

Xiaomi Corporation Conflict Minerals Policy

1 Declaration

1.1 Xiaomi Group (hereinafter referred to as “Xiaomi”) is committed to being a responsible corporate citizen and ensuring compliance in our operations as part of our efforts to drive the sustainable development of Xiaomi’s value chain. We strive to use minerals from responsible suppliers in our value chain.

1.2 “Conflict Minerals” usually refer to the extracts of minerals including but not limited to tin, tungsten, tantalum, gold (3TG), cobalt, mica, etc. and the derivatives of these metals, from conflict-affected and high-risk areas (CAHRA) (including the Democratic Republic of Congo (DRC) and adjoining countries). The extraction and trading of these minerals may be at risk of associating with human rights abuse and contributing to conflicts or social unrest. We are highly concerned about this issue in our supply chain and take proactive measures to address it. Xiaomi does not directly participate in the extraction, production, and procurement of the raw materials of our products.

1.3 Xiaomi supports peaceful liaison in conflict-affected and high-risk areas (CAHRAs), and advocates for the responsible and sustainable sourcing of minerals, and for a diverse and stable economic institution.

1.4 Xiaomi pledges not to use conflict minerals that directly or indirectly finance or benefit armed groups in the DRC and adjoining countries. We urge all supply chain companies or individuals directly or indirectly involved in the production of goods and services for Xiaomi, as well as their employees, agents and subcontractors (hereinafter referred to as "supplier"), to refrain from sourcing or using conflict minerals that directly or indirectly finance or benefit armed groups in the DRC and adjoining countries.

1.5 To fulfill our commitment, Xiaomi will take all necessary measures to trace the source of conflict minerals used in our products and identify their countries of origin. Information about smelters and refineries used by suppliers or sub-suppliers for minerals (e.g. 3TG, cobalt, mica, etc. and their derivatives) must be disclosed to Xiaomi upon request.

1.6 Xiaomi requires similar or stricter commitments from its suppliers. In any sourcing site, Xiaomi's suppliers are expected to make every effort to ensure that the products they provide to Xiaomi do not contribute to armed conflict, violate human rights or cause environmental degradation.

1.7 Xiaomi adheres to the principles stipulated in the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Conflict-Free Mineral Supply Chains and the Conflict-Free Sourcing Initiative (CFSI)’s Conflict-free Smelter Audit Program, and requires our suppliers to conform to these guidelines and conduct investigations to identify the countries of origin of the conflict minerals used in its products.

Suppliers shall establish a Conflict Minerals Policy and identify the countries of origin of the conflict minerals, and proactively communicate and engage with upstream suppliers to build a conflict-free supply chain. Xiaomi has the right to request additional evidence from its suppliers to prove the countries of origin of the conflict minerals, and undertakes verification audits if necessary.

1.8 Xiaomi is willing to partner with suppliers who share our values and principles. If a supplier refuses to trace or manage the sources of the conflict minerals, or is unable to verify that these minerals are sourced from conflict-free regions, Xiaomi will consider suspending its business relationship with this supplier.

2 Xiaomi's Conflict Minerals Due Diligence Procedure

2.1 Suppliers should develop appropriate management systems for conducting due diligence in accordance with the standards set out in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (the "OECD Guidance") and other applicable international standards.

2.2 Establish and develop a Conflict Minerals policy, due diligence procedure and safeguard measures, and define the roles and responsibilities of internal personnel.

2.3 Continue to refine, revise and improve the due diligence process in light of the existing infrastructure for conflict minerals compliance across the industry and changes in applicable law.

2.4 Identify the risk hotspots in the supply chain, and develop risk response procedures and remediation plans for situations that may cause impacts or contribute to adverse impacts. Provide affected stakeholders with remedies that comply with local laws and regulations.

2.5 Require suppliers to conduct due diligence on smelters and refiners, and disclose the information of smelters and refiners in accordance with the Xiaomi Conflict Minerals management template or the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT/EMRT) on an annual basis. If necessary, request smelters and refiners to undertake the relevant certification process.

2.6 Analyze and verify the due diligence results reported by the suppliers to ensure that the conflict minerals are not sourced from conflict-affected areas.

2.7 Disclose the list of smelters and refiners who have passed the due diligence and verification process. Increase the transparency of the results of conflict minerals due diligence investigations at the appropriate time.

2.8 Design and implement strategies to address identified risks based on supplier due diligence and risk assessment or develop and implement response strategies for identified risks.

2.9 Engage with suppliers continuously to improve response rate and enhance the data credibility of the smelters.

2.10 Continuously monitor existing suppliers, identify and assess supplier risk tolerance, and monitor the implementation of risk mitigation strategies.

2.11 Establish communication channels for stakeholders on Conflicted Minerals management.

2.12 Provide training on Conflict Minerals Policy and the due diligence procedure to our employees and suppliers.

3 Xiaomi Supplier Code of Conduct for Responsible Minerals Management

3.1 Endorse the initiatives, processes, standards, and achievements of the Responsible Business Alliance (RBA).

3.2 Support the work and achievements of the RBA Responsible Minerals Initiative (RMI).

3.3 Follows the RBA Conflict Minerals Reporting Template/Extended Minerals Reporting Template (CMRT/EMRT) and Responsible Minerals Assurance Process to develop Xiaomi's Conflict Minerals management procedure and template.

3.4 Obliges to support Xiaomi in direct or indirect communication with smelters and refiners who are involved in Conflict Minerals.

3.5 Refers to the RBA Code of Conduct to conduct Conflict Minerals due diligence, or engage RBA-endorsed third-party audit agencies to conduct independent audits. Report the audit result and corrective actions to ensure conformance.

3.6 Requires upstream suppliers to manage minerals responsibly with reference to the RBA Code of Conduct and ensure transparency and traceability of minerals from extraction to product.

3.7 Establish policies to ensure that there is no direct or indirect contribution to financing crimes and human rights abuse.