

济源市万洋冶炼（集团）有限公司

风险管理计划

一、 目标

1. 制定本《风险管理计划》是为了预防公司铅供应链中出现《中国矿产供应链尽责管理指南》（以下简称“中国指南”）附录一和《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）（以下简称“《OECD 指南》”）附录二所列四类风险。

四类风险如下：

1. 1 与矿产开采、运输或贸易有关的严重侵权行为；
1. 2 关于直接或间接支持非国家武装团体；
1. 3 关于公共或私人安全武装；
1. 4 关于行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、向政府支付的税收、费用和特许费

2. 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。

新增需预防的风险（以下简称“合规与制裁风险”）如下：

2. 1 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；
2. 2 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。

新增需预防的风险（以下简称“合规与制裁风险”）如下：

二、 原则

1. 制定风险管理计划时，公司需征询供应商、受影响相关方及合规领域专业机构（如法律顾问、制裁合规咨询方）的意见，就风险缓解策略达成一致，保存参与记录；
2. 对合规与制裁风险的管理，需遵循“动态更新、属地适配”原则，确保覆盖公司业务涉及国家/地区的最新法规及制裁要求；

3. 风险识别与应对需与供应链现有四类风险管理流程协同, 避免重复操作, 提升管理效率。.

三、 供应链风险现状

经过供应链追溯、风险评估及合规审查, 目前未识别出以下证据:

1. 公司铅供应链存在直接或间接符合中国指南附录一和《OECD 指南》(第三版) 附录二所列四类风险的情况;
2. 公司及供应商存在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情况。

为预防上述两类风险, 公司制定本《风险管理计划》, 并每半年结合以下信息更新 1 次:

- 供应链合作范围及供应商变动情况;
- 特定国家法律法规(如矿产、贸易、税务领域)的修订与新增内容;
- 联合国及主要贸易伙伴国制裁清单的更新结果。

四、 管理计划

4.1 公司活动(新增合规与制裁风险相关措施, 原有措施保持不变)

- a) 公司制定《供应链尽责管理政策》, 政策中严禁出现四类风险及合规与制裁风险;
- b) 公司向员工提供培训, 宣讲四类风险、合规与制裁风险(含最新法规及制裁清单解读);
- c) 公司建立《内部评估工作计划》, 定期开展内部评估, 新增“合规与制裁风险专项审查”模块;
- d) 公司设立《供应链尽责管理申诉机制》, 接受四类风险及合规与制裁风险的申诉;
- e) 保持跟踪联合国有关非国家武装团体的决议, 同步跟踪联合国及主要贸易伙伴国制裁清单更新(每月 1 次), 建立《制裁清单动态跟踪表》;
- f) 与重点供应商保持沟通, 新增“合规与制裁风险沟通”议题;
- g) 以《事故表》统计四类风险及合规与制裁风险(含违规事件类型、涉及法规/制裁条款、影响范围等);
- h) 制定《供应链追溯地图信息表》要求填写原产地, 同步要求标注“是否涉及制裁国家/实体”, 并制定、填写和归档《文件和记录控制程序》;

- i) 编制财务报告并根据所在国法律法规的要求适当公开, 新增“制裁合规相关交易排查说明”;
- j) 一旦公司供应链发生风险(含四类风险及合规与制裁风险), 与相关方就危机事件和影响进行沟通;
- k) 一旦供应链发生风险, 公司风险计划管理的实施将与利益相关方合作推动或协商, 并监测和追踪缓解措施的绩效; 必要时, 可通过建立或支持当地社区监督力量, 涉及合规与制裁风险时需同步联动法律顾问;
- l) 组建社区代表小组: 从当地居民、商户、公益组织中筛选代表, 每季度召开1次风险沟通会, 提前告知企业重大经营决策的潜在风险。开放风险信息公示渠道: 通过社区公告栏、公众号、线下宣讲会, 定期公示企业风险防控措施, 确保信息透明。设立专属监督反馈通道: 开通24小时监督热线、线上反馈小程序, 明确1个工作日内响应、5个工作日内反馈处理进展的时效要求。邀请社区参与风险核查: 每年2次邀请社区代表参与企业现场风险检查, 允许代表查阅非涉密的风险记录。
- m) 每年委托第三方合规机构对公司铅供应链进行“法规与制裁合规审计”, 出具审计报告并整改问题;
- n) 建立《特定国家法律法规数据库》, 按业务涉及国家/地区分类梳理铅供应链相关法规(如中国《矿产资源法》、欧盟《冲突矿物法规》等)。

4.2 业务关系(新增合规与制裁风险相关管理要求, 原有措施保持不变)

- a) 一般供应商(不涉及国际采购): 公司持续更新供应商的追溯情况, 新增“属地法规合规审查”(每年1次), 排查是否存在违反当地矿产、税务、环保等法规的行为;
- b) 重点供应商(涉及国际采购): 公司持续更新供应商的合规及追溯情况, 新增以下要求:
 - 每年收集1次供应商的《合规与制裁自查报告》, 确认其未涉及制裁清单及违反目标国家法规;
 - 要求供应商提供“不涉及制裁国家/实体”的书面承诺函;
- c) 新增供应商: 开展合作前尽职调查, 重点关注警示信号、四类风险及合规与制裁风险, 具体包括: 核查供应商及其关联方是否在联合国、中国、欧盟、美国等制裁清单内;

五、针对重点供应商开展的具体活动

为更好的管理重点供应商, 避免《中国指南》附录一和《OECD指南》(第三版)附录二所列风险, 公司将:

1. 进一步搜集目标国家法规更新、国际制裁清单调整等信息，及时同步至重点供应商；
2. 对供应商施加影响力，推动其建立“合规与制裁风险内部管理机制”，完善相关记录与报告流程；
3. 制定合规与制裁风险预防措施，最大程度防止风险发生；
4. 制定合规与制裁风险缓解措施，当不利影响发生时有效减缓后果和损失。

1. 针对与矿产开采、运输或贸易有关的严重侵权行为：

- 制定并向供应商传递供应商行为守则；（12个月）
- 制定并向供应商传递责任采购合同条款；（12个月）
- 公司对供应商开展尽职调查，并建议供应商对其供应商开展尽职调查；（采购前/12个月）
- 建议供应商及其供应商通过制定《童工程序》和《预防强迫劳动程序》等程序文件预防童工和强迫劳动等风险；（24个月）
- 建议供应商及其供应商为员工提供预防严重侵权风险的培训；（12个月）
- 要求供应商就危机事件和影响进行沟通；（实时）
- 要求供应商使用《事故表》统计供应链严重侵权风险事件并与公司及时沟通。（实时）

2. 关于直接或间接支持非国家武装团体：

- 制定并向供应商传递供应商行为守则；（12个月）
- 制定并向供应商传递责任采购合同条款；（12个月）
- 公司对供应商开展尽职调查，并建议供应商对其供应商开展尽职调查；（采购前/12个月）
- 建议供应商及其供应商为员工提供预防非国家武装团体风险的培训；（12个月）
- 要求供应商就危机事件和影响进行沟通；（实时）
- 要求供应商使用《事故表》统计非国家武装团体风险事件并与公司及时沟通。（实时）

3. 针对关于公共或私人安全武装：

- 制定并向供应商传递供应商行为守则；（12个月）

社区联络点建设: 在沿线社区设立固定联络点, 配备专职人员, 负责接收居民反馈、发放风险防控宣传资料、登记投诉信息。同步开通线上反馈平台(微信小程序、热线电话、邮箱), 实现 24 小时诉求受理, 承诺 3 个工作日内给出初步回应。

参与式风险评估: 在供应链风险排查、应急预案制定等环节, 邀请社区代表参与现场核查, 对铅矿开采、冶炼、运输、回收等关键节点的风险点进行共同识别。

七、社区监督体系完善

1. 监督内容明确化

风险管控执行监督: 社区监督小组有权核查企业铅排放数据、环保设施运行记录、运输车辆合规性(如是否密闭运输、是否避开居民密集区)、废弃物处置台账等, 确保企业严格落实风险管理计划。

健康安全保障监督: 监督社区卫生服务中心的铅暴露筛查工作(如儿童血铅检测频次、结果公示)、风险区域警示标识设置、防护用品发放情况, 确保居民健康权益得到保障。

信息公开监督: 督促企业和政府及时公开铅供应链相关信息, 包括原材料来源、生产工艺、污染物排放浓度及标准、应急预案、事故处理结果等, 禁止信息隐瞒或延迟公开。

2. 监督方式多样化

志愿监督队伍建设: 招募社区内具备环保、卫生知识的志愿者, 定期对供应链关键节点开展巡查, 记录相关情况并反馈至相关部门。

投诉举报机制优化: 建立“受理 - 调查 - 处理 - 反馈”闭环投诉流程, 居民可通过线上线下渠道举报违规行为, 相关部门需在 7 个工作日内完成调查处理。

铅供应链尽责管理联合办公室(签字):

日期: 2025.5

胡丹丹

供应链尽责管理委员会(签字):

日期: 2025.5

蒋国华

- 制定并向供应商传递责任采购合同条款; (12 个月)
- 公司对供应商开展尽职调查, 并建议供应商对其供应商开展尽职调查; (采购前/12 个月)
- 建议供应商及其供应商为员工提供预防公共和私人安保风险的培训; (12 个月)
- 要求供应商就危机事件和影响进行沟通; (实时)
- 要求供应商使用《事故表》统计公共和私人安保风险事件并与公司及时沟通。 (实时)

4. 针对关于行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、向政府支付的税收、费用和特许费:

- 制定并向供应商传递供应商行为守则; (12 个月)
- 制定并向供应商传递责任采购合同条款; (12 个月)
- 公司对供应商开展尽职调查, 并建议供应商对其供应商开展尽职调查; (采购前/12 个月)
- 向供应商传递或要求供应商制定《监管链信息表》; (12 个月)
- 建议供应商及其供应商为员工提供预防行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、向政府支付的税收、费用和特许费风险的培训; (12 个月)
- 要求供应商就事件和影响进行沟通; (实时)
- 要求供应商使用《事故表》统计行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、向政府支付的税收、费用和特许费风险事件并与公司及时沟通; (实时)
- 建议供应商编制财务报告并根据国家法律要求进行披露。 (12 个月)

六、社区参与机制构建

1. 分层参与主体界定

明确社区参与核心主体, 包括铅供应链沿线社区居民(尤其是儿童、孕妇等敏感人群)、社区居委会、社区卫生服务中心、社区环保组织、教育机构等。按参与深度分为决策咨询层(社区代表、专业机构人员)、执行协作层(社区工作者、志愿者)、监督反馈层(全体社区居民), 确保不同群体的诉求均能得到响应。

2. 多元化参与渠道搭建

update and territorial adaptation" to ensure coverage of the latest laws, regulations, and sanction requirements of the countries/regions involved in the company's business;

3. Risk identification and response shall be coordinated with the existing four-type risk management processes of the supply chain to avoid duplicate operations and improve management efficiency.

III. Current Status of Supply Chain Risks

After supply chain tracing, risk assessment, and compliance review, no evidence has been identified for the following:

1. The company's lead supply chain directly or indirectly involves the four types of risks listed in Appendix 1 of the China Guidelines and Appendix 2 of the OECD Guidelines (3rd Edition);

2. The company and its suppliers have violated the laws and regulations of specific countries or sanctions imposed by the United Nations and relevant international organizations.

To prevent the above two types of risks, the company formulates this Risk Management Plan, which will be updated semi-annually based on the following information:

- Changes in the scope of supply chain cooperation and suppliers;
- Revisions and additions to the laws and regulations of specific countries (such as in the fields of minerals, trade, and taxation);
- Updates to the sanctions lists of the United Nations and major trading partners.

IV. Management Plan

4.1 Company Activities (New measures related to compliance and sanctions risks are added; existing measures remain unchanged)

- a) The company formulates the "Policy on Responsible Supply Chain Management," which strictly prohibits the four types of risks and compliance and sanctions risks;
- b) The company provides training to employees to promote the four types of risks and compliance and sanctions risks (including interpretation of the latest laws, regulations, and sanctions lists);
- c) The company establishes the "Internal Assessment Work Plan" to conduct regular internal assessments and adds a special module for "compliance and sanctions risk review";
- d) The company sets up the "Appeal Mechanism for Responsible Supply Chain Management" to accept appeals related to the four types of risks and compliance and sanctions risks;
- e) Continuously track UN resolutions related to non-state armed groups and updates to the sanctions lists of the United Nations and major trading partners (once a month), and establish

the "Dynamic Tracking Table of Sanctions Lists";

- f) Maintain communication with key suppliers and add the topic of "communication on compliance and sanctions risks";
- g) Use the "Incident Form" to record the four types of risks and compliance and sanctions risks (including the type of violation, involved laws/regulations/sanction clauses, scope of impact, etc.);
- h) Formulate the "Supply Chain Tracing Map Information Form" requiring the filling of origin, and simultaneously require the marking of "whether involving sanctioned countries/entities," and formulate, fill in, and file the "Document and Record Control Procedure";
- i) Prepare financial reports and disclose them appropriately in accordance with the requirements of the laws and regulations of the country where it is located, adding the "Explanation on the Investigation of Sanctions Compliance-Related Transactions";
- j) In the event of risks in the company's supply chain (including the four types of risks and compliance and sanctions risks), communicate with relevant parties on the crisis events and impacts;
- k) In the event of supply chain risks, the implementation of the company's risk plan management will be promoted or negotiated in cooperation with stakeholders, and the performance of mitigation measures will be monitored and tracked; if necessary, local community supervision forces can be established or supported, and legal advisors shall be linked simultaneously when compliance and sanctions risks are involved;
- l) Establish a community representative group: select representatives from local residents, merchants, and public welfare organizations, hold risk communication meetings once a quarter, and inform in advance of potential risks of major business decisions of the enterprise. Open risk information disclosure channels: regularly disclose enterprise risk prevention and control measures through community bulletin boards, official WeChat accounts, and offline lectures to ensure information transparency. Set up an exclusive supervision and feedback channel: open a 24-hour supervision hotline and an online feedback mini-program, with clear time limits of responding within 1 working day and feedback on handling progress within 5 working days. Invite communities to participate in risk verification: invite community representatives to participate in on-site enterprise risk inspections twice a year and allow representatives to review non-confidential risk records;
- m) Entrust a third-party compliance institution to conduct an "audit on compliance with laws, regulations, and sanctions" on the company's lead supply chain every year, issue an audit report, and rectify problems;
- n) Establish a "Database of Laws and Regulations of Specific Countries" to sort out lead supply chain-related laws and regulations by country/region involved in the business (such as China's "Mineral Resources Law" and the EU's "Conflict Minerals Regulation").

4.2 Business Relationships (New management requirements related to compliance and sanctions risks are added; existing measures remain unchanged)

- a) General suppliers (not involving international procurement): The company continuously updates the tracing status of suppliers, adds "territorial legal compliance review" (once a year), and investigates violations of local mineral, taxation, environmental protection, and other laws

and regulations;

b) Key suppliers (involving international procurement): The company continuously updates the compliance and tracing status of suppliers and adds the following requirements:

- Collect suppliers' "Self-Assessment Report on Compliance and Sanctions" once a year to confirm that they are not on the sanctions list and have not violated the laws and regulations of target countries;

- Require suppliers to provide a written commitment letter stating "not involving sanctioned countries/entities";

c) New suppliers: Conduct due diligence before cooperation, focusing on red flags, the four types of risks, and compliance and sanctions risks, including: verifying whether suppliers and their affiliated parties are on the sanctions lists of the United Nations, China, the European Union, the United States, etc.;

V. Specific Activities Carried Out for Key Suppliers

To better manage key suppliers and avoid the risks listed in Appendix 1 of the China Guidelines and Appendix 2 of the OECD Guidelines (3rd Edition), the company will:

1. Further collect information such as updates to the laws and regulations of target countries and adjustments to international sanctions lists, and promptly synchronize them to key suppliers;

2. Exert influence on suppliers to promote them to establish an "internal management mechanism for compliance and sanctions risks" and improve relevant recording and reporting processes;

3. Formulate preventive measures for compliance and sanctions risks to prevent risks to the greatest extent;

4. Formulate mitigation measures for compliance and sanctions risks to effectively mitigate consequences and losses when adverse impacts occur.

1. For severe human rights violations related to mineral mining, transportation, or trade:

- Formulate and transmit the Supplier Code of Conduct to suppliers; (12 months)

- Formulate and transmit responsible procurement contract clauses to suppliers; (12 months)

- Conduct due diligence on suppliers and advise suppliers to conduct due diligence on their own suppliers; (before procurement/12 months)

- Advise suppliers and their suppliers to formulate procedural documents such as the "Child Labor Procedure" and the "Forced Labor Prevention Procedure" to prevent risks such as child labor and forced labor; (24 months)

- Advise suppliers and their suppliers to provide training for employees to prevent the risk of severe human rights violations; (12 months)

- Require suppliers to communicate on crisis events and impacts; (in real time)

- Require suppliers to use the "Incident Form" to record severe human rights violation risk events in the supply chain and communicate with the company in a timely manner. (in real time)

2. For direct or indirect support to non-state armed groups:

- Formulate and transmit the Supplier Code of Conduct to suppliers; (12 months)

- Formulate and transmit responsible procurement contract clauses to suppliers; (12 months)

- Conduct due diligence on suppliers and advise suppliers to conduct due diligence on their own suppliers; (before procurement/12 months)

- Advise suppliers and their suppliers to provide training for employees to prevent the risk of non-state armed groups; (12 months)

- Require suppliers to communicate on crisis events and impacts; (in real time)

- Require suppliers to use the "Incident Form" to record non-state armed group risk events and communicate with the company in a timely manner. (in real time)

3. For public or private security forces:

- Formulate and transmit the Supplier Code of Conduct to suppliers; (12 months)

- Formulate and transmit responsible procurement contract clauses to suppliers; (12 months)

- Conduct due diligence on suppliers and advise suppliers to conduct due diligence on their own suppliers; (before procurement/12 months)

- Advise suppliers and their suppliers to provide training for employees to prevent the risk of public and private security forces; (12 months)

- Require suppliers to communicate on crisis events and impacts; (in real time)

- Require suppliers to use the "Incident Form" to record public and private security force risk events and communicate with the company in a timely manner. (in real time)

4. For bribery and corrupt practices, fraudulent misrepresentation of mineral origin, money laundering, and taxes, fees, and royalties paid to governments:

- Formulate and transmit the Supplier Code of Conduct to suppliers; (12 months)

- Formulate and transmit responsible procurement contract clauses to suppliers; (12 months)

- Conduct due diligence on suppliers and advise suppliers to conduct due diligence on their own suppliers; (before procurement/12 months)

- Transmit to suppliers or require suppliers to formulate the "Chain of Custody Information Form"; (12 months)
- Advise suppliers and their suppliers to provide training for employees to prevent the risks of bribery and corrupt practices, fraudulent misrepresentation of mineral origin, money laundering, and taxes, fees, and royalties paid to governments; (12 months)
- Require suppliers to communicate on events and impacts; (in real time)
- Require suppliers to use the "Incident Form" to record risk events such as bribery and corrupt practices, fraudulent misrepresentation of mineral origin, money laundering, and taxes, fees, and royalties paid to governments and communicate with the company in a timely manner; (in real time)
- Advise suppliers to prepare financial reports and disclose them in accordance with national legal requirements. (12 months)

VI. Construction of Community Participation Mechanism

1. Definition of Hierarchical Participation Subjects

Clarify the core subjects of community participation, including residents along the lead supply chain (especially vulnerable groups such as children and pregnant women), community neighborhood committees, community health service centers, community environmental protection organizations, and educational institutions. Divide them into decision-making consultation level (community representatives, professional institution personnel), execution and coordination level (community workers, volunteers), and supervision and feedback level (all community residents) according to the depth of participation to ensure that the demands of different groups are responded to.

2. Establishment of Diversified Participation Channels

Construction of community contact points: Set up fixed contact points in communities along the line, equipped with full-time personnel, responsible for receiving residents' feedback, distributing risk prevention and control publicity materials, and registering complaint information. Simultaneously open online feedback platforms (WeChat mini-program, hotline, email) to achieve 24-hour acceptance of demands and promise to give initial responses within 3 working days.

Participatory risk assessment: Invite community representatives to participate in on-site verification during supply chain risk investigation, emergency plan formulation, and other links to jointly identify risk points in key nodes such as lead ore mining, smelting, transportation, and recycling.

VII. Improvement of Community Supervision System

1. Clarification of Supervision Content

Supervision of risk control implementation: Community supervision teams have the right to verify the company's lead emission data, operation records of environmental protection facilities, compliance of transportation vehicles (such as whether they are sealed for transportation and whether they avoid densely populated residential areas), and waste disposal accounts to ensure that the company strictly implements the risk management plan.

Supervision of health and safety guarantees: Supervise the lead exposure screening work of community health service centers (such as the frequency of children's blood lead testing and result disclosure), the setting of warning signs in risk areas, and the distribution of protective equipment to ensure that residents' health rights and interests are protected.

Supervision of information disclosure: Urge enterprises and the government to timely disclose lead supply chain-related information, including raw material sources, production processes, pollutant emission concentrations and standards, emergency plans, and accident handling results, and prohibit information concealment or delayed disclosure.

2. Diversification of Supervision Methods

Construction of volunteer supervision teams: Recruit volunteers with environmental protection and health knowledge in the community to conduct regular inspections of key nodes of the supply chain, record relevant situations, and feedback to relevant departments.

Optimization of complaint and reporting mechanisms: Establish a closed-loop complaint process of "acceptance - investigation - handling - feedback." Residents can report violations through online and offline channels, and relevant departments must complete the investigation and handling within 7 working days.

Joint Office for Responsible Lead Supply Chain Management (Signature):

Date: 2025.8

Supply Chain Responsible Management Committee (Signature):

Date: