Due Diligence Guidance.

### **4) Independent third-party certification for supply chain due diligence**

Although we do not have direct relationships with upstream smelters or refineries



(SORs), we recognize the importance of third-party conflict-free certifications at the SOR level for downstream companies. Therefore, we require all of InnoLight Technology's direct suppliers to provide a detailed list of upstream smelters or refineries (SORs) that have been identified through supply chain due diligence. This list will subsequently be cross-referenced with smelters or refineries (SORs) data from the Responsible Minerals Assurance Process (RMAP) or other recognized external organizations to ensure that they have been verified as conflict-free.

### **5) Supply chain due diligence reporting**

Based on our good faith efforts and the Reasonable Country of Origin Inquiry (RCOI), we have reason to believe that any potential conflict minerals originate from the Democratic Republic of the Congo (DRC) or Covered Countries (CC). We have conducted the Due Diligence (DD) on the potential sources of conflict minerals in our products and created the Conflict Minerals Reporting Template (CMRT) accordingly. Furthermore, we have carried out the Reasonable Country of Origin Inquiry (RCOI) for all direct suppliers, with all suppliers confirmed to be 100% conflict-free. We believe that disclosing all smelters or refineries (SORs) in the supply chain is essential to upholding our corporate social responsibility. Regardless of whether they supply refined metals for our products, these smelters or refineries (SORs) shall undergo further due diligence as necessary.

InnoLight Technology provides an annual disclosure of updates to its supply chain due diligence policies and progress. In addition to this report, a list of all verified smelters or refineries (SORs), along with their third-party certification status, is available to business partners and investors upon request.

### **5. Key Indicators for Smelters or Refineries (SORs)**

Through conducting the Reasonable Country of Origin Inquiry (RCOI) and Due Diligence (DD) with our suppliers, we have identified the SORs within our direct supply chain to the best of our ability and determined the number of suppliers that comply with conflict mineral management requirements.

Below are the key statistics gathered from the Reasonable Country of Origin Inquiry (RCOI) and Due Diligence (DD) processes conducted with our suppliers in 2024:

<b>Metal</b>	<b>Total SOR</b>	<b>Conformant</b>	<b>Active</b>	<b>Non-Compliant</b>	<b>%Conformant</b>
Tantalum	34	34	0	0	100%
Tin	47	47	0	0	100%
Gold	86	86	0	0	100%
Tungsten	34	34	0	0	100%
Cobalt	46	46	0	0	100%





Mica	3	3	0	0	100%
Overall	253	253	0	0	100%

### Key Statistics

- ▷ Number of suppliers surveyed using the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT): 117
- ▷ Supplier Conflict Minerals Reporting Template (CMRT) response rate: 100%
- ▷ Supplier Extended Minerals Reporting Template (EMRT) response rate: 100%
- ▷ Number of suppliers with non-compliant/invalid smelters or refineries (SORs): 0
- ▷ Data will be periodically updated as required by the Responsible Business Alliance (RBA) Code of Conduct for reporting purposes.

### 6. List of Countries of Origin and Smelters or Refineries (SORs)

The Dodd-Frank Act mandates that downstream companies make reasonable efforts to determine the origin or location of conflict minerals. However, the Dodd-Frank Act also acknowledges the Organisation for Economic Co-operation and Development (OECD) guidelines, which recognize that downstream companies may face limitations in determining the exact origin or location of conflict minerals. Therefore, we will take the following steps to identify the origin of conflict minerals:

- ▷ We identify smelters or refineries (SORs) and their locations using the Conflict Minerals Reporting Template (CMRT) within our supply chain
- ▷ The Conflict Minerals Reporting Template (CMRT) provides the names and locations of the mines
- ▷ We validate the smelters or refineries (SORs) through the Responsible Minerals Initiative (RMI), which provides a list of certified, legitimate smelters or refineries (SORs)

It is important to note that the smelters or refineries (SORs) listed may not necessarily be involved in our products. Regardless of whether these smelters or refineries (SORs) are part of our supply chain, our goal is to encourage Due Diligence (DD) within the supply chain to ensure that the smelters or refineries (SORs) linked to our products are in compliance with conflict-free mineral requirements.

The list provided is for reference only and includes, but is not limited to, the information disclosed. Any inaccuracies or omissions in the list are not the responsibility of InnoLight Technology. It is widely recognized within the industry that obtaining an accurate list is a challenging, complex, and dynamic process. The decision to use all or



part of the information in this list is solely at the user's discretion and is their own responsibility. InnoLight Technology hereby disclaims any representations or warranties of any kind, whether express, implied, or arising from trade, custom, or practice, with respect to the list.

To the fullest extent permitted by applicable law, InnoLight Technology shall not be held liable for any loss, cost, or damage arising from the use of the list, including but not limited to special, incidental, punitive, direct, indirect, or consequential damages, or any loss of revenue or profits resulting from its use.

By accessing and using this list, the user agrees to indemnify and hold InnoLight Technology and its affiliates (including, but not limited to, directors, agents, employees, volunteers, representatives, contractors, successors, and assigns) free from harm of any claims, lawsuits, losses, damages, judgments, taxes, or enforcement liabilities arising from or in connection with the list, or any litigation or claims related to its use. If any provision of these terms and conditions is found to be invalid or unenforceable under applicable law, it will only affect that specific provision. The validity and enforceability of the remaining provisions and the rest of this document will remain unaffected.

By accessing and using the list, the user agrees to the terms outlined above.

The following is the list of Tin, Tantalum, Tungsten, and Gold (3TG) smelters or refineries (SORs) collected through the Reasonable Country of Origin Inquiry (RCOI) and Due Diligence (DD) with suppliers in 2024:

<b>Metal</b>	<b>Smelter</b>	<b>Country</b>	<b>Identification</b>
Gold	Tokuriki Honten Co., Ltd.	JAPAN	CID001938
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN	CID001875
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN	CID001798
Gold	Nihon Material Co., Ltd.	JAPAN	CID001259
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001193
Gold	Mitsubishi Materials Corporation	JAPAN	CID001188
Gold	Matsuda Sangyo Co., Ltd.	JAPAN	CID001119
Gold	Kojima Chemicals Co., Ltd.	JAPAN	CID000981
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN	CID000937
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN	CID000807
Gold	Dowa	JAPAN	CID000401
Gold	Asahi Pretec Corp.	JAPAN	CID000082
Gold	Aida Chemical Industries Co., Ltd.	JAPAN	CID000019
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA	CID001993
Gold	Heraeus Metals Hong Kong Ltd.	CHINA	CID000707
Gold	CCR Refinery - Glencore Canada Corporation	CANADA	CID000185
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA	CID000920
Gold	Asahi Refining Canada Ltd.	CANADA	CID000924
Gold	Argor-Heraeus S.A.	SWITZERLAND	CID000077
Gold	Metal Concentrators SA (Pty) Ltd.	SOUTH AFRICA	CID003575
Gold	Eco-System Recycling Co., Ltd. West Plant	JAPAN	CID003425
Gold	Eco-System Recycling Co., Ltd. North Plant	JAPAN	CID003424
Gold	NH Recytech Company	KOREA, REPUBLIC OF	CID003189
Gold	Planta Recuperadora de Metales SpA	CHILE	CID002919
Gold	SungEel HiMetal Co., Ltd.	KOREA, REPUBLIC OF	CID002918
Gold	Italpreziosi	ITALY	CID002765
Gold	Abington Reldan Metals, LLC	UNITED STATES OF AMERICA	CID002708
Gold	TOO Tau-Ken-Altyn	KAZAKHSTAN	CID002615
Gold	REMONDIS PMR B.V.	NETHERLANDS	CID002582
Gold	KGHM Polska Miedz Spolka Akcyjna	POLAND	CID002511
Gold	MMTC-PAMP India Pvt., Ltd.	INDIA	CID002509
Gold	SAFINA A.S.	CZECHIA	CID002290
Gold	Yokohama Metal Co., Ltd.	JAPAN	CID002129
Gold	Yamakin Co., Ltd.	JAPAN	CID002100

Gold	Sichuan Tianze Precious Metals Co., Ltd.	CHINA	CID001736
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN	CID001585
Gold	PX Precinox S.A.	SWITZERLAND	CID001498
Gold	PT Aneka Tambang (Persero) Tbk	INDONESIA	CID001397
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN	CID001325
Gold	Navoi Mining and Metallurgical Combinat	UZBEKISTAN	CID001236
Gold	Nadir Metal Rafineri San. Ve Tic. A.S.	TURKEY	CID001220
Gold	Kazzinc	KAZAKHSTAN	CID000957
Gold	Jiangxi Copper Co., Ltd.	CHINA	CID000855
Gold	Japan Mint	JAPAN	CID000823
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA	CID000801
Gold	LT Metal Ltd.	KOREA, REPUBLIC OF	CID000689
Gold	DSC (Do Sung Corporation)	KOREA, REPUBLIC OF	CID000359
Gold	Chugai Mining	JAPAN	CID000264
Gold	Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	PHILIPPINES	CID000128
Gold	Almalyk Mining and Metallurgical Complex (AMMC)	UZBEKISTAN	CID000041
Gold	Valcambi S.A.	SWITZERLAND	CID002003
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA	CID002030
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA	CID001761
Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA	CID001512
Gold	MKS PAMP SA	SWITZERLAND	CID001352
Gold	Materion	UNITED STATES OF AMERICA	CID001113
Gold	LS MnM Inc.	KOREA, REPUBLIC OF	CID001078
Gold	Istanbul Gold Refinery	TURKEY	CID000814
Gold	Heimerle + Meule GmbH	GERMANY	CID000694
Gold	Eco-System Recycling Co., Ltd. East Plant	JAPAN	CID000425
Gold	C. Hafner GmbH + Co. KG	GERMANY	CID000176
Gold	Boliden Ronnskar	SWEDEN	CID000157
Gold	Aurubis AG	GERMANY	CID000113
Gold	Asaka Riken Co., Ltd.	JAPAN	CID000090
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL	CID000058
Gold	Agosi AG	GERMANY	CID000035
Gold	WIELAND Edelmetalle GmbH	GERMANY	CID002778
Gold	Korea Zinc Co., Ltd.	KOREA, REPUBLIC OF	CID002605
Gold	T.C.A S.p.A	ITALY	CID002580

Gold	Zhongyuan Gold Smelter of Zhongjin Gold Corporation	CHINA	CID002224
Gold	Royal Canadian Mint	CANADA	CID001534
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO	CID001161
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA	CID001157
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE	CID001152
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA	CID001149
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA	CID001147
Gold	Kennecott Utah Copper LLC	UNITED STATES OF AMERICA	CID000969
Gold	Chimet S.p.A.	ITALY	CID000233
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM	CID001980
Gold	Metalor Technologies S.A.	SWITZERLAND	CID001153
Gold	Heraeus Germany GmbH Co. KG	GERMANY	CID000711
Gold	Advanced Chemical Company	UNITED STATES OF AMERICA	CID000015
Gold	Gold by Gold Colombia	COLOMBIA	CID003641
Gold	GG Refinery Ltd.	TANZANIA, UNITED REPUBLIC OF	CID004506
Gold	Coimpa Industrial LTDA	BRAZIL	CID004010
Gold	WEEEREFINING	FRANCE	CID003615
Tin	Aurubis Beerse	BELGIUM	CID002773
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA	CID002180
Tin	Yunnan Chengfeng Non-ferrous Metals Co., Ltd.	CHINA	CID002158
Tin	Thaisarco	THAILAND	CID001898
Tin	PT Timah Tbk Mentok	INDONESIA	CID001482
Tin	PT Timah Tbk Kundur	INDONESIA	CID001477
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)	CID001337
Tin	Mitsubishi Materials Corporation	JAPAN	CID001191
Tin	Minsur	PERU	CID001182
Tin	Mineracao Taboca S.A.	BRAZIL	CID001173
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA	CID001105
Tin	China Tin Group Co., Ltd.	CHINA	CID001070
Tin	Fenix Metals	POLAND	CID000468
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL	CID002036
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA	CID000228
Tin	Alpha	UNITED STATES OF AMERICA	CID000292
Tin	PT Putera Sarana Shakti (PT PSS)	INDONESIA	CID003868

Tin	PT Mitra Sukses Globalindo	INDONESIA	CID003449
Tin	Resind Industria e Comercio Ltda.	BRAZIL	CID002706
Tin	PT Cipta Persada Mulia	INDONESIA	CID002696
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL	CID002468
Tin	Estanho de Rondonia S.A.	BRAZIL	CID000448
Tin	Luna Smelter, Ltd.	RWANDA	CID003387
Tin	CRM Synergies	SPAIN	CID003524
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA	CID003325
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA	CID003190
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA	CID003116
Tin	Aurubis Berango	SPAIN	CID002774
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA	CID002503
Tin	PT Mitra Stania Prima	INDONESIA	CID001453
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND	CID001314
Tin	Jiangxi New Nanshan Technology Ltd.	CHINA	CID001231
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA	CID001142
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES	CID002517
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA	CID001539
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA	CID000538
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)	CID000438
Tin	Dowa	JAPAN	CID000402
Tin	Mining Minerals Resources SARL	CONGO, DEMOCRATIC REPUBLIC OF THE	CID004065
Tin	CRM Fundicao De Metais E Comercio De Equipamentos Eletronicos Do Brasil Ltda	BRAZIL	CID003486
Tin	HuiChang Hill Tin Industry Co., Ltd.	CHINA	CID002844
Tin	PT Bangka Prima Tin	INDONESIA	CID002776
Tin	Super Ligas	BRAZIL	CID002756
Tin	PT Rajehan Ariq	INDONESIA	CID002593
Tin	PT Premium Tin Indonesia	INDONESIA	CID000313
Tin	Malaysia Smelting Corporation Berhad (Port Klang)	MALAYSIA	CID004434
Tin	Yunnan Yunfan Non-ferrous Metals Co., Ltd.	CHINA	CID003397
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN	CID002549
Tantalum	Mitsui Mining and Smelting Co., Ltd.	JAPAN	CID001192
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA	CID001163

Tantalum	Jiujiang Tanbre Co., Ltd.	CHINA	CID000917
Tantalum	XIMEI RESOURCES (GUANGDONG) LIMITED	CHINA	CID000616
Tantalum	Global Advanced Metals Aizu	JAPAN	CID002558
Tantalum	Taki Chemical Co., Ltd.	JAPAN	CID001869
Tantalum	QuantumClean	UNITED STATES OF AMERICA	CID001508
Tantalum	RFH Yancheng Jinye New Material Technology Co., Ltd.	CHINA	CID003583
Tantalum	Resind Industria e Comercio Ltda.	BRAZIL	CID002707
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY	CID002550
Tantalum	Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	CHINA	CID002512
Tantalum	XinXing HaoRong Electronic Material Co., Ltd.	CHINA	CID002508
Tantalum	Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	CHINA	CID002506
Tantalum	Mineracao Taboca S.A.	BRAZIL	CID001175
Tantalum	AMG Brasil	BRAZIL	CID001076
Tantalum	Jiangxi Tuohong New Raw Material	CHINA	CID002842
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA	CID002548
Tantalum	TANIOBIS Co., Ltd.	THAILAND	CID002544
Tantalum	KEMET de Mexico	MEXICO	CID002539
Tantalum	Hengyang King Xing Lifeng New Materials Co., Ltd.	CHINA	CID002492
Tantalum	Telex Metals	UNITED STATES OF AMERICA	CID001891
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA	CID001522
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA	CID002557
Tantalum	TANIOBIS GmbH	GERMANY	CID002545
Tantalum	FIR Metals & Resource Ltd.	CHINA	CID002505
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA	CID002504
Tantalum	Ulba Metallurgical Plant JSC	KAZAKHSTAN	CID001969
Tantalum	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	CID001277
Tantalum	NPM Silmet AS	ESTONIA	CID001200
Tantalum	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	CID000914
Tantalum	F&X Electro-Materials Ltd.	CHINA	CID000460
Tantalum	PowerX Ltd.	RWANDA	CID004054
Tantalum	Guangdong Rising Rare Metals-EO Materials Ltd.	CHINA	CID000291
Tungsten	Xiamen Tungsten (H.C.) Co., Ltd.	CHINA	CID002320
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA	CID002082
Tungsten	Japan New Metals Co., Ltd.	JAPAN	CID000825

Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA	CID000258
Tungsten	Cronimet Brasil Ltda	BRAZIL	CID003468
Tungsten	Philippine Chuangxin Industrial Co., Inc.	PHILIPPINES	CID002827
Tungsten	Asia Tungsten Products Vietnam Ltd.	VIET NAM	CID002502
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA	CID000966
Tungsten	Fujian Xinlu Tungsten Co., Ltd.	CHINA	CID003609
Tungsten	Hubei Green Tungsten Co., Ltd.	CHINA	CID003417
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID003407
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA	CID002494
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA	CID002321
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA	CID002319
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA	CID002318
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA	CID002317
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA	CID000218
Tungsten	China Molybdenum Tungsten Co., Ltd.	CHINA	CID002641
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA	CID002589
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA	CID002551
Tungsten	Masan High-Tech Materials	VIET NAM	CID002543
Tungsten	TANIOBIS Smelting GmbH & Co. KG	GERMANY	CID002542
Tungsten	H.C. Starck Tungsten GmbH	GERMANY	CID002541
Tungsten	Hunan Shizhuyuan Nonferrous Metals Co., Ltd. Chenzhou Tungsten Products Branch	CHINA	CID002513
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA	CID002316
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA	CID002315
Tungsten	Wolfram Bergbau und Hutten AG	AUSTRIA	CID002044
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA	CID000105
Tungsten	A.L.M.T. Corp.	JAPAN	CID000004
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA	CID000568
Tungsten	Keneo Mining Corporation Vietnam	VIET NAM	CID004619
Tungsten	Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	CHINA	CID004430
Tungsten	Lianyou Resources Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID004397
Tungsten	Tungsten Vietnam Joint Stock Company	VIET NAM	CID003993
Cobalt	Anhui Hanrui New Material Co., Ltd.	CHINA	CID003927



Cobalt	Chemaf Etoile	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003264
Cobalt	Compagnie de Tifnout Tiranimine	MOROCCO	CID003280
Cobalt	Dynatec Madagascar Company	MADAGASCAR	CID003232
Cobalt	Eti Bakir A.S	TURKEY	CID004057
Cobalt	Fujian Evergreen New Energy Technology Co.	CHINA	CID003974
Cobalt	Ganzhou Highpower Technology Co., Ltd.	CHINA	CID003384
Cobalt	Ganzhou Tengyuan Cobalt New Material Co., Ltd.	CHINA	CID003212
Cobalt	Gem (Jiangsu) Cobalt Industry Co., Ltd.	CHINA	CID003209
Cobalt	Guangdong Jiana Energy Technology Co., Ltd.	CHINA	CID003291
Cobalt	Guangxi Yinyi Advanced Material Co., Ltd.	CHINA	CID003213
Cobalt	Guizhou CNGR Resource Recycling Industry Development Co., Ltd.	CHINA	CID003610
Cobalt	Harima Refinery, Sumitomo Metal Mining	JAPAN	CID003577
Cobalt	Hunan CNGR New Energy Science & Technology Co., Ltd.	CHINA	CID003411
Cobalt	Hunan Yacheng New Materials Co., Ltd.	CHINA	CID003404
Cobalt	Impala Refineries – Base Metals Refinery (BMR)	SOUTH AFRICA	CID004608
Cobalt	Impala Rustenburg	SOUTH AFRICA	CID004614
Cobalt	Jiangsu Xiongfeng Technology Co., Ltd.	CHINA	CID003293
Cobalt	Jiangxi Jiangwu Cobalt Industrial Co., Ltd.	CHINA	CID003377
Cobalt	Jiangxi Miracle Golden Tiger Cobalt Co. Ltd.	CHINA	CID004003
Cobalt	Jingmen GEM Co., Ltd.	CHINA	CID003378
Cobalt	Kamoto Copper Company	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003261
Cobalt	Kisanfu Mining (Kimin)	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003587
Cobalt	La Compagnie de Traitement des Rejets de Kingamyambo S.A. (Metalkol S.A.)	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003275
Cobalt	Lanzhou Jinchuan Advanced Materials Technology Co., Ltd.	CHINA	CID003210
Cobalt	Lianyou Resources Co., Ltd.	TAIWAN, PROVINCE OF CHINA	CID004393
Cobalt	Mechema Taiwan Plant 2	TAIWAN, PROVINCE OF CHINA	CID003534
Cobalt	Mine de Bou-Azzer	MOROCCO	CID003279
Cobalt	Murrin Murrin Nickel Cobalt Plant	AUSTRALIA	CID003406

Cobalt	Mutanda Mining SPRL	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003301
Cobalt	Niihama Nickel Refinery, Sumitomo Metal Mining	JAPAN	CID003278
Cobalt	NORILSK NICKEL HARJAVALTA OY	FINLAND	CID003390
Cobalt	Port Colborne Refinery	CANADA	CID003239
Cobalt	Quzhou Huayou Cobalt New Material Co., Ltd.	CHINA	CID003255
Cobalt	Societe pour le Traitement du Terril de Lubumbashi (STL)	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003266
Cobalt	SungEel HiTech Co., Ltd.	KOREA, REPUBLIC OF	CID003338
Cobalt	Tenke Fungurume Mining SA	CONGO, DEMOCRATIC REPUBLIC OF THE	CID003429
Cobalt	Tianjin Maolian Science & Technology Co., Ltd.	CHINA	CID003215
Cobalt	Umicore Finland Oy	FINLAND	CID003226
Cobalt	Umicore Olen	BELGIUM	CID003228
Cobalt	CoreMax Corporation	TAIWAN, PROVINCE OF CHINA	CID003473
Cobalt	Vale – Long Harbour Processing Plant (LHPP)	CANADA	CID003584
Cobalt	Zhejiang Greatpower Cobalt Materials Co., Ltd.	CHINA	CID003526
Cobalt	Zhejiang Huayou Cobalt Company Limited	CHINA	CID003225
Cobalt	Zhejiang New Era Zhongneng Technology Co., Ltd.	CHINA	CID003398
Cobalt	Zhuhai Kelixin Metal Materials Co., Ltd.	CHINA	CID003211
Mica	Yamaguchi Mica	JAPAN	CID003512
Mica	Yamaguchi Mica Co., Ltd. Shinshiro Factory	JAPAN	CID003971
Mica	Yamaguchi Mica Co., Ltd. Toyohashi Factory	JAPAN	CID003970

\*Please note that the smelter list and its status are subject to recurring updates, with the latest data in this report being current as of December 2024.

## 7. Inherent Limitations of Due Diligence Measures

As downstream purchasers, our due diligence measures can provide reasonable, but not absolute, assurance regarding the source and supply chain of conflict minerals. Due to the absence of direct contractual relationships with smelters or refineries (SORs), we rely on our direct suppliers to gather and report specific information. Additionally, we depend significantly on independent third-party audits for data collection and verification. These information sources may lead to the acquisition of inaccurate or incomplete data, and may sometimes contain misleading or false information.

## 8. Future Goals and Plans

InnoLight Technology conducts conflict mineral due diligence based on resources and guidelines provided by the Responsible Minerals Initiative (RMI), which requires suppliers to follow the list of Responsible Minerals Initiative (RMI)-compliant smelters. This ensures our commitment to achieving a conflict-free mineral supply chain. To improve our due diligence processes and reduce the risk of financing armed groups or violating human rights through the use of conflict minerals, InnoLight Technology plans to take the following actions:

### Short-term goals:

1. Integrate conflict mineral management with internal and external IT platforms to improve work efficiency and enhance management effectiveness
2. Broaden the scope of conflict mineral management, strengthen on-site teams, and enhance the accuracy and reliability of on-site audits
3. Provide training for auditors and inspectors in on-site teams to enhance both work efficiency and professionalism
4. Develop and offer additional training programs for suppliers to raise awareness of conflict minerals and strengthen their management capabilities
5. Collaborate more actively with both upstream and downstream suppliers to strengthen business relationships and mitigate potential conflict mineral risks. Participate in more international conflict mineral conferences to enhance the industry's influence and contribute to the efforts of global conflict mineral organizations.
6. Continuously enhance conflict mineral management capabilities to meet customer needs and strive to attain a leading role within the industry
7. Maintain a 100% response rate for Conflict Minerals Reporting Template (CMRT)/Extended Minerals Reporting Template (EMRT) submissions from suppliers
8. Ensure that all approved material suppliers sign the *Conflict-free Minerals Declaration*
9. Validate supplier due diligence as part of the supplier evaluation process

### Medium- to long-term goals:

1. Proactively collaborate with upstream suppliers, smelters, and refiners to help suppliers secure third-party certifications, and engage in industry activities related to conflict minerals to support international conflict mineral organizations
2. Partner with suppliers, stakeholders, and industry peers to further raise awareness of conflict minerals and enhance due diligence capabilities
3. Build and strengthen management frameworks in accordance with international Environmental, Social, and Governance (ESG) rating standards and requirements

4. Ensure continuous improvement in both internal and external conflict mineral management processes
5. Expand the scope of audits to include other critical minerals across the supply chain, from downstream to upstream suppliers, thereby enhancing the completeness of the supply chain map and improving the transparency of risks associated with minerals such as cobalt (Co).