



# **CONFLICT MINERALS POLICY STATEMENT**

We have adopted this conflict minerals policy in support of our commitment to responsible sourcing, compliance with applicable legal requirements and meeting the expectations of our customers. As used in this policy, “conflict minerals” has the meaning given to that term in each of the U.S. Conflict Minerals Rule and the EU Conflict Minerals Regulation (together, the “Regulations”). As set forth in the Regulations, “conflict minerals” includes tin, tantalum, tungsten, and gold generally and as further set forth in the more detailed list of minerals and metals within the scope of the EU Conflict Minerals Regulation (collectively, “3TG”). This policy applies to conflict minerals regardless of where they are sourced, processed or sold.

S.E.C. Accessories Ltd. refer as (S.E.C.) does not knowingly procure any 3TG that originates from a conflict-affected or high-risk area (a “CAHRA”), unless they are processed by smelters and refiners that are verified or in the process of becoming verified as “conflict free,” “conformant” or the equivalent by an independent third party (collectively referred to as “conflict free”).

Our due diligence processes and efforts conform to the relevant portions of the Organisation for Economic Co-operation and Development’s internationally recognized Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Consistent with the foregoing and the Regulations, we ask our suppliers to undertake due diligence with their supply chains to determine the location from which 3TG is being sourced and whether the smelter or refiner is conflict free. This request is supported by S.E.C.’s Supplier Code of Conduct, which require our suppliers upon request to conduct their own due diligence and provide written documentation as to the origin of the 3TG in their products. In addition, suppliers are expected to maintain policies and procedures that support their due diligence and our expectation that supplier’s source responsibly.

If we discover that products procured by us contain 3TG from CAHRAs that is processed by facilities that are not conflict free or in the process of becoming conflict free, we will take steps in conjunction with the supplier to transition the products’ 3TG supply chain to conflict free sources or to seek to use leverage to influence the smelter or refiner to become conflict free. We do not seek to embargo responsibly sourced 3TG from CAHRAs (as doing so could be detrimental to the legitimate economies and populations of those areas). Suppliers are therefore encouraged to continue support of conflict free smelters and refiners and to take similar measures with their supply chains.

The information provided by S.E.C.’s suppliers is used to conduct our due diligence. In addition to assessing supplier information for accuracy, completeness and consistency, we compare the smelter and refinery lists provided by our suppliers with the Responsible Mineral Initiative’s lists of “conformant” and “active” smelters and refiners to determine which facilities are third party-verified or in the process of becoming verified. Information provided by our suppliers is used to inform our risk assessments and risk mitigation activities and in the development of S.E.C.’s Conflict Minerals Report.

This Statement is sign on 15 Aug 2022 and approved by:

A handwritten signature in black ink, appearing to read 'Victor Cheung', is written over a horizontal line. The signature is fluid and cursive.

**Mr. Victor Cheung**  
**Sr. Director of QA & Compliance**