

# 云南乘风有色金属股份有限公司

## 负责任矿物供应链政策

云南乘风有色金属股份有限公司（以下简称公司）是依据中国法律合法成立的以生产精锡为主的民营股份制企业。生产原料主要来源于国内贸易商采购。公司下属冶炼厂名为云南乘风有色金属股份有限公司；CID：002158；地址：中国云南省个旧市大屯街道红土坡；联系邮箱:yhtin@yhtin.cn；适用范围：公司业务范围内或相关原（辅）料供应商涉及负责任矿物供应链管理的部门、人员及相关方。

公司于 2001 年建立质量、环境、职业健康安全管理体系，并通过 ISO 认证，生产过程有规范且严谨的治理体系，严格遵守国家法规、尊重人权，履行社会责任。我们认识到在“受冲突影响和高风险区域”（CAHRAs）内从事矿产资源开采、交易、处理、出口存在可能造成重大不利影响的风险，同时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。因此，公司践行负责任的原料采购，持续参与中国五矿的尽责管理倡议（RCI）和负责任矿产计划（RMI），并根据《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》和 OECD 框架五步法要求建立完整的负责任矿物供应链管理体系，建立受冲突影响高风险区域识别程序，结合公司《锡物料采购管理办法》，实施负责任采购，确保公司的经营活动、产品符合标准。

我们承诺，采纳并广泛宣传《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 OECD 五步法的相关内容，并

将其纳入到与供应商签订的合同和协议之中。从制度上确保公司采购和使用的原料是可追溯的。我们承诺，不从事任何会为冲突提供资助的活动，承诺遵守联合国相关制裁决议，或者在适用情况下遵守执行此类决议的国内法律，并尊重《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）有关信息公开的建议。公司在采购过程中，支持采掘业透明度倡议（EITI）。为此承诺在商业活动中识别并在已知情况下避免以下风险：

## 1、与矿产开采、运输或贸易有关的严重侵犯人权的行为

1.1 在“受冲突影响和高风险区域”开展采购或经营活动时，在我们能力范围内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相威胁榨取的任何个人的，并非本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行为，反人类罪或种族灭绝罪。

## 1.2 风险缓解

如果我们有充足理由认为上游供应商正从实施以上有严重侵犯人权的行为的任何一方进行采购或与该方有关联，公司将立即中止或中断与该供应商的合作。

## 2. 直接或间接支持非国家武装团体

2.1 公司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”包括但不限于从非国家武装团体或其关联方购买矿产，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是指（或可能存在）：

（1）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；

（2）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的行为主体；

（3）对中间商、出口企业、或国际贸易者非法征税或勒索的行为主体。

## 2.2 风险缓解

如果我们有合理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密切关系，我们将立即中止或终止与该供应商的合作。

## 3、直接或间接支持公共或私人安全武装

3.1 公司杜绝向非法控制矿址、运输路线、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、索要钱财（矿产），或者向中间商、出口企业（国际贸易者）非法征税或勒索的公共（私人）安全武装提供直接或间接支持。

3.2 公司认可，矿址及（或）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。

3.3 如公司或公司供应链上的任何企业与公共或私人安全武装签订了相关合约，我们承诺或规定这类安全武装需被公认的处理公共（私人）安全武装的国际标准和指导性文件（如：《安全与人权自愿原则》等）所认可。尤其是，公司将会支持或采取措施运用筛查政策，确保已周知的实施过严重侵犯人权行为的个人或安全武装不被录用。

3.4 公司支持或采取措施（如若可能）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。

3.5 我们支持或适当时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（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。（注：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。）

### 3.6 风险缓解策略：

如果我们发现或有理由认为在一定程度上存在上述风险，将根据公司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，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后未起作用，我们将暂时中止或终止与上游供应商的合作。

## 4、关于行贿受贿及矿产原产地欺诈性失实陈述

4.1 公司不会提出、承诺、给予或索要任何贿赂，并且坚决抵制诱惑。不会因掩盖（伪造）矿产原产地、虚报矿产开采、贸易、处理、运输出口等活动达到规避向政府缴纳税收（费用）和特许开采费而进行行贿。

4.2 我们禁止一切业务活动和交易中的贿赂行为，包括代理方和其它第三方的贿赂行为，为馈赠、收受礼物拟定标准与审批程序，尽量最大努力促进与所有业务伙伴间负责任的商业实践。

4.3 关于洗钱。如果公司有充分理由认为，存在因开采、贸易、处理、运输或出口，在矿址入口、运输沿线或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，我们将立即支持或采取能力范围内的措施，为有效消除洗钱行为做出应有贡献。

4.4 关于向政府支付税收、费用及特许费。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信息进行披露。

#### 4.5 风险缓解策略:

根据公司在供应链上所处具体位置，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进行酌情合作。

4.5.1 对于贿赂及腐败行为：我们禁止一切在业务活动和交易中的贿赂行为，包括代理方各其它第三方的贿赂行为，为馈赠、收受礼物制定标准和审批程序；尽最大努力促进所有业务伙伴间负责任的商业实践。

4.5.2 对于洗钱行为：公司承诺将采取有效措施，防止卷入洗钱或恐怖主

义融资，例如：通过明确和发布供应商、客户身份和实际所有权等，监测异常或可疑活动的交易、出口相关的合法税收、费用各特许费，并承诺根据供应链上所处位置，对此类支付进行披露。

**4.5.3 对于矿产原产地欺诈性失实陈述及向政府支付的各项费用行为：**根据企业在供应链上所处的具体位置，公司本着在合理时间跨度内采取措施防范或降低风险的目的，对绩效进行改善或跟踪。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开展合作，风险降低措施未起作用的，我们将暂时停止或中断与上游供应商的合作，时间至少三个月，并对风险管理计划进行再评估、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。

批准：万希立

生效日期：2023年6月30日

注：后附英文版

# **Yunnan Chengfeng Nonferrous Metals Co., Ltd.**

## **Responsible Mineral Supply Chain Policy**

Yunnan Chengfeng Nonferrous Metals Co., Ltd. (hereinafter referred to as the "Company") is a private joint-stock enterprise legally established in accordance with Chinese laws, mainly engaged in the production of refined tin. Its production raw materials are mainly purchased from domestic traders. The smelter affiliated to the Company is named Yunnan Chengfeng Nonferrous Metals Co., Ltd.; CID: 002158; Address: Hongtupo, Datun Street, Gejiu City, Yunnan Province, China; Contact email: yhtin@yhtin.cn; Scope of application: departments, personnel and related parties involved in responsible mineral supply chain management within the Company's business scope or among relevant raw (auxiliary) material suppliers.

The Company established quality, environment, and occupational health and safety management systems and obtained the related ISO certificates in 2001. It has a standardized and rigorous governance system in the production process, strictly abides by national laws and regulations, respects human rights, and fulfills social responsibilities. We recognize that engaging in the extraction, trading, processing, and export of mineral resources in "conflict-affected and high-risk areas"(CAHRAs) may pose risks of significant adverse impacts. At the same time, we recognize our obligations to respect human rights, avoid exacerbating conflicts, and avoid adverse impacts on the environment and society. Therefore, the

Company practices responsible raw material procurement, continuously participates in the Responsible Critical Mineral Initiative (RCI) of China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters and the Responsible Minerals Initiative (RMI) , and establishes a complete responsible mineral supply chain management system in accordance with the "Chinese Due Diligence Guidelines for Mineral Supply Chain" (Second Edition), the "Responsible Minerals Assurance Process - Tin and Tantalum Standard" and the OECD Framework's Five-Step Approach. The company also establishes an identification procedure for CAHRAs, and combined with the Company's "Tin Material Procurement Management Measures", implements responsible procurement to ensure that the Company's business activities and products comply with standards.

We promise to adopt and widely publicize the relevant contents of the "Chinese Due Diligence Guidelines for Mineral Supply Chain" (Second Edition), the "Responsible Minerals Assurance Process - Tin and Tantalum Standard" and the OECD Five-Step Approach, and incorporate them into the contracts and agreements signed with suppliers, institutionally ensure that the raw materials purchased and used by the Company are traceable. We promise not to engage in any activities that would finance conflicts, to comply with relevant UN sanctions resolutions, or, where applicable, to comply with domestic laws implementing such resolutions, and to respect the recommendations on information disclosure in the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" (Third Edition). In the procurement

process, the Company supports the Extractive Industry Transparency Initiative (EITI). To this end, the Company promises to identify and, where known, avoid the following risks in business activities:

1. Regarding serious abuses associated with the extraction, transport or trade of minerals

1.1 While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- a. any forms of torture, cruel, inhuman and degrading treatment;
- b. any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- c. the worst forms of child labor;
- d. other gross human rights violations and abuses such as widespread sexual violence;
- e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

## 1.2 Risk mitigation

If we have sufficient reason to believe that an upstream supplier is purchasing from or being associated with any party that has committed the above-mentioned serious human rights violations, the Company will immediately suspend or

discontinue engagement with that supplier.

## 2. Regarding direct or indirect support to non-state armed groups

2.1 We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

(1) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

(2) illegally tax or extort<sup>6</sup> money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;

(3) illegally tax or extort intermediaries, export enterprises, or international traders.

## 2.2 Risk mitigation

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

## 3. Regarding public or private security forces

3.1 We agree to eliminate direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream

actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

3.2 We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

3.3 Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with international standards and guiding documents such as Voluntary Principles on Security and Human Rights. In particular, we will support or take steps to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

3.4 We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

3.5 We will support efforts, or take steps, to engage with local authorities,

international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites

### 3.6 Risk mitigation strategies:

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

4. Regarding bribery and fraudulent misrepresentation of the origin of minerals

4.1 We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

4.2 We prohibit all bribery in business activities and transactions, including bribery by agents and other third parties. We formulate standards and approval procedures for giving and receiving gifts and make every effort to promote

responsible business practices among all business partners.

4.3 Regarding money laundering. If the company has sufficient reason to believe that there is a money laundering risk caused by or related to minerals obtained through illegal taxation or extortion at the entrance of mining sites, along transportation routes, or at mineral trading places during mining, trade, processing, transportation, or export, we will immediately support or take measures within our capabilities to contribute to the effective elimination of money laundering.

4.4 Regarding payment of taxes, fees, and concessions to the government. We will ensure that all legal taxes, fees, and concessions related to the mining, trade, and export of ores in conflict-affected and high-risk areas are paid to the government, and we commit to disclosing such payment information in accordance with the company's position in the supply chain and the requirements of the host country regarding the disclosure of tax and fee information paid to government departments.

4.5 Risk mitigation strategies:

In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate.

4.5.1 For bribery and corruption: We prohibit all bribery in business activities and transactions, including bribery by agents and other third parties. We formulate standards and approval procedures for giving and receiving gifts and make every effort to promote responsible business practices among all business partners.

4.5.2 For money laundering: The company undertakes to take effective measures to prevent involvement in money laundering or terrorist financing, such as clarifying and disclosing the identities and beneficial ownership of suppliers and customers, monitoring transactions involving abnormal or suspicious activities, and related legal taxes, fees, and concessions. It also commits to disclosing such payments based on its position in the supply chain.

4.5.3 For fraudulent misrepresentation of mineral origin and payment of various fees to the government: Based on the company's specific position in the supply chain, the company aims to take measures within a reasonable time frame to prevent or reduce risks, and improve or track performance. We commit to cooperating as appropriate with suppliers, central or local government agencies, international organizations, civil society, and affected third parties. If the risk reduction measures are ineffective, we will temporarily suspend or terminate cooperation with upstream suppliers for at least three months, re-evaluate and revise the risk management plan, and clarify the performance targets that should be achieved through improvement work before resuming trade relations.

Approved by: Wan Xili

Effective Date: 30 June 2023