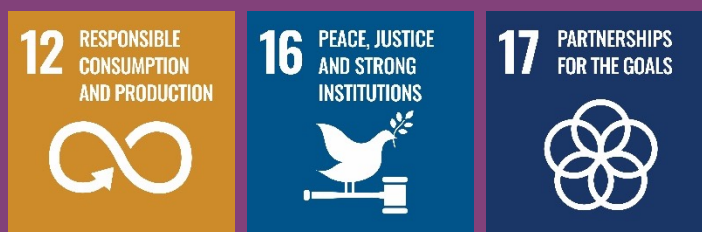


Luxshare Precision Conflict Minerals Management Strategy



Prepared by: Sustainable Development Center

Publication Date
July 2026

Contents

01 Create a Conflict-Free Supply Chain

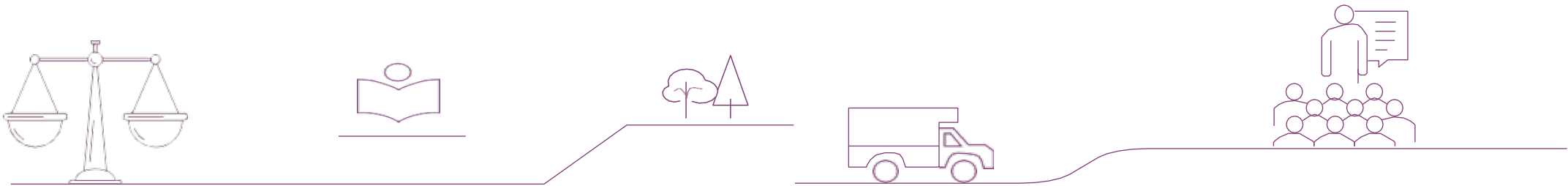
Adhere to International Conventions and Initiatives	03
Our Commitments and Goals	03

02 Implement Responsible Minerals Management

Sound Responsible Minerals Management	05
Supply Chain Risk Identification and Assessment	07
Risk Mitigation and Response Strategies	08
Supply Chain Due Diligence Practices	09
Due Diligence Results Report	09

03 A Long-Term Object that Needs Continuous Effort

A Long-Term Object that Needs Continuous Effort	09
---	----



Create a Conflict-Free Supply Chain

Minerals such as tantalum, tin, tungsten, gold (collectively referred to as "3TG"), cobalt and mica are widely used in electronic products and are also the main minerals illegally mined in conflict-affected and high-risk areas¹. The illegal mining of these minerals by armed groups has caused serious human rights and environmental issues, and the trade in these minerals has provided financial support for ongoing armed conflicts, leading to long-term instability in these regions. Therefore, to create a conflict-free supply chain, it is particularly important to implement responsible minerals procurement.

Adhere to International Conventions and Initiatives

Luxshare Precision Industry Company Limited (hereinafter referred to as "Luxshare Precision" or "the Company" or "we"), a leading global company in precision manufacturing, actively adheres to internationally recognized conventions and initiatives on conflict minerals. We proactively manage the conflict minerals value chain in response to the collective efforts of domestic and international regulators, industry associations, and customers to mitigate the potential environmental and social negative impacts of mineral trade, while collaborating to build a conflict-free minerals supply chain.

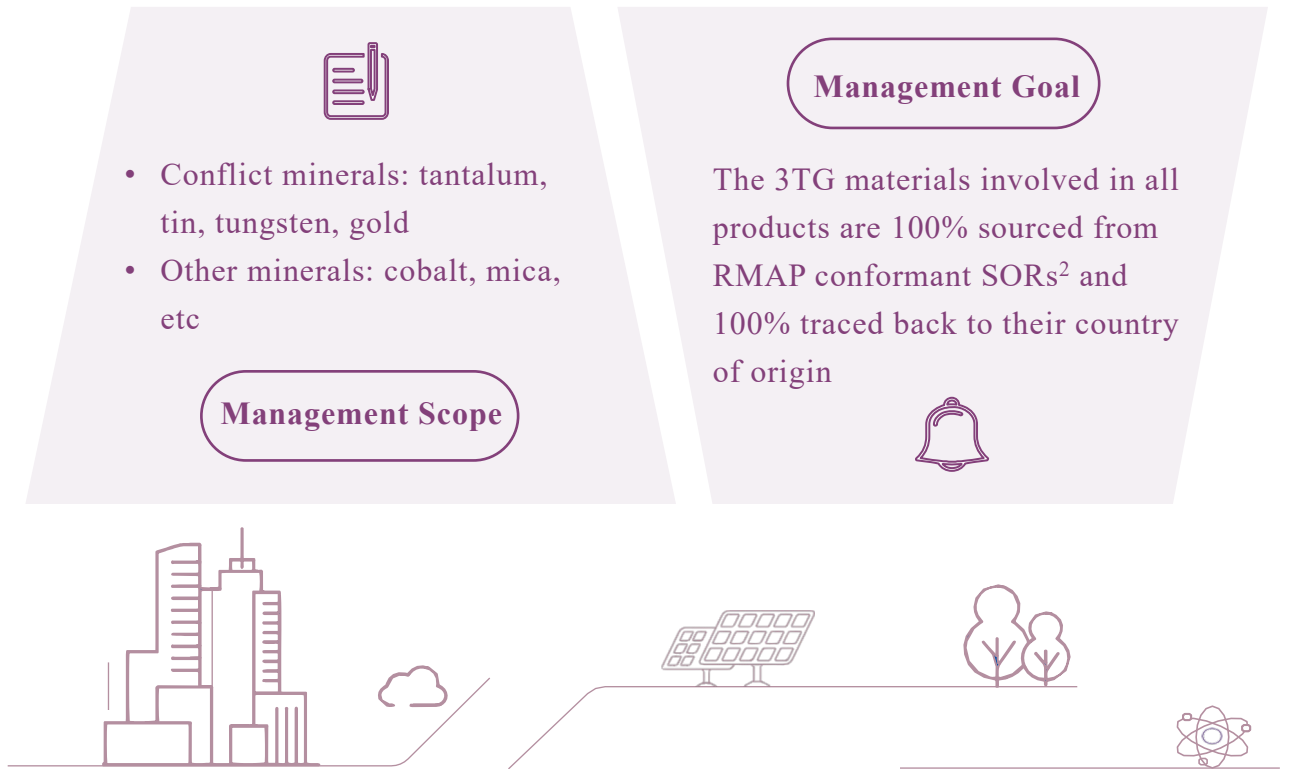
Our Guiding Conventions and Initiatives on Conflict Minerals

Organizations and Industry Associations	Conventions and Initiatives
RBA	Responsible Minerals Initiative (RMI)
US SEC	<i>Dodd-Frank Wall Street Reform and Consumer Protection Act</i>
EU	<i>EU Conflict Minerals Regulation</i>
OECD	<i>Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas</i>
IPC	<i>IPC Standard on Conflict Minerals Due Diligence</i>
ESMA	<i>Securities Financing Transactions Regulation</i>
CCCMC	<i>Guidelines for Social Responsibility in Outbound Mining Investments</i>

Our Commitments and Goals

Although Luxshare Precision does not directly purchase and use raw minerals, materials and components used in our production may potentially contain metals such as 3TG, cobalt and mica. Luxshare Precision is committed to implementing responsible minerals procurement, establishing and improving due diligence and management procedures, striving to ensure that all materials used in our products come from socially and environmentally responsible procurement channels.

The Company officially joined the RMI initiated by the RBA in 2023, and actively adopts the tools and resources provided by RMI, such as the Responsible Minerals Assurance Process (RMAP) and the Reasonable Country of Origin Inquiry (RCOI) database, to identify and address mineral-related risks in the supply chain, ensuring the materials used are sourced transparently and legally. Meanwhile, we provide various types of supports to suppliers to assist them in establishing responsible minerals management procedures that comply with Luxshare Precision's standards.



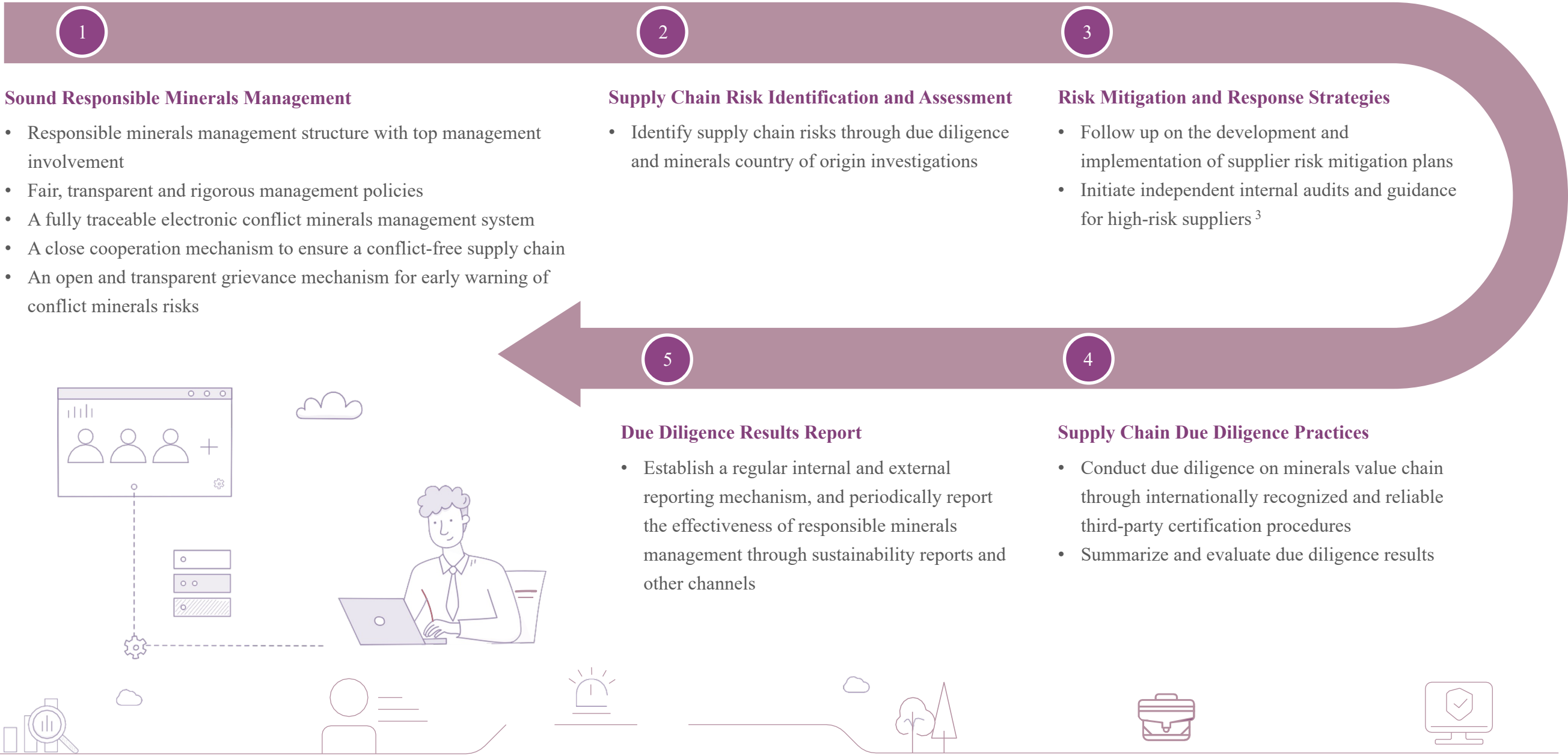
¹ Regions in a state of armed conflict, fragile post-conflict regions, and locations with weak or non-existent governance and security.

² SORs: Smelters or refineries.

Implement Responsible Minerals Management

Luxshare Precision has established a sound responsible minerals management system to strengthen the control of conflict minerals. The system aims to ensure a traceable and conflict-free minerals supply chain through measures such as due diligence and Reasonable Country of Origin Inquiry (RCOI), all of which are planned and implemented in detail in accordance with the OECD Due Diligence Guidance.

Luxshare Precision Responsible Minerals Management Framework



³ High-Risk Suppliers: Suppliers that use minerals originating from high-risk regions or from smelters/refineries that are not RMAP conformant. Conflict Minerals Management Strategy 04



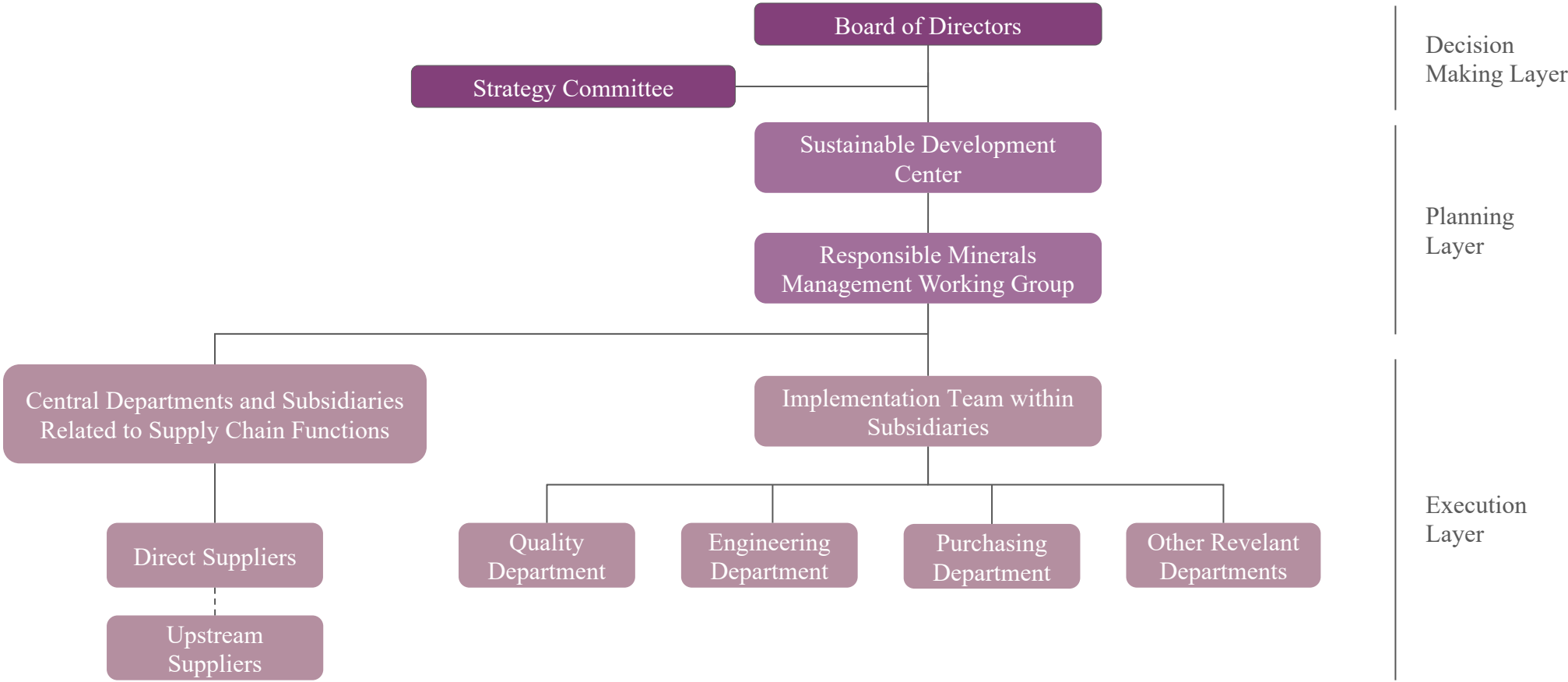
Sound Responsible Minerals Management

Luxshare Precision has established a sound responsible minerals management system by building a professional execution team, formulating comprehensive management policies, leveraging a fully traceable electronic management platform, and developing an open and transparent grievance mechanism. The Company has promoted Luxshare Precision’s conflict minerals management concepts and practices to direct suppliers and even the entire value chain, establishing closed-loop management and dynamic monitoring of conflict minerals-related risks in the supply chain, to ensure that the minerals supply chain is traceable and conflict-free.

Professional Management and Executive

Luxshare Precision carries out responsible minerals management systematically. This work is centrally coordinated and managed by the Sustainable Development Center, which operates under the supervision of the Board of Directors and the Strategy Committee. The Center collaborates with the implementation teams within subsidiaries and minerals value chain suppliers to jointly promote responsible minerals management. The Sustainable Development Center has established a responsible minerals management working group, responsible for the overall formulation, oversight and implementation of management policies and standards, regularly reviewing work progress and goal achievement and reporting to the Board of Directors. The implementation team in subsidiaries is composed of members with relevant capabilities and experiences, and is responsible for executing responsible minerals management processes in collaboration with supply chain partners, including conducting supply chain due diligence investigations and implementing risk identification and mitigation.

Luxshare Precision Responsible Minerals Management Organizational Structure

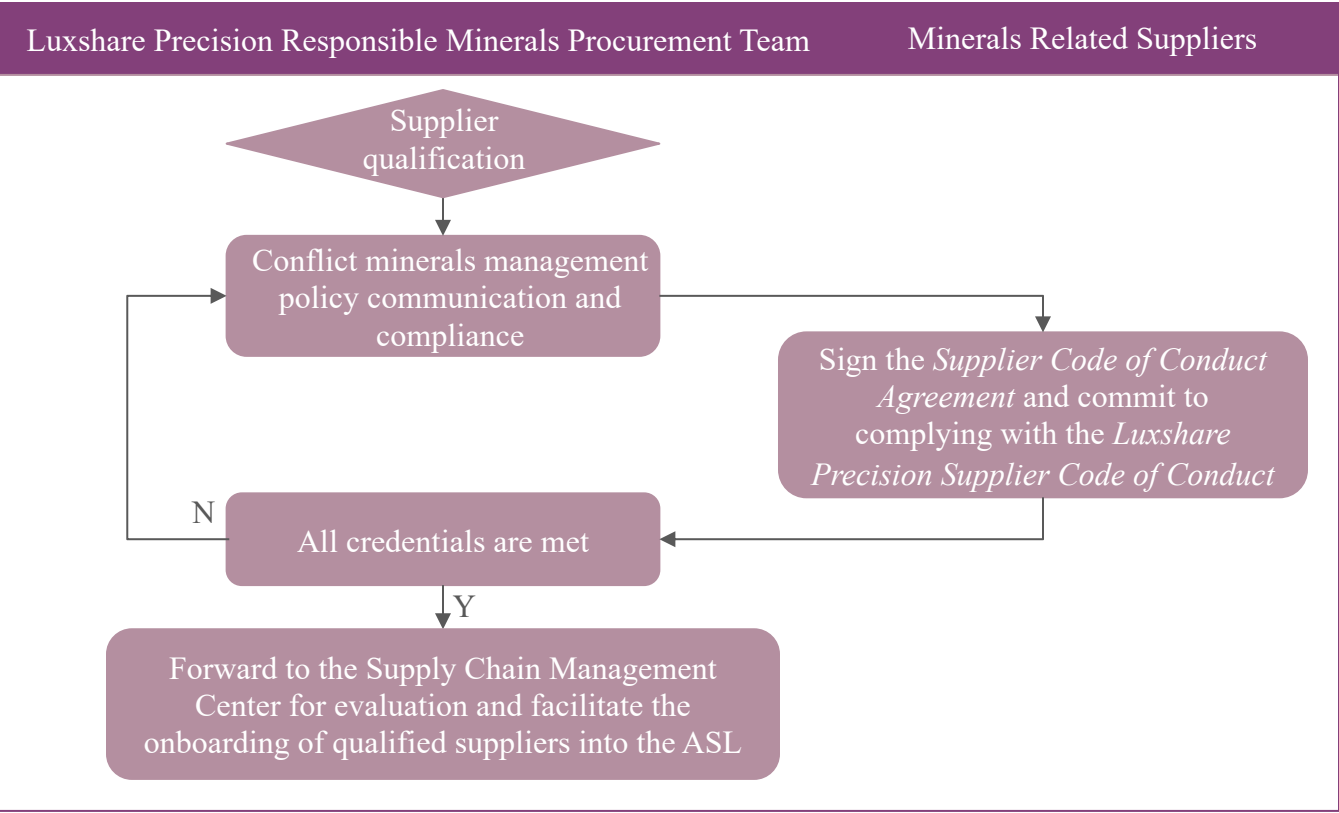


Fair, Transparent and Rigorous Management Policies

Luxshare Precision follows international standards and initiatives including the RBA and OECD Guidelines. Our conflict minerals policy reflects our concerns on environmental and labor rights issues in the mineral supply chain and promoting responsible sourcing to avoid contributing to environmental harm or human rights violations. We formulate and regularly update our *Conflict Minerals Management Measures* to define roles, responsibilities, and workflows.

We require suppliers to comply with the RBA guidelines. Upon onboarding, they must sign the *Supplier Code of Conduct Agreement* and comply with *Luxshare Precision Supplier Code of Conduct*, ensuring requirements are communicated and implemented. All suppliers must procure materials from environmentally and socially responsible sources, selecting conformant SORs for conflict-free materials. Non-conformant SORs must be removed from the supply chain.

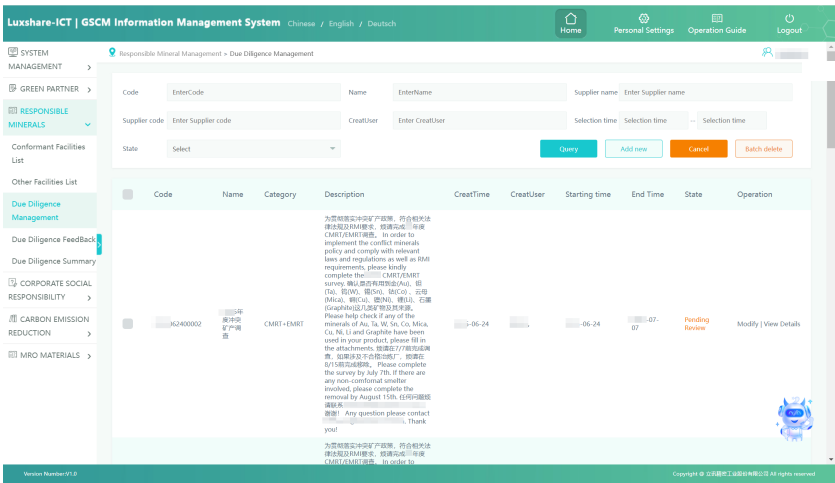
Supplier Onboarding Stage



Our conflict minerals policy is publicly available on our official website. For details, please visit the link below:
<https://www.luxshare-ict.com/sustainability/our-initiatives/responsible-procurement.html>

A Full Traceable Electronic System

Luxshare Precision has embedded and continuously improved a conflict minerals management module within its Green Supply Chain Management (GSCM) system, achieving full material traceability and investigability. To ensure the timeliness of investigation tools, we promptly update the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT) within the GSCM system.



GSCM System Conflict Minerals Management Module

In addition, we regularly update and maintain internal and external conflict minerals requirements to help suppliers understand and stay updated on the latest information. Meanwhile, we have developed the *Responsible Minerals Management System Operational Guidance* to provide more direct and effective support to suppliers.



Responsible Mineral Operation Guide

Closer Supplier Support and Cooperation

We are committed to working closely with suppliers to help them enhance their conflict minerals management capabilities and awareness, establish and improve conflict minerals management systems that meet our requirements, and strengthen every link of the conflict-free value chain.

We provide policy training for new suppliers and hold annual conferences featuring conflict minerals trainings. Our execution team offers timely guidance including on developing risk mitigation plans, and shares expertise through various channels to help suppliers eliminate non-conformant SORs and strengthen upstream management and traceability. Furthermore, the Company is committed to sharing the latest industry updates accessible to RMI members with suppliers in a timely manner, and encourages their participation in RMAP certification.

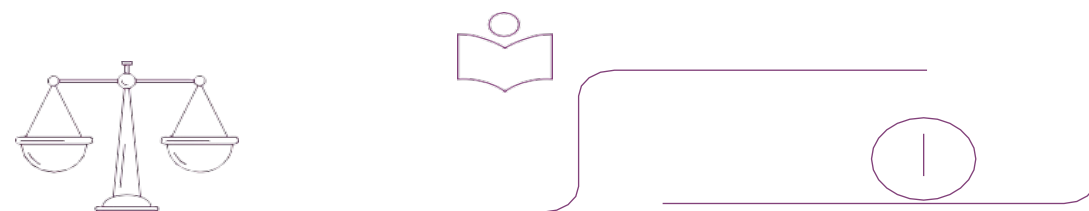
We have developed and regularly update a dedicated training guide, *Introduction to Conflict Minerals Management*, which is distributed via an online learning platform. This enhances the team's understanding of conflict minerals, enabling more effective support for suppliers.

Accessible Grievance Mechanism

We welcome the attention of stakeholders and are willing to accept the supervision and inquiries of all parties regarding the Company's conflict minerals management. We welcome and encourage internal employees, suppliers, and external stakeholders to report any issues, concerns, or violations related to our conflict minerals procedures through public channels. Reports can be made anonymously and will be kept confidential to the maximum extent permitted and feasible by law.

The Company is committed to taking all good-faith feedback seriously and will conduct in-depth investigations on a case-by-case basis.

Email: MineralsReporting@luxshare-ict.com



Supply Chain Risk Identification and Assessment

Luxshare Precision does not directly purchase mineral materials, which poses additional challenges for supply chain risk identification. The Company adopts an RCOI program to reasonably trace and investigate the origin of minerals used in our products, determine if they originate from conflict-affected and high-risk areas or from recycled materials and scrap, in order to evaluate and control potential risks posed by minerals crucial to our products' performance.

We conduct due diligence on direct suppliers and require them to provide CMRT/EMRT as a reasonable method to obtain and trace mineral supply chain procurement information. We compile data on the SORs in the Company's minerals supply chain and compare it with the RCOI database provided by RMI to reasonably determine the minerals' origin.

The Company integrates supplier due diligence with reasonable country of origin investigation results to comprehensively evaluate and define suppliers' risk levels. We focus on CMRT/EMRT reports that list RMAP non-conformant SORs, as well as suppliers deemed risky based on country of origin investigations.

Conflict Minerals Investigation Scope Confirmation Process



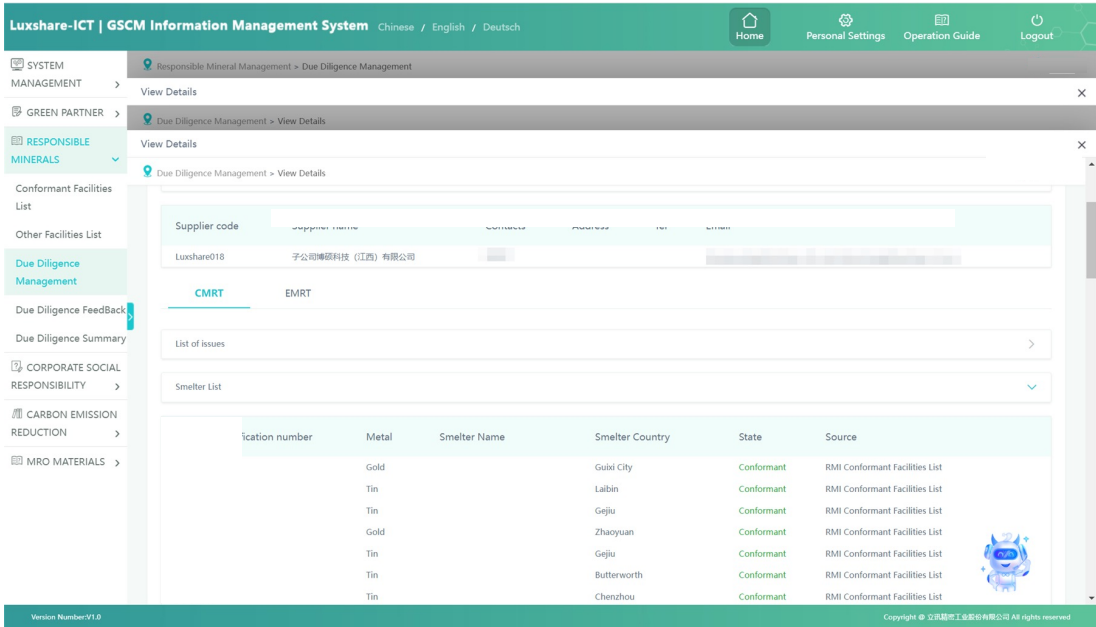
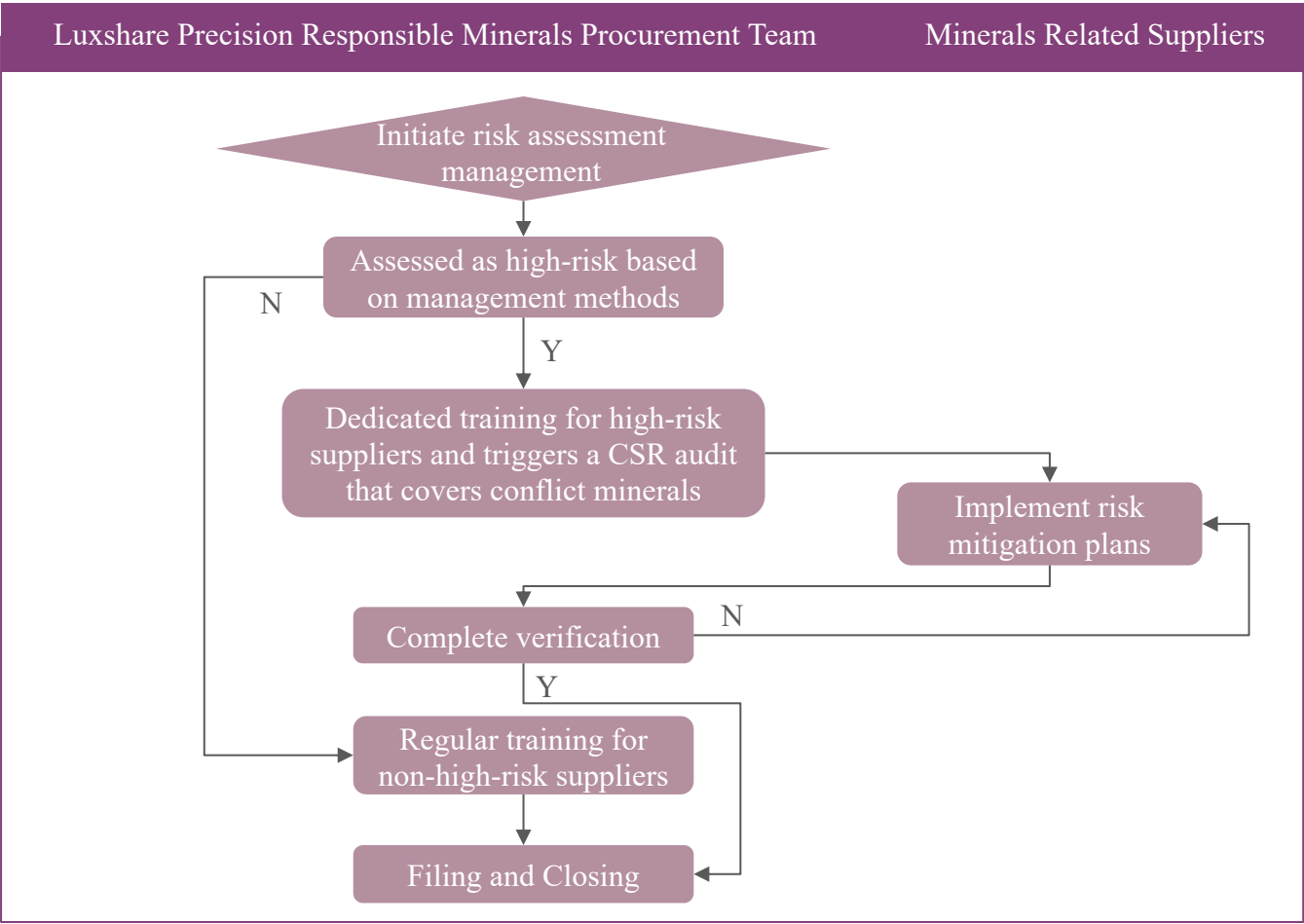
Risk Mitigation and Response Strategies

Luxshare Precision develops and implements different response strategies based on supplier risk levels. For direct suppliers assessed as high-risk, we will not immediately cease our business relationship with them. We are willing to provide necessary information and resources to assist suppliers in taking practical actions to mitigate potential conflict mineral risks.

In supply chain due diligence, the GSCM system automatically reviews suppliers’ CMRT/EMRT reports, flags RMAP non-conformant SORs, and issues alerts. The Company’s responsible minerals procurement management team will then provide targeted guidance. For high-risk suppliers, we require them to facilitate non-conformant SORs in obtaining RMAP conformant certification or to remove them from the supply chain within a specified timeframe. We also provide them with dedicated training and conduct CSR audits that include conflict minerals evaluation indicators in accordance with the *Luxshare Precision Supplier Code of Conduct* and *Supplier Audit Checklist*. The team continuously tracks, evaluates, and reviews the progress of SORs certification and mineral traceability until all SORs in the supply chain are verified as conformant, upon which the case is closed. For non-high-risk suppliers, we conduct regular training to continuously enhance their conflict minerals management capabilities and awareness.

We will also take strict action against suppliers who still fail to meet requirements after communication and improvement efforts. The inaction of direct suppliers will trigger a business-level escalation process.

Risk Assessment and Mitigation Process



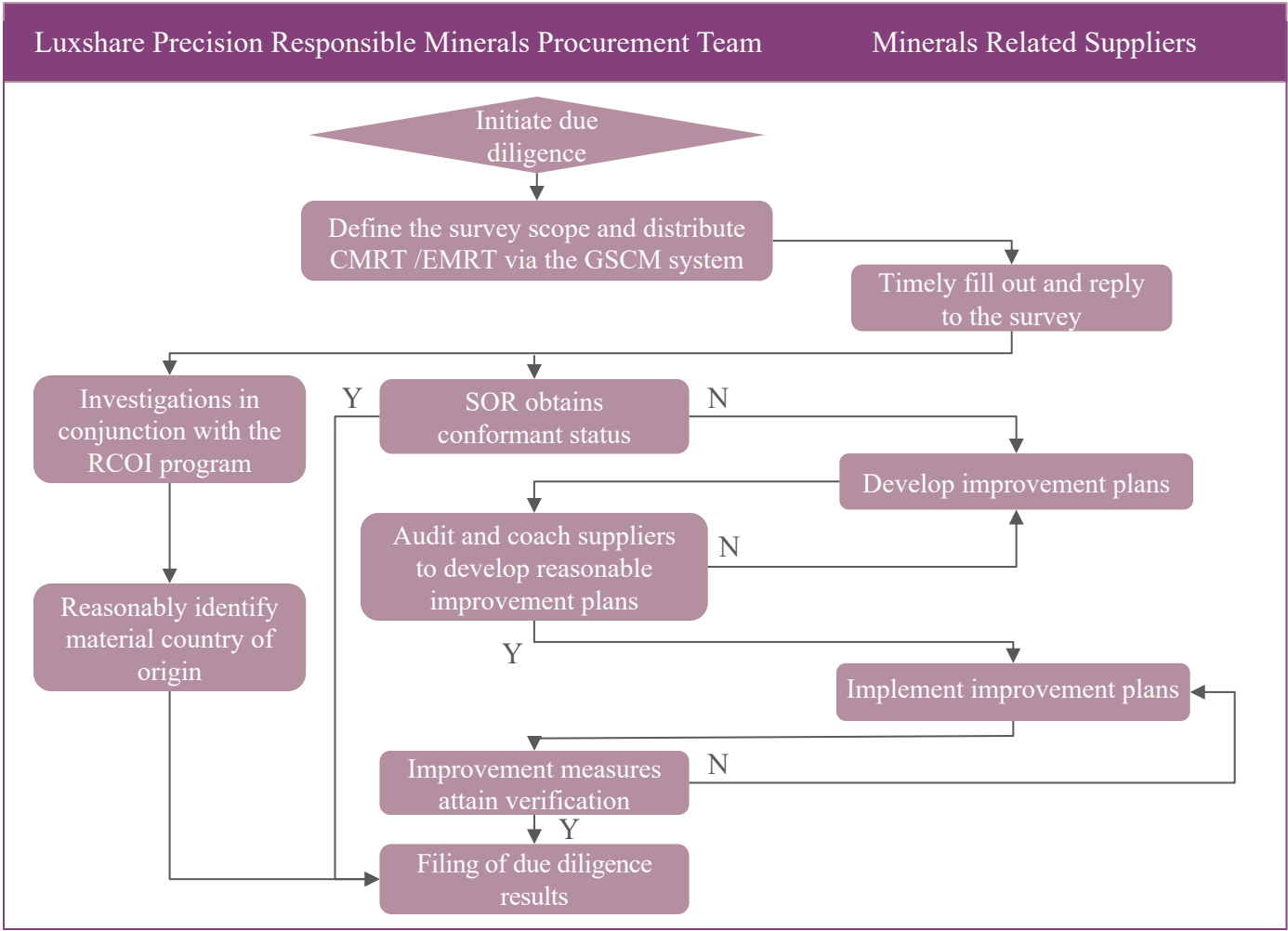
GSCM System Automatically Verifies the RMAP Conformant Status of SORs



Supply Chain Due Diligence Practices

As a downstream member in the minerals supply chain, Luxshare Precision recognizes the importance of supply chain due diligence, while also acknowledging the complexity of conducting independent third-party audits. Therefore, the Company has established procedures to conduct commercially reasonable due diligence on suppliers. We primarily rely on the professional tools and authoritative data provided by RMI to perform a comparative analysis of suppliers' CMRT/EMRT reports. We also leverage the findings from the RMAP's independent third-party audit program to evaluate whether SORs involved in the supply chain meet conflict-free requirements. At the same time, we require direct suppliers to establish management systems to conduct conflict minerals due diligence and tracing for their raw materials. Through collaboration with direct suppliers, we indirectly participate in the compliance auditing of SORs.

Supplier Due Diligence Process



Due Diligence Results Report

In the first half of each year, the Company initiates an annual conflict minerals due diligence process targeting suppliers, conducting comprehensive investigations specifically on those supplying materials containing key minerals of concern such as 3TG, cobalt, and mica. After completing the annual investigation, the company will proceed to statistical integration of supplier CMRT/EMRT data. By combining due diligence and RCOI investigation results, it accurately assesses and defines supplier risk levels to implement effective risk mitigation and response strategies.

Luxshare Precision has established a comprehensive information disclosure mechanism, using the annual sustainability report as the primary channel to summarize and review the progress and outcomes of the conflict minerals due diligence program. We aim to strengthen communication with stakeholders through detailed disclosure, while further enhancing our management capabilities for conflict minerals.

A Long-Term Object that Needs
Continuous Effort

Go far with constant and concrete efforts. Luxshare Precision will continue to carry out responsible minerals procurement management and practices with high standards, collaborate with like-minded supplier partners to eliminate human rights and environmental violations in the minerals supply chain, and create a conflict-free minerals supply chain.

