



BRILLIANT

CONFLICT MINERALS POLICY

Introduction

Our Supplier Code of Business Conduct defines our principles and commitment toward legal compliance, ethical conduct, anti-corruption, labor and environmental protection. These expectations extend to our suppliers. This Policy should be read in conjunction with our Supplier Code of Business Conduct and sets forth our principles against human rights violations related to the illegal trade of conflict minerals. Because of the link between the illegal extraction and trade of conflict minerals and associated human rights violations in the Democratic Republic of the Congo, we strive to increase transparency and ensure responsible procurement by our suppliers in an attempt to create positive change.

Our Commitment

We want to ensure that all components, parts and materials used to manufacture our products contain minerals from conflict-free sources. We do not knowingly tolerate, or profit from, contribute to, assist with or facilitate any activity that fuels conflict or violates human rights.

Implementation of the Policy

We prohibit human rights abuses associated with the extraction, transport or trade of conflict minerals. We also prohibit any direct or indirect support to armed groups or security forces that illegally control or tax mine sites, transport routes, trade points or any upstream actors in our supply chain. Similarly, we have no tolerance for corruption, money-laundering and bribery. We require our suppliers to agree to follow the same principles.

Company Activities

We have implemented a reasonable, good faith process in an attempt to identify tantalum, tin, tungsten and gold in our supply chain and to determine, to the degree reasonably practicable, the country of origin of those identified minerals. We have incorporated the principles of this Policy into our Purchase Order Terms and Conditions and we will work with our suppliers in an attempt to increase transparency in the supply chain. We aim to create awareness and build capacity within our suppliers through communication and training. We will communicate this Policy to identified suppliers who provide to us components, parts or materials containing tantalum, tin, tungsten and/or gold.

Supplier Requirements

Our Policy requires that suppliers who provide components, parts or materials containing tantalum, tin, tungsten, and/or gold must work with us to achieve conflict-free sourcing. Components, parts or materials, which either directly or indirectly contribute to conflict, are unacceptable. Our suppliers must define, implement and communicate to sub-suppliers their commitment to responsible sourcing and legal compliance. Our suppliers must work with sub-suppliers in an attempt to ensure traceability of these minerals at least to the smelter or refiner level. Traceability information must be maintained and recorded for five years and provided to us upon request. Our suppliers are encouraged to support industry efforts to enhance traceability and responsible practices in global mineral supply chains.



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Assessing and Responding to Identified Risks

Through strategic partnerships with our contract manufacturers and electronic component distributors, we collect information from suppliers for our products in an attempt to identify those suppliers that use tantalum, tin, tungsten or gold in their products. This information, along with data gathered from other available sources is used to assess risks of non-compliance with this Policy. Our approach, when commercially reasonable, is to establish long-term relationships with suppliers, seek sustainable solutions and work with suppliers to achieve improvements. If we identify a reasonable risk that a supplier is violating our commitments set forth in this Policy, we will require them to commit to and implement a corrective action plan within a reasonable timeframe. If necessary, we will follow-up on the effectiveness of corrective actions. Continued non-conformance or refusal to address issues of concern may ultimately lead to termination of the supplier relationship.

Grievance Mechanism and Reporting

This Policy will be reviewed regularly and updated as needed. We will comply with legal requirements to disclose our conflict minerals due diligence process and our conclusions regarding our mineral supply chain. Our employees, suppliers and other parties can report concerns and alleged violations of this Policy as follows:

- (i) Write us at Brilliant Home Technology, General Counsel, 241A S. San Mateo Drive, San Mateo, CA 94401
- (ii) Email us at Legal@brilliant.tech

Reports can be made anonymously, will be kept confidential to the fullest extent practicable and allowed by law and we will not take any retaliatory action against our employees because of making a report in good faith. Our suppliers are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this Policy.