



济源市万洋冶炼（集团）有限公司

铅供应链尽责管理进展报告

Jiyuan Wanyang Smeltery Group Co., Ltd.

Lead Supply Chain Due Diligence Progress Report

2024-2025

关于本报告 About this report

编制主体/Compiled by:

济源市万洋冶炼(集团)有限公司, 为了便于表述和方便阅读, 在本报告中也以“万洋”“公司”或“我们”指代。

Jiyuan Wanyang Smeltery Group Co., Ltd. is also referred to as "Wanyang", "the Company" or "we" in this report for the convenience of expression and reading.

编制范围/Scope of preparation:

公司尽责管理体系、风险识别与评估、风险缓解、审计与评估、报告等尽责管理步骤。本报告的信息和数据主要涵盖 2024 年 8 月到 2025 年 7 月期间公司开展的各项供应链尽责管理活动。基于报告的延续性, 部分内容和数据适当溯及其他重要年份, 不仅限于上述时间范围。

Due diligence steps such as the company's due diligence system, risk identification and assessment, risk mitigation, audit and assessment, and reporting. The information and data in this report mainly cover the various supply chain due diligence activities carried out by the company from Aug 1, 2024 to July 30, 2025. Based on the continuity of the report, some content and data are appropriately traced back to other important years, not limited to the above time range.

编制依据/Preparation basis:

公司根据中国五矿化工进出口商会(CCCMC)发布的《中国矿产供应

链尽责管理指南》、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职调查指南》，《联合国指导原则报告框架》进行编制。

The company prepared this report based on the "China Mineral Supply Chain Due Diligence Guidelines" issued by the China Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters (CCCME), the "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" of the Organization for Economic Cooperation and Development (OECD), and the "United Nations Guiding Principles Reporting Framework"

特别说明/Special Notes:

本报告依据伦敦金属交易所关于负责任采购透明度的要求(可参见网址:

<https://www.lme.com/Company/Responsibility/Responsible-sourcing>) 进行披露。

This report is disclosed in accordance with the London Metal Exchange's responsible sourcing transparency requirements (available at:

<https://www.lme.com/Company/Responsibility/Responsible-sourcing>).

发布周期/Release cycle:

公司供应链尽责管理进展报告为年度报告,发布周期为每年一次。相关方可在官网查阅报告进展。(官网:济源市万洋冶炼(集团)有限公司 (wanyanggroup.cn) 公司将定期更新本报告,我们诚挚欢迎各界对我司供应链尽责管理工作提出建议和意见。(联系邮箱: hudandan56@163.com)

The company's lead supply chain due diligence management progress report is an annual report, which is published once a year. Stakeholders can check the progress of the report on the official website. (Official website:

<http://www.jyjlyl.com/kechixufazhan/1.html>) The company will update this report regularly. We sincerely welcome suggestions

and comments from all walks of life on our lead supply chain due diligence management work. Contact email: hudandan56@163.com)

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前言

Preface to the Report

铅作为关键工业原料，广泛应用于蓄电池、冶金、印刷等诸多领域，其中铅酸蓄电池在起动及大型储能领域占据核心地位。伴随下游需求持续增长，中国铅矿产量稳居全球首位，行业繁荣背后，矿产供应链面临的环境挑战、社会风险及合规压力日益凸显。

Lead, as a key industrial raw material, is widely used in various fields such as storage batteries, metallurgy, printing, pigments, paints, glazes, and soldering. Among these applications, lead-acid batteries hold the largest market share and the widest range of uses among chemical batteries, especially in starting and large-scale energy storage applications. With the continuous growth of output in major downstream lead-acid battery sectors, China's lead ore production has maintained a steady upward trend in recent years. In 2021, China's lead ore production reached 2 million tons, ranking first globally.

本报告由济源市万洋冶炼（集团）有限公司（以下简称“公司”“万洋冶炼”）编制，严格依据《经济合作与发展组织关于来自受冲突影响和高风险地区矿石的负责任供应链尽职调查指南》（第三版）（以下简称“经合组织指南”）及中国五矿化工进出口商会（CCCMC）《中国矿产供应链尽责管理指南》（以下简称“中国指南”）核心要求，系统呈现公司在铅供应链尽责管理中的实践、成效与规划，响应国际社会对供应链风险管控的共识。

Behind the industry's prosperity, the mineral supply chain is facing unprecedented challenges including environmental issues, innovation demands, investment pressures, and social operating licenses. Over the past decade, the international community has been committed to breaking the links between business operations and human rights abuses, conflict escalation, and other significant adverse impacts. A series of international standards and guidelines regulating corporate supply chain due diligence have been successively issued, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition) (hereinafter referred to as the "OECD Guidance") and the China Mineral Supply Chain Due Diligence Guidelines issued by the China Chamber of Commerce for Import and Export of Metals, Minerals and Chemicals (CCC MC) (hereinafter referred to as the "China Guidelines"). This trend reflects a global consensus that enterprises should conduct supply chain due diligence to identify, prevent, mitigate, and disclose measures taken to address actual and potential adverse impacts in their own operations, supply chains, and other business relationships.

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1. 关于我们 about Us

济源市万洋冶炼（集团）有限公司, 始建于 1995 年, 位于思礼镇万洋大道, 注册资金 2.8 亿元, 总资产 125 亿元, 占地面积 131 万平方米, 现有员工 6000 余人。拥有 2 个事业部、20 个独资子公司、8 个合资公司, 涉及有色冶炼、新能源、综合回收、金银制品、珠宝首饰、健康产业、化工、物流运输等领域。年生产能力为电解铅 25 万吨、合金铅 20 万吨、锌合金 15 万吨、氧化锌 3 万吨、白银 2000 吨、黄金 20 吨、锑 3000 吨、铋 800 吨、复合肥 60 万吨、铅酸蓄电池 14GWH、锂离子电池 2GWH、废旧铅酸蓄电池 30 万吨、废旧锂电池 2 万吨、纸面石膏板 5000 万平方米、白银制品 400 吨、黄金制品 10 吨, 是“中国企业制造业 500 强”“中国民营企业 500 强”“河南省 100 强”企业, 荣获“国家级绿色工厂”“全国质量标杆”“河南省纳税 100 强企业”“中国有色金属工业协会 AAA 信用企业”等荣誉称号。2024 年实现销售收入 484 亿元, 上缴税金超 8 亿元。

Founded in 1995, Jiyuan Wanyang Smelting (Group) Co., Ltd. is located at Wanyang Avenue, Sili Town. It has a registered capital of 280 million yuan, total assets of 12.5 billion yuan, covers an area of 1.31 million square meters, and employs over 6,000 people. The company consists of 2 business divisions, 20 wholly-owned subsidiaries, and 8 joint ventures, with business scope involving non-ferrous smelting, new energy, comprehensive recycling, gold and silver products, jewelry,

health industry, chemical industry, logistics and transportation, etc. Its annual production capacity includes: 250,000 tons of electrolytic lead, 200,000 tons of alloy lead, 150,000 tons of zinc alloy, 30,000 tons of zinc oxide, 2,000 tons of silver, 20 tons of gold, 3,000 tons of antimony, 800 tons of bismuth, 600,000 tons of compound fertilizer, 14 GWh of lead-acid batteries, 2 GWh of lithium-ion batteries, 300,000 tons of waste lead-acid batteries, 20,000 tons of waste lithium batteries, 50 million square meters of gypsum board, 400 tons of silver products, and 10 tons of gold products. Its annual production capacity includes: 250,000 tons of electrolytic lead, 200,000 tons of alloy lead, 150,000 tons of zinc alloy, 30,000 tons of zinc oxide, 2,000 tons of silver, 20 tons of gold, 3,000 tons of antimony, 800 tons of bismuth, 600,000 tons of compound fertilizer, 14 GWh of lead-acid batteries, 2 GWh of lithium-ion batteries, 300,000 tons of waste lead-acid batteries, 20,000 tons of waste lithium batteries, 50 million square meters of gypsum board, 400 tons of silver products, and 10 tons of gold products. The company is listed among "China Top 500 Manufacturing Enterprises", "China Top 500 Private Enterprises" and "Henan Top 100 Enterprises". It has been awarded honors such as "National Green Factory", "National

Quality Benchmark”, “Henan Top 100 Taxpaying Enterprises” and “AAA Credit Enterprise of China Non-Ferrous Metals Industry Association”. In 2024, it achieved sales revenue of 48.4 billion yuan and paid over 800 million yuan in taxes.

公司致力于发展绿色经济、循环经济。自建科研中心及专业研发团队，获得国家专利 200 余项。“底吹熔炼-熔融还原-富氧挥发连续炼铅新技术及产业化应用”项目获国家科技进步奖二等奖；独创“L-硒-甲基硒代半胱氨酸”生产工艺且被国家卫健委纳入国家标准；探索研究钠离子电池规模化生产工艺及商业化应用情景；开发、量产锂离子电池商用、家用储能和动力产品，并与中科院合肥技术创新工程院共建废旧锂电池回收综合利用联合实验室。

Dedicated to the development of green economy and circular economy, the company has built an in-house research center and a professional R&D team, holding more than 200 national patents. The project “New Technology and Industrial Application of Continuous Lead Smelting via Bottom-Blown Smelting – Smelting Reduction – Oxygen-Enriched Volatilization” won the Second-Class Award of the National Scientific and Technological Progress Award. Its independently developed production process of “L-selenium-methylselenocysteine” has been incorporated into the national standard by the National

Health Commission of the People's Republic of China. The company is exploring the large-scale production process and commercial application scenarios of sodium-ion batteries, and has developed and mass-produced commercial, household energy storage and power products of lithium-ion batteries. It has also established a joint laboratory for the comprehensive recycling of waste lithium batteries with Hefei Institute of Technology Innovation of the Chinese Academy of Sciences.

多年来，公司追求卓越的产品质量。先后通过质量、环境、职业健康安全、能源、测量、两化融合、IATF16949 质量管理体系认证及 CNAS 评审认证。“万洋”牌铅是上海期货交易所、LME 伦敦有色金属交易所交割品牌；“万洋”牌白银是上海期货交易所、上海黄金交易所、LMBA 伦敦贵金属交易协会交割品牌；“万洋 WANYANG”白银获得全国“食品接触用银安全认证证书”，白银商标荣膺中国驰名商标。

Over the years, the company has pursued excellent product quality. It has successively passed certifications including Quality Management System, Environmental Management System, Occupational Health and Safety Management System, Energy Management System, Measurement Management System, Integration of Informatization and Industrialization Management System, IATF16949 Quality Management System, as well as CNAS accreditation. The "Wanyang" brand lead is a delivery brand of

the Shanghai Futures Exchange (SHFE) and the London Metal Exchange (LME); the "Wanyang" brand silver is a delivery brand of the Shanghai Futures Exchange (SHFE), the Shanghai Gold Exchange (SGE) and the London Bullion Market Association (LMBA); the "WANYANG" silver has obtained the national "Food Contact Silver Safety Certification Certificate", and the silver trademark is honored as a China Well-Known Trademark.

1.1 企业文化/Corporate Culture

万洋始终将公司的使命、愿景、核心价值观融入公司日常运营和管理中，高度重视企业社会责任治理和可持续发展，积极开展供应链尽责管理。

Wanyang consistently integrates its mission, vision, and core values into daily operations and management. We attach great importance to corporate social responsibility governance and sustainable development, and actively conduct supply chain due diligence.



Mission

Enrich Wanyang, benefit the public, and serve the country. Based on the main business, we will promote the high-quality development of the industry, support the construction of the local economy, build Wanyang into an enterprise with global competitiveness, and become a cornerstone for the sustainable development of the industry. We will strive to create value for customers, provide opportunities for employees, create benefits for shareholders, and assume responsibility for the society, making Wanyang a century-old enterprise.

Vision

Become a world-class and century-old Wanyang. We are committed to building Wanyang into a world-class enterprise, achieving "prosperity for employees, happiness for families, and well-being for future generations" by focusing on the high-quality development of the main business, and contributing to the society.

Core Values

Integrity, professionalism, innovation, responsibility, and win-win cooperation. For employees: Integrity is the cornerstone of Wanyang's development; professionalism is the key to forging Wanyang's core competitiveness; innovation is

the driving force for Wanyang' s sustainable development; responsibility is the foundation for Wanyang to gain social trust; win-win cooperation is the guarantee for Wanyang to move forward steadily

1.2 社会责任/Social Responsibility

万洋始终践行“兴百年万洋，富四方百姓”的企业愿景。投资建成思礼村中心小学教学楼、老年活动中心、幼儿园、武山剧场、卢仝文化广场等公共设施；购置农机设备，常年为周边村民免费提供春耕、秋收服务；每年出资 30 余万元用于丰富周边村民业余生活和慰问周边村庄老人、贫困群众等；新冠肺炎爆发以来，公司累计捐赠“希百康®”系列硒营养素补充剂产品 5.7 万盒，价值 1265.94 万元，为战“疫”贡献力量。董事长卢一明同志更是荣获全国抗击新冠肺炎疫情先进个人的称号，用实际行动彰显党员担当，用世间大爱谱写企业的社会责任。

Wanyang has always practiced its corporate vision of "Building a Centennial Wanyang, Enriching People Near and Far". We have invested in the construction of public facilities including the teaching building of Sili Village Central Primary School, senior activity center, kindergarten, Wushan Theater, and Lu Tong Cultural Square. We have purchased agricultural machinery and provided free spring plowing and autumn harvest services to surrounding villagers year-round. Each year, we

allocate over 300,000 yuan to enrich the leisure life of nearby villagers, and to care for the elderly and impoverished groups in surrounding villages. Since the outbreak of COVID-19, the company has donated a total of 57,000 boxes of "Xibaikang®" series selenium nutrient supplements, worth 12.6594 million yuan, contributing to the fight against the pandemic. Mr. Lu Yiming, the chairman, was awarded the honorary title of "National Advanced Individual in the Fight Against COVID-19". He demonstrates the responsibility of a Party member through practical actions, and writes the company's social responsibility with great love.

2. 供应链尽责管理实践 Supply Chain Due Diligence Practices

万洋按照尽责管理的六个步骤，并参照《中国指南》中对于企业开展尽责管理工作的建议，开展供应链尽责管理实践。

Wanyang has carried out supply chain due diligence management practices in accordance with the six steps of due diligence management and in reference to the suggestions for enterprises to carry out due diligence management work in the "China Guidelines".

2.1 建立尽责管理体系 Establish a due diligence management system

2.1.1 供应链尽责管理政策 Supply Chain Due Diligence Policy

万洋建立了供应链尽责管理的体系，制定并批准实施包括《供应链尽责管理政策》、《供应链尽责管理申诉办法》等尽责管理文件。其中《供应链尽责管理政策》在公司官网公布，各相关方可查询，网址：济源市万洋冶炼(集团)有限公司 (wanyanggroup.cn)。

Wanyang has established a supply chain due diligence management system and formulated and approved the implementation of due diligence management documents including the Supply Chain Due Diligence Management Policy and the Supply Chain Due Diligence Appeal Measures. Among them, the Supply Chain Due Diligence Management Policy is published on the company's official website for inquiry by all relevant parties. Website: Jiyuan Wanyang Smelting (Group) Co., Ltd. (wanyanggroup.cn).

2.1.2 供应链尽责管理委员会 Supply Chain Due Diligence Committee

万洋成立了供应链尽责管理委员会，委员会由主席、副主席、供应链尽责管理联合办公室（国际业务中心、原料部、生产运营部、企管办、人事部、财务部、保卫中心）等相关部门负责人组成，共同建立和完善公司的供应链尽责管理体系，提升公司供应链尽责管理能力。

Wanyang has established a Supply Chain Due Diligence Management Committee, which consists of a chairman, a vice chairman, and responsible persons of relevant departments

including the Joint Office of Supply Chain Due Diligence Management (International Business Center, Raw Materials Department, Production and Operations Department, Enterprise Management Office, Human Resources Department, Finance Department, and Security Center). The committee jointly establishes and improves the company's supply chain due diligence management system and enhances the company's supply chain due diligence management capabilities.

2.1.3 供应链控制和透明度系统 Supply Chain Control and Transparency

万洋建立了供应链控制和透明度系统，以识别相应矿产供应链中的参与者、原产地信息（矿权信息）、运输路线的信息，及按照所在国法律法规要求向政府进行支付税费的相关信息披露。如果涉及采掘业透明度倡议（EITI）执行国家，则按照 EITI 披露信息提供相应内容。报告期内，万洋铅矿石全部矿产原料来自区域均不是受冲突影响和高风险区域。

Wanyang has established a supply chain control and transparency system to identify participants in the corresponding mineral supply chain, origin information (mineral rights information), transportation route details, and disclose relevant information on tax and fee payments to the government in accordance with the laws and regulations of

the host country. For countries implementing the Extractive Industries Transparency Initiative (EITI), the corresponding information is provided in compliance with EITI disclosure requirements. During the reporting period, all lead ore raw materials of Wanyang are sourced from regions that are not conflict-affected and high-risk areas.

表 1：供应链追溯信息 Table 1: Supply chain traceability information
<p>公司开展“警示信号审查”汇总搜集的信息有：The information collected by the company during the “warning signal review” includes:</p> <ol style="list-style-type: none"> 1. 原料来源国和地区； The country and region of origin of the raw materials; 2. 上游参与者的名字和地址，包括矿区、当地贸易商、仓库、交易市场、冶炼厂、出口商、国际贸易商等； The names and addresses of upstream participants, including mining areas, local traders, warehouses, trading markets, smelters, exporters, international traders, etc.; 3. 运输路线和运输方式； Transportation routes and methods; 4. 矿产或金属的商品名和类型； The commodity name and type of minerals or metals; 5. 收集直接供应商和其他已知上游企业的所有权信息（包括实益所有信息）Collect ownership information of direct suppliers and other known upstream companies (including beneficial ownership information)
<p>如果触发警示信号，万洋还将开展强化版尽职调查工作，收集更多供应链信息：</p>
表 2：补充追溯信息 Table 2: Supplementary Traceback Information
<p>触发“警示信号”补充搜集的信息有 The additional information to be collected upon triggering the “warning signal” includes::</p> <ol style="list-style-type: none"> 1. 为矿产开采、贸易、运输、出口而向政府支付的税金、费用或特许权使用费； Taxes, fees or royalties paid to the government for mineral extraction, trade, transportation and export;

2. 为矿产开采、贸易、运输、出口而向政府官员支付的任何其他款项； Any other payments made to government officials for mineral extraction, trade, transportation and export;
3. 自矿产开采开始，在供应链中所有环节向公共或私人安全部队或其他团体支付的所有税款和任何其他款项； All taxes and any other payments made to public or private security forces or other groups at all links in the supply chain since the start of mineral extraction;
4. 出口商的所有权（包括受益所有权）和公司架构，包括公司管理人员和董事的姓名，以及其与政府或军队的隶属关系； The ownership (including beneficial ownership) and corporate structure of the exporter, including the names of company managers and directors, as well as their affiliations with the government or military;
5. 矿山、开采量、日期和开采方式（例如手工和中小规模采矿或大规模采矿）； The location of the mine, the volume of extraction, the date and the method of extraction (such as artisanal and small-scale mining or large-scale mining);
6. 矿产交易、冶炼、出口的地点； The locations of mineral transactions, smelting and export;
7. 冶炼厂、贸易商的出口和进口文件。Export and import documents of smelters and traders.

2.1.4 加强与供应商的合作 Strengthen cooperation with suppliers

万洋致力于与供应商合作共同完善供应链尽责管理体系。我们制定了供应商尽责管理程序，要求供应商签署供应商行为守则/承诺书，确认供应商遵守与企业尽责管理政策一致的供应商政策。

Wanyang is committed to cooperating with suppliers to jointly improve the supply chain due diligence management system. We have formulated supplier due diligence management

procedures, requiring suppliers to sign the Supplier Code of Conduct/Commitment Letter, confirming that they comply with supplier policies consistent with the company's due diligence management policies.

同时，我们在与供应商合作前对供应商情况进行资格预审，积极与通过预审的供应商建立长期的合作关系。

Meanwhile, we conduct pre-qualification on suppliers before establishing cooperation with them, and actively build long-term cooperative relationships with pre-qualified suppliers.

此外，报告期内，万洋积极开展供应商尽责管理能力培训，提升供应商尽责个管理意识和能力，以期与供应商共同打造包容、清洁、可持续、负责任的矿产供应链。

In addition, during the reporting period, Wanyang actively carried out supplier due diligence management capacity training to enhance suppliers' awareness and capabilities in this regard, aiming to jointly build an inclusive, clean, sustainable and responsible mineral supply chain with suppliers.

2.1.5 申诉机制 Grievance Mechanism

万洋充分尊重利益相关方的诉求，建立了申诉机制并制定了详尽的《申诉管理办法》和申诉流程。（申诉邮箱：hudandan56@163.com；申诉链接：wanyanggroup.cn）

Wanyang fully respects the demands of stakeholders and has established a grievance mechanism, along with detailed Grievance Management Measures and grievance procedures (Grievance Email: hudandan56@163.com; Grievance Link: wanyanggroup.cn).

申诉机制提供了内外部利益相关方表达期望与诉求的渠道，同时也是建立尽责管理体系必不可少的组成部分。所有相关方均可通过申诉机制向公司反映存在的合理诉求，在任何情况下，我们均保证以独立、公正和客观的方式处理、调查、回复并归档所接收的申诉材料。报告期内，公司没有收到相关申诉。

This mechanism provides a channel for internal and external stakeholders to express their expectations and demands, and it is also an indispensable part of the due diligence management system. All relevant parties may submit reasonable appeals to the company through this mechanism. Under no circumstances will we ensure that all received grievance materials are handled, investigated, responded to, and filed in an independent, fair, and objective manner. During the reporting period, the company did not receive any relevant grievances.

同时，万洋认可并参与中国五矿化工进出口商会发布的行业调解和磋商机制 ——《采矿业和矿产价值链调解磋商机制》，详见中国五矿化工进出口商会网站（中国五矿化工进出口商会（cccmc.org.cn））。

Meanwhile, Wanyang recognizes and participates in the industry mediation and consultation mechanism issued by the China Chamber of Commerce for Import and Export of Metals, Minerals and Chemicals (CCCMC) — the Mediation and Consultation Mechanism for the Mining and Mineral Value Chain. For details, please refer to the official website of CCCMC (China Chamber of Commerce for Import and Export of Metals, Minerals and Chemicals (cccmc.org.cn)).

2.2 风险识别和评估 Risk identification and assessment

万洋开展了警示信号审查，经审查，公司虽然没有触发“警示信号”，不需要开启强化版的尽责管理，但我们依然制定了相应的风险管理计划来加强公司的尽责管理工作，并制定程序如在供应链实际情况发生改变时，适时参考《中国指南：附录三》开展实地评估。

Wanyang has conducted a warning signal review. After the review, although the company has not triggered any “warning signals” and thus does not need to launch enhanced due diligence management, we have still formulated corresponding risk management plans to strengthen the company’s due diligence work.

We have also established procedures, such as conducting on-site assessments with reference to the China Guidelines: Appendix III in a timely manner when there are changes in the actual situation of the supply chain.

表 2：三类警示信号 Table 2: Three types of warning signals

矿 产 来 源 地 和 运 输 路 线 警 示 信 号 Warning signs of mineral sources and transpo rtation routes	1. 矿产来自于“受冲突影响和高风险区域”（CAHRAs）；The minerals come from “conflict-affected and high-risk areas” (CAHRAs); 2. 矿产运输路线经过“受冲突影响和高风险区域”；The mineral transportation route passes through “conflict-affected and high-risk areas”; 3. 矿产原产国为已知储存、预估储量或预期生产水平有限的国家（即宣称的来自该国的矿产的产量与其已知储量或预期生产水平不符）；The country of origin of the minerals is a country with limited known reserves, estimated reserves or expected production levels (that is, the output of minerals claimed to come from this country does not match its known reserves or expected production levels); 4. 矿产原产国实际上只是“受冲突影响和高风险区域”的中转国；The country of origin of the minerals is actually only a transit country for “conflict-affected and high-risk areas”; 5. 矿产来自多个回收渠道，且在“受冲突影响或高风险区域”进行加工；The minerals come from multiple recycling channels
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	and are processed in "conflict-affected or high-risk areas";
供 应 商 警 示 信 号 Supplier warning signs	1. 供应商或其他上游企业在出现上述警示信号的地区开展经营活动，或是上述地区供应商的股东，或与之存在利益关系； The supplier or other upstream enterprise conducts business activities in the area where the above warning signals appear, or is a shareholder of the supplier in the above area, or has an interest relationship with it; 2. 获知供应商或其他上游企业在过去十二个月内曾经从示警矿源地和中转地采购过矿产。It is known that the supplier or other upstream enterprise has purchased minerals from the warning mineral source and transit point in the past twelve months.
特 定 情 况 下 的 警 示 信 号 Warning signs in certain situatio ns	1. 收集信息识别异常情况，判断与矿产有关的活动是否有可能助长冲突或者其他侵犯权利的行为；Collect information to identify anomalies and determine whether mineral-related activities may contribute to conflicts or other violations of rights; 2. 无法判定矿产原产国和中转国的情况。Unable to determine the country of origin and transit of minerals.

万洋在供应链运营实践中重点识别和管理以下风险： Wanyang focuses on identifying and managing the following risks in supply chain operation practices

一、与矿产开采、运输或贸易有关的严重侵权风险； Risks of

serious human rights violations related to mineral mining, transportation, or trade;

二、直接或间接支持非法的非国家武装团体风险；Risks of directly or indirectly supporting illegal non-state armed groups；

三、公共或私人安全武装风险；Risks associated with public or private security forces；

四、关于行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、及向政府支付的税收、费用、特许费的风险。Risks of bribery, fraudulent misrepresentation of mineral origin, money laundering, and risks related to tax, fee, and royalty payments to governments；

五、违反特定国家法律法规、联合国及相关国际组织制裁措施的风险。如：Risks of violating the laws and regulations of specific countries, as well as sanctions imposed by the United Nations and relevant international organizations, such as：

a. 违反铅供应链相关的特定国家法律法规，包括但不限于矿产开采许可、进出口管制、环保标准、劳动保护、税务征管等领域的法律条款；a. Violations of specific national laws and regulations related to the lead supply chain, including but not limited to legal provisions in fields such as mineral mining permits, import and export controls, environmental protection standards,

labor protection, and tax collection and administration;

b. 违反联合国安理会、欧盟、美国、中国等国际组织及主要贸易伙伴国发布的针对特定国家、实体或个人的制裁措施，包括但不限于矿产禁运、交易限制、资产冻结等。 b. Violations of sanctions imposed by international organizations such as the United Nations Security Council, the European Union, the United States, China, and major trading partner countries targeting specific countries, entities, or individuals, including but not limited to mineral embargos, transaction restrictions, and asset freezes.

同时，公司参考国际权威机构，包括欧盟受冲突影响和高风险地区指示性清单、非洲大湖区国家清单、联合国安理会制裁、联合国维和部队、海德堡国际冲突研究所“冲突晴雨表”、世界银行“世界治理指数”相关指标、透明国际清廉指数、联合国人类发展指数等资源和信息，制定“受冲突影响和高风险地区识别程序”，并根据该程序对本公司涉及的全部原产国进行识别。

Meanwhile, with reference to resources and information from authoritative international institutions — including the EU Indicative List of Conflict-Affected and High-Risk Areas, the List of Great Lakes Region Countries in Africa, sanctions by the United Nations Security Council, United Nations peacekeeping forces, the "Conflict Barometer" of the Heidelberg Institute for International Conflict Research, relevant

indicators of the World Bank's "World Governance Indicators", Transparency International's Corruption Perception Index, and the United Nations Human Development Index — the company has formulated the "Procedure for Identifying Conflict-Affected and High-Risk Areas". All countries of origin involved in the company's operations are identified in accordance with this procedure.

如果公司触发警示信号，需要开展实地评估，公司将参考《中国指南》附录及本公司制定的《实地评估程序》中的相关要求，成立专业的实地评估团队，并采取循证等方法适时开展实地评估。

If the company triggers a warning signal requiring on-site assessment, it will establish a professional on-site assessment team with reference to the requirements in the Appendix to the China Guidelines and the company's internal On-Site Assessment Procedure, and conduct on-site assessments in a timely manner using evidence-based methods.

2.3 风险预防和缓解 Risk Prevention and Mitigation

为保障矿产供应链尽责管理的有效落地，万洋从制度建设、能力提升、风险管控三个维度构建全流程预防与缓解体系，具体措施如下：

To ensure the effective implementation of responsible mineral supply chain management, Wanyang has established a full-process prevention and mitigation system covering three

dimensions: system construction, capacity building, and risk control. The specific measures are as follows:

2.3.1 制度先行，筑牢内控基础 System-First: Lay a Solid Foundation for Internal Control

制定《禁止使用强迫劳动管理程序》《禁止使用童工和补救控制程序》《运输管理办法》等专项制度，明确各部门在供应链尽责管理中的职责、操作标准与管控要求，为合规执行提供清晰的制度依据，确保各项要求可落地、可追溯。

Wanyang has formulated special systems including the Management Procedure for Prohibition of Forced Labor, Management Procedure for Prohibition of Child Labor and Remedial Control, and Transportation Management Measures. These systems clarify the responsibilities, operating standards, and control requirements of each department in responsible supply chain management, provide clear institutional basis for compliant execution, and ensure all requirements are actionable and traceable.

2.3.2 强化培训，提升管理能力 Strengthen Training to Enhance Management Capabilities

建立定期培训机制，持续提升全员供应链尽责管理意识与专业能力：

A regular training mechanism has been established to continuously improve the awareness and professional

capabilities of all employees in responsible supply chain management:

- 邀请外部行业专家开展尽责管理体系专项培训，引入先进理念与实践经验；
- Invite external industry experts to conduct special training on the responsible management system, introducing advanced concepts and practical experience;
- 针对供应链风险识别、合规审核等核心环节，举办专题培训；
- Organize thematic training focusing on core links such as supply chain risk identification and compliance review;
- 所有培训均按统一模板填写记录并归档，形成完整的培训管理闭环，逐步提升公司整体管控水平。 - All training sessions are documented and filed using a unified template, forming a complete training management closed loop to gradually improve the company's overall control level.

2.3.3 动态管控, 高效应对风险 Dynamic Control for Effective Risk Response

- 制定《风险管理计划》及配套实施监测程序，将风险管控嵌入生产运营全流程； Formulate the Risk Management Plan and supporting implementation and monitoring procedures, integrating risk control into the entire production and operation process;

- 风险识别与报告：一旦发现供应链潜在风险，立即开展事实核查，同步向供应链尽责管理委员会及高级管理者汇报供应链风险调查结果、尽责管理体系运行有效性的监测情况；
- Risk identification and reporting: Once potential supply chain risks are identified, immediately conduct factual verification and simultaneously report the results of supply chain risk investigations and the monitoring status of the effective operation of the responsible management system to the Responsible Supply Chain Management Committee and senior management;
- 精准施策：明确风险涉及的业务版块，针对性制定并落地风险缓解措施；
- Targeted measures: Clarify the business areas involved in the risks, and formulate and implement targeted risk mitigation measures;

- 持续优化：《风险管理计划》确立后，定期核查、跟踪风险缓解策略的实际效果；若风险出现重大变化，及时调整风险管理方案，持续开展风险监测与补充评估，确保风险得到有效控制与缓解。

- Continuous optimization: After the establishment of the Risk Management Plan, regularly verify and track the actual effectiveness of risk mitigation strategies; if significant changes occur in the risks, promptly adjust the risk management plan, continuously conduct risk monitoring and supplementary assessments, and ensure risks are effectively controlled and mitigated.

2.4 开展内外部评估 Conduct Internal and External Assessments

万洋遵循《中国指南》中“持续改进”的原则，十分重视对尽责管理绩效的改善进行持续的监督和追踪。供应链尽责管理联合办公室制定《内部评估计划》，定期进行内部审核并制定改进计划并监督实施效果。

In line with the “continuous improvement” principle outlined in the Guidelines for Responsible Mineral Supply Chains in China (hereinafter referred to as the China Guidelines), Wanyang attaches great importance to the continuous supervision and tracking of improvements in due diligence management performance. The Joint Office for Supply

Chain Due Diligence formulates the Internal Assessment Plan, conducts regular internal audits, develops improvement plans, and supervises the implementation effects.

同时，我们按照矿产供应链尽责管理要求积极参加外部评估，满足利益相关方对供应链合规、透明的期待。2023 年万洋第一次参加《中国指南》外部评估，并顺利通过审核，摘要评估报告参见：

<https://www.cccmc.org.cn/kcxfzzx/zyzx/bg/ff8080818b809d13018cbf1238db2fb3.html>。2024 年万洋第二次参加《中国指南》外部评估，并顺利通过审核，摘要评估报告参见：

<https://www.cccmc.org.cn/kcxfzzx/zyzx/bg/ff80808194628b4701948691935306ad.html>

Meanwhile, we actively participate in external assessments in accordance with the requirements for mineral supply chain due diligence, to meet stakeholders' expectations for supply chain compliance and transparency. In 2023, Wanyang participated in the external assessment under the China Guidelines for the first time and successfully passed the audit; the summary assessment report is available at: [d7be3951fb864778b512d3314feb39f8.pdf](https://www.shuzih.com/d7be3951fb864778b512d3314feb39f8.pdf) (shuzih.com). In 2024, Wanyang participated in the external assessment under the China Guidelines for the second time and also successfully passed the audit; the summary assessment report can be accessed via:

<https://www.cccmc.org.cn/kcxfzzx/zyzx/bg/ff80808194628b4701948691935306ad.html>

2.5 对风险管理过程和结果进行沟通 and 报告

Communicate and Report on the Risk Management Process and Results

万洋定期更新尽责管理进展报告，各相关方可查阅年度《供应链尽责管理报告》。

Wanyang regularly updates the due diligence management progress report, and all relevant parties can access the annual Supply Chain Due Diligence Management Report.

进展报告由供应链尽责管理联合办公室牵头，各个业务部门参与共同编制，确保供应链尽责管理进展报告的实质性、有效性、可信度。按照《中国指南》，并参考《经合组织指南》，进展报告重点陈述公司尽责管理体系，例如供应链政策、内部组织架构、工作机制和人员构成、供应链透明和追溯系统、申诉机制等，供应链风险识别与评估，例如风险评估结果等以及风险管理，例如风险管理计划中降低风险的策略、风险缓解行动计划等，以及开展的绩效监督和跟踪工作情况等方面，用实际行动践行必要的信息公开、提高供应链的透明度。

The progress report is led by the Joint Office for Supply Chain Due Diligence Management and jointly compiled by various business departments to ensure the substantiality, effectiveness, and credibility of the supply chain due

diligence management progress report. In accordance with the China Guidelines and with reference to the OECD Guidelines, the progress report focuses on stating the company's due diligence management system, such as supply chain policies, internal organizational structure, working mechanisms and personnel composition, supply chain transparency and traceability systems, appeal mechanisms, etc., the identification and assessment of supply chain risks, such as risk assessment results, and risk management, such as the risk reduction strategies in the risk management plan, risk mitigation action plans, etc., as well as the performance supervision and tracking work carried out, etc. Wanyang practices the necessary information disclosure with practical actions to improve the transparency of the supply chain.

2.6 适时提供条件或合作开展补救 Provide Conditions or Cooperate in Remediation in a Timely Manner

在矿产供应链尽责管理体系中，补救并非核心管理流程的环节，而是一项独立且关键的保障性机制，需在风险转化为实际影响时提供必要条件与支持。

Within Wanyang's mineral supply chain due diligence management system, remediation is not an integral part of the core management process, but an independent and critical supporting

mechanism—one that requires the provision of necessary conditions and support when risks materialize into actual impacts.

万洋始终将“风险前置防控”作为核心原则，通过完善的风险识别、评估及动态管控机制，最大限度降低供应链中潜在问题（如人权侵害、合规风险等）转化为实际损害的可能性。

Wanyang has always embraced “proactive risk prevention” as a core principle. Leveraging a robust framework encompassing risk identification, assessment, and dynamic control, we minimize the potential for supply chain-related concerns (such as human rights infringements, compliance breaches, etc.) to escalate into tangible harms.

报告期内，得益于全流程的尽责管理实践，公司供应链未发生需启动补救程序的事件，各类潜在风险均通过前期防控措施得到有效化解。

During the reporting period, owing to the implementation of full-process due diligence practices, no incidents necessitating the initiation of remediation procedures have occurred within the company’s supply chain. All potential risks have been effectively mitigated through pre-emptive prevention measures.

承诺书

Commitment Letter

万洋郑重承诺，严格遵守《中国矿产供应链尽责管理指南》《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》要求，恪守国际国内矿产供应链管理相关法律法规、制裁措施及行业规范，坚决践行以下承诺：

Wanyang solemnly commits to complying with the requirements of the Guidelines for Responsible Mineral Supply Chains in China and the OECD Guidelines for Multinational Enterprises on Responsible Supply Chain Due Diligence of Minerals from Conflict-Affected and High-Risk Areas. We strictly adhere to international and domestic laws, regulations, sanctions, and industry norms related to mineral supply chain management, and resolutely fulfill the following commitments:

1. 零容忍违规用工行为

在矿产供应链各环节严格禁止使用强迫劳动、童工及任何形式的劳动剥削。持续完善《禁止使用强迫劳动管理程序》《禁止使用童工和补救控制程序》等内控体系，定期开展合规检查，确保全面符合劳动权益保护相关要求。

1.Zero Tolerance for Unethical Labor Practices

We strictly prohibit the use of forced labor, child labor, and any form of labor exploitation in all links of the mineral supply chain. We will continuously improve internal control systems such as the Management Procedure for Prohibition of Forced Labor and the Management Procedure for Prohibition of Child Labor and Remedial Control, and conduct regular compliance inspections to ensure full alignment with labor rights protection requirements.

2. 精准防控四类核心风险

聚焦矿产供应链关键风险领域，建立专项识别、评估与管控机制，实现风险精准防控：

- 1.1 防范与矿产开采、运输或贸易有关的严重侵权行为；
- 1.2 防范直接或间接支持非国家武装团体的相关风险；
- 1.3 防范公共或私人安全武装相关合规风险；
- 1.4 防范行贿受贿、矿产原产地欺诈性失实陈述、洗钱及向政府支付的税收、费用和特许费相关违规风险。

2.Targeted Prevention and Control of Four Core Risks

We focus on key risk areas in the mineral supply chain and establish specialized mechanisms for risk identification, assessment, and control to achieve precise risk prevention:

- 1.1 Prevent serious human rights abuses related to mineral mining, transportation, or trade;

- 1.2 Prevent risks associated with direct or indirect support to non-state armed groups;
- 1.3 Prevent compliance risks related to public or private security forces;
- 1.4 Prevent risks of bribery and corruption, fraudulent misrepresentation of mineral origin, money laundering, and irregularities in tax, fee, and royalty payments to governments.

3. 全面落实尽责管理要求

坚持构建涵盖制度建设、能力提升、风险管控的全流程风险预防与缓解体系。将四类核心风险防控嵌入尽责管理全环节，定期开展内外部评估，动态监测并优化尽责管理体系运行效能，确保各项管理行动具备实质性、有效性与可信度。

3. Comprehensive Implementation of Due Diligence Requirements

We persist in building a full-process risk prevention and mitigation system covering system construction, capacity building, and risk control. We integrate the prevention and control of the four core risks into all links of due diligence management, conduct regular internal and external assessments, and dynamically monitor and optimize the operational

effectiveness of the due diligence system to ensure all management actions are substantive, effective, and credible.

4. 严守法律法规与制裁要求

建立健全法律法规及制裁措施合规审查机制，全面梳理国际国内矿产供应链领域相关禁令、制裁清单及监管要求，将合规审查嵌入供应商准入、原料采购、物流运输等全流程。坚决防范违反国家法律法规、规避制裁措施等风险，确保供应链各环节合法合规、可追溯。

4. Strict Compliance with Laws, Regulations, and Sanctions

We establish and improve a compliance review mechanism for laws, regulations, and sanctions. We comprehensively sort out relevant bans, sanctions lists, and regulatory requirements in the international and domestic mineral supply chain fields, and embed compliance reviews into the entire process of supplier access, raw material procurement, and logistics transportation. We resolutely prevent risks such as violations of national laws and regulations and evasion of sanctions, ensuring all links of the supply chain are legally compliant and traceable.

5. 坚持信息透明公开披露

定期发布《年度供应链尽责管理报告》，全面披露尽责管理体系、四类核心风险识别与评估结果、风险缓解措施、合规审查情况、绩效监督等关键信息。保障所有利益相关方可便捷查阅报告，及时回应各类咨询，持续提升供应链透明度。

5. Commitment to Transparent Information Disclosure

We regularly publish the Annual Supply Chain Due Diligence Management Report, fully disclosing key information including the due diligence system, identification and assessment results of the four core risks, risk mitigation measures, compliance review status, and performance supervision. We ensure all stakeholders have convenient access to the report, respond to inquiries in a timely manner, and continuously enhance supply chain transparency.

6. 主动推进补救与持续改进

认可补救是供应链尽责管理的关键保障性机制。若潜在风险转化为实际影响，或发生合规偏差，将及时提供必要条件，积极配合相关方实施有效补救措施。坚守“持续改进”原则，不断优化尽责管理流程与风险防控机制，推动矿产供应链可持续健康发展。

6. Proactive Remediation and Continuous Improvement

We recognize that remediation is a critical supporting mechanism for supply chain due diligence. If potential risks materialize into actual impacts or compliance deviations occur, we will promptly provide necessary conditions and actively cooperate with relevant parties to implement effective remediation measures. Adhering to the principle of "continuous improvement," we will constantly optimize due diligence

processes and risk prevention mechanisms to promote the sustainable and healthy development of the mineral supply chain.

本公司真诚接受利益相关方、监管机构及社会公众的监督，将以实际行动履行上述承诺，主动承担社会责任，为构建合规、诚信、透明的全球矿产供应链贡献力量。

We sincerely accept supervision from stakeholders, regulatory authorities, and the general public. We will fulfill the above commitments through practical actions, actively assume social responsibility, and contribute to building a compliant, trustworthy, and transparent global mineral supply chain.

济源市万洋冶炼（集团）有限公司

供应链尽责管理委员会

Jiyuan Wanyang Smeltery Group Co., Ltd.

Supply Chain Due Diligence Committee

附录

appendix

表:《中国指南》和《经合组织指南》报告要求答复索引 Table: Index
of responses to reporting requirements in the China
Guidelines and the OECD Guidelines

《中国指南》报告要求/China Guidelines Reporting Requirements	答复位置 Reply Location	《经合组织指南》报告要求OECD Guidance Reporting Requirements	答复位 置 Reply Location
a. 企业尽责管理政策 /Corporate Due Diligence Policy	P8	1. 企业管理体系 /Enterprise management system	P8-13
b. 负责尽责管理工作的 企业管理架构 /Corporate governance structure responsible for stewardship	P8	a. 制定企业供应链尽职调查 政策/Formulate corporate supply chain due diligence policies	P8
c. 描述企业控制和透明度 系统/Describe corporate control and transparency systems	P8	b. 阐述企业尽职调查工作的管 理架构, 确定直接负责人 /Explain the management structure of corporate due diligence work and identify the direct person in charge	P8
d. 供应商合作方式和 内容 /Supplier cooperation methods and contents	P9	c. 阐述企业确定的矿产供应 链控制系统, 说明其运作方式 /Describe the	P8-9

		mineral supply chain control system that the company has established and explain how it operates	
e. 申诉机制、流程和已发生的申诉处理情况 /Complaints mechanism, process and handling of complaints that have occurred	P9	d. 描述企业的数据库和记录系统，并对从矿源地到下游行为主体在内的所有供应商的披露方法进行描述/Describe the company's databases and record-keeping systems and disclosure approach for all suppliers, from the mine's source to downstream actors	P9
f. “受冲突影响和高风险区域”的识别程序或方法 /Process or methodology for identifying “conflict-affected and high-risk areas”	P11	e. 根据所在国的法律法规要求披露向政府进行支付的相关信息/Disclose information related to payments to the government in accordance with the laws and regulations of the country where you are located	P9
g. 企业评估报告或概要/Business evaluation report or summary	P13	2. 企业供应链风险评估 /Enterprise supply chain risk assessment	P10-11
h. 报告公开的途径或方法/Channels or methods for reporting disclosure	P2/P13	a. 在适当考虑商业机密和其他竞争保密因素的情况下，公布风险评估结果 /Publicly publish risk assessment results with due regard for commercial and other competitive	P12

		confidentiality considerations	
i. 每年定期编制报告和公开 Prepare and publish reports regularly every year	P2/P13	b. 阐述实地评估采用的方法、惯 例、以及取得的信息/Describe the methods and practices used in the field assessment and the information obtained	P11
j. 产销监管链或供应链 追溯信息 Chain of custody or supply chain traceability information	P8	c. 解释企业供应链风险评估 使用的方法/Explain the methods used in enterprise supply chain risk assessment	P10-11
k. 原料的原产地 信息 Origin information of raw materials	P8	3. 风险管理/Risk Management	P13
l. 风险识别和评估的方法 和结果 Risk identification and assessment methods and results	P10-11	a. 描述风险管理所采取的步骤， 总结风险管理计划中降低风险 的策略、能力培养及受影响的利 益相关方参与的情况。 /Describe the steps taken to manage	P12
		risk and summarize the risk reduction strategies, capacity building, and involvement of affected stakeholders in the risk management plan.	
m. 实地评估的方法、过程 和结果 Field evaluation methods, process and	P11	b. 披露企业开展的绩效监督 和跟踪工作情况 Disclosure of the	P11-12

results		performance monitoring and tracking work carried out by the enterprise	
n. 风险管理计划中所采取的措施、策略、受影响利益相关方的参与情况等 Measures and strategies adopted in the risk management plan, participation of affected stakeholders, etc.	P12		
o. 风险监测和跟踪绩效结果 Risk monitoring and tracking performance results	P12		
p. 在某些国家还可能有对采掘业透明度或信息公开提出的披露内容建议 In some countries there may also be recommendations on the content of disclosures required for transparency or disclosure of information in the extractive industries.	P8		