



## ATX Group Policy for Responsible Minerals Sourcing

The mining and distribution of "conflict minerals"<sup>1</sup> originating from the Democratic Republic of the Congo (the "DRC") are sometimes controlled by violent organizations in order to fund conflict in that country and adjacent regions. Our industry supply chains are inadvertently subject to metals derived from these conflict minerals which can be introduced through the metals we use such as gold, tin, tantalum, tungsten, cobalt and mica etc. ATX Group and its subsidiaries is dedicated to the elimination of these conflict minerals in our supply chain and to using only responsibly sourced "conflict-free minerals"<sup>2</sup>. We expect our suppliers to source conflict-free minerals from smelters or refineries that have been certified by an independent third party audit program to fulfill our objective. It is also our objective to support the continued use of conflict-free minerals from the DRC and its adjacent regions such that responsible mining is not diminished. We exercise due diligence with our suppliers on the origin and supply chain of minerals in accordance with the "OECD Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" to establish conflict minerals management mechanism.

All suppliers to ATX Group must support this policy by:

- (a) Being diligent in their assessment and validation of their supply chains to ensure ATX Group's objectives of a transparent supply chain and conflict-free purchases are inputs to the services and products we produce.
- (b) Be in compliance at all times with all regional and international regulations for conflict minerals.
- (c) Be in compliance at all times with industry standards for the sourcing and reporting of conflict minerals.
- (d) Being diligent and accurate in their formal assurances of conflict-free minerals provided to us.

<sup>1</sup> "Conflict minerals" are columbite-tantalite (coltan), cassiterite, gold, and wolframite, or their derivatives as defined in the Dodd-Frank Act Section 1502 and SEC Rule 13p-1 under the Securities Exchange Act of 1934.

<sup>2</sup> "Conflict-free minerals" are conflict minerals that through their distribution directly or indirectly do not benefit violent organizations in the Democratic Republic of the Congo and its adjacent regions.

Ponnie Maa  
Deputy Chief Executive Officer, ATX Group

## 日月新集团负责任矿产采购政策

来自刚果民主共和国的「冲突矿产\*」之开采与销售，有时会被武装团体控制用以资助该国和邻近区域的冲突，而我们产业的供应链可能会不慎取得衍生自冲突矿产的金属，例如金、锡、钽、钨、钴和云母等。日月新集团及其子公司致力于供应链非冲突采购，只使用来源可靠的「非冲突矿产\*\*」。我们期望供应商与通过独立第三方稽核计划审核机构认可的非冲突冶炼或熔炼厂进行采购。同时，我们也支持继续使用来自刚果民主共和国或邻近地区的非冲突矿产的措施，以不致于影响或缩减该区域「有责采矿作业\*\*\*」。日月新集团遵循经济合作暨发展组织(OECD)所制订「来自有冲突或高风险地区的矿产其负责的供应链尽职调查指南」的尽职调查(Due Diligence)架构，对供应商执行尽责调查，以建立冲突矿产的管理机制。

日月新集团的供应商必须遵守以下方针：

- (a) 积极调查与验证其供应链，以确保日月新集团供应链透明化及非冲突采购的目标。
- (b) 遵循冲突矿产之区域及国际法规。
- (c) 遵循冲突矿产之采购及报告的产业标准。
- (d) 务求提供正确的非冲突矿产之正式保证。

\* 「冲突矿产」指「华尔街改革与消费者保护法(Dodd-Frank Act)」第 1502 条和依据 1934 年证券交易法之美国证券交易委员会规则 13P-1 所界定的钨钽铁矿、锡石、黄金、黑钨矿或其衍生物。

\*\* 「非冲突矿产」指不直接(或间接)为刚果民主共和国及邻近区域的武装团体带来利益的「冲突矿产」。

\*\*\* 「有责采矿作业」指承担社会和环境责任的采矿作业。

马同舟  
日月新集团 代理执行长