

# Conflict Minerals Policy

## Introduction

NIU Technologies (together with its subsidiaries and consolidated affiliated entities, “NIU”, “We” or the “Company”) is committed to ensuring the health, safety and protection of people who come into contact with our products and business, and we require high social, environmental, and human rights standards among our suppliers. Managing our obligations in relation to Conflict Minerals is a part of this corporate responsibility. The Policy applies to all employees and is comprehensively applied to corporates, agents, and supply chains engaged in a working relationship with NIU.

Conflict Minerals are acute in the illegal mining and trade of ores of tantalum, tin, tungsten, gold, and cobalt in conflict-affected and high-risk areas (CAHRA) including the Democratic Republic of the Congo (DRC) and adjoining countries (e.g. Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, Angola, Congo, and the Central African Republic), from which such ores are transferred to global markets.

## Core Principles

NIU does not procure metals directly, but we are working towards ensuring that our products do not contain conflict minerals that have been sourced from mines that support or fund. NIU will implement and take all necessary actions and measures to trace the origin of conflict minerals used in products:

- **Risk identification**
  - **Necessity:** NIU will identify and assess conflict minerals used in products to understand their application in the functionality of the products. NIU will document relevant information when necessary.
  - **Supplier survey:** NIU will communicate with suppliers through appropriate channels to understand the use of conflict minerals in the supply chain. Suppliers are encouraged to provide relevant information.
  - **Response verification:** NIU will review the information of conflict minerals received from suppliers and may request supplementary explanations when necessary.
  - **Country of origin:** NIU will, where feasible, collaborate with suppliers to understand the origin of conflict minerals in the supply chain.
- **Risk management**
  - NIU will establish a risk assessment framework to identify potential risks associated with conflict minerals in the supply chain.

- Upon identifying potential risks, NIU may take one or more of the following measures:
  - Maintain communication with relevant suppliers
  - Request necessary additional information
  - Provide suggestions for improvement when appropriate
- Specific risk management measures will be based on:
  - The nature and extent of the risk
  - The resources available to NIU
  - The feasibility of implementation

## **Review and Update**

The policy has been approved by the management and will be reviewed and updated regularly to reflect changes in regulations, industry best practices, and the evolving needs of NIU.