

Zyxel Group Responsible Minerals Management Policy and Commitment

September 2024 Version 1

Zyxel Group and its subsidiaries declare and commit to upholding the principles of responsible and sustainable procurement by formulating the Responsible Minerals Management Policy and responsible sourcing management processes. We do not accept using metals sourced from conflict-affected regions or non-compliant smelters. We conduct due diligence on our suppliers and require all suppliers to comply with Zyxel Group's Responsible Minerals Procurement Policy.

1. Avoid Conflicts and Risks

We are committed to prevent significant adverse impacts associated with the extraction, trade, handling, and export of 3TG minerals (Tungsten, Tantalum, Tin, and Gold), as well as Cobalt (Co) and Mica from conflict-affected and high-risk areas. We pledge not to fuel conflicts and to avoid contributing to social, environmental, and human rights deterioration, fulfilling our responsibility to uphold human rights.

2. Compliance with International Standards

We adhere to the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, published by the Organization for Economic Cooperation and Development (OECD), and comply with customer requirements. We conduct due diligence on our suppliers and require all suppliers to complete due diligence forms in order to verify the source of related raw materials.

3. Dedicated Management Mechanism

A designated unit is responsible for establishing a conflict minerals management mechanism, ensuring compliance with the Responsible Business Alliance (RBA) Code of Conduct. We also support the strategies and practices of the Responsible Minerals Initiative (RMI) by adopting RMI's due diligence reporting templates and related management tools.

4. Promotion and Communication

We actively promote responsible procurement policies, educating suppliers on relevant requirements to ensure the supply chain partners comply with and implement responsible sourcing principles. Additionally, we provide a grievance reporting channel, offering affected individuals or whistleblowers the opportunity to voice their concerns.

Den Li