



Fulgent Sun Group Conflict Minerals Control Policy

鈺齊集團衝突礦產管控政策

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1. Introduction 簡介

Fulgent Sun Group and its branches are committed to complying with the social environmental liability, and sourcing materials from suppliers that sharing the same values. US Securities and Exchange Commission rules about “conflict minerals” in Aug, 22th, 2012, the new regulation is that the companies should disclose the use and source of these minerals, to cut down the funding of armed group that participating in DRC (Democratic Republic of Congo) and adjoining countries of Angola, Burundi, the Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia conflict, The term “conflict minerals” refers to tin, tantalum, tungsten and gold (3TG). Fulgent Sun Group as a public company, has the responsibility to abide by this rule, also conduct due diligence to determine whether any conflict minerals used in our products originate from the DRC. Therefore, we take the following several steps:

鈺齊集團及其子公司致力於遵守社會環境責任，向擁有共同價值觀的公司採購材料。

2012年8月22日，美國證券交易委員會要求對“衝突礦物”的規定。新規規定，公司須額外披露這些礦物的使用與來源資訊，旨在減少參與剛果民主共和國及周邊國家如安哥拉，布隆迪，中非共和國，盧旺達，南蘇丹，坦桑尼亞，烏干達，尚比亞衝突的武裝團體的資金，這些“礦產”指的是鎢，鈹，錫，金(3TG)。鈺齊集團作為上市公司，有義務遵守此規定，並調查確定本產品是否有使用任何來自於剛果民主共和國及其周邊的國家（DRC）。為此，鈺齊集團採取以下四步流程：

1. Confirm the scope of products and suppliers---conduct an audit with the supplier.
確定產品與供應商範圍—對供應商進行稽查。
2. The purchasing team should require the suppliers to do a survey with the country of origin:
offer the name of smelting plant, the approval audit of country of origin, and the minerals purchasing certificate of smelting plant that certificated by third party.
採購部要求供應商對原產地進行調查：提供冶煉廠名稱、對礦產原產地審核鑑定、提供第三方驗證過的冶煉廠進行礦產採購證明書。
3. Due diligence—According to the suppliers’ reply, follow up and check if exist any conflict minerals in materials.
展開盡職調查-根據供應商的回覆、追溯、查證材料是否存在衝突礦物。
4. Data storage by lab.
檢驗股進行資料保存。



2. Responsibilities 職責

The Fulgent Sun Group which is consist of development, materials team, purchasing team and lab to manage the conflict minerals. Every organize it's conflict minerals team and set up the resources sharing folders of conflict minerals.

鈺齊集團公司由開發、開發材料課、採購、檢驗負責管理衝突礦物。各單位組織自己的衝突礦物團隊，創建“衝突礦物”資源共享資料夾。

- (1) Development: Receive the RSL requirements from customer, forward to the relevant laboratory, material team and purchasing team within the group.
開發收到品牌客戶的 RSL 要求，分享給相關的實驗室、材料課及採購。
- (2) Material team: For new brands, the new suppliers must comply with the related RSL requirements.
材料課要求新廠商符合相關的 RSL 要求。
- (3) Purchasing team: provide the conflict minerals suppliers list to lab and update it timely, need to check if all suppliers provide the guarantee letters.
採購提供衝突礦物供應商明細給實驗室，及時更新，要確認都已提供衝突礦物保證書。
- (4) Chemical: Provide the bottom material sample to laboratory annually, then laboratory will send it to 3rd party lab for testing.
化工課：自製底料需每年提供相關送測樣品給實驗室送測。
- (5) Laboratory: keep files for RSL.
實驗室：對 RSL 進行存檔。

3. RSL

Restricted substances list 受限物質清單 (RSL)

In order to protect the customer, workers and environment, Fulgent Sun will comply with the policy of restricted substance.

為了保護客戶、員工以及環境，鈺齊集團遵守“受限物質的政策”。

The main heavy metals are nickel, cadmium, lead(pb), mercury(hg).

主要有五種重金屬鎳，鎘，鉛，汞，鉻。

Testing agency 檢測機構：

The third party or the lab that assigned by the client.

第三方測試、或客戶指定實驗室測試。

4. Confirm the product and supplier scope 確定產品與供應商範圍

- A. Understand the documents requirements of 3TG (5 heavy metals nickel, cadmium, lead, mercury, chromium) and check if using any conflict minerals in materials producing.

了解 3TG (五種重金屬鎳，鎘，鉛，汞，鉻) 的文件要求，確定生產材料未使用任何衝突礦物。

- B. Identify conflict minerals

識別衝突礦物

Each development department should recognize the known all products, and review if any conflict minerals included in products; Examine the materials data and BOM to confirm any possible items of conflict minerals contain in products within scope.

Documents requirements: product name, item No, product category and sources. (materials data, BOM)

各開發單位需識別已知的全部產品，篩查產品是否含有衝突礦物：審查物料的資料、審查產品清單和相應的物料清單、確定範圍內產品可能含有衝突礦物的任何項目文件要求：產品名稱、產品編號、產品類別、來源（物料資料,BOM 清單等）。



C. Identify the 3TG suppliers

識別 3TG 供應商

Confirm the active supplier within the scope, use the products and raw materials lists that contain conflict minerals to determine the right supplier of components/technical. With the help of purchasing team, check the relevant information of supplier, include:

確定範圍內物料的往來供應商，利用含衝突礦物的產品及原材料清單，確定部件/工藝的對應供應商，在採購人員的幫助下，確定供應商的相關資訊，要求有：

- (1) Supplier name 供應商名稱
- (2) Supplier system ID no 供應商系統 ID 編號
- (3) Supplier contact information 供應商聯繫資訊
- (4) The supplier contact point of Fulgent Sun group 供應商聯繫點

5. Make a survey for the country of origin 對原產地的調查

The purchasing should ask the suppliers to make a survey for the country of origin, on the basis of the supplier replying, classify into high, medium, low risk level.

採購向供應商要求對原產地進行審核調查、分發供應商調查、進行跟進、跟進供應商回覆，歸類高、中、低風險級別。

- (1) Provide the name of smelting plant.
提供冶煉廠名稱。
- (2) Ask the suppliers to make a survey for the country of origin.
要求供應商對原產地進行審核鑑定。
- (3) Provide the certificate of smelting plant that certificated by third party.
要求提供第三方審核驗證過的冶煉廠進行礦產採購證明書。
- (4) Provide the conflict minerals guarantee letters, to prove no from the DRC.
提供衝突礦產保證書，證明非來自於剛果民主共和國。

6. Due diligence 展開盡職調查

In accordance with the supplier risk level to due diligence:

根據供應商風險級別展開盡職調查：

- (1) Low risk supplier—record research conclusions and supplier research reply.
低風險供應商—記錄調查結論並記下供應商調查回覆。
- (2) Medium and high risk level supplier—use the due diligence actions listed in appendix B.
中高風險供應商—展開附錄 B 所列盡職調查行動。
- (3) For the suppliers without replying—contact with the supplier contact to inquiry when can we receive the answer.
未回覆供應商—聯繫供應商聯絡人詢問可以收到回覆的時間。

Appendix A—main term 附錄 A---主要術語

1. 3TG-- tin, tantalum, tungsten and gold

3TG-- 鎢、鈹、錫和金

2. Democratic Republic of Congo and adjoining countries of Angola, Burundi, the Central African Republic, Rwanda, South Sudan, Tanzania, Uganda and Zambia

剛果民主共和國及周邊國家 DRC，包括安哥拉，布隆迪，中非共和國，剛果共和國，盧旺達，蘇丹，坦桑尼亞，烏干達和尚比亞。



3. Active suppliers—contain the 3TG suppliers
往來供應商-- 含有 3TG 的供應商

Appendix B—due diligence actions

附錄 B—盡職調查措施

Research issues 調查問題	Due diligence actions 盡職調查措施
<p>1. If your company has any policy rules, without purchasing any conflict minerals from DRC ? 貴公司是否有政策規定，不得採購剛果民主共和國衝突礦物？</p>	<p>If reply yes, require to issue the relevant evidence 如答覆“是”，要求出具相關證據； If reply no, require the company has any purchasing policy 如答覆“否”，要求該公司需有採購政策</p>
<p>2. If your company has issued the policy on official website? 貴公司是否已在公司官網公佈該政策？</p>	<p>If reply yes, require to provide the information 如答覆“是”，要求提供資訊 If reply no, ask if will open its conflict minerals policy on the website 如答覆“否”，詢問是否希望在網站上公佈衝突礦物政策</p>
<p>3. If your company require the supplier without any DRC conflict directly? 貴公司是否要求直接供應商做到無 DRC 衝突？</p>	<p>If reply yes, require to issue the documentary evidence 如“是”，要求出具證明文件 If reply no, no the further actions 如“否”，則無須進一步措施</p>
<p>4. If your company requires the supplier to provide the name of smelting plant? 貴公司是否要求供應商提供冶煉廠名稱？</p>	<p>If reply yes, need to issue any evidence 如“是”，要求出具任何證據 If reply no, need to provide 如“否”，則要求提供</p>
<p>5. If your company will verify the conflict minerals information receive from the suppliers? 貴公司是否會驗證從供應商處收到的衝突礦物信息？</p>	<p>If reply yes, need to issue how you verify 如“是”，要求出具如何驗證的證據 If reply no, need to ask the reason and when can provide 如“否”，則詢問原因，何時可提供</p>
<p>6. If any come from the DRC of adjoining countries in these metals 在這些金屬中，是否有任何來自 DRC 或周邊國家</p>	<p>If reply yes, require to issue the country of origin and supporting evidence (such as invoice) 如“是”，要求出具產地，以及支持性證據（比如發票）</p>
<p>7. If your company has find out the smelting plant that used by supplier for each metal? 就每種金屬，貴公司是否已查明供應商所用的冶煉廠？</p>	<p>If reply yes, need to provide the smelting plant name or any supporting evidence (such as invoice) 如“是”，要求提供冶煉廠名稱，或出具支持性證據（比如發票） If reply no, require to make sure this 如“否”，要求查明</p>