

派纳维森（苏州）电气科技有限公司



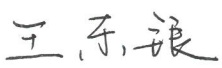
Panawincn Electric Co.,Lt

2025 年冲突矿物质尽职调查报告

Conflict Minerals Due Diligence Report 2025

<p>报告依据 Report Basis</p>	<p>1934 年《证券交易法》第 13p-1 条及 Form SD 要求 Section 13p-1 of the Securities Exchange Act of 1934 and Form SD requirements</p>
<p>原产国溯源 Country of Origin Traceability</p>	<p>根据 CMRT 申报信息，公司使用的 3TG 矿物主要原产国为[列出主要原产国，如：中国、马来西亚、美国、玻利维亚等]。报告期内未收到任何供应商申报其 3TG 矿物直接来源于覆盖国家的冲突区域。 According to CMRT declaration information, the main countries of origin of 3TG minerals used by the company are China, Malaysia, the United States, Bolivia, etc. During the reporting period, no supplier reported that its 3TG minerals were directly sourced from conflict areas in the covered countries.</p>
<p>监管合规说明 Regulatory Compliance Statement</p>	<p>本报告根据美国证券交易委员会（SEC）颁布的《冲突矿产规则》（17 CFR §240.13p-1）要求编制，旨在披露公司产品中所含锡（Sn）、钽（Ta）、钨（W）、金（Au）（以下统称“3TG 矿物”）的来源及供应链尽职调查情况。上述规则为落实《2010 年多德-弗兰克华尔街改革和消费者保护法案》第 1502 条制定，要求 SEC 注册人披露其产品功能或生产所必需的 3TG 矿物是否来源于刚果民主共和国及其周边 10 个覆盖国家（安哥拉、布隆迪、中非共和国、刚果共和国、卢旺达、南苏丹、坦桑尼亚、乌干达、赞比亚、刚果民主共和国）。 This report is prepared in accordance with the requirements of the Conflict Minerals Rule (17 CFR §240.13p-1) promulgated by the U.S. Securities and Exchange Commission (SEC), aiming to disclose the source of tin (Sn), tantalum (Ta), tungsten (W), gold (Au) (hereinafter collectively referred to as "3TG minerals") contained in the company's products and the supply chain due diligence situation. The above rules are formulated to implement Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, requiring SEC registrants to disclose whether 3TG minerals</p>

	<p>necessary for the function or production of their products are sourced from the Democratic Republic of the Congo and its surrounding 10 covered countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia, Democratic Republic of the Congo).</p>
<p>独立审计说明 Independent Audit Statement</p>	<p>根据 SEC 于 2014 年 4 月 29 日发布的《关于冲突矿产规则上诉法院裁决影响的声明》，以及哥伦比亚特区巡回法院的相关判决，本报告未进行独立私营部门审计 (IPSA)。公司未将任何产品描述为“无刚果(金)冲突”(DRC Conflict Free)，因此无需提交第三方审计报告。</p> <p>In accordance with the SEC's Statement on the Impact of the Court of Appeals Decision on the Conflict Minerals Rule issued on April 29, 2014, and the relevant judgment of the District of Columbia Circuit Court, this report has not undergone an Independent Private Sector Audit (IPSA). The company does not describe any product as "DRC Conflict Free", so there is no need to submit a third-party audit report.</p>
<p>合理原产国查询 (RCOI) 说明 Reasonable Country of Origin Inquiry (RCOI) Statement</p>	<p>公司按照 SEC 规则要求，对供应链中的 3TG 矿物开展了善意、合理的原产国查询 (Reasonable Country of Origin Inquiry, RCOI)，调查设计旨在识别 3TG 矿物是否来源于覆盖国家、或来自回收/废料来源。</p> <p>In accordance with the requirements of SEC rules, the company has conducted a good-faith and reasonable Reasonable Country of Origin Inquiry (RCOI) on 3TG minerals in the supply chain. The survey is designed to identify whether 3TG minerals are sourced from covered countries or from recycled/scrap sources.</p>
<p>调查结果: Investigation Results:</p>	<p>通过调查，未发现任何证据表明公司采购的 3TG 矿物直接资助了覆盖国家的武装团体。</p> <p>Through the investigation, no evidence was found that the 3TG minerals purchased by the company directly funded armed groups in the covered countries.</p>

批准:		审核:		编制:	
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Date:	2025.12.24	Date:	2025.12.24	Date:	2025.12.24



Contents

内容

一、公司及覆盖产品说明 **Company and Covered Product Description**

1.1 公司概况 **Company Profile**

派纳维森（苏州）电气有限公司是线束行业快速发展的一家致力于成为世界一流的工业电气连接方案企业，专注于电子、工业控制，风电，新能源汽车，医疗，AI 等领域的线束及连接方案开发与生产，全球运营网络覆盖 86 个国家和地区，报告期内员工总数约 1300 人。

Identify all direct suppliers that provide raw materials, parts or processing services containing 3TG minerals for covered products, exclude service suppliers, indirect material suppliers and inactive suppliers, and finally determine 11 suppliers to be included in the investigation scope.

1.2 覆盖产品范围 **Covered Product Scope**

本报告涵盖报告期内公司制造或委托制造的、3TG 矿物对其功能或生产为必需的所有产品，具体包括：电缆，线束，连机器、传感器等，上述产品所包含的含 3TG 矿物的零部件、半成品及原材料，经初步评估，报告期内公司范围内所有产品均符合上述覆盖标准，占公司同期总产品数量的 100 %。

This report covers all products manufactured or contracted by the company during the reporting period for which 3TG minerals are necessary for their function or production, including: cables, wiring harnesses, connectors, sensors, etc. The parts, semi-finished products and raw materials containing 3TG minerals included in the above products have been preliminarily evaluated. All products within the company's scope during the reporting period meet the above coverage standards, accounting for 100% of the company's total product quantity in the same period.

二、调查实施流程 Investigation Implementation Process

2.1 供应商范围确定: Determination of Supplier Scope

识别所有为覆盖产品提供含 3TG 矿物原材料、零部件或加工服务的直接供应商，排除服务供应商、间接材料供应商及非活跃供应商，最终确定 11 家供应商纳入调查范围。

Identify all direct suppliers that provide raw materials, parts or processing services containing 3TG minerals for covered products, exclude service suppliers, indirect material suppliers and inactive suppliers, and finally determine 11 suppliers to be included in the investigation scope.

2.2 信息收集工具: Information Collection Tools:

采用负责任矿产倡议 (RMI) 发布的《冲突矿产报告模板》CMRT 作为标准化调查工具，要求供应商申报其供应物料中 3TG 矿物的使用情况、冶炼厂/精炼厂信息及原产国。

The Conflict Minerals Reporting Template (CMRT) issued by the Responsible Minerals Initiative (RMI) is used as a standardized investigation tool, requiring suppliers to declare the use of 3TG minerals in their supplied materials, smelter/refinery information and country of origin.

2.3 催办与核验: Follow-up and Verification:

对未按时回复或填报不完整的供应商开展至少 8 轮跟进，包括邮件提醒、电话沟通及采购层级升级催告，并对回收的 CMRT 进行逻辑性校验、完整性审查及与历史数据交叉比对。

Carry out at least 8 rounds of follow-up for suppliers who fail to reply on time or submit incomplete forms, including email reminders, telephone communications and procurement level escalation reminders, and conduct logical verification, integrity review and cross-comparison with historical data on the recovered CMRT.

2.4 数据来源说明: Data Source Description:

部分冶炼厂合规性数据来源于 RMI 会员服务及公开的《合规冶炼厂名单》(CFS List)。

Part of the smelter compliance data comes from RMI member services and the public Certified Smelter List (CFS List).

2.5 RCOI 调查结果 RCOI Investigation Results

指标	数值	说明
纳入调查范围的供应商总数 Total number of suppliers included in the investigation scope	11 家	覆盖所有可能供应含 3TG 物料的直接供应商 Covers all direct suppliers that may supply materials containing 3TG
回收有效 CMRT 报告数量 Number of valid CMRT reports recovered	11 份	指填报信息完整、符合规范要求的有效回复 Refers to valid replies with complete submitted information and compliance with normative requirements
综合回收率 Comprehensive recovery rate	100%	有效回复数/调查供应商总数 × 100% Number of valid replies / Total number of surveyed suppliers × 100%
识别的独特冶炼厂/精炼厂数量 Number of unique smelters/refineries identified	346 家	对所有 CMRT 申报的冶炼厂信息去重后统计 Statistics after deduplication of smelter information declared by all CMRT
确认来自覆盖国家的 3TG 数量 Quantity of 3TG confirmed to be from covered countries	0	经核查，本年度未发现明确来源于覆盖国家的 3TG 矿物 After verification, no 3TG minerals clearly originating from covered countries were found this year After verification, no 3TG minerals clearly originating from covered countries were found this year

基于本次 RCOI 结果，公司无法完全排除部分 3TG 矿物可能来源于覆盖国家的可能性，因此按照 SEC 规则要求，开展了下述供应链尽职调查工作。

Based on the results of this RCOI, the company cannot completely exclude the possibility that some 3TG minerals may originate from covered countries. Therefore, in accordance with the requirements of SEC rules, the following supply chain due diligence work was carried out.

三、尽职调查措施与实施情况 Due Diligence Measures and Implementation

公司的尽职调查体系完全符合经济合作与发展组织（OECD）《受冲突影响和高风险地区矿物负责任供应链尽职调查指南》（第三版）的五步框架要求，具体措施如下：

The company's due diligence system fully complies with the five-step framework requirements of the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition).

The specific measures are as follows:

3.1 管理体系建设 (OECD 第一步) Management System Construction (OECD Step 1)

政策发布: 正式发布《冲突矿物质政策及管理办法》，明确公司对 3TG 矿物负责任采购的承诺，政策已公开并加入 IPC 行业会员，公开背书。

Policy Release: Officially issued the Conflict Minerals Policy and Management Measures, clarifying the company's commitment to responsible procurement of 3TG minerals. The policy has been made public and joined the IPC industry membership for public endorsement.

组织架构: 成立跨部门冲突矿产管理团队，成员来自供应链管理、质量部、行政部及人事部，由质量部李燕统筹管理，向董事会审计委员会定期汇报。

Organizational Structure: Established a cross-departmental conflict minerals management team with members from the Supply Chain Management Department, Quality Department, Legal and Human Resources Department, coordinated by Li Yan from the Quality Department, and regularly reported to the Audit Committee of the Board of Directors.

供应商约束: 将冲突矿产合规条款纳入所有新签/续签的供应商采购合同，明确要求供应商配合尽职调查并确保所供应物料的 3TG 来源合规。

Supplier Constraints: Incorporate conflict minerals compliance clauses into all newly signed/renewed supplier procurement contracts, clearly requiring suppliers to cooperate with due diligence and ensure that the 3TG sources of the supplied materials are compliant.

申诉机制: 建立多渠道风险预警与申诉机制，包括匿名举报热线及 IPC 平台，接受供应链各环节的违规举报。

Appeal Mechanism: Establish a multi-channel risk early warning and appeal mechanism, including an anonymous reporting hotline and the IPC platform, to accept reports of violations in all links of the supply chain.

3.2 供应链风险识别与评估 (OECD 第二步) Supply Chain Risk Identification and Assessment (OECD Step 2)

冶炼厂合规判定: 将识别出的 346 家冶炼厂与 RMI 最新版 CFS 名单进行逐一比对，按以下标准进行风险分级：

Smelter Compliance Judgment: Compare the 346 identified smelters with the latest version of the RMI CFS list one by one, and classify risks according to the following standards:

风险等级 Risk Level	判定标准 Judgment Criteria	数量 Quantity	占比 proportion
无风险 Risk-free	已列入 CFS 名单且状态为“合规” Already on the CFS list and in a “compliant” status	345 家	99.7%
待核查 to be verified	列入 CFS 名单且状态为“积极参与审计”；或不属于 3TG 审计范围 On the CFS list and with the status of “actively participating in the audit”; or not within the scope of the 3TG audit	1 家	0.3%
高风险 high-stake	未列入 CFS 名单 Not included in the CFS list	0	%

原产国溯源：根据 CMRT 申报信息，公司使用的 3TG 矿物主要原产国为中国。报告期内未收到任何供应商申报其 3TG 矿物直接来源于覆盖国家的冲突区域。

Country of Origin Traceability: According to CMRT declaration information, the main country of origin of 3TG minerals used by the company is China. During the reporting period, no supplier reported that its 3TG minerals were directly sourced from conflict areas in the covered countries.

3.3 风险应对与缓释（OECD 第三步） Risk Response and Mitigation (OECD Step 3)

针对不同风险等级的冶炼厂，公司实施分级管控措施：

For smelters of different risk levels, the company implements hierarchical control measures:

3.3.1 高风险冶炼厂应对 Response to High-Risk Smelters:

向对应供应商发出正式整改通知，要求其在 90 天内提供冶炼厂的尽职调查证明文件（如第三方审计报告、矿产追溯政策等）

Issue a formal rectification notice to the corresponding supplier, requiring it to provide the smelter's due diligence certification documents (such as third-party audit reports, mineral traceability policies, etc.) within 90 days

要求供应商制定明确的合规切换时间表，最迟于 2026 年第二季度前完成向 CFS 合规冶炼厂转换

Require suppliers to formulate a clear compliance switching schedule, and complete the conversion to CFS-compliant smelters by the second quarter of 2026 at the latest

将合规表现纳入供应商年度绩效考评，对拒不整改的供应商启动淘汰流程

Incorporate compliance performance into the annual performance evaluation of suppliers, and start the elimination process for suppliers who refuse to rectify

3.3.2 待核查冶炼厂应对 Response to Smelters to be Verified:

建立动态跟踪台账，每季度核查 CFS 名单更新，跟进冶炼厂审计进度

Establish a dynamic tracking ledger, verify the update of the CFS list every quarter, and follow up the audit progress of the smelter

引导供应商向上游传导合规要求，推动冶炼厂尽快完成 RMAP（负责任矿产保证流程）认证
Guide suppliers to transmit compliance requirements upstream, and promote smelters to complete RMAP (Responsible Minerals Assurance Process) certification as soon as possible

下一年度调查中作为重点核查对象

As a key verification object in the next year's investigation

3.3.3 合规冶炼厂管理 Management of Compliant Smelters:

在合格供应商名录中标注为“冲突矿产合规”

Marked as "Conflict Minerals Compliant" in the qualified supplier list

后续采购中优先选择使用合规冶炼厂矿产的供应商

Prioritize suppliers that use minerals from compliant smelters in subsequent procurement

已将全部合规冶炼厂信息录入供应链管理系统，作为采购决策的强制参考依据

All compliant smelter information has been entered into the supply chain management system as a mandatory reference for procurement decisions

3.4 独立审计支持（OECD 第四步） Independent Audit Support (OECD Step 4)

公司不直接与冶炼厂/精炼厂建立采购关系，因此依赖国际公认的第三方验证体系确认冶炼厂合规性，包括：

The company does not directly establish procurement relationships with smelters/refineries, so it relies on internationally recognized third-party verification systems to confirm smelter compliance, including:

- 要求供应商优先选择通过 RMI RMAP 认证、LBMA（伦敦金银市场协会）认证或其他同等独立第三方审计的冶炼厂

Require suppliers to prioritize smelters that have passed RMI RMAP certification, LBMA (London Bullion Market Association) certification or other equivalent independent third-party audits

- 作为 RMI 成员参与行业标准制定，推动冶炼厂层面的独立审计机制完善

Participate in the formulation of industry standards as an RMI member, and promote the improvement of the independent audit mechanism at the smelter level

- 报告期内，供应链中 CFS 合规冶炼厂数量较 2024 年度增加 34 家，合规占比提升至 99.7%
During the reporting period, the number of CFS-compliant smelters in the supply chain increased by 34 compared with 2024, and the compliance proportion increased to 99.7%

3.5 信息披露与报告（OECD 第五步） Information Disclosure and Reporting (OECD Step 5)

- 每年编制本冲突矿产报告，提交客户，后续将公开披露。
Prepare this conflict minerals report annually, submit it to customers, and will disclose it publicly in the future.
- 每季度向高级管理层汇报尽职调查进展，每年向董事会审计委员会提交年度合规报告
Report the progress of due diligence to senior management every quarter, and submit an annual compliance report to the Audit Committee of the Board of Directors every year
- 定期向供应商、客户及投资者沟通公司冲突矿产管理进展，回应利益相关方关切。
Regularly communicate the company's conflict minerals management progress to suppliers, customers and investors, and respond to stakeholder concerns
- 每年编制本冲突矿产报告，提交客户，后续将公开披露。
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Regularly communicate the company's conflict minerals management progress to suppliers, customers and investors, and respond to stakeholder concerns

四、风险敞口与改进计划 Risk Exposure and Improvement Plan

4.1 现存风险敞口 Existing Risk Exposure

- 公司作为下游制造商，对供应链末端冶炼厂层级的直接管控能力有限，部分中小供应商的上游追溯能力不足
As a downstream manufacturer, the company has limited direct control over the smelter level at the end of the supply chain, and some small and medium-sized suppliers have insufficient upstream traceability capabilities
- 钴、云母等扩展矿物的尽职调查体系尚在建设中，暂未纳入强制披露范围
The due diligence system for extended minerals such as cobalt and mica is still under construction and has not yet been included in the scope of mandatory disclosure
- 少数供应商响应率较低，部分 CMRT 数据的颗粒度有待提升
The response rate of a small number of suppliers is low, and the granularity of some CMRT data needs to be improved

4.2 2026 年度改进计划 2026 Annual Improvement Plan

- 供应商能力建设：选取 10 家核心供应商开展专项培训，提升其上游追溯能力和 CMRT 填报质量
Supplier Capacity Building: Select 10 core suppliers to carry out special training to improve their upstream traceability capabilities and CMRT filling quality
- 扩展调查范围：同步引入 RMI《扩展矿物报告模板》（EMRT），启动钴、云母等矿物的供应链摸底工作
Expand the scope of investigation: Simultaneously introduce the RMI Extended Minerals Reporting Template (EMRT) to start the supply chain investigation of minerals such as cobalt and mica
- 披露优化：编制面向客户的冲突矿产合规简报，主动披露供应链管理成效
Disclosure Optimization: Prepare customer-oriented conflict minerals compliance briefings to proactively disclose supply chain management effectiveness

五、结论 Chapter 5: Conclusion

派纳维森（苏州）电气有限公司承诺严格遵守 SEC 冲突矿产相关规则，持续完善供应链尽职调查体系。尽管全球供应链具有高度复杂性，公司已尽合理努力开展 RCOI 及尽职调查工作，未发现任何证据表明公司采购的 3TG 矿物直接资助了覆盖国家的武装团体。未来公司将继续与供应商、行业组织及监管机构协作，共同推动 3TG 供应链的透明度提升和负责任发展。

Panawincn Electric Co., Ltd. promises to strictly comply with SEC conflict minerals related rules and continuously improve the supply chain due diligence system. Despite the high complexity of the global supply chain, the company has made reasonable efforts to carry out RCOI and due diligence work, and no evidence has been found that the 3TG minerals purchased by the company directly fund armed groups in the covered countries. In the future, the company will continue to cooperate with suppliers, industry organizations and regulators to jointly promote the improvement of transparency and responsible development of the 3TG supply chain.

附录 / Appendix

附录 A：《冲突矿物质政策及管理办法》
Appendix A: Conflict Minerals Policy and Management Measures

附录 B：2025 年度回收 CMRT 报告汇总表
Appendix B: Summary of 2025 Recovered CMRT Reports

附录 C：RMI 合规冶炼厂名单（CFS List）引用说明
Appendix C: Reference Description of RMI Certified Smelter List (CFS List)