

附件 23:

云南乘风有色金属股份有限公司

负责任矿物供应链尽责管理年度报告

CHF/JZGL-GL 尽责组 018-2023

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、出口等经营活动可能产生重大的社会和环境风险，并有尊重人权、不助长冲突，消除和管控相关风险的责任。公司秉持负责任、尊重、诚信的核心价值观，以一个评估周期为界编制发布一次本报告。通过展示和推进有效的管理持续增强对供应链的管理能力，以树立负责任的企业形象。同时，向供应商沟通明确的行为准则，强化其尽责管理意识和能力。

一、公司信息

公司名称：云南乘风有色金属股份有限公司

公司地址：云南省个旧市大屯街道红土坡

CID 编号：002158

使用原料：锡矿、锡精矿（砂状）、氧化锡（粉状、泥状）、锡粒子（颗粒状）等。

上次评估日期：2024 年 12 月 11 日至 12 日

评估期间：2024 年 10 月 1 日 - 2025 年 9 月 30 日

主要产品：锡 锭

评估公司：中国质量认证中心有限公司

二、依据标准

公司遵循以下标准实施负责任矿物供应链管理：

1) 《中国矿产供应链尽责管理指南》（第二版）-简称《中国指南》；

2) 《负责任矿物审验流程 锡和钽的审验标准》；

3) 参考《经济发展与合作组织关于来自受冲突影响和高风险区域的矿产的负责任供应链尽责调查指南》（第三版）——简称 OECD 指南；

4) 参考《联合国工商业与人权指导原则》。

三、供应链尽责管理实践

云南乘风自开展矿产供应链尽责管理工作以来，遵照我国矿产供应链尽责管理领域相关法规要求，并遵守矿源地所在国相宜法规，逐步建立、完善负责任矿物供应链管理体系。先后按照《中国矿产供应链尽责管理指南》（第二版）、《负责任矿物审验流程 锡和钽的审验标准》及其他相关标准和要求构建了公司负责任矿物供应链管理体系，制定了供应链政策及其他控制文件和透明度系统记录文件，逐步实现系统性、可追溯的供应链尽责管理。具体开展工作如下：

第一步 建立、完善负责任矿物供应链管理体系

1. 负责任矿物供应链政策

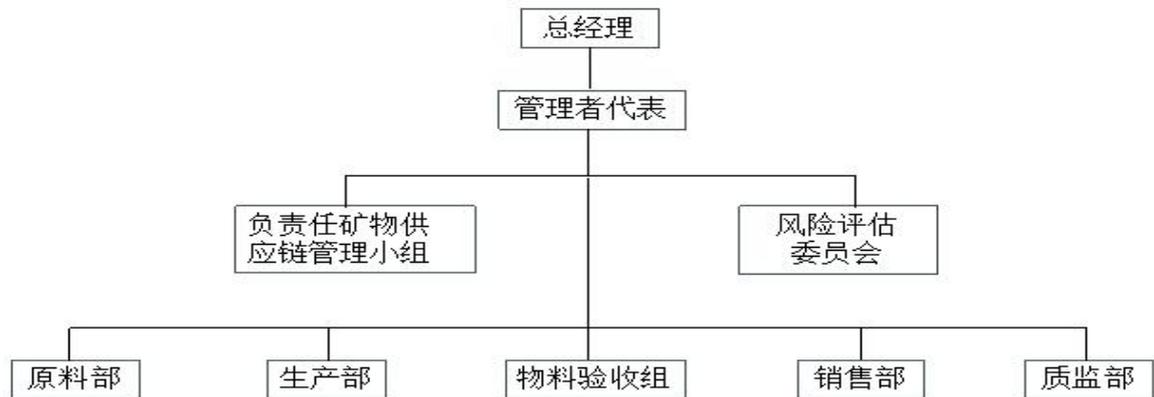
为规避使用直接或间接为武装团体提供资金或使他们得益的冲突矿物及/或涉及在高风险和受冲突影响地区进行其他严重侵犯人权行为的冲突矿物，公司依据《中国矿产供应链尽责管理指南》（第二版）、《负责任矿物审验流程 锡和钽的审验标准》及其他相关标准和要求制定了《云南乘风有色金属股份有限公司负责任矿物供应链政策》及其他制度文件，并向利益相关者（供应商、客户和员工等）广泛传播，同时于公司官网公布：<https://www.yhtin.cn/newsinfo/1581249.html>。

2. 公司管理体系架构与运行机制

2.1 组织结构。公司已构建由总经理领导，管理者代表全面负责的管理架构，实施负责任矿物供应链管理的策划、推进和改善，提供必要的资源支持。任命了管理者代表，组建了公司负责任矿物供应链管理小组、及跨部门的风险评估委员会，并明确职责。日常工

作在管理者代表领导下，由原料部、生产部、物料验收组、销售部、质量监督部等部门配合供应链管理小组开展具体工作。 组织架构图如下：

云南乘风有色金属股份有限公司负责任矿物供应链管理组织架构图



为规范供应链尽责管理，公司负责任矿物供应链管理小组相继编制并发布了《负责任矿物供应链管理手册》《负责任矿物供应链管理体系文件编制规则》《负责任矿物供应链政策》《负责任矿物供应商行为守则》《负责任矿物供应链沟通与申诉程序》《负责任矿物供应链培训控制程序》《年度负责任矿物供应链管理培训计划》《负责任矿物供应链风险管理计划》《负责任矿物内、外部评估控制程序》《负责任矿物供应链内部评估计划》《负责任矿物供应链内部评估报告》《负责任矿物供应链尽责管理年度报告》《负责任矿物供应链文件、记录控制程序》《统计管理制度》《物料验收标准》《负责任矿物供应链尽职调查报告》《负责任矿物供应链实地评估程序》及支持记录文件等 30 余份书面文件和程序。

2.2 公司按照建立的《负责任矿物供应链培训控制程序》《年度负责任矿物供应链管理培训计划》组织对与公司负责任矿物供应链管理相关的人员和部门开展锡供应链尽责管理专项培训，使其了解和掌握管理理念和工作方法。一年来，共开展培训 8 次，其中供应商培训 4 次，评估员外部培训 2 次，公司内部培训 2 次。同时，积极参与外部 CCCMC、RMI

等相关机构组织的线上、线下研讨（SMISC 论坛）、交流会等，定期收集国内外供应链尽责管理信息、资料、动态等，与相关人员共享学习，以提高公司尽责管理的整体能力。

3. 供应链透明度管理。公司建立供应链控制和透明度系统(包含：供应链尽责管理程序、制度、结果及相应决策的内部记录等)，用于识别我们所采购锡物料供应链中的上游参与者、原料来源国或地区以及运输路线等关键信息，为开展“警示信号审查”“风险识别与评估”及向关注的第三方传递责任采购行为信息，同时也为后续工作提供基础信息，支持和改进体系运行。我们为所输入和产出的每一批次锡物料或产品设定一个唯一性的内部编号标注。该编号与收集到的物料输入和输出的所有信息以及通过“了解你的交易伙伴”（KYC）获得的信息相对应，然后通过物料平衡计算，使其保持整体量处于合理范围内。原料部、物料验收组、供应链管理小组分别按公司负责任矿物供应链管理手册“2.3 锡物料供应链透明度与控制系统”章节所确定的职责和内容开展物料透明度管理工作，并配套《原料采购信息追溯表》等，实现含锡原料从：采购 进入公司 制成品 销售的全过程追溯。以此持续推进公司负责任矿物供应链管理的透明化、流程化和规范化。

4. 记录保持。公司在《负责任矿物供应链文件、记录控制程序》中明确规定与负责任矿物供应链管理相关的所有记录原则上至少保存 5 年，并在日常业务工作中得以执行。

第二步 与供应商合作

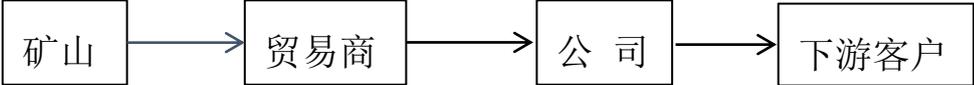
公司在建立负责任矿物供应链政策时明确了在原料采购过程中可能面临的各种风险，因而结合风险的可接受程度制定了针对性的缓解策略，且向供应商或相关给予展示和沟通。其次，我们制定了编号为 CHF/JZGL-GL 尽责组 007-2023 的《负责任矿物供应商行为守则》与供应商一道共建和遵守相关尽责责任，本报告期内共向供应商发出书面守则近 44 份；制定了编号为 CHF/JZGL-GL 尽责组 008-2023 的《负责任矿物供应链供应商通知函》，本报告期内共向供应商发出书面通知函近 44 份，在采购第一时间与供应商沟通公司尽责管理的要求和内容；制定了编号为 CHF/JZGL-GL 尽责组 009-2023 的《负责任矿物供应链合同条款》，把公司负责任矿物采购的具体核心要求及要点列为合同内容，以契约形势给予

遵守。同时，为进一步降低供应链上的风险或对识别出的风险改进绩效给予客观、有效之评价，公司建立《供应商识别问卷(KYC)》《风险缓解计划沟通函》及《风险缓解计划沟通表》，本报告期内陆续向供应商发出书面通知函 44 余份，供应商对公司风险缓解计划的内容、有效性等都做了详细填写和回复，并持续收到供应商的反馈回复。

第三步 供应链风险识别与评估

1. 公司在管理手册“3、供应链风险的识别与评估”章节中策划并建立了负责任矿物供应链风险的识别与评估程序（详见：《负责任矿物供应链管理手册 P10》）。以此为依据和程序，在此基础上日常工作以《负责任矿物供应链风险管理计划》《原料采购管理办法》《供应链风险评估表》等制度文件增强对进入公司的含锡原料进行风险识别和控制，也通过 KYC 调查表、直接与供应商沟通、查询供应商公开信息等方式和渠道收集供应商相关合规性信息、原料信息、尽责管理信息等。

2. 根据以上信息绘制供应链地图框架如下



3. 从武装冲突、人权、治理三个方面，使用如下资源或工具对矿产来源地进行风险评估，形成《锡原料采购风险判定汇总表》，使用工具主要包括：

- a. 《海德堡冲突晴雨表》，以国家或地区概览强度评分定义供应链冲突情况；
- b. 《联合国人类发展指数》，以极高、高、中人权发展程度认定；
- c. 《世界银行全球治理指标》，以治理指数定义供应链治理情况；
- d. 《联合国制裁名单》/欧盟 CAHRAs 清单及参考《多德-弗兰克法案》，以名单内外涉及内容判定高低风险。

第四步 风险管理与控制

公司制定了《负责任矿物供应链风险管理计划》，通过以下方式管理风险：

- (1) 在整个降低可衡量风险的过程中继续开展贸易；
- (2) 在不断降低可衡量风险的同时暂时中止贸易；
- (3) 在风险减缓失败或公司有理由认为风险减缓措施不可行或无法接受的情况下，终止与供货商的合作。

工作中我们通过供应链地图、《供应链追溯地图信息表》、《KYC 调查表》、当面与供应商沟通等方式对供应链进行了解和调查，本评估年度内公司锡原料经追溯发现有来自国内的采购，但也有部分原料经多级追溯发现来自缅甸、尼日利亚、刚果金、玻利维亚等国家。同时，屈于自身在供应链上微小的影响力而不能在锡原料采购过程中对供应商施加足够的影响力来实施供应链信息的多级追溯，从而导致目前所收集的尽责信息有限或不全面。这是我们本年度供应链风险的主要来源。我们进一步了解到，这些风险主要由源国家发展受限或发展水平低造成，仅依靠公司单方面力量无法彻底解决，我们倡议必要时各利益相关方（包括供应链上下游企业、行业组织、相关国家政府等）协同合作，以更有效的方式根治风险源头。对此公司与相关供应商进行了很多有建设性的沟通和协商，讨论风险缓解措施及其可行性，但截止目前进展仍然缓慢，未及预期

第五步 申诉机制与结果

为及时发现和处理供应链中可能存在的各类风险与隐患，保障利益相关方与公司的顺畅沟通，构建和谐互利的利益关系，公司建立和实施了编号为 CHF/JZGL-GL 尽责组 007-2023 的《负责任矿物供应链沟通与申诉程序》，并在公司网站（网址：<https://www.yhtin.cn/newsinfo/1581250.html>）及内部实体位置向公众公布，以收集各利益相关方意见或建议。本评估年度内经收集统计，没有收到各利益相关方的申述意见。因此，本报告期内收到供应商和利益相关的投诉事件为“零”。

第六步 对触发警示信号采购原料的管理

本评估周期内公司锡原料采购有 44 家供应商，其中主要为低风险国家，也有少部分来自高风险国家。经审查发现来自高风险国家的供应商矿山料触发了公司负责任矿物供应

链体系确定的警示信号。为此，针对其我们从以下几个方面开展了相关工作：一是加强对产销监管链或供应链追溯信息的进一步收集和验证。本着从源头识别、降低、控制风险的意愿，对于来自触发警示信号地区的原料公司强化了监管力度，通过网络、电话沟通、书面信息查询等方式持续健全、完善供应链信息，并试图摸清楚、搞明白每一批次物料的详细信息，持续把公司尽责管理诉求和压力通过一级供应商向上游多级供应商持续传导；二是更进一步对触发警示信号原料的原产地信息按《中国矿产供应链尽责管理指南》（第二版）5.1.3.1及5.1.3.3条款12项条款要求，尽力持续作更进一步的信息收集和确认（注：详见原料采购台账）；第三，如有可能我们将逐步对所有国外采购的矿物收集其矿产原产地证、矿产的境外运输路线和运输方法、矿山开采量和开采方式等供应链追溯详尽信息，以期建立更完整的追溯系统。本评估周期内，公司逐步开始制定并实施上述措施，组建了实地评估小组，并制定了评估计划，但就目前公司自身能力及我们在行业内或供应链上的影响力还无法实质性推动相关工作开展。总之，我们期盼通过上述措施的实施，以加强对触发警示信号的采购原料进行管理，确保公司锡物料的采购不造成供应链政策中承诺的三种类型风险。

第七步 独立第三方评估与审核

可持续的负责任矿物供应链尽责管理公司不仅在内部持续推动，同时还接受外部独立第三方的审核评估，以满足利益相关方对公司负责任矿物供应链合规、透明的期望。截止目前，公司已先后累计多次接受第三方机构（如：CCCMC、RMI等）委托的独立评估，并通过评估，获得证书。最近一次评估为2024年12月11日至12日接受了中标合信（北京）认证有限公司的外部评估。本年度外部评估计划于2025年11月中旬进行。同时，公司亦按《中国矿产供应链尽责管理指南》（第二版）、《负责任矿物审验流程 锡和钽的审验标准》及公司负责任矿物供应链管理体系要求每年开展内部评估。本年度内部评估于2025年10月30日开展，评估结束后编制了内部评估报告和改进项。以此循序渐进地从侧面更客观、公允、全面地对公司尽责管理体系的运行进行合理性、有效性评估，也反应公司尽责管理实践取得的成果。同时，提出改善意见和建议，实现持续改进，并由管理者代表向

最高管理者报告情况。

第八步 尽责管理过程和结果的报告

公司每年完成上一年度的供应链尽责管理报告，并在公司网站公布（网址：<https://www.yhtin.cn/newsinfo/6758819.html>）。同时，供应链尽责管理相关信息及工作动态也适时在网站发布，为公众及利益相关方履行告知义务。公司于2024年12月11日至12日间接受了CCCMC委托的独立第三方评估机构中标合信(北京)认证有限公司的现场评估,结果为A级,并发布于公司网站(<https://www.yhtin.cn/newsinfo/7181860.html>)。公司于2023年12月13日-15日接受了RMI委托的第三方评估公司（ULVS上海有限公司深圳分公司）的现场评估，目前为整改状态。为持续健全、完善、履行公司对负责任矿物供应链的尽责管理义务，我们依据《中国矿产供应链尽责管理指南》（第二版）及公司《负责任矿物供应链管理手册》之要求，积极、且多渠道地推进CAP项逐步关闭。

云南乘风在持续完善自身尽责管理的同时，更关注外部供应链合规的最新要求，我们不断加强与上下游企业的沟通、联系与交流，增进互信，积极参加行业会议、论坛及各类培训等，与相关方分享和报告供应链尽责管理的经验和进展，并呼吁锡行业相关方能共建更为持续、健康有效的负责任矿物供应链管理机制。

批 准： 万希立

日 期：2025年11月25日

审 核：张 恩

日 期：2025年11月25日

云南乘风有色金属股份有限公司

Annex 23:

Yunnan Chengfeng Nonferrous Metals Co., Ltd.
Annual Report on Responsible Mineral Supply Chain Due
Diligence Management

CHF/JZGL-GL 尽责组 018-2023

We recognize that business activities such as mineral resource extraction, trading, processing, and exporting in conflict-affected and high-risk areas (CAHRAs) may give rise to significant social and environmental risks. We also bear the responsibility to respect human rights, avoid exacerbating conflicts, and eliminate and control relevant risks. Adhering to the core values of responsibility, respect, and integrity, the company compiles and releases this report once per assessment cycle. By demonstrating and advancing effective management, we continuously enhance our supply chain management capabilities to establish a responsible corporate image. Meanwhile, we communicate clear codes of conduct to suppliers and strengthen their awareness and capacity for due diligence management.

I. Company Information

Company Name: Yunnan Chengfeng Nonferrous Metals Co., Ltd.

Company Address: Hongtupo, Datun Steet, Gejiu City, Yunnan Province

CID Number: 002158

Raw Materials: Tin concentrate (sand-like), tailings, tin oxide (powdered, mud-like, secondary materials generated from electronic and chemical factories), tin particles (granular), etc.

Previous Assessment Date: December 11-12, 2024

Assessment Period: October 1, 2024 - September 30, 2025

Main Products: Tin ingots

Assessment Company: China Quality Certification Center Co., Ltd.

II. Standards Implemented

The company implements responsible mineral supply chain management in accordance with the following standards:

- 1) Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition) - referred to as the "China Guidelines";
- 2) Responsible Minerals Assurance Process - Tin and Tantalum Standard;
- 3) With reference to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) - referred to as the "OECD Guidance";
- 4) With reference to the UN Guiding Principles on Business and Human Rights.

III. Practices in Supply Chain Due Diligence Management

Since implementing responsible mineral supply chain due diligence work, the company has gradually established and improved a responsible mineral supply chain management system in compliance with relevant national regulations in China's mineral supply chain due diligence field and applicable laws of mineral source countries. In successively accordance with the Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition), the Responsible Minerals Assurance Process - Tin and Tantalum Standard, and other relevant standards and

requirements, the company has built its responsible mineral supply chain management system, formulated supply chain policies, other control documents, and transparent systematic records. It has gradually achieved systematic and traceable supply chain due diligence management. Specific work carried out is as follows:

Step 1: Establish and Improve the Responsible Mineral Supply Chain Management System

1. Responsible Mineral Supply Chain Policy

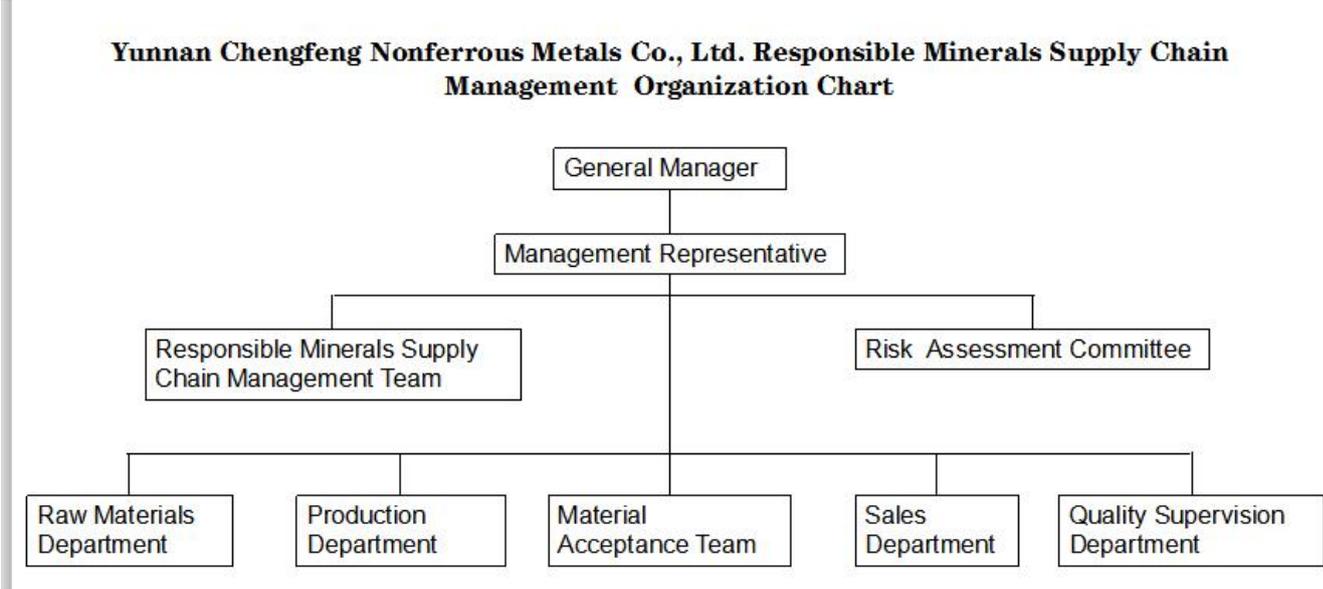
To avoid the use of conflict minerals that directly or indirectly fund or benefit armed groups and/or involve other serious human rights violations in CAHRAs, the company has formulated the Responsible Mineral Supply Chain Policy of Yunnan Chengfeng Nonferrous Metals Co., Ltd. and other institutional documents in accordance with the Guidelines for Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition), the Responsible Minerals Assurance Process - Tin and Tantalum Standard, and other relevant standards and requirements. These documents have been widely disseminated to stakeholders (suppliers, customers, employees, etc.) and published on the company's official website: <https://www.yhtin.cn/newsinfo/1581249.html>.

2. Company Management System Structure and Operation Mechanism

2.1 Organizational Structure

The company has established a management structure led by the General Manager and is fully responsible for the Management Representative, which plans,

promotes, and improves responsible mineral supply chain management and provides necessary resource support. A Management Representative has been appointed, and a corporate Responsible Mineral Supply Chain Management Team and an inter-departmental Risk Assessment Committee have been set up with clear responsibilities. Under the leadership of the Management Representative, daily work is specifically carried out by the Supply Chain Management Team in collaboration with departments such as the Raw Materials Department, Production Department, Material Acceptance Group, Sales Department, and Quality Supervision Department. The organizational structure diagram is as follows:



To standardize supply chain due diligence management, the company’s Responsible Mineral Supply Chain Management Team has successively compiled and issued more than 30 written documents and procedures, including the Responsible Mineral Supply Chain Management Manual, Rules for Compiling Responsible Mineral Supply Chain Management System Documents, Responsible Mineral Supply Chain Policy, Code of Conduct for Responsible Mineral Suppliers,

Communication and Appeal Procedures for Responsible Mineral Supply Chains, Training Control Procedures for Responsible Mineral Supply Chains, Annual Training Plan for Responsible Mineral Supply Chain Management, Risk Management Plan for Responsible Mineral Supply Chains, Internal and External Assessment Control Procedures for Responsible Minerals, Internal Assessment Plan for Responsible Mineral Supply Chains, Internal Assessment Report for Responsible Mineral Supply Chains, Annual Report on Responsible Mineral Supply Chain Due Diligence Management, Document and Record Control Procedures for Responsible Mineral Supply Chains, Statistical Management System, Material Acceptance Standards, Due Diligence Investigation Report for Responsible Mineral Supply Chains, On-site Assessment Procedures for Responsible Mineral Supply Chains, and supporting record documents.

2.2 In accordance with the established Training Control Procedures for Responsible Mineral Supply Chains and Annual Training Plan for Responsible Mineral Supply Chain Management, the company organizes special training on tin supply chain due diligence management for personnel and departments involved in the company's responsible mineral supply chain management, enabling them to understand and master management concepts and working methods. Over the past year, a total of 8 training sessions has been conducted, including 4 supplier trainings, 2 external assessor trainings, and 2 internal company trainings. Meanwhile, the company actively participates in online and offline seminars (such as SMISC Forums) and exchange meetings organized by relevant external

institutions such as CCCMC and RMI, regularly collects domestic and foreign information, data, and trends related to supply chain due diligence management, and shares and learns with relevant personnel to improve the company's overall due diligence management capabilities.

3. Supply Chain Transparency Management

The company has established a supply chain control and transparency system (including internal records of supply chain due diligence management procedures, systems, results, and corresponding decisions) to identify key information such as upstream participants, raw material source countries/regions, and transportation routes in the supply chain of tin materials purchased by the company. This system supports "red flag reviews", "risk identification and assessment", and communicates responsible procurement practices to concerned third parties, while also providing basic information for subsequent work to support and improve system operation. A unique internal number is assigned to each batch of tin materials or products input and output by the company. This number corresponds to all collected information on material input and output, as well as information obtained through "Know Your Counterparty (KYC)". Through material balance calculations, the overall quantity is maintained within a reasonable range. The Raw Materials Department, Material Acceptance Group, and Supply Chain Management Team carry out material transparency management in accordance with the responsibilities and content specified in Chapter "2.3 Tin Material Supply Chain Transparency and Control System" of the company's Responsible Mineral

Supply Chain Management Manual, supplemented by documents such as the Raw Material Procurement Information Traceability Form, to achieve full-process traceability of tin-containing raw materials from: Procurement - Entry into the company - Manufacturing into finished products -Sales. This continuously promotes the transparency, processization, and standardization of the company's responsible mineral supply chain management.

4. Record Retention

The company clearly stipulates in the Document and Record Control Procedures for Responsible Mineral Supply Chains that all records related to responsible mineral supply chain management shall be retained for at least 5 years in principle, which is implemented in daily business operations.

Step 2: Cooperation with Suppliers

When formulating the responsible mineral supply chain policy, the company identified various risks that might be encountered in the raw material procurement process. Accordingly, targeted mitigation strategies have been developed based on the acceptability of risks and communicated to suppliers and relevant parties. Secondly, the company formulated the Code of Conduct for Responsible Mineral Suppliers (No.: CHF/JZGL-GL Due Diligence Team 007-2023) to jointly establish and abide by relevant due diligence responsibilities with suppliers. During the reporting period, nearly 44 written codes were issued to suppliers; the Notice to Suppliers for Responsible Mineral Supply Chains (No.: CHF/JZGL-GL Due Diligence Team 008-2023) was formulated, and nearly 44 written notices were sent

to suppliers during the reporting period to communicate the company's due diligence management requirements and content to suppliers at the time of procurement; the Contract Terms for Responsible Mineral Supply Chains (No.: CHF/JZGL-GL Due Diligence Team 009-2023) was developed, which incorporates the specific core requirements and key points of the company's responsible mineral procurement into the contract content to ensure compliance through contractual agreements. Meanwhile, to further reduce supply chain risks or objectively and effectively evaluate the performance improvement of identified risks, the company has established the Supplier Identification Questionnaire (KYC), Risk Mitigation Plan Communication Letter, and Risk Mitigation Plan Communication Form. During the reporting period, more than 44 written notices were successively sent to suppliers, who have filled in detailed information and responded to the content and effectiveness of the company's risk mitigation plans, and continuous feedback from suppliers has been received.

Step 3: Supply Chain Risk Identification and Assessment

1. The company has planned and established procedures for identifying and assessing responsible mineral supply chain risks in Chapter 3 "Identification and Assessment of Supply Chain Risks" of the Management Manual (see details in Responsible Mineral Supply Chain Management Manual, Page 10). Based on these procedures, daily work utilizes institutional documents such as the Risk Management Plan for Responsible Mineral Supply Chains, Raw Material Procurement Management Measures, and Supply Chain Risk Assessment Form to

enhance the identification and control of risks associated with tin-containing raw materials entering the company. In addition, relevant compliance information, raw material information, and due diligence management information of suppliers are collected through channels such as KYC questionnaires, direct communication with suppliers, and inquiries about suppliers' public information.

2. Based on the above information, the framework of the supply chain map is drawn as follows:



3. Risk Assessment of Mineral Origin Countries/Regions

Risk assessments of mineral origin countries/regions are conducted from three dimensions—armed conflict, human rights, and governance—using the following resources or tools, resulting in the Summary Table for Risk Determination of Tin Raw Material Procurement. The main tools include:

- a. Heidelberg Conflict Barometer: Defines supply chain conflict situations based on intensity scores for country/region overviews;
- b. UN Human Development Index (HDI): Classifies human rights development levels as "very high," "high," or "medium";
- c. World Bank Worldwide Governance Indicators (WGI): Defines supply chain governance conditions through governance indices;
- d. UN Sanctions Lists/EU CAHRAs Lists, with reference to the Dodd-Frank Wall Street Reform and Consumer Protection Act: Determines high/low risks

based on content covered in or excluded from the lists.

Step 4: Risk Management and Control

The company has formulated the Risk Management Plan for Responsible Mineral Supply Chains and manages risks through the following approaches:

- (1) Continue trade throughout the process of reducing measurable risks;
- (2) Temporarily suspend trade while continuously reducing measurable risks;
- (3) Discontinue engagement with suppliers if risk mitigation fails, or if the company has reasonable grounds to believe that risk mitigation measures are infeasible or unacceptable.

In daily operations, the company gains insights into and investigates the supply chain through supply chain maps, the Supply Chain Traceability Map Information Form, KYC questionnaires, and face-to-face communication with suppliers. During the assessment year, traceability of the company's tin raw materials revealed purchases from domestic sources, while some raw materials found to come from high-risk countries through multi-level tracing. However, due to the company's limited influence in the supply chain, it cannot exert sufficient leverage on suppliers during tin raw material procurement to implement multi-level traceability of supply chain information, resulting in limited or incomplete due diligence information collected to date. This constitutes the primary source of supply chain risks for the company this year. Further investigation indicates that these risks are mainly caused by restricted development

or low development levels in the origin countries, which cannot be fully resolved by the company alone. The company advocates collaborative efforts among all stakeholders (including upstream and downstream supply chain enterprises, industry organizations, and governments of relevant countries) when necessary to address the root causes of risks more effectively. To this end, the company has conducted numerous constructive communications and consultations with relevant suppliers to discuss risk mitigation measures and their feasibility, but progress remains slow and below expectations as of the reporting date.

Step 5: Appeal Mechanism and Results

To promptly identify and address various potential risks and hazards in the supply chain, ensure smooth communication between stakeholders and the company, and build harmonious and mutually beneficial relationships, the company has established and implemented the Communication and Appeal Procedures for Responsible Mineral Supply Chains (No.: CHF/JZGL-GL 尽责组 007-2023). This document is publicly available on the company's official website (URL: <https://www.yhtin.cn/newsinfo/1581250.html>) and at internal physical locations to collect opinions and suggestions from all stakeholders. During the assessment year, statistical collection showed no appeal opinions received from stakeholders. Therefore, the number of complaints from suppliers and stakeholders during the reporting period is "zero".

Step 6: Management of Procured Raw Materials Triggering Red Flags

During the assessment cycle, the company procured tin raw materials from 44

suppliers, mostly from low-risk countries, with a small number from high-risk countries. Reviews revealed that mine materials from suppliers in high-risk countries triggered red flags identified in the company's responsible mineral supply chain system. In response, the company has taken the following actions:

1) Strengthen the further collection and verification of chain-of-custody (CoC) or supply chain traceability information. With the intention of identifying, reducing, and controlling risks at the source, the company has enhanced supervision over raw materials from regions triggering red flags. It continuously improves and supplements supply chain information through online research, telephone communications, and written information inquiries, striving to clarify detailed information for each batch of materials. The company also continuously transmits its due diligence management demands and pressure upstream to multi-level suppliers through first-tier suppliers;

2) Conduct further collection and verification of origin information for materials triggering red flags in accordance with the 12 requirements specified in Clauses 5.1.3.1 and 5.1.3.3 of the Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition) (Note: See raw material procurement accounting books for details);

3) Where possible, the company will gradually collect detailed supply chain traceability information for all imported minerals, including mineral origin certificates, overseas transportation routes and methods, mine production volumes, and mining methods, to establish a more comprehensive traceability system.

During the assessment cycle, the company gradually formulated and implemented the above measures, established an on-site assessment team, and developed an assessment plan. However, due to the company's current capabilities and its influence in the industry or supply chain, it cannot substantially advance the relevant work. In summary, the company aims to strengthen the management of procured raw materials triggering red flags through the implementation of the above measures, ensuring that its procurement of tin materials does not give rise to the three types of risks committed to in the supply chain policy.

Step 7: Independent Third-Party Evaluation and Audit

A company with sustainable and responsible mineral supply chain due diligence not only continuously promotes internal efforts but also accepts audits and evaluations from external independent third parties to meet the expectations of stakeholders regarding the compliance and transparency of the company's responsible mineral supply chain. Up to now, the company has successively undergone multiple independent evaluations commissioned by third-party organizations (such as CCCMC, RMI, etc.), passed the evaluations, and obtained certificates. The most recent evaluation was an external assessment conducted by China Standard Conformity Assessment CO., LTD. from December 11 to 12, 2024. The external evaluation for this year is scheduled to be carried out in mid-November 2025. Meanwhile, the company also conducts annual internal evaluations in accordance with the requirements of the "Chinese Due Diligence Guidelines for Mineral Supply Chain" (Second Edition), the "Responsible Mineral

Assurance Process - Tin and Tantalum Standard" and the company's responsible mineral supply chain management system. This year's internal evaluation was conducted on October 30, 2025, and after the evaluation, an internal evaluation report and improvement items were compiled. Through this gradual process, a more objective, fair, and comprehensive assessment of the rationality and effectiveness of the operation of the company's due diligence management system is conducted from the side, which also reflects the achievements of the company's due diligence management practices. At the same time, improvement opinions and suggestions are put forward to achieve continuous improvement, and the management representative reports the situation to the top management.

Step 8: Reporting on Due Diligence Processes and Results

The company completes the supply chain due diligence report for the previous year every year and publishes it on the company's website (URL: <https://www.yhtin.cn/newsinfo/6758819.html>). In addition, information related to supply chain due diligence and work dynamics are also released on the website in a timely manner to fulfill the obligation of informing the public and stakeholders. The company underwent an on-site evaluation by China Standard Conformity Assessment CO., LTD., an independent third-party evaluation agency commissioned by CCCMC, from December 11 to 12, 2024, and the result was Level A, which was published on the company's website (<https://www.yhtin.cn/newsinfo/7181860.html>). The company accepted an on-site evaluation by a third-party evaluation company (ULVS Shanghai Co., Lt

d. Shenzhen Branch) commissioned by RMI from December 13 to 15, 2023, and is currently in the rectification stage. To continuously improve, perfect, and fulfill the company's due diligence obligations for the responsible mineral supply chain, we actively promote the gradual closure of CAP items through multiple channels in accordance with the requirements of the "Chinese Due Diligence Guidelines for Mineral Supply Chain" (Second Edition) and the company's "Responsible Mineral Supply Chain Management Manual".

While continuously improving its own due diligence management, the company pays more attention to the latest requirements for external supply chain compliance. We constantly strengthen communication, contact, and exchanges with upstream and downstream enterprises to enhance mutual trust, actively participate in industry conferences, forums, and various training sessions, share and report the experience and progress of supply chain due diligence with relevant parties, and call on relevant parties in the tin industry to jointly build a more sustainable, healthy, and effective responsible mineral supply chain management mechanism.

Approval: Wan Xili

Date: November 25, 2025

Review: Zhang En

Date: November 25, 2025

Yunnan Chengfeng Nonferrous Metals Co., Ltd.