

# 金隆铜业有限公司

## 矿产供应链尽责管理政策

金隆铜业有限公司认识到在“受冲突影响和高风险区域”从事矿产资源开采、交易、加工、出口存在可能造成不利影响的风险，并认识到我们有尊重人权、不助长冲突和不对环境和社会产生不利影响的义务，我们承诺采纳并广泛传播《中国矿产供应链尽责管理指南》（第二版）、《LBMA 负责任白银指南》（第二版）、《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》（第三版）相关内容，并将其纳入到与业务合作伙伴签订的合同和协议之中。

这一政策为供应链全过程涉及冲突敏感的采购活动以及业务合作伙伴提高风险意识提供参考。我们承诺不从事任何会为冲突提供资助的活动，承诺遵守联合国等相关制裁决议。

公司承诺在矿产供应链运营实践中识别和管理以下风险：

### 一、与矿产开采、运输或贸易有关的严重侵权行为：

1. 在“受冲突影响和高风险区域”开展采购或经营活动时，我们既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施：

- a. 任何形式的酷刑，残忍、不人道和有辱人格的待遇；
- b. 任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务；
- c. 最恶劣形式的童工；
- d. 其他严重侵犯和践踏人权的的行为，如普遍的性暴力行为；
- e. 战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪。

### 风险缓解策略：

2. 如果我们有合理理由认为该风险存在，即上游供应商正从实施上述严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或终止与该供应商的合作。

## 二、关于直接或间接支持非国家武装团体<sup>1</sup>：

3. 我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括且不限于从非国家武装团体或其关联方<sup>2</sup> 购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方：

- i. 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体<sup>3</sup>；并/或
- ii. 在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产<sup>4</sup>；并/或
- iii. 对中间商、出口企业、或国际贸易者非法征税或勒索。

### 风险缓解策略：

4. 如果我们有理由认为，上游供应商从向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或终止与该供应商的合作。

## 三、关于公共或私人安全武装：

5. 我们杜绝向非法控制矿址、运输路线以及供应链上游行为主体，在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易者非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。<sup>5</sup>

6. 我们认可，矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

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<sup>1</sup> 企业应参照联合国安理会有关决议对非国家武装团体进行识别。

<sup>2</sup> “关联方”包括供应链上直接与武装团体合作，为矿产开采、贸易、处理提供便利的贸易商、批发商、中间商及其他各方。

<sup>3</sup> 对矿山、运输路线、矿产交易地、以及供应链上游行为主体进行“控制”是指 i) 对开采活动进行监视，包括对进入矿区进行授权，以及/或对下游中间商、出口企业或国际贸易者的销售进行协调；ii) 在矿产开采、运输、贸易或销售过程中利用任何形式的强迫或强制劳动；或 iii) 在上游企业或矿山担任领导或管理人员，或是享有受益权或其他所有者权益。

<sup>4</sup> 向矿山、运输路线、矿产交易地、或上游企业进行“勒索”是指以暴力或其他手段相威胁，通常以允许开采、使用运输路线、或矿产运输、购买、销售等活动作为筹码，向被勒索人索要并非其自愿支付的金钱或矿产。

<sup>5</sup> 此处所述“直接或间接支持”指的并不是合法形式的支持，合法形式包括企业向其经营所在国政府支付的法定税收、费用和/或特许开采费。

7. 在我们或我们供应链上的任何企业与公共或私人安全武装签订了合约的情况下，我们承诺或者将规定，这类安全武装需被公认的处理公共或私人安全武装的国际标准和指导性文件所认可<sup>6</sup>。尤其是，我们将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

8. 我们将支持或采取措施与中央或地方政府、国际组织和民间组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

9. 我们将支持或采取措施与当地政府、国际组织和民间组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响，尤其是对小作坊矿工的负面影响，在这种情况下，供应链上的矿产是通过小作坊或小规模采矿的方式开采出来的。

#### **风险缓解策略：**

10. 如果我们发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划<sup>7</sup>，从而使为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，我们将暂时中止或终止与上游供应商的合作<sup>8</sup>。我们发现在一定程度上有可能存在有违上述第 8 段和第 9 段内容的情况下，将采取同样的应对措施。

#### **四、关于行贿受贿及矿产原产地的欺诈性失实陈述：**

11. 我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿<sup>9</sup>。

#### **关于洗钱：**

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<sup>6</sup> 例如《安全与人权自愿原则》等国际指导文件。

<sup>7</sup> 实施风险计划中如若遇到海啸、地震、火灾、疫情、战争等不可抗力因素，可相应调整时间期限，但将对情况提供文字说明。

<sup>8</sup> 对采用风险管理计划后需要降低的风险，企业应额外进行风险评估。若风险管理计划六个月内未取得明显效果，为公共或私人安全武装提供直接或间接支持的风险没有得到遏制或降低的话，企业应暂时停止与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明合作关系恢复之前改进工作所应达到的绩效目标。

<sup>9</sup> 参见经合组织《关于打击国际商业交易中行贿外国公职人员行为的公约》(1997)和《联合国反腐败公约》(2004)。

12. 如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

**关于向政府支付的税收、费用及特许费：**

13. 我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照所在国关于向政府部门缴纳的税费信息公开的要求对此类支付进行披露。

**风险缓解策略：**

14. 根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的风险的目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或终止与上游供应商的合作。对采用风险管理计划后需要降低的风险，我们将额外进行风险评估。若风险管理计划六个月内未取得明显效果，行贿受贿及对矿产产地进行欺诈性失实陈述、洗钱、以及向政府缴纳税款、费用、特许费等行为的风险未能得到遏制或降低的话，我们将暂时停止或中断与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明贸易关系恢复之前改进工作所应达到的绩效目标。

**五、关于下列 ESG 因素的政策和实践：**

- i. 遵守经营所在国家/地区的环境、健康、安全和劳工法规及/或公司政策。
- ii. 环境管理，包括：
  - 空气、水、土地污染和事件管理计划
  - 水管理，特别是在缺水地区
  - 未经授权从世界遗产地和保护区采购
- iii. 危险化学品（包括汞和氰化物）的储存、处理和处置。

- iv. 劳工问题的管理，包括薪酬、工作时间、集体谈判、歧视、多样性、纠纷和工人权益保障。
- v. 社区参与和管理方案(土地征用和社区重新安置、文化遗产地和土著人民、关闭规划和保护弱势群体)。
- vi. 管理商业诚信和道德行为，并支持实施相关倡议(如采掘业透明度倡议(EITI))。

**风险缓解策略：**

15. 如果我们有理由认为，供应商因上述因素存在不可忽视的 ESG 管理风险，我们将及时与上游供应商进行沟通，督促对方立即制定风险管理计划并采取有效措施在合理规划时间内以降低乃至消除相关风险，若风险管理计划时限内未能达到明显成效，我们将暂时中止或终止与上游供应商的合作。我们非常希望并且乐意在能力范围内提供帮助，在加强供应商上下沟通协作的同时，为降低供应链 ESG 风险做出贡献。

公司将本着持续改进的原则，将该政策融入公司管理体系及各相关部门职责。随企业运营、供应链与其他业务关系中出现的变化定期审阅和更新尽责管理政策。该政策也适用于公司业务合作伙伴，公司将采取积极措施将政策传递给业务合作伙伴，政策自发布之日起生效，并公开发布。



## **Jinlong Copper Co., Ltd.**

### **Mineral Supply Chain Due Diligence Policy**

Jinlong Copper Co., Ltd. recognized the risks of significant adverse impacts which may be associated with extracting, trading, processing, and exporting minerals from conflict-affected and high-risk areas, and that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt and widely disseminate the policy of Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, LBMA Responsible Silver Guidance and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and incorporate the policy in contracts and/or agreements with suppliers.

This policy provides a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until the end user. We commit not to get involved in any activities which contribute to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions.

We are committed to identifying and managing the following risks in the supply chain:

#### **I. Regarding serious abuses associated with the extraction, transport or trade of minerals:**

While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- a. any forms of torture, cruel, inhuman and degrading treatment;

- b. any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- c. the worst forms of child labour;
- d. other gross human rights violations and abuses such as widespread sexual violence;
- e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

**Risk mitigation measures:**

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.

**II. Regarding direct or indirect support to non-state armed groups<sup>10</sup>:**

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates<sup>11</sup> who:

- i. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain<sup>12</sup>; and/or

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<sup>10</sup> Companies can refer to relevant UN Security Council resolutions, to identify non-state armed groups.

<sup>11</sup> “Affiliates” includes traders, consolidators, intermediaries, and others in the supply chain that work directly with armed groups to facilitate the extraction, trade or handling of minerals.

<sup>12</sup> “Control” of mines, transportation routes, points where minerals are traded and upstream actors in the supply chain means i) overseeing extraction, including by granting access to mine sites and/or coordinating downstream sales to intermediaries, export companies or international traders; ii) making recourse to any forms of forced or compulsory labour to mine, transport, trade or sell minerals; or iii) acting as a director or officer of, or holding beneficial or other ownership interests in, upstream companies or mines

- ii. illegally tax or extort<sup>13</sup> money or minerals at points of access to mine sites, along transportation routes or at points where mineral are traded; and/or
- iii. illegally tax or extort intermediaries, export companies or internal trader.

**Risk mitigation measures:**

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

**III. Regarding public or private security forces:**

We disagree to provide direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders<sup>14</sup>.

We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the international widely recognized standards<sup>15</sup>. In particular, we will support or take steps, to

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<sup>13</sup> "Extort" from mines, transportation routes, points where minerals are traded or upstream companies means the demanding, under the threat of violence or any other penalty, and for which the person has not voluntarily offered, sums of money or minerals, often in return for granting access to exploit the mine site, access transportation routes, or to transport, purchase, or sell minerals.

<sup>14</sup> "Direct or indirect support" does not refer to legal form of support, including legal taxes, fees, and/or royalties that companies pay to the government of a country in which they operate.

<sup>15</sup> Such as Voluntary Principles on Security and Human Rights.

adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

**Risk mitigation measures:**

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan<sup>16</sup> with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan<sup>17</sup>.

**IV. Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

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<sup>16</sup> If force majeure events such as tsunamis, earthquakes, fires, epidemics, or wars occur during the implementation of the risk management plan, the timeline may be adjusted accordingly, provided that a written explanation of the situation is given.

<sup>17</sup> In order to mitigate risks after implementing the risk management plan, the company should carry out additional risk assessments. If the risk management plan does not show significant results within six months and if the risk of providing direct or indirect support to public or private security forces has not been contained or reduced, the company should temporarily suspend cooperation with the supplier for at least three months. During this suspension, the company should revise the risk management plan and clarify the performance goals that need to be achieved for the cooperation to resume.

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export<sup>18</sup>.

**Regarding money laundering:**

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

**Regarding the payment of taxes, fees and royalties due to governments:**

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the requirements of host country on the disclosure of tax information paid to government departments.

**Risk mitigation measures:**

In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation. Companies should conduct an additional risk assessment on those risks requiring mitigation after the adoption of the risk management plan. If within six months from the adoption of the risk management plan there is no significant measurable

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<sup>18</sup> See OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997); and the United Nations Convention Against Corruption (2004)

improvement to prevent or mitigate the risks of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments, companies should suspend or discontinue engagement with the supplier for a minimum of three months. Suspension may be accompanied by a revised risk management plan, stating the performance objectives for progressive improvement that should be met before resuming the trade relationship.

**V. Regarding the policies and practices of suppliers at all levels concerning the following ESG factors:**

- i. Compliance with environmental, health, safety, and labor regulations in the country/region of operation and/or company policies.
- ii. Environmental management, including:
  - Air, water, and land pollution prevention and incident management plans.
  - Water management, especially in water-scarce areas.
  - Unauthorized procurement from World Heritage sites and protected areas.
- iii. Storage, handling, and disposal of hazardous chemicals (including mercury and cyanide).
- iv. Management of labor issues, including compensation, working hours, collective bargaining, discrimination, diversity, disputes, and worker rights protection.
- v. Community engagement and management programs (land acquisition and community resettlement, cultural heritage sites and indigenous peoples, closure planning, and protection of vulnerable groups).
- vi. Management of business integrity and ethical behavior, and support for the implementation of related initiatives (such as the Extractive Industries Transparency Initiative (EITI)).

If we have reason to believe that a supplier faces significant ESG management risks due to the aforementioned factors, we will promptly communicate with the upstream supplier, urging them to immediately develop a risk management plan and take effective measures within a reasonable timeframe to reduce or eliminate the relevant risks. If significant progress is not achieved within the timeframe specified in the risk management plan, we will temporarily suspend or terminate our cooperation with the upstream supplier. We are eager and willing to provide assistance within our capabilities, strengthening communication and collaboration with suppliers while contributing to the reduction of ESG risks in the supply chain.

Our company is committed to continuous improvement, and we have integrated this principle into our overall management system and the responsibilities of all relevant departments. We regularly review and update our policy to reflect changes in our operations, supply chain, and other business relationships. This policy applies to all our suppliers as well, and we will take active measures to ensure that they are aware of and adhere to this policy. The policy will come into effect immediately and will be published publicly

