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OECD

Tonly Technology Co., Ltd. (hereinafter referred to as "Tonly") is committed to eliminating the use of any minerals sourced from conflict-affected or high-risk areas in its products and supply chain. We strictly adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and actively respond to customer and industry expectations for responsible mineral sourcing.

We commit that all suppliers and their supply chains shall not procure, use, or support any conflict minerals that directly or indirectly finance or support areas affected by armed conflict. We require all suppliers to source minerals in a responsible manner that respects the human rights and environment of conflict-affected regions.

Sn Co

Au Ta W

This policy applies to the entire process of raw material procurement, product manufacturing, and supply chain management of Tonly Technology Co., Ltd. It covers all minerals and metallic materials used in Tonly products, including but not limited to Gold (Au), Tantalum (Ta), Tungsten (W), Tin (Sn), and Cobalt (Co).

Rwanda DRC
Kenya Uganda Burundi Tanzania

Conflict minerals refer to mineral products originating from the Democratic Republic of the Congo (DRC) and its neighboring countries or regions — including but not limited to Rwanda, Uganda, Burundi, Tanzania, and Kenya. These areas have been designated by the United Nations Security



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Including supply chain policies, internal controls, grievance mechanisms, and supplier engagement.

Including prompt supply chain mapping, red-flag identification, and evaluation of conflict or human rights abuse risks.

Including risk mitigation plans, supplier capability building, and continuous monitoring.

Smelters and refiners must undergo customer-approval or other internationally recognized independent third-party audits to ensure compliance.

Prepare and disclose annual conflict minerals due diligence reports to customers and stakeholders.

Tonly has established internal and supply chain grievance channels, allowing employees, suppliers, and other stakeholders to anonymously report violations related to conflict minerals. All reports will be handled with strict confidentiality, and Tonly commits to protecting whistleblowers from any form of retaliation.

Grievance handling and investigation are the responsibility of the audit department, with records retained for no less than five years.

SQA

This policy statement is interpreted and revised by the SQA Department of Tonly Technology Co., Ltd.