

## 济源市万洋冶炼（集团）有限公司 铅供应链尽责管理政策

济源市万洋冶炼（集团）有限公司（以下简称“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）、《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，并将其纳入到与供应商签订的合同和协议之中。

这一政策为矿产供应链全过程涉及冲突敏感的采购活动以及供应商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。

公司承诺在铅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。

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、国际组织和民间社会组织开展合作，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、国际组织和民间社会组织开展互动，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：**

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。

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。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, 政策自发布之日起生效, 并将在公司网站公布。



注释:

<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。

<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)。

# JIYUAN WANYANG SMELTERY GROUP CO.,LTD.

## Due Diligence Management Policy for Lead Supply Chain

JIYUAN WANYANG SMELTERY GROUP CO.,LTD. (hereinafter referred to as the "Company") recognizes that engaging in mineral resource exploitation, trading, processing, and export in "conflict-affected and high-risk areas" may pose risks of adverse impacts. It also acknowledges its obligations to respect human rights, not fuel conflicts, and avoid adverse environmental and social impacts. The Company commits to adopting and widely promoting the relevant contents of the Guidelines for Due Diligence Management of China's Mineral Supply Chain (2nd Edition) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition), and incorporating them into contracts and agreements signed with suppliers.

This policy serves as a reference for conflict-sensitive procurement activities throughout the mineral supply chain and for suppliers to enhance risk awareness. The Company pledges not to engage in any activities that fund conflicts and to comply with relevant sanctions resolutions of the United Nations and other bodies.

The Company commits to identifying and managing the following risks in the operation of its lead supply chain:

### 1. Severe Violations Related to Mineral Exploitation, Transportation, or Trade:

1. When conducting procurement or business activities in "conflict-affected and high-risk areas", the Company will neither tolerate nor profit from, assist, facilitate, or enable any party to commit, in any manner, the following acts:
  - a. Torture in any form, or cruel, inhuman, or degrading treatment;
  - b. Forced or compulsory labor in any form. Forced or compulsory labor refers to labor or services extracted from any person under the threat of punishment and not voluntarily provided by that person;
  - c. The worst forms of child labor;
  - d. Other acts of serious human rights violations and abuses, such as widespread sexual violence;
  - e. War crimes, other serious violations of international humanitarian law, crimes against humanity, or genocide.

### Risk Mitigation Strategies:

2. If the Company has reasonable grounds to believe that such risks exist — i.e., upstream suppliers are procuring from or have connections with any party that commits the aforementioned severe violations — the Company will immediately

suspend or terminate cooperation with such suppliers.

**II. Direct or Indirect Support to Non-State Armed Groups [^endnote0]:**

3. The Company will not tolerate any direct or indirect support to non-state armed groups through mineral exploitation, transportation, trade, processing, or export. "Direct or indirect support" to non-state armed groups through these activities includes, but is not limited to, purchasing minerals from non-state armed groups or their affiliates [^endnote1], making payments to them, or providing logistical support, equipment, or other forms of assistance. Such armed groups or their affiliates:

- i. Illegally control mineral sites, or otherwise control transportation routes, mineral trading points, and upstream actors in the supply chain [^endnote2]; and/or
- ii. Illegally tax or extort money or minerals at the entrances of mineral sites, along transportation routes, or at mineral trading points [^endnote3]; and/or
- iii. Illegally tax or extort intermediaries, export enterprises, or international traders.

**Risk Mitigation Strategies:**

4. If the Company has reasonable grounds to believe that upstream suppliers are procuring from or have relationships with any party that provides direct or indirect support to non-state armed groups, the Company will immediately suspend or terminate cooperation with such suppliers.

**III. Public or Private Security Forces:**

5. The Company prohibits providing direct or indirect support to public or private security forces that illegally control mineral sites, transportation routes, and upstream actors in the supply chain; illegally tax or extort money or minerals at the entrances of mineral sites, along transportation routes, or at mineral trading points; or illegally tax or extort intermediaries, export enterprises, or international traders. [^endnote4]

6. The Company recognizes that the role of public or private security forces at and/or around mineral sites and/or along transportation routes is solely to uphold the rule of law, including protecting human rights, safeguarding miners, equipment, and facilities, and securing mineral sites or transportation routes to ensure that legal exploitation and trade are not disrupted.

7. In cases where the Company or any enterprise in its supply chain has signed contracts with public or private security forces, the Company commits to requiring, or specifying that, such security forces must be recognized by internationally accepted standards and guidelines governing public or private security forces [^endnote5]. In particular, the Company will support or take measures to implement screening policies to ensure that individuals or security force units known to have

committed serious human rights violations are not engaged.

8. The Company will support or take measures to collaborate with central or local governments, international organizations, and civil society organizations to identify feasible solutions for enhancing the transparency, proportionality, and accountability of security costs incurred by public security forces.

9. The Company will support or take measures to engage with local governments, international organizations, and civil society organizations to avoid or minimize the adverse impacts of the presence of public or private security forces at mineral sites on vulnerable groups, especially artisanal miners—particularly when minerals in the supply chain are extracted through artisanal or small-scale mining.

**Risk Mitigation Strategies:**

10. If the Company identifies such risks to a certain extent, it will, based on the specific position of the enterprise in the supply chain, immediately develop, adopt, and implement a risk management plan for upstream suppliers and other stakeholders [^endnote6] to contain or reduce the risk of providing direct or indirect support to public or private security forces. If the risk management plan fails to take effect within six months, the Company will temporarily suspend or terminate cooperation with upstream suppliers. [^endnote7] The same response measures will be adopted if the Company identifies potential non-compliance with the provisions of paragraphs 8 and 9 above.

**IV. Bribery and Fraudulent Misrepresentation of Mineral Origin:**

11. The Company will not offer, promise, engage in, or demand any form of bribery. It will also resist temptations to bribe for the purpose of concealing or falsifying the origin of minerals, or underreporting taxes, fees, and royalties payable to the government for mineral exploitation, trade, processing, transportation, or export activities. [^endnote8]

**Money Laundering:**

12. If the Company has reasonable grounds to believe that there is a money laundering risk arising from, or related to, the exploitation, trade, processing, transportation, or export of minerals that were illegally taxed or extorted at the entrances of mineral sites, along transportation routes, or at mineral trading points of upstream suppliers, the Company will support or take measures to contribute to the effective elimination of money laundering.

**Taxes, Fees, and Royalties Paid to the Government:**

13. The Company will ensure the payment of all legal taxes, fees, and royalties related to the exploitation, trade, and export of minerals from conflict-affected and high-risk areas to the government. It also commits to disclosing such payments in accordance with the requirements of the country where it operates regarding the transparency of tax and fee payments to government authorities, based on the enterprise's position in the supply chain.

**Risk Mitigation Strategies:**

14. Based on the specific position of the enterprise in the supply chain, the Company commits to collaborating with suppliers, central or local government authorities, international organizations, civil society, and affected third parties as appropriate. The goal is to improve or monitor performance by taking significant measures to prevent or reduce the risk of adverse impacts within a reasonable time frame. If risk reduction measures are ineffective, the Company will temporarily suspend or terminate cooperation with upstream suppliers. For risks that need to be reduced after the implementation of a risk management plan, the Company will conduct additional risk assessments. If the risk management plan fails to achieve significant results within six months, and the risks of bribery, fraudulent misrepresentation of mineral origin, money laundering, and non-compliance with tax, fee, and royalty payments to the government are not contained or reduced, the Company will temporarily suspend cooperation with the supplier for at least three months. During the suspension period, the Company will revise the risk management plan and clarify the performance targets that must be met for the resumption of the business relationship.

The Company will, in line with the principle of continuous improvement, integrate this policy into its management system and the responsibilities of relevant departments. This policy also applies to all suppliers of the Company, and the Company will take active measures to communicate this policy to suppliers. The policy shall take effect from the date of issuance and will be published on the Company's official website.



Notes:

1. Enterprises shall refer to relevant resolutions of the United Nations Security Council to identify non-state armed groups.
2. "Affiliates" include traders, wholesalers, intermediaries, and other parties in the supply chain that directly cooperate with armed groups and facilitate mineral exploitation, trade, and processing.
3. "Control" over mineral mines, transportation routes, mineral trading locations, and upstream actors in the supply chain means: i) monitoring exploitation activities, including authorizing access to mining areas, and/or coordinating sales for downstream intermediaries, export enterprises, or international traders; ii) using any form of forced or compulsory labor in mineral exploitation, transportation, trade, or sales; or iii) holding leadership or management positions in upstream enterprises or mines, or having beneficial ownership or other ownership interests.
4. "Extortion" against mines, transportation routes, mineral trading locations, or upstream enterprises refers to demanding money or minerals that the extorted party is not willing to pay, usually under the threat of violence or other means, and using permission for exploitation, use of transportation routes, or mineral transportation, purchase, or sales activities as leverage.
5. The "direct or indirect support" mentioned herein does not refer to legitimate forms of support, which include statutory taxes, fees, and/or royalties paid by enterprises to the government of the country where they operate.
6. For example, international guiding documents such as the Voluntary Principles on Security and Human Rights.
7. In case of force majeure events such as tsunamis, earthquakes, fires, pandemics, or wars during the implementation of the risk plan, the time limit may be adjusted accordingly, but a written explanation of the situation shall be provided.
8. For risks that need to be reduced after the implementation of a risk management plan, enterprises shall conduct additional risk assessments. If the risk management plan fails to achieve significant results within six months, and the risk of providing direct or indirect support to public or private security forces is not contained or reduced, the enterprise shall temporarily suspend cooperation with the supplier for at least three months. During the suspension period, the enterprise shall revise the risk management plan and clarify the performance targets that must be met for the resumption of the cooperative relationship.
9. See the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997) and the United Nations Convention against Corruption (2004).