

附件：《负责任矿物的供应链政策细节》

Appendix: Supply Chain Policy of Responsible Mineral

我们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、处理、出口存在可能造成重大不利影响的风险，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负面影响的义务。我们承诺将按照CCCMC（五矿化工进出口商会）发布的《中国负责任矿物供应链尽责管理指南》和OECD（经合组织）发布的《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物的负责任供应链尽责管理指南》（以下简称“《中国指南》和《经合组织指南》”），制定我们的《负责任矿物的供应链政策》（以下简称“政策”）。

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, processing and exporting mineral resources from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, as well as not to contribute to adverse environmental and social impacts. Therefore, we commit to develop our Responsible Minerals Supply Chain Policy (Hereinafter referred to as the "Policy") in accordance with the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains* established by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) and the *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* established by the Organisation for Economic Co-operation and Development (OECD) (Hereinafter referred to as "*The Chinese Guidelines*" and "*The OECD Guidelines*").

我们将此政策按照《中国指南》和《经合组织指南》在钴、镍矿产资源供应链中推行和广泛传播，并将其纳入与供应商签订的合同和协议之中。这一政策为矿产资源供应链全过程涉及冲突敏感的采购活动以及供应商的风险意识提供参考。我们承诺遵守联合国相关制裁决议，遵守适用执行此类决议的国内法律，不参与任何会为冲突提供帮助或便利的行为。

We promote and widely disseminate this policy in the cobalt and nickel mineral resources supply chain in accordance with *The China Guidelines* and *The OECD Guidelines*, and incorporate it into contracts and agreements with our suppliers. This

policy serves as a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness throughout the process of mineral resource supply chain. We commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions and commit to refraining from any action which contributes to or facilitates a conflict.

为此，我们承诺在钴、镍供应链运营实践中按《经合组织指南》附录一列明的五步框架法，并参考《中国指南》规定的五步法来识别、管理和避免以下风险：

Therefore, we commit that we will identify manage and avoid the following risks in our cobalt and nickel supply chain operational practices in accordance with the five-step framework set out in Appendix 1 of *The OECD Guidelines* and with reference to the Five-Step Framework set out in the *The China Guidelines*:

一、严重侵犯人权的行为

Serious human rights abuses

我们既不容忍也不以任何方式获利于、助长、协助或便利任何一方实施：

We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

1.任何形式的酷刑，残忍、不人道和有辱人格的待遇；

Any forms of torture or cruel, inhuman or degrading treatment;

2.任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚相威胁，强迫任何人从事的非本人愿提供的劳动或服务；

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

3.最恶劣形式的童工（危害性工作是最恶劣形式童工中的一种）；

The worst forms of child labor (Hazardous work is one of the worst forms of child labour);

4.其他严重侵犯和践踏人权的行爲，如大规模性暴力；

Other gross human rights violations and abuses such as widespread sexual violence;

5.战争罪或其他严重违反国际人道法的行为，反人类罪或种族灭绝。

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

降低风险

Risk Mitigation

如果我们有合理理由认为上游供应商从有严重侵犯人权行为的任何一方采购或与之存在关联，我们将立即中止或中断与该供应商的合作。

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 human rights abuses.

二、直接或间接支持非法的有组织武装团体和公共或私人安全武装

Direct or indirect support to non-state armed groups and public or private security forces

我们不容忍任何通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供直接或间接的支持。通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供“直接或间接的支持”，包括且不限于从非法的有组织武装团体或其关联方购买资源，向其付款，或以其他方式向其提供后勤支援或设备等。这些武装团体或关联方：

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, processing or export of mineral resources. “Direct or indirect support” to non-state groups through the extraction, transport, trade, processing or export of mineral resources includes, but is not limited to, procuring resources from, making payments to or otherwise providing logistical assistance or equipment to, illegal organized armed groups or their affiliates who:

1.非法控制矿址，或以其他方式控制运输路线、矿产资源交易点以及供应链的上游行为主体；

Illegally control extraction sites or otherwise control transportation routes, points where mineral resources are traded and upstream actors in the supply chain;

2.在矿址入口、运输路线沿线或矿产资源交易点非法征税或者勒索钱财或矿产资源；

Illegally tax or extort money or mineral resources at points of access to extraction sites, along transportation routes or at points where mineral resources are traded;

and/or

3.对中间商、出口企业或国际贸易商非法征税或勒索。



Illegally tax or extort intermediaries, export companies or international traders.

我们将杜绝向非法控制矿址、运输路线以及供应链上游参与方，在矿址入口、运输路线沿线或矿产资源交易点非法征税或勒索钱财或矿产资源，或者向中间商、出口企业或国际贸易商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。

We will eliminate direct or indirect support to public or private security forces who illegally control extraction sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or mineral resources at point of access to extraction sites, along transportation routes or at points where mineral resources are traded; or illegally tax or extort intermediaries, export companies or international traders.

我们认可，矿址、周边地区和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。

We recognize that the role of public or private security forces at the extraction 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 workers, equipment and facilities, and protecting the extraction site or transportation routes from interference with legitimate extraction and trade.

在我们或我们供应链上的任何企业或商业关系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。尤其是，我们将支持或采取措施，运用筛查政策，确保已知实施过侵犯人权行为的个人或安全武装单位不被录用。

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 recognized international standards and guidance documents concerning public or private security forces. In particular, we will support or take steps, to 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.

我们将支持或采取措施，与中央或地方政府、国际组织和民间社会组织开展合作，共同制定提高公共安全武装安保费用的透明度、相称性和问责性的可行解决方案。

We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations 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.

我们将支持或采取措施，与当地政府、国际组织和民间社会组织开展合作，供应链上的矿产资源通过小作坊或小规模采矿方式开采的，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不利影响，尤其是对小作坊的不利影响。

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal operators where mineral resources in the supply chain are extracted through artisanal or small-scale operators, to adverse impacts associated with the presence of security forces, public or private, on extraction sites.

降低风险

Risk Mitigation

如果我们有合理理由认为上游供应商从向非国有有组织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联，我们将立即中止或中断与该供应商的合作。

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.

我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关



方一起制定、采用和实施风险管理计划，从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。这些安全武装非法控制矿址、运输路线和供应链上游参与方，在矿址入口、运输线路或矿产交易点非法征税或勒索钱财或矿产资源，或对中间商、出口公司或国际贸易商非法征税或勒索，我们有理由认为存在风险。在此情况下，如果风险管理计划实施六个月未奏效，我们将中止或中断与供应商的合作。同时，如果我们发现在一定程度上有可能存在有违上文中关于“提高公共安全武装安保费用的透明度、相称性和问责性”，以及“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不利影响，尤其是对小作坊的不利影响”的行为的情况下，将采取同样的应对措施。

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with suppliers and other stakeholders to prevent or mitigate the risk of 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, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. At the same time, the same response will be taken if we find that such behavior is possible to some extent that are contrary to the above statements on “improving the transparency, proportionality and accountability in payments made to public security forces” and “avoiding or minimising the adverse impacts of the presence of armed security forces, public or private, on vulnerable groups, particularly small-scale operators”.

三、腐败、洗钱和向政府支付的各项费用

Corruption, Money Laundering and Payments to Governments

我们不提供、承诺、给予或索要任何贿赂，并且抵制索贿，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、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。

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of mineral resources, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral resources extraction, trade, processing, transport and export.

我们禁止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序；尽最大努力促进与所有业务伙伴间负责的商业实践。

We will prohibit bribery in all business practices and transactions, including those of agents and other third-parties, and set criteria and approval procedures with respect to the offer or acceptance of gifts; use the greatest efforts to promote responsible business practices with all business partners.

如果我们有理由认为，存在因开采、交易、处理、运输或出口在矿址入口、运输路线沿线，或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产资源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。

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, processing, transport or export of mineral resources derived from the illegal taxation or extortion of mineral resources at points of access to extraction sites, along transportation routes or at points where mineral resources are traded by upstream suppliers.

我们承诺采取有效措施，防止卷入洗钱或恐怖主义融资，例如：通过明确和发布供应商、客户身份和实际所有权等，监测异常或可疑活动的交易，保存高于适用法律法规中金额上限的现金交易记录。

We commit to take effective measures to prevent the involvement in money laundering and financing of terrorism, e.g. by establishing and publishing the identity and beneficial ownership of suppliers and customers; monitoring transactions for unusual or suspicious activity; and maintaining records of cash transactions that occur



above the relevant defined financial threshold under applicable law.

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产资源开采、交易、出口相关的合法税收、费用和特许费，并承诺根据企业在供应链上所处位置，对此类支付进行披露。

We will ensure that all taxes, fees, and royalties related to mineral resources 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.

降低风险

Risk Mitigation

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、国际组织、民间社会以及受影响的第三方酌情开展合作，以在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将中止或中断与上游供应商的合作。

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 organizations, 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 time scales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

四、关于职业健康与安全

Regarding occupational health and safety

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何为其直接和/或间接雇员和/或在其生产现场的任何人员提供威胁到生命的职业健康与安全环境的一方，或从该方处采购或与之存在关联。

While sourcing from, or operating in high-risk areas, we will not profit from,



assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and / or indirect employees and / or any person present on the party's operations.

降低风险

Risk Mitigation

如果我们有合理理由认为上游供应商提供如“关于职业健康与安全”中所定义的威胁到生命的职业健康和安全环境的任何一方采购或与之存在关联，我们将立即中止或中断与该供应商的合作。

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 life threatening occupational health and safety conditions as defined in“Regarding occupational health and safety”.

五、关于童工

Regarding child labour

在高风险区域开展采购或开展经营活动时，我们将不会雇佣、获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业而提供便利或跟其采购或与其有关联。如果东道国没有相关的法律或法规规定，最低工作年龄为16岁。

While sourcing from, or operating in high-risk areas, we will not employ, profit from, assist with, or facilitate, or source from, or be linked to, any party employing, profiting from, assisting with, or facilitating the employment of children under the minimum working age which is legally prescribed by the host country laws and regulations. If there is no relevant host country law or regulation, the minimum working age shall be 16 years.

降低风险

Risk Mitigation

如果我们有合理理由认为该风险存在，即上游供应商正从“关于童工”中所规



定的任何一方雇佣童工进行采购或与该方有关联,我们将立即中止或中断与该供应商的合作。

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 employing children as defined in “Regarding child labour”.

六、关于环境保护、资源开采及文化遗产保护

Regarding Environmental protection, resource extraction and cultural heritage protection

在高风险地区进行采购或生产时,我们不会获利于、协助、便利于任何给周围土壤、空气和水的状况造成重大不利影响,严重违反当地相关法律法规的一方或从该处采购或与之存在关联。我们将支持或采取措施定期评估、降低采矿对土壤、空气、水造成的不利影响。

While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate significant adverse impacts regarding ambient soil, air and water conditions, or source from or be linked to any party with gross violation of local laws and regulations. We will support or take actions to evaluate periodically to minimize the adverse impacts of extraction regarding soil, air and water.

我们不参与、不容忍、也不受益于在未获得当地人和土著人自由、事先和知情同意或在非法获得法定所有权、租赁权、特许权或许可证,或违反国内法的土地上开采资源。

We do not participate in, tolerate, or profit from the exploitation of resources from land where the free, prior and informed consent of local and indigenous peoples has not been obtained, a legal title, lease, concession, or license has been obtained illegally, or national laws have been violated.

我们不参与、不容忍、也不受益于从不尊重、不保护当地人和土著人文化和



遗产，或损害当地人传统文化和遗产以及在法定保护区的采矿作业中开采或采购资源。

We do not participate in, tolerate, or profit from extracting or sourcing resources from mining operations where the culture and heritage of local and indigenous peoples have not been respected and protected, or where traditional cultures and heritage of local peoples have been harmed.

降低风险

Risk Mitigation

如果我们有合理理由认为存在此类风险，我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低侵害土地权利、引发重大不利环境影响或与当地文化遗产破坏相关的具体风险。风险降低措施未起作用的，我们将中断或终止与上游供应商的合作。

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 employing children as defined in “Regarding child labour”. If we have proper reasons to believe that such a risk exists, we will immediately work with suppliers and other stakeholders to develop, adopt and implement risk management plans based on where the enterprise’s specific position in the supply chain is. In order to prevent or mitigate the specific risks related to infringement of land rights, leading to significant adverse environmental impact or local cultural heritage damage. If the risk mitigation measures do not work, we will suspend or terminate our cooperation with upstream suppliers.