

Xiaomi Corporation

Anti-Slavery and Human Trafficking Statement

This statement confirms the steps Xiaomi has taken during Fiscal Year (FY) 2024 to meet the requirements of the United Kingdom (UK) Modern Slavery Act (MSA) 2015, Chapter 30, Part 6, Provision 54. This statement is prepared in accordance with the UN Guiding Principles on Business and Human Rights. In the statement, Xiaomi is committed to ensuring that modern slavery and human trafficking do not take place in our business or supply chain. As part of this commitment, we continually strive to achieve the highest level of ethical, environmental, and employee-related standards within our own business and supply chain, making sure that employees, partners, suppliers, and others are working together to eradicate modern slavery and human trafficking.

For the purposes of Chapter 30, Part 6, Provision 54 of the U.K. Modern Slavery Act 2015, the statement is made on behalf of Xiaomi Technology UK Limited., with registered office at 100 Brook Drive, Green Park, Reading RG2 6UJ, United Kingdom.

About Us

Xiaomi Corporation is a consumer electronics and smart manufacturing company with smartphones and smart hardware connected by an IoT platform at its core. The Group is steadily advancing the global strategy with deep local market cultivation, operating in more than 100 countries and regions around the world. As of the end of 2024, the Group had 43,688 employees worldwide.

The Group's business scope encompasses two core segments: the "Smartphone × AIoT" and the "EV and Other New Initiatives". In UK, we offer a diverse range of products, including smartphones, smart home appliances, tablets, wearables and lifestyle products.

Corporate Policies

Xiaomi recognizes that slavery, forced labor and human trafficking can occur through more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities. Xiaomi's policies and integrated approach to preventing modern slavery draw upon internationally recognized labor and human rights standards such as the UN Universal Declaration of Human Rights, the ILO International Labor Standards, the OECD Guidelines for Multinational Enterprises, and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. These standards establish our baseline expectations and communicate our values, along with our commitment to ethics and integrity.

1. Corporate Code of Conduct

- Comply with the laws and regulations of the locations in which we operate and follow pertinent provisions of the ILO and the OECD.
- Regularly review our recruitment processes, employee records, and supplier qualifications to identify, assess, and minimize the risk of slavery, forced labor and human trafficking.

2. Supplier Social Responsibility Code of Conduct

- Adhere to the RBA Code of Conduct and the JAC Supply Chain Sustainability Guidelines.
- Outline clear terms prohibiting forced labor, bonded (including debt bondage) or indentured labor, involuntary prison labor, sex trafficking, slavery or trafficking of persons in any form in any stage of manufacturing.
- Require suppliers to sign and comply with this code as a prerequisite for cooperation with us.

3. Conflict Minerals Policy

- Commit to responsibly purchasing raw materials, considering the respect and protection of human rights as the top priority, and avoiding financing to armed groups in the Democratic Republic of the Congo (DRC) and its neighboring countries.
- Actively communicate and cooperate with upstream suppliers to gradually achieve conflict-free supply chain, and require their suppliers to provide additional evidence of the source of conflict minerals in their products and to conduct special audits if necessary.

4. The Code of Integrity and Anti-Corruption

- Form the foundation for maintaining high standards of ethics, integrity and compliance across all business.
- Enable employees to report misconduct in operations or supply chains without fear of retaliation.

Risk Assessment and Due Diligence

Pursuant to our own policies and the United Kingdom Modern Slavery Act 2015 as updated from time to time, Xiaomi has established explicit programs aimed at prohibiting Modern Slavery in our supply chain and in our business operations.

As a global technology company, we manage a dynamic multi-tiered supply chain across raw materials mining, processing, assembly, logistics, sales and services, product recovery and recycling. To maintain supply chain stability and business continuity, we have embedded ESG risk management in our supplier life-cycle management and have also partnered with suppliers to improve their ESG performance. Our suppliers are primarily classified into two categories, namely

production suppliers that directly and indirectly provide products and services, such as product components and final products assembly, and non-production suppliers that support our business operations. Considering ESG risks and impacts, we prioritize production suppliers in our protocols.

- **Compliance with the Xiaomi Corporation Supplier Social Responsibility Code of Conduct**

We conduct supplier risk assessments through documentary reviews. The documentary reviews cover all Tier-1 and key Tier-2 suppliers, requiring them to upload relevant qualification documents to our digital supply chain system to ensure basic compliance. Based on the results of the documentary reviews, we conduct on-site audits for suppliers identified as high-risk, onboarding suppliers, and qualified suppliers expanding their business or product categories. For key suppliers and critical processes, we also implement an unannounced inspection mechanism and conduct irregular spot checks to ensure compliance.

For human rights performance in supply chain, we have developed a supplier CSR assessment tool based on the Supplier Social Responsibility Code of Conduct. The tool evaluates suppliers across multiple dimensions, including but are not limited to:

- Whether procedures prohibiting child labor recruitment are established
- Whether workers are subjected to involuntary labor under violence or threats within facility premises
- The existence of any form of sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse
- Protection mechanisms for juvenile workers and female employees during pregnancy, maternity, and nursing periods ("three-period" protection)
- Employees' average annual weekly working hours on a yearly basis
- Coverage rate of occupational hazard health examinations

Each dimension is scored from two perspectives: compliance and system soundness. A higher score indicates a higher risk level, and suppliers are classified as high, medium, or low risk based on predefined thresholds.

For the high-risk suppliers, we promptly conduct on-site audits. In on-site audits, we collaborate with certified third-party institutions to conduct compliance and CSR audits. These audits involve reviewing compliance and system documents, on-site inspections of production facilities, and interviews with employees and management to assess multiple aspects of CSR performance, including the protection mechanisms of human rights and well-being, and the completeness of the business integrity management system. Suppliers are required to promptly address any issues identified during the on-site audits and assume joint supervisory responsibility. If a Tier-2 supplier encounters issues, we require its Tier-1 supplier to collaborate with them in developing rectification measures.

- **Compliance with the Xiaomi Corporation Conflict Minerals Policy**

For conflict minerals management, we have defined the investigation scope of our conflict minerals mechanism and established clear due diligence procedures. Annual reviews are conducted in accordance with these procedures. We maintain an extensive supply chain traceability program to trace the sources of 3TG, cobalt, and mica in our smartphones, tablet batteries and other electronic products.

We track and monitor suppliers' mineral usage, ensuring that our supply chain does not involve minerals from CAHRAs. We require suppliers to establish conflict minerals policies, conduct origin investigations, actively cooperate with upstream supply chains, and provide supplementary evidence or undergo special audits when necessary. Currently, the Group monitors the sources of six minerals, including 3TG, cobalt, and mica, and plans to expand the scope of monitored minerals in 2025 to further strengthen conflict minerals management.

Supply Chain Audits

We evaluate the effectiveness of measures we have taken to ensure that slavery and human trafficking do not occur in our business or supply chains through:

- **Monitor compliance with our Codes by both own operations and suppliers**

We require each supplier candidate to submit relevant materials in our digital supply chain management system, sign documents such as the Purchase Agreement, Non-Disclosure Agreement, Integrity Agreement, Quality Agreement, and Supplier Corporate Social Responsibility Agreement, and undergo our on-site audit or complete the RBA VAP audit. In the event of any red-line issues, suppliers will not be admitted until those issues are rectified. In our smartphone supply chain audits in 2024, two suppliers were disqualified from cooperation due to their failure to rectify multiple red-line issues related to CSR compliance, and the DPF issues identified in the RBA VAP audit.

In 2024, within an on-site CSR audit of Supplier A, we identified underage workers^{1*} working overtime, triggering a red-line issue under the Group's labor standards. We communicated our red-line policy to the supplier, provided a detailed explanation of pertinent labor regulations of Mainland China, and emphasized our strong commitment to human rights protection. We required the supplier to establish and enforce policies prohibiting overtime for underage workers and to formally commit to preventing such incidents in the future. During the rectification period, the supplier continuously submitted employee records for verification. In our follow-up audit, we confirmed that the issue had been fully rectified.

For conflict minerals due diligence, we achieved a 100% response rate from suppliers in 2024, which allowed us to fully evaluate the conflict minerals risk exposure in all component categories. This year, in the due diligence of the **smartphone supply chain**, we identified 402 upstream smelters or refiners from 52 countries and regions worldwide, with the RMAP certification status shown in the table below. For

¹ Underage workers: This refers to laborers who are at least 16 years old but under 18 years old (in Mainland China), or those who are above the minimum employment age in the country/region where the supplier produces for the Group but have not yet reached the legal adult age.

smelters/refiners without certification, we implemented origin traceability measures, requiring suppliers to conduct due diligence through their upstream chain and assist in promoting certification completion for the smelters/refiners. If necessary, cooperation may be suspended with smelters/refineries that do not meet the requirements to ensure that our products do not contain minerals from CAHRAs. Additionally, 62.17% of suppliers in the smartphone supply chain have publicly disclosed their conflict minerals purchasing policies.

RMAP Certification Status of Smelters/Refiners in the Group's Supply Chain in 2024

Metal	Number of Smelters/Refiners	Proportion of Smelters/Refiners Certified as RMAP Conformant	Proportion of Smelters/Refiners Certified as RMAP Conformant or in Non-CAHRAs
Tin	84	82.14%	98.81%
Tantalum	35	97.14%	100%
Tungsten	49	67.35%	100%
Gold	168	54.17%	100%
Cobalt	65	66.15%	96.92%
Mica	1	100%	100%

- **Confirm the Effective Grievance and Reporting Channels**

We actively listen to suppliers' opinions and suggestions, aiming to enhance our supplier management system's efficiency. To expand complaint channels for the supply chain issues, we have established an open reporting window on the Xiaomi Corporation Integrity and Compliance Platform. Additionally, we provide measures for suppliers' employees to feel more welcomed and included. For industry or external complaints, we specify contact information in the Xiaomi Corporation Supplier Social Responsibility Code of Conduct. We also require all stakeholders to sign contracts to ensure compliance and transparency.

In 2024, we did not receive any reports from employees, suppliers, the public, or law enforcement agencies regarding alleged modern slavery practices in our operations or supply chains.

Training

In 2024, we continued to enhance supplier competence in ESG management. To this

end, we cooperated with external institutions to organize and arrange a broad array of subject-specific trainings for our suppliers with topics including but not limited to environmental protection, respect for human rights, energy management, health and safety management. Additionally, we invited experts to provide on-site coaching sessions to guide our suppliers in identifying potential risks, strengthening management skills and improving internal management.

We inform suppliers of our expectation and requirement through webinars, workshops and various regular communications. Each year, we specifically communicate our expectation and requirement on fighting slavery and human trafficking to suppliers in multiple webinars. In addition, suppliers shall receive training on compliance with the Code. Xiaomi's standards are essentially equivalent to the RBA Code of Conduct regarding the prohibition of slavery, coercion and labor trafficking practices. If a supplier breaches these standards, we will take immediate and appropriate action, which may include termination of the partnership.