



QEHS POLICY

CONFLICT MINERALS POLICY

1.0 PURPOSE

FiberHK Conflict Minerals Policy reflects the commitment of FiberHK to comply with legal and customer/industry requirements to ensure FiberHK does not directly or indirectly engage with suppliers where FiberHK identifies a reasonable risk that they are sourcing from, or linked to, any party committing human rights or related abuses.

2.0 SCOPE

This policy applies to all FiberHK entities and all suppliers who provide materials that contain tin, tantalum, tungsten, or gold.

3.0 REFERENCE DOCUMENTS

3.1 USA H. R. 4173

Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502

3.2 OECD DUE DILIGENCE GUIDANCE FOR RESPONSIBLE SUPPLY CHAINS OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

See www.oecd.org

3.3 EICC/GESI CONFLICT-FREE SMELTER PROGRAM

See www.conflictreesmelter.org

4.0 DEFINITIONS

4.1 CONFLICT-AFFECTED MINES AND HIGH-RISK AREAS

Conflict-affected mines and high-risk areas are mines or areas identified by the presence of armed conflict, widespread violence, or other risks of harm to people, including the eastern region of the Democratic Republic of the Congo.

4.2 CONFLICT MINERALS

Conflict minerals are columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, including tin, tantalum, tungsten, and gold, sourced from conflict-affected mines or high-risk areas.

4.3 REFINER

A refiner is a processor who improves the purity of a metal (such as gold).

4.4 SMELTER

A smelter is a processor who obtains minerals (such as columbite-tantalite, cassiterite, or wolframite) and extracts metals (such as tin, tantalum, or tungsten).

5.0 POLICY

FiberHK recognizes that extracting, trading, handling and exporting minerals (such as columbitetantalite, cassiterite, gold, wolframite, or their derivatives), from conflict-affected and high-risk areas may lead to human rights or related abuses.

As a good corporate citizen, FiberHK has the responsibility to respect human rights and not contribute to these conflicts.

FiberHK commits to refraining from any action which contributes to the financing of conflict and to comply with relevant United Nations (UN) sanctions resolutions or, where applicable, laws implementing such resolutions, such as the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502.

FiberHK will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the payment by any party of the following human rights or related abuses:

- any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labor;

- child or underage labor;
- other gross human rights violations and abuses;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

FiberHK commits to adopt, communicate and incorporate into contracts and agreements with suppliers the requirement for responsible sourcing of minerals.

FiberHK will suspend or discontinue engagement with suppliers where FiberHK identifies a reasonable risk that they are sourcing from, or linked to, any party committing abuses as defined above.

To achieve these goals, FiberHK will require its supply chain to only use smelters/refiners verified to be compliant with the EICC/GeSI Conflict-Free Smelter Program (as published at www.conflictreesmelter.org).

Until smelters/refiners are audited and published as compliant, FiberHK will map its supply chain to its smelters/refiners and require smelters/refiners to participate in the EICC/GeSI Conflict-Free Smelter Program.

6.0 IMPLEMENTATION

This policy is effective immediately.

7.0 REVISION HISTORY

Revision	Date	Description
A	2022/11/01	Initial release

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