烽火通信科技股份有限公司

FiberHome Telecommunication Technologies Co., Ltd.

烽火通信冲突矿产管理政策

FiberHome Conflict Minerals Management Policy

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方针

Statement

烽火通信科技股份有限公司（以下简称“烽火通信”或“公司”）依据适用的中国法律法规，参考经济合作与发展组织（OECD）《关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》、中国五矿化工进出口商会（CCCMC）《中国负责任矿产供应链尽责管理指南》等负责任矿产供应链尽职管理框架，制定并实施本政策。公司不容忍任何因矿产开采、运输、贸易、加工或冶炼活动直接或间接助长武装冲突、严重侵犯人权、非法贸易或暴力融资，或造成重大环境损害的行为。公司承诺以负责任的方式采购产品中使用的金、钽、锡、钨、钴、云母等矿产，并要求涉及相关矿产的适用供应商遵守本政策，向其上游供应链传递相关要求。

FiberHome Telecommunication Technologies Co., Ltd. ("FiberHome" or "the Company") formulates and implements this Policy in accordance with applicable laws and regulations of China and with reference to responsible mineral supply chain due diligence frameworks, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC). The Company does not tolerate any activity in the extraction, transportation, trade, processing or smelting of minerals that directly or indirectly contributes to armed conflict, serious human rights abuses, illicit trade or the financing of violence, or causes significant environmental damage. The Company is committed to responsibly sourcing gold (Au), tantalum (Ta), tin (Sn), tungsten (W), cobalt (Co), mica and other minerals used in its products, and requires applicable suppliers involving such minerals to comply with this Policy and communicate the relevant requirements to their upstream supply chains.

适用范围

Scope

本政策适用于公司产品、原材料或零部件中涉及金、钽、锡、钨、钴、云母等矿产的采购及供应商管理活动，也适用于公司结合业务特点、客户要求和风险评估确定纳入管理的其他矿产。涉及相关矿产的适用供应商应遵守本政策。

This Policy applies to the Company's procurement and supplier management activities involving products, raw materials or components containing gold, tantalum, tin, tungsten, cobalt, mica and other minerals included in the management scope based on the Company's business characteristics, customer requirements and risk assessments. Applicable suppliers involving such minerals are required to comply with this Policy.

管理体系与职责

Management System and Responsibilities

公司建立了基于风险的冲突矿产管理体系，将冲突矿产管理纳入供应商企业社会责任（CSR）管理，制定并实施《冲突矿产控制管理程序》，对矿产资源供应链开展负责任管理。冲突矿

产管理由认证与采购中心统筹，系统设备制造部、线缆产出线、光配线产出线等相关部门协同执行；管理团队定期审阅政策执行情况、关键指标和重大风险，并按照公司 ESG 治理机制向战略与 ESG 委员会报告相关进展。

The Company has established a risk-based conflict minerals management system, incorporated conflict minerals management into its supplier Corporate Social Responsibility (CSR) management, and developed and implemented the Conflict Minerals Control Management Procedure to promote responsible mineral sourcing throughout its supply chain. Conflict minerals management is coordinated by the Certification and Procurement Center, in collaboration with the System Equipment Manufacturing Department, Cable Production Line, Optical Distribution Production Line and other relevant departments. The management team regularly reviews policy implementation, key indicators and major risks, and reports relevant progress to the Strategy and ESG Committee in accordance with the Company's ESG governance mechanism.

承诺

Commitment

公司致力于遵守适用的中国法律法规及业务所在地相关法律法规，尊重人权、保护环境并遵守契约原则。公司开展与风险相适应的供应链尽职调查，努力促进相关矿产以负责任的方式采购，持续提升供应链透明度和管理能力；在符合法律法规、合同约定、商业秘密及数据安全要求的前提下，与客户及其他利益相关方沟通相关政策、管理措施和进展。

The Company is committed to complying with applicable laws and regulations of China and the jurisdictions in which it operates, respecting human rights, protecting the environment, and honoring contractual obligations. The Company conducts risk-based supply chain due diligence, seeks to promote the responsible sourcing of relevant minerals, and continuously enhances supply chain transparency and management capabilities. Subject to applicable laws and regulations, contractual obligations, trade secret protection and data security requirements, the Company communicates relevant policies, management measures and progress to customers and other stakeholders.

管理要求

Management Requirements

1、供应商要求。公司将本政策相关要求纳入合格供应商和新品牌导入供应商的准入与持续管理，要求涉及相关矿产的适用供应商签署《不使用冲突矿产承诺书》，在其管理体系中建立负责任矿产采购要求，并将相关要求向其上游供应链传递。

1. Supplier Requirements. The Company incorporates the requirements of this Policy into the qualification and ongoing management of approved suppliers and newly onboarded suppliers. Applicable suppliers involving relevant minerals are required to execute a Commitment to the Non-use of Conflict Minerals, establish responsible mineral sourcing requirements within their management systems, and communicate the relevant requirements to their upstream supply chains.

2、尽职调查与追溯。公司依法合规选用适当的矿产供应链尽职调查工具，包括适用的 CMRT/EMRT 等模板，开展供应链尽职调查及合理原产国调查（RCOI），要求目标供应商提供冶炼厂/精炼厂（SOR）清单及矿产原产国/地区信息。公司建立“供应商→冶炼厂/精炼厂（SOR）→矿产原产国/地区”的三级追溯流程，结合合法可获得的设施清单、独立第三方验证状态及原产国/地区信息进行比对核验；对来自受冲突影响和高风险地区或存在其他高

风险信号的供应链开展强化尽职调查。相关记录在采购数字化管理系统中至少保存五年，以支持追溯和核查。

2. Due Diligence and Traceability. The Company lawfully selects appropriate mineral supply chain due diligence tools, including applicable CMRT/EMRT templates, and conducts supply chain due diligence and Reasonable Country of Origin Inquiries (RCOI). Target suppliers are required to provide smelter/refinery (SOR) lists and information on the countries/regions of origin of minerals. The Company maintains a three-tier traceability process covering "Supplier → Smelter/Refinery (SOR) → Country/Region of Mineral Origin", verifies relevant information against legally available facility lists, independent third-party verification status and country/region-of-origin information, and conducts enhanced due diligence where conflict-affected and high-risk areas or other high-risk indicators are identified. Relevant records are retained in the digital procurement management system for at least five years to support traceability and verification.

3、风险管理与合规执行。公司定期开展供应商冲突矿产风险评估，根据采购规模和风险水平实施分类管理，将冲突矿产要求纳入供应商 CSR 审核、供应商准入认证和监督审核，并根据风险情况采取沟通培训、补充调查、专项复核、现场审核和整改跟踪等措施。对拒绝整改、持续不配合，或者存在重大风险且无法有效缓解的供应商，公司依据供应商管理制度采取限制新增合作、暂停采购、取消合格供应商资格或终止合作等措施。

3. Risk Management and Policy Compliance. The Company regularly assesses supplier conflict minerals risks, classifies suppliers based on procurement volume and risk level, and incorporates conflict minerals requirements into supplier CSR audits, supplier qualification and monitoring audits. Depending on the level of risk, the Company may provide communication and training, request supplementary due diligence, conduct targeted reviews or on-site audits, and track corrective actions. For suppliers that refuse corrective action, remain uncooperative, or present material risks that cannot be effectively mitigated, the Company may restrict new business, suspend procurement, revoke approved supplier status or terminate cooperation in accordance with its supplier management rules.

4、独立第三方验证。公司通过供应链尽职调查识别冶炼厂/精炼厂清单，鼓励供应链上游冶炼厂/精炼厂接受符合适用法律法规要求并采用严格标准的独立第三方负责任矿产尽职调查评估或验证，并根据合法、可靠的信息持续核验相关状态。对未满足公司要求的来源，公司要求供应商补充溯源信息、实施整改或更换来源，并以真实、准确、可核验的口径披露相关验证情况。

4. Independent Third-Party Verification. Through supply chain due diligence, the Company identifies smelters/refineries and encourages upstream smelters/refineries to undergo independent third-party responsible minerals due diligence assessments or verification that comply with applicable laws and regulations and apply stringent criteria. The Company continuously verifies relevant status using lawful and reliable information. For sources that do not meet the Company's requirements, suppliers are required to provide supplementary traceability information, implement corrective actions or switch sources. The Company discloses relevant verification information on a truthful, accurate and verifiable basis.

5、目标与披露。公司根据尽职调查结果和供应链风险设定并定期审视清晰、可衡量且有时

限的冲突矿产管理目标，跟踪目标进展，并通过年度冲突矿产报告、可持续发展报告或其他适当公开渠道披露管理政策、实施措施、年度进展及目标完成情况。

5. Targets and Disclosure. Based on due diligence results and supply chain risks, the Company establishes and periodically reviews clear, measurable and time-bound conflict minerals management targets, monitors progress, and discloses its management policy, implementation measures, annual progress and target performance through its annual Conflict Minerals Report, sustainability report or other appropriate public channels.

6、沟通、申诉与政策审查。公司通过适当渠道接收供应商、客户、员工及其他利益相关方对负责任矿产采购事项的意见、投诉、举报或申诉，并按照公司适用机制开展调查、整改和闭环处理。公司定期审查本政策，并根据适用法律法规、业务特点及供应链风险变化适时更新。

6. Communication, Grievance and Policy Review. The Company provides appropriate channels for suppliers, customers, employees and other stakeholders to submit feedback, complaints, reports or grievances concerning responsible mineral sourcing, and conducts investigations, corrective actions and closed-loop follow-up in accordance with applicable internal mechanisms. The Company periodically reviews this Policy and updates it as appropriate in response to changes in applicable laws and regulations, business characteristics and supply chain risks.

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