

Conflict Minerals Management Policy

1. Purpose

To prevent conflict minerals originating from the Democratic Republic of the Congo and its adjoining countries from being used in our raw materials, to uphold the Company's Conflict Minerals Policy, and to improve supply chain conditions in alignment with the requirements of the social responsibility system.

2. Definitions

2.1 Conflict Metals

Including metals such as tin, tungsten, tantalum, gold, and cobalt.

2.2 Conflict Minerals

Mineral products originating from conflict regions controlled by non-governmental military groups or non-military factions in the Democratic Republic of the Congo (DRC), where illicit mining profits are obtained through theft from civilians, resulting in human rights abuses and environmental degradation. Such products, which fail to meet the "conflict-free" standard, come not only from the DRC but also from neighboring countries identified by the United Nations Security Council as sharing the DRC's mineral belt, including Rwanda, Uganda, Burundi, Tanzania, and Kenya. These minerals include gold (Au), tantalum (Ta), tungsten (W), cobalt (Co), tin (Sn), and other metallic minerals.

2.3 DRC Conflict-Free Metals

Products that are free from conflict minerals and do not directly or indirectly finance armed groups in the DRC or its adjoining countries.

3. Scope of Application

This policy applies to all functional departments, directly or indirectly wholly-owned subsidiaries, and directly or indirectly controlled subsidiaries of the Company (hereinafter collectively referred to as "Subsidiaries").

4. Management Framework

Fuyao Group implements a three-tier mechanism for conflict minerals management. The Automotive Glass Supply Management Department is responsible for establishing the policy and consolidating group-level Conflict Minerals Reporting Template (CMRT) reports and annual summaries. The Automotive Trim BU Supply Management Department, together with each Subsidiary, is responsible for communicating requirements throughout the supply chain, collecting, and reviewing supplier CMRT reports, and monitoring corrective actions by risk suppliers. In addition, each Subsidiary must independently prepare and submit its product-level CMRT reports, ensuring

comprehensive coverage and full implementation of the management system.

5. Conflict Minerals Management Measures

5.1 The Company requires its suppliers to source materials only from environmentally and socially responsible suppliers. Suppliers are prohibited from procuring minerals from the Democratic Republic of the Congo or its neighboring countries and must ensure that the metals they purchase are sourced from smelters and refiners listed in the Responsible Minerals Assurance Process (RMAP) as recognized by the Responsible Minerals Initiative (RMI). Smelters and refiners that are not RMAP-certified or that fail to meet customer requirements must be removed from the supply chain, and suppliers are expected to commit to conducting due diligence.

The Conflict Minerals Policy is published on the Company's website at:

<https://www.fuyaogroup.com/responsibility.html>

5.2 Risk Analysis

The Company conducts 3TG analysis based on its products and raw materials used to identify processes involving tantalum, tin, tungsten, and gold. It assesses the locations of relevant suppliers, communicates with them to understand their awareness of conflict minerals, and preliminarily gathers information on their tier-2 suppliers to determine the suppliers' conflict minerals risk level.

5.3 Due Diligence

5.3.1 The Company shall require suppliers and the supply chain to perform commercially reasonable due diligence annually to ensure that metals used in products supplied to the Company are not sourced from conflict minerals. The investigation must use the latest version of the CMRT (RMI_CMRT_x.xx) available on the RMI website (<https://www.responsiblemineralsinitiative.org>). Changes in suppliers or supply chain smelters and refiners (including additions or removals) shall be treated as major change management and must be promptly reported to the Company using the latest CMRT.

5.3.2 When introducing new suppliers for risk-relevant materials, the Company shall verify whether the supplier uses conflict minerals. If conflict minerals are used, the supplier shall not be onboarded. Suppliers must implement corrective measures as required by the Company, and may only be approved after such measures have been verified as completed.

5.4 Suppliers and mineral processors in the supply chain must ensure that conflict minerals are not used. If conflict minerals are used in products supplied to the Company, the supplier shall immediately notify the Company, adopt alternative solutions, and implement corrective measures as required by the Company. Supply may only resume after such measures have been verified as completed, ensuring full compliance with conflict-free requirements.

5.5 Communication and Training

5.5.1 The Company communicates its conflict minerals policy to suppliers and incorporates conflict minerals requirements into the master supply agreements with all 3TG suppliers, requiring them not to procure conflict minerals and to ensure that the metals they purchase are sourced from smelters and refiners listed in the RMAP as recognized by the RMI.

5.5.2 The Company provides conflict minerals training to suppliers through methods such as video presentations, on-site training, and supplier conferences to deepen their understanding of conflict minerals and the proper way to complete conflict minerals surveys.

5.6 Conflict Minerals Due Diligence

5.6.1 Suppliers are required to truthfully complete conflict minerals survey information using the latest version of the CMRT, with assistance provided when necessary to ensure accurate completion.

5.6.2 The Company reviews the CMRT information and risks provided by suppliers and subcontractors (assessing validity, authenticity, and compliance), cross-references them against the RMI conformant list and customer requirements. Approved data is compiled and archived. Any discrepancies are handled in accordance with the non-conformance handling process.

6. Non-Conformance Handling Process

6.1 If a supplier fails to cooperate with the Company's conflict minerals requirements, such as refusing to sign the "Conflict-Free Minerals Declaration" or declining to participate in CMRT surveys, the Company will treat such supplier as high-risk. The Company will engage directly with the supplier's senior management to request corrective actions and may terminate cooperation if necessary.

6.2 If a smelter is not listed on the RMI conformant list or fails to meet customer requirements, the Company shall issue a non-conformance notice to the supplier and require further confirmation. Based on the actual situation, the supplier shall be required to implement a corresponding risk mitigation plan. Measures include, but are not limited to:

6.2.1 Removal of non-conforming smelters.

6.2.2 Re-certification of smelters to obtain approval, with communication with customers regarding whether deliveries may continue during the certification period.

6.2.3 Suspension of deliveries or termination of cooperation if the proposed risk mitigation measures are deemed infeasible or ineffective.

6.2.4 Verification of the risk mitigation measures proposed by the supplier to ensure proper implementation

and due diligence.

7. Conflict Minerals Summary Report

The Company prepares an annual conflict minerals summary report based on its conflict minerals-related efforts, serving as a record for corporate oversight. At least once a year, the Company issues CMRT surveys to suppliers using 3TG metals to assess conflict minerals status.

Fuyao Glass Industry Group Co., Ltd.