

Conflict Minerals Policy

1. Purpose

- (1) CINCON Electronics, Inc. (the “Company”) is committed to corporate social responsibility, respect for human rights, and responsible sourcing. We seek to ensure that the raw materials used in our products and supply chain are managed in accordance with applicable conflict minerals and responsible sourcing requirements.
- (2) The Company recognizes that the extraction, transportation, and trade of minerals may be associated with armed conflict, human rights abuses, forced labor, child labor, or other improper practices. Through supply chain due diligence and responsible sourcing practices, we seek to reduce the risk that minerals used in our products directly or indirectly finance armed groups or contribute to serious human rights abuses.

2. Minerals in Scope

The conflict minerals primarily covered by this Policy include:

- (1) Tin (Sn)
- (2) Tantalum (Ta)
- (3) Tungsten (W)
- (4) Gold (Au)

These minerals are commonly referred to collectively as “3TG.”

The Company will also monitor other minerals associated with significant social, human rights, or supply chain risks as appropriate in response to applicable regulations, customer requirements, and developments in internationally recognized responsible mineral sourcing practices.

3. Our Commitments

(1) Responsible Mineral Sourcing

The Company is committed to responsibly sourcing materials used in its products and continuously improving awareness and management of conflict minerals and responsible mineral sourcing throughout its supply chain.

(2) No Support for Armed Conflict or Human Rights Abuses

The Company does not knowingly support, finance, or otherwise enable armed groups engaged in serious human rights abuses or illegal activities in conflict-affected and high-risk areas, whether directly or indirectly.

(3) Avoidance of Conflict-Affected Minerals

The Company seeks to avoid sourcing 3TG minerals that are reasonably determined to finance armed conflict, contribute to serious human rights abuses, or otherwise originate from irresponsible sources.

(4) Supplier Cooperation

The Company expects relevant suppliers to establish appropriate mineral sourcing management processes and to provide reasonable and necessary supply chain information and due diligence data upon request to assist in identifying mineral origins and associated supply chain risks.

(5) Preference for Responsible Sources

The Company encourages suppliers to source from smelters and refiners that have undergone appropriate independent third-party audits or participate in internationally recognized responsible mineral sourcing programs in order to enhance supply chain transparency and reduce risk.

4. Supply Chain Due Diligence

To support responsible mineral sourcing, the Company implements appropriate due diligence measures based on its business needs and supply chain risks, including:

- (1) Conducting conflict minerals or responsible mineral sourcing surveys of relevant suppliers.

- (2) Requesting suppliers, where appropriate, to provide the Conflict Minerals Reporting Template (CMRT) or other relevant due diligence information.
- (3) Collecting and reviewing information regarding smelters, refiners, and mineral origins within the supply chain.
- (4) Identifying potential supply chain risks based on due diligence results and conducting appropriate follow-up and risk management.
- (5) Responding to reasonable customer requests for information regarding conflict minerals and responsible mineral sourcing.

5. Supplier Responsibilities

The Company expects relevant suppliers to:

- (1) Comply with applicable conflict minerals and responsible mineral sourcing requirements.
- (2) Establish appropriate supply chain due diligence and mineral traceability processes.
- (3) Provide accurate information regarding mineral origins, smelters, refiners, and other relevant supply chain information upon request.
- (4) Appropriately communicate relevant requirements to their upstream supply chains.
- (5) Take appropriate corrective and risk mitigation measures when significant mineral sourcing risks are identified.

Where a supplier fails to provide necessary information, or where significant risks are identified and reasonable corrective measures are not taken, the Company may, depending on the circumstances, require corrective action, conduct further follow-up, or reassess its business relationship with the supplier.

6. Continuous Improvement

The Company will continue to monitor developments in international conflict minerals and responsible mineral sourcing standards and industry practices. We will periodically review our supply chain management and due diligence processes and work with suppliers to improve mineral sourcing transparency and traceability, with the objective of continuously reducing the risk of armed conflict and human rights abuses within our supply chain.