

Statement on Compliance with Responsible Mineral Supply Chain Management

To customers and stakeholders:

In response to the initiative of the RCI (Responsible Cobalt Industry Initiative) organization, NGYC implements its three major goals and follows the three international standards advocated by it, That is, the "Guidelines for Due Diligence of China's Responsible Mineral Supply Chain" and "Guidelines for Social Responsibility of China's Outbound Mining Investment Industry" established by CCCMC, and the "International OECD Protection of the Worst Child Labor" standard established by the OECD, and promises to be committed to a detailed investigation of the supply chain to ensure gold (Au), tantalum (Ta), tungsten (W), tin (Sn), cobalt (Co) and other metals are not mined or illegally smuggled from mining areas in the conflict zone of the Democratic Republic of the Congo through anarchy or illegal groups Obtain through channels and any high-risk areas, give priority to using the list of legal mineral factories published by international organizations related to responsible minerals, promote cooperation with the Congolese (Kinshasa) government, civil organizations and affected local communities to take actions or support relevant actions, Drive improvement together.

For details, please refer to the attachment "Supply Chain Details of Responsible Minerals".

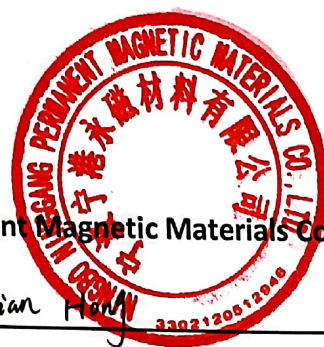
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NGYC CO., LTD.

Attachment

"Supply Chain Policy Details for Responsible Minerals"

We recognize that mining, trading, processing, and exporting mineral resources in conflict-affected and high-risk areas may carry risks of significant adverse impacts, and recognize that we have an obligation to respect human rights, not contribute to conflict, and not have a negative impact on the environment and society. We commit to adopt and widely disseminate the relevant policies of the "Guidelines for Responsible Mineral Supply Chain Due Diligence in China" and incorporate them into contracts with suppliers. In contracts and agreements. This policy provides a reference for the conflict-sensitive procurement activities involved in the whole process of the mineral supply chain and the risk awareness of suppliers. We are committed to abide by relevant United Nations sanctions resolutions, abide by domestic laws applicable to the implementation of such resolutions, and refrain from engaging in any conduct that would help or facilitate conflict.

To this end, we are committed to identifying and avoiding the following risks in our business activities,

1. Serious Human Rights Violations

We neither condone nor in any way benefit, facilitate or facilitate any party to,

- ① Any form of torture, cruel, inhuman and degrading treatment;
- ② Any form of forced or compulsory labor. Forced or compulsory labor is defined as the threat of punishment, forcing any person to perform labor or services not voluntarily provided by the person;
- ③ The worst forms of child labor;
- ④ Other serious violations and abuses of human rights, such as mass sexual violence;
- ⑤ War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Reduce Risk

If we have reasonable grounds to believe that an upstream supplier is sourcing from or associated with any party that has committed serious human rights abuses, we will immediately suspend or discontinue cooperation with that supplier.

2. Direct or Indirect Support to Illegal Organized Armed Groups and Public or Private Security Forces

We do not tolerate any direct or indirect support for non-state organized armed groups through the extraction, transportation, processing or export of mineral resources. Provide "direct or indirect support" to non-state organized armed groups through mineral resource extraction, transportation transactions, processing or export, including but not limited to purchasing resources from illegal organized armed groups or their affiliates, making payments to them, or otherwise provide them with logistical support or equipment, etc. These armed groups or affiliates,

- ① Illegal control of mining sites. Or other means of controlling transportation routes, mineral resource trading points, and upstream actors in the supply chain;
- ② Illegal taxation or extortion of money or mineral resources at the entrance of the mine site, along the transportation route or at the trading point of mineral resources;
- ③ Illegal taxation or extortion of middlemen, exporters or international traders.

We will eliminate illegal control addresses, shipping routes and upstream participants in the supply chain. Unlawful taxation or extortion of money or mineral resources along mining site entry transportation routes or at mineral resource trading points, or providing direct or indirect support to public or private security forces who illegally tax or extort intermediaries, exporters or international traders .

We recognize that the role of public or private security forces at mine sites, surrounding areas and haulage routes is solely to uphold the rule of law, including safeguarding human rights, protecting the safety of miners, equipment and facilities, and protecting mine sites or haulage routes so that legitimate mining and trade are not disturbed.

Where we or any business or commercial relationship in our supply chain has entered into a contract with a public or private security force, we undertake or will provide that such security force is subject to recognized international standards for dealing with public or private security forces and approved by the guidance document. In particular, we will support or take steps to apply screening policies to ensure that individuals or security forces known to have committed human rights abuses are not recruited.

We will support or take steps to work with central or local governments, international organizations and civil society organizations to develop workable solutions to improve the clarity, proportionality and accountability of public safety and security spending.

We will support or take measures to cooperate with local governments, international organizations and civil

society organizations. Mineral resources in the supply chain are mined through small workshops or small-scale mining methods to avoid or minimize the presence of public or private security forces in The adverse impact of the mine site on vulnerable groups, especially on small workshops.

Reduce Risk

If we have reasonable grounds to believe that an upstream supplier is sourcing from or associated with any party that provides direct or indirect support to a non-state organized armed group, we will immediately suspend or discontinue cooperation with that supplier.

Depending on where the business is in the supply chain, we will immediately develop an adoption and implementation risk management plan with suppliers and other stakeholders to prevent or reduce the risk of providing direct or indirect support to public or private security forces. These security forces illegally control site transportation routes and upstream participants in the supply chain, illegally tax or extort money or mineral resources at mine site entrances, transportation routes or mineral trading points, or illegally tax intermediaries, export companies or international traders Or extortion, we have reason to believe there is a risk. In this case, if the risk management plan has not been implemented for six months, we will suspend or discontinue the cooperation with the supplier.

3. Corruption Laundering and Various Expenses to the Government

We do not offer, promise, give or solicit any bribes and resist solicitation of bribes. We will not pay bribes to the government for the purpose of concealing or falsifying the origin of mineral resources, falsely reporting mineral resource mining transactions, handling transportation, exporting and other activities that should be paid to the government for micro-nano tax fees and concession mining competitions.

We prohibit bribery in our business activities and transactions, including bribery by agents and other third parties. Develop standards and approval procedures for giving and receiving gifts, and do our best to promote responsible business practices with all business partners.

If we have reason to believe that there are mineral resources arising from or related to the unlawful taxation or extortion of mineral resources from mining transactions, processing, transport or export at the entrance to a mine site, along transport routes, or where upstream supplier mineral resources are traded Related money laundering risks, we will support or take measures to contribute to the effective elimination of money laundering.

We are committed to taking effective measures to prevent involvement in money laundering or terrorist financing, such as: monitoring transactions for unusual or suspicious activity by identifying and publishing suppliers,



customer identities and actual ownership, etc., and keeping cash above the upper limit of applicable laws and regulations Transaction Record.

We will ensure that all legitimate tax fees and royalties related to the extraction, trade, and export of mineral resources in conflict-affected and high-risk areas are paid to governments, and we are committed to disclosing such payments based on where the business is in the supply chain.

Reduce Risk

We are committed to working with suppliers, central or local governments, international organizations, civil society, and affected third parties, as appropriate, with measurable measures within a reasonable time span. For the purpose of preventing or reducing the risk of adverse impact, if the performance improvement or tracking risk reduction measures do not work, we will suspend or discontinue cooperation with upstream suppliers.

4. Land Rights, Emissions and Small Workshops

We do not participate in, tolerate or benefit from the extraction of resources on lands without the prior informed consent of local and indigenous people, including miners holding legal titles, leases, concessions or licenses. We do not participate in, tolerate or benefit from mining operations where the culture and heritage of local and indigenous peoples are not respected and protected, or that damage the traditional culture of local people.

We are committed to regularly assessing and reducing the adverse impacts of incoming mines on soil, air and water. Considering the conditions of surrounding soil, air and water resources, adopt pollution prevention methods and technologies with technical and financial feasibility and applicability to avoid or reduce and control pollution as much as possible. In accordance with the requirements of relevant laws and regulations, monitor the main pollutants discharged by the enterprise, keep abreast of the pollution status of the enterprise, and make clear records, publicize the monitoring results, and adopt strategies to control and reduce emissions.

We agree to ensure compliance with applicable legal requirements for chemicals and toxic substances. Avoid the manufacture, trade and use of chemicals and hazardous substances that are subject to international bans due to high toxicity, environmental persistence or potential irreversible ecological effects. Including strict control of arsenic and mercury emissions, management of oxides, ensuring that the disposal, storage and transportation of hazardous substances comply with relevant laws and regulations in accordance with the highest international standards, ensuring no leakage, spillage or other forms of release into the environment during the process .

We prohibit the exploitation of resources in World Heritage Sites or legally protected areas and the resulting threat to the value of these heritage sites.

Reduce Risk

If we have reasonable grounds to believe that such a risk exists, we will immediately work with suppliers and other stakeholders to develop, adopt and implement a risk management plan based on the company's specific position in the supply chain to prevent or reduce land rights violations , causing significant adverse environmental impacts or specific risks associated with small workshops or small-scale miners.