

文件名称： 矿产供应链尽责管理政策	文件编号：TY-GYL-001 生效日期：2024/03/18	版本：V3.1
----------------------	------------------------------------	---------

## 赣州腾远钴业新材料股份有限公司

### 矿产供应链尽责管理政策

**Ganzhou Tengyuan Cobalt New Material Co.,Ltd.**

**Due Diligence Policy for Supply Chain of Minerals**

赣州腾远钴业新材料股份有限公司（以下简称“公司”）认识到，公司有确保自身没有故意或无意地造成或助长人权侵犯，或从中受益；并对受其商业活动影响的所有人群的权利示以尊重。同时，公司也意识到，负责任的企业必须对其所有商业活动，包括获取自然资源的整个过程中可能存在的风险进行持续而全面的尽责管理。为此，公司根据中国五矿化工进出口商会（CCCMC）发布的《中国负责任矿产供应链尽责管理指南》以及关键矿产责任倡议（RCI）与负责任矿产倡议（RMI）联合编制的《钴冶炼厂供应链尽责管理标准》，并参考经济合作与发展组织（OECD）的《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责管理指南》，制定本公司“矿产供应链尽责管理政策”（以下简称“政策”）。公司承诺在矿产供应链运营实践中识别和管理以下风险：

Ganzhou Tengyuan Cobalt New Material Co.,Ltd. (hereinafter referred to as "the company" ) recognizes that the company's responsibility is to ensure that it does not intentionally or unintentionally cause or contribute to human rights violations, or to benefit from it; and to show all groups affected by its business activities with respect. At the same time, the company also recognizes that a responsible company must conduct due diligence management of all its business activities in a continuous and comprehensive way, including the risks that may exist in the process of sourcing natural resources. To this end, based on the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain released by CCCMC and and Cobalt Refiner Supply Chain Due Diligence Standard developed in collaboration by Responsible Critical Mineral Initiative(RCI) and Responsible Minerals Initiative (RMI), as well as OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the company developed the Due Diligence Policy for Supply Chain of Minerals (hereinafter referred to as"Policy"). The company is committed to identifying and managing the following risks in the practice of supply chain management:

## 一、严重侵犯人权的行为/Serious Human Rights Abuses

在开展矿物原料开采、交易、处理、出口等经营活动中，公司既不容忍，也不以任何方式直接或间接支持以下行为：

In the process of extraction, trade, handling and export of raw materials, the company neither tolerates nor directly or indirectly supports the following actions in any means:

1、任何形式的酷刑、残暴、不人道和有辱人格的待遇；

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

2、任何形式的强迫或强制劳动，包括任何形式的人口贩运、抵债劳动和监狱劳动；

Any form of forced or compulsory labor, including any form of human trafficking, bonded labor and prison labor;

3、不使用童工，尤其是最恶劣形式的童工；

Do not use child labor, especially the worst forms of child labor;

4、其他严重侵犯和践踏人权的行为；

Other serious violations and abuses of human right;

5、战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

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

对严重侵犯人权行为的风险管理：

Regarding risk management of serious abuses:

如果我们有合理理由认为该风险存在，即相关方正从实施上述所规定的严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或中断与该相关方的合作。

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 abuses.

## 二、非国家武装团体/Non-state Armed Groups

公司在矿物原料开采、运输、交易、处理及出口等经营活动中，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，这些武装团体或者关联方：

The company does not tolerate any direct or indirect support to non-state organized armed groups through the extraction, transport, trade, handling or export of mineral resources. Direct or indirect support to non-state organized armed groups through the extraction, transport, trade, handling or export of mineral resources includes, but not limited to, procuring resources from, making payments to or otherwise providing logistical assistance to illegal organized armed groups or their affiliates who:

1、非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制；

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

2、在矿区入口、矿区运输路线、矿产资源交易地等进行非法征税、勒索钱财或掠夺资源；

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

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.

对向非国家武装团体提供直接或间接支持的风险管理：

Regarding risk management of direct or indirect support to non-state armed groups:

如果我们有理由认为，相关方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，我们将立即中止或中断与该相关方的合作。

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 group.

### **三、公共或私人安全武装/Public or Private Security Forces**

公司认识到，高风险区域的矿区及周边地区、运输道路沿线的公共或私人安全武装的作用仅是依法保障权益，包括保护矿工、维护设备和设施安全、保护矿区合法运营及运输路线不受非法干扰。

The company recognizes that the role of public or private security forces at the extraction sites and/or surrounding areas and/or along transportation routes at high-risk areas should be solely to protect rights and interests in accordance with the law, including providing security to workers, maintaining equipment and facilities, protecting the extraction site or transportation routes from interference with legitimate extraction and trade.

公司承诺，支持或采取措施不予录用已确认实施过严重侵犯人权行为的公共或私人安全武装，同时与当地政府、国际组织和民间社会组织开展合作，避免或最大

限度地降低本公司雇佣的公共或私人安全武装给当地社区或弱势群体带来的不利影响。

The company commits to 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 human rights abuses will not be hired. Meanwhile, the company will engage with local authorities, international organizations and civil society organizations to avoid or minimize the adverse impacts on local communities or vulnerable groups due to the employment of public or private security forces.

对公共或私人安全武装的风险管理：

Regarding risk management of public or private security forces:

如果我们发现在一定程度上存在此类风险，将根据该公共或私人安全武装在供应链上所处的具体位置，立即与供应商和利益相关方一起制定、采用和实施风险管理计划，从而使风险得到遏制或降低。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该公共或私人安全武装的合作。

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 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.

#### **四、腐败、洗钱和向政府支付的各项费用/Corruption, Money Laundering and Fees Paid to the Government**

公司不提供、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。

The company will not offer, promise, give or demand any bribes, and 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, handling, transport and export.

公司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任的商业实践。

The company prohibits bribery in all business practices and transactions, including those of agents and other third parties. The company will set standards and approval

procedures with respect to the offer or acceptance of gifts; and uses the greatest efforts to promote responsible business practices with all business partners.

公司承诺采取有效措施，防止卷入洗钱或为恐怖主义融资。公司将确保向政府支付所有与矿产资源开采、交易、出口相关的合法税收、费用和特许费。

The company commits to take effective measures to prevent the involvement in money laundering or financing of terrorism. The company will ensure that all legal taxes, fees and royalties related to the mineral resources extraction, trade and export are paid to the government.

对腐败、洗钱和向政府支付的各项费用的风险管理：

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

根据公司在供应链上所处的具体位置，我们承诺与供应商、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之目的，对绩效进行改善或跟踪。风险降低措施实施六个月未奏效，我们将中止或中断与上述相关方的合作。

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 timescales. 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.

## **五、人身安全与职业健康/Personal Safety and Occupational Health**

公司承诺，在从事矿物原料开采、运输、交易、处理及出口等经营活动中，不会直接或间接支持、参与和关联任何存在严重威胁人身安全和严重职业健康的行为。

The company commits that it will not directly or indirectly support, participate in and associate with any activities that seriously threaten personal safety and occupational health in the process of material extraction, transport, trade handling and export.

公司承诺，将采取有效措施，保持员工、承包方和其他相关方在工作中的身心健康，防止由于不当的工作条件，包括不安全的建筑、化学品和机械设备等造成健康伤害，并持续改善工作环境。

The company commits to take effective measures to maintain the physical and mental health of employees, contractors and other interested parties at work, and to prevent health damage caused by improper working conditions, including unsafe

construction, chemicals and machinery, and to continue to improve working environment.

对人身安全与职业健康的风险管理：

Regarding risk management of occupational health and safety:

如果我们有合理理由认为相关方与存在严重威胁人身安全和职业健康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相关方的合作。

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.

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。在识别以上风险基础上，公司将采取中国五矿化工进出口商会（CCCMC）《中国负责任矿产供应链尽责管理指南》以及经济合作与发展组织（OECD）《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责管理指南》中推荐的尽责管理“六步法”，并建立相应风险管理程序进行风险管理：

The company will incorporate the policy into the company's management system and the responsibilities of all relevant departments in line with the principle of continuous improvement. Based on the above identified risks, the company will adopt the "Six-Step" due diligence management approach recommended by the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains(CCCMC)and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and establish corresponding risk management procedures for risk management:

- 1、建立完善的企业风险管理体系；  
Establish strong risk management systems;
- 2、供应链风险的识别和评估；  
Identify and assess risk in the supply chain;
- 3、针对已经识别的风险制定并实施应对策略；  
Design and implement a strategy to mitigate identified risks;
- 4、对供应链中已识别的关键环节开展独立第三方评估与审核；  
Carry out independent third-party audit in the supply chain;
- 5、对供应链风险管理过程和结果进行报告。

Report on process and results of supply chain due diligence management.

该政策也适用于公司所有供应商，公司将采取积极措施将政策传递给供应商，并纳入到与供应商签订的合同和协议之中，政策自发布之日起生效。

This policy also applies to all suppliers, the company will take active measures to communicate the policy with all suppliers and incorporate it into contracts and agreements with suppliers, the policy will take effect from the date of publication.

**赣州腾远钴业新材料股份有限公司**  
**2024年3月18日**  
**Ganzhou Tengyuan Cobalt New Material Co.,Ltd**  
**18-March-2024**