

Policy Statement on Responsible Minerals

Zhongji InnoLight (hereinafter referred to as “Zhongji InnoLight” or “the Company”) supports the responsible sourcing of tin, tantalum, tungsten, gold (collectively known as “3TG”), cobalt, mica and other minerals in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the standards of the Responsible Business Alliance (RBA). We are committed to ensuring that these minerals do not finance or indirectly armed conflict or human rights abuses, particularly in the Democratic Republic of Congo (DRC) and adjoining countries, and other globally recognized high-risk regions.

Zhongji InnoLight has established and continuously improved a comprehensive conflict minerals management system. The Company has developed and maintains a conflict mineral due diligence program. This program is grounded in the OECD Guidance and integrates internationally recognized standards, including the Responsible Minerals Initiative (RMI) and the Responsible Minerals Assurance Process (RMAP). Zhongji InnoLight is committed to implementing the most accurate and thorough procedures for conflict mineral due diligence. Our internal management system includes supplier audits, employee training, data collection, and risk assessment processes designed to ensure that minerals in our supply chain are responsibly sourced.

Zhongji InnoLight will:

- a) prohibit and avoid the use of conflict minerals;
- b) not adopt, distribute and incorporate in contracts and/or agreements with suppliers sourcing of conflict minerals;
- c) work with our suppliers to ensure that their products are conflict free by auditing our suppliers periodically;
- d) maintain the Management System in an effective way to avoid trading, refining and handling conflict materials that directly or indirectly finance or benefit armed groups from conflict-affected regions;
- e) continue to encourage our employees to understand conflict-free policy.
- f) provide transparency to customers and stakeholders by disclosing responsible minerals sourcing efforts through public reporting and upon request.

Zhongji InnoLight mandates each supplier:

- a) adopt a responsible minerals sourcing policy aligned with the OECD Guidance;
- b) exercise due diligence on the source and chain of custody of covered minerals;
- c) source exclusively from smelters/refiners validated through the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) or equivalent cross-recognized assessment programs;
- d) provide Zhongji InnoLight with completed Conflict Minerals Reporting Template (CMRT), Extended Minerals Reporting Template (EMRT), audit reports, and corrective action plans

upon request.

Zhongji Innolight expects full compliance with this policy. Non-compliant suppliers will be subject to corrective actions, including potential termination of business relationships. In addition,

Zhongji Innolight has extended the scope of its Responsible Minerals Program beyond the DRC region to include other conflict-affected and high-risk areas (CAHRAs), recognizing the evolving global expectations for supply chain transparency.

We review this policy annually to ensure it reflects the latest legal requirements, industry best practices, and stakeholder expectations. Our commitment to responsible sourcing is a critical component of our sustainability and corporate social responsibility (CSR) strategy.

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