



TCL ELECTRONICS HOLDINGS LIMITED

TCL 電子控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 01070)

Conflict Minerals Policy

Version: 1.0

1 Objective

This Conflict Minerals Policy (the “Policy”) is formulated to ensure the compliant operation and continuously responsible sourcing of TCL Electronics Holdings Limited and its subsidiaries (hereinafter referred to as the "Group"), and foster the sustainable development of the industrial chain.

2 Scope of application

This Policy is applicable to the Group, and all of its direct and indirect suppliers in the supply chain.

3 Terms and definitions

Conflict minerals referred to in this Policy mean ores and their derivatives (collectively referred to as "Conflict Minerals") such as Tin, Tantalum, Tungsten, Gold (3TGs) originating from conflict-affected areas in the Democratic Republic of the Congo (DRC) and its adjoining countries, as well as other minerals (e.g., Cobalt, Mica, etc.). Conflict-affected areas refer to areas designated by United Nations Security Council resolutions as conflict-affected, areas defined by the European Union as conflict-affected and high-risk, and source regions for conflict minerals defined by the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act). It is generally believed that illegal mining of minerals in conflict-affected areas involves issues such as human rights violation and environmental damage.

4 Detailed rules

4.1 The Group does not support any mineral trade that may involve severe human rights violations. The Group commits itself to complying with international conventions and industrial initiatives such as the United Nations Global Compact, the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the Responsible Minerals Initiative (RMI), striving to ensure that all raw materials for our products are responsibly sourced.

4.2 The Group requires its suppliers to adhere to responsible sourcing principles, procuring materials only from environmentally and socially responsible sources that meet conflict-free mineral requirements. The Group reserves the right to request evidence regarding the origin of relevant materials from its suppliers.

4.3 To avoid sourcing any minerals from known conflict sources, the Group follows the due diligence framework guidance of the OECD to conduct due diligence on suppliers and establish a conflict minerals management mechanism, including:

4.3.1 Supplier Management: Incorporate provisions prohibiting Conflict Minerals into the Partner Code of Conduct Agreement, and require partners, including suppliers, not to purchase, use, or sell Conflict Minerals and to certify that their products do not contain conflict minerals.

4.3.2 Due Diligence: Utilize the RMI due diligence tools (Conflict Minerals Reporting Template and Extended Minerals Reporting Template) to regularly conduct supply chain due diligence related to conflict minerals to understand and assess the risk within the supply chain. Identify the list of smelters and encourage smelters to apply for and maintain compliance certification with the Responsible Minerals Assurance Process. For identified risks, the Group will develop and implement risk management strategies, including making decisions on whether to continue, suspend, or terminate cooperation with suppliers. Refusal to cooperate will result in liability for breach of contract under the Partner Code of Conduct Agreement.

4.3.3 Training and Education: Empower suppliers to establish conflict minerals management mechanisms and require them to convey responsible sourcing principles to their upstream suppliers; provide training to employees to enhance their awareness and understanding of conflict minerals issues.

4.3.4 Continuous Improvement: Regularly review and improve the conflict minerals management mechanism to ensure its ongoing effectiveness.

4.3.5 Information Disclosure: The implementation status of this Policy and key performance indicators (including the results of risk assessments, risk mitigation measures, and audit outcomes) will be disclosed in the Group's annual ESG Report. The Group will maintain records of due diligence processes, risk assessments, and risk management measures for at least five years.

5 Whistleblowing mechanism

The Group has established a reporting mechanism to allow internal and external stakeholders to raise complaints regarding responsible sourcing practices or report any concerns or incidents to the Group. The Group will handle matters objectively and impartially and protect whistleblowers from any form of retaliation. A whistleblower may report his/her concerns on any improprieties to the Company via tmtjubao@tcl.com.

6 Periodic Review

6.1. The mechanism set out in this Policy shall be reviewed periodically.

6.2. The guiding principles set out in this Policy shall be read in conjunction with the code of conduct and practical guidance issued by the Group from time to time.