



5C GROUP

5C Hong Kong Ltd

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Policy – Supply Chain

This Policy shows 5C Hong Kong Limited's (5C) commitment and its expectations for its product suppliers regarding actions to address Conflict Minerals.

5C expects its suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing **conflict minerals** are **conflict** free.

5C, being a responsible company, supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

5C is committed to working with its suppliers to educate them on these matters and concerning steps they can take to obtain increased transparency regarding the origin of minerals contained in the products they manufacture and sell to us.

5C reserves the right to evaluate the extent to which a supplier has failed to reasonably comply with this Policy.

5C reserves the right to request additional documentation from its suppliers regarding the origin of any Conflict Minerals included in any products sold to us.

Policy – Sourcing

5C Hong Kong Limited (5C) is committed to ensuring that our supply chain is free of any metal which was procured for the support or benefit of armed and anti-social conflict groups or involving serious abuses of human rights and non-compliant with OECD Guidelines.

5C clearly criticizes such activity and will reject any material which we believe was obtained involving serious human rights violations or which benefitted or supported armed rebels or terrorist groups through illegal finance or other activities.

5C shall carry out risk assessments for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any supplier involved in dealing with Conflict-Affected and High-Risk areas, any form of Human Right Violation; Torture, Cruel, In-Human and Degrading Treatment; Forced/Compulsory Labour; Child Labour; Abuses such as widespread Sexual Violence; War Crimes; other serious violations of International Humanitarian Law, Crime against Humanity; Genocide and/or To Bribe or To be Bribed. We strictly condemn and prohibit any Direct/Indirect support to public/private security forces which illegally Control, Tax or Extort money from Mining Sites, Transportation Routes and Upstream Sectors.

5C shall carry out due diligence to assess risks related to procurement from the Conflict-affected and high-risk areas – CAHRAs and shall always source from compliant miners/refiners/traders.

5C shall always set reasonable efforts to source Conflict-Free Minerals from smelters and refiners validated as being DRC Conflict Free, and require their direct and indirect suppliers to do the same.

5C strives to work supportively with our customers and supply chain partners in implementing conflict minerals compliance programs.

Policy – Due Diligence

5C Hong Kong Limited (5C) shall always undertake to ensure that the extraction and trade of mineral ores containing tin, tantalum, tungsten and gold support peace and development, not conflict.

5C remains committed to enhance its Supply Chain Due Diligence program through internal review and external assessments. We have a zero-tolerance policy for any supplier violating OECD due diligence guidelines and we shall immediately stop commercial relationship if any of our business associates are found to be non-compliant or High-Risk during our internal/external risk assessment.

Currently 5C procures its precious metals from RJC-CoC and CoP compliant miners/refiners/traders. However, we have established a strong due diligence process and shall review any report of grievance or complaint during our annual assessment.

Grievance Mechanism

Our employees, suppliers and other parties can report concerns and alleged violations of supply chain/sourcing/due diligence policy as follows:

Email: support@5C-group.com

Reports can be made anonymously and will be kept confidential to the fullest extent practicable and allowed by law.

We will not take any retaliatory action against our employees, suppliers, or other parties who make a report in good faith.

Our suppliers are encouraged to contact support@5C-group.com if they wish to seek guidance on the application of this Policy.

Date : 17-Jan-2020

Hong Kong