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赣州腾远钴业新材料股份有限公司

矿产供应链尽责管理政策

Ganzhou Tengyuan Cobalt New Material Co.,Ltd.

Due Diligence Policy for Supply Chain of Minerals

赣州腾远钴业新材料股份有限公司（以下简称“公司”或者“我们”）认识到，负责任的企业必须对其所有商业活动，包括获取自然资源的整个过程中可能存在的风险进行持续而全面的尽责管理。为此，公司根据中国五矿化工进出口商会（CCCCMC）发布的《中国矿产供应链尽责管理指南》以及负责任矿产倡议（RMI）编制的《矿产供应链全球负责任采购尽职调查标准—所有矿产》，并参考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责管理指南》以及欧盟电池法，制定本公司“矿产供应链尽责管理政策”（以下简称“政策”）。公司供应链政策遵循《国际人权法案》，包括《公民权利和政治权利国际公约》和《经济、社会及文化权利国际公约》，《联合国工商与人权指导原则》，经合组织《跨国企业准则》与《负责任商业行为尽责管理指南》，国际劳工组织《关于多国企业和社会政策的三方原则宣言》。公司承诺，依据本政策对运营中所涉及的矿产金属（钴、镍、锂）进行尽责管理。本政策旨在供应链运营实践中识别和管理以下风险：

Ganzhou Tengyuan Cobalt New Material Co.,Ltd. (hereinafter referred to as "The Company" or "We") recognizes that a responsible company must conduct due diligence management of all its business activities in a continuous and comprehensive way, including the risks that may exist in the process of sourcing natural resources. To this end, based on the Chinese Due Diligence Guidelines for Mineral Supply Chain released by CCCCCMC and Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains (All Minerals) developed in by Responsible Minerals Initiative (RMI), as well as OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and EU Regulation 2023/1542, the company developed the Due Diligence Policy for Supply Chain of Minerals (hereinafter referred to as "Policy"). The company's policy adheres to the International Bill of Human Rights, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social, and Cultural Rights; the United Nations Guiding Principles on Business and Human Rights; the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct;

as well as the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. The company commits to conducting due diligence management of mineral metals (cobalt, nickel, lithium) involved in its operations in accordance with this policy. The policy aims to identify and manage the following risks in supply chain operations:

一、严重侵犯人权的行为/Serious Human Rights Abuses

在开展矿物原料开采、交易、处理、出口等经营活动中，公司既不容忍，也不以任何方式直接或间接支持以下行为：

In the process of extraction, trade, handling and export of raw materials, the company neither tolerates nor directly or indirectly supports the following actions in any means:

1、任何形式的酷刑、残暴、不人道和有辱人格的待遇；

Any form of torture, cruel, inhuman or degrading treatment;

2、任何形式的强迫或强制劳动，包括任何形式的人口贩运、抵债劳动和监狱劳动；

Any form of forced or compulsory labor, including any form of human trafficking, bonded labor and prison labor;

3、不使用童工，尤其是最恶劣形式的童工；

Do not use child labor, especially the worst forms of child labor;

4、其他严重侵犯和践踏人权的行爲；

Other serious violations and abuses of human right;

5、战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

War crimes, crimes against humanity, genocide or other serious violations of international humanitarian law.

对严重侵犯人权行为的风险管理：

Regarding risk management of serious abuses:

如果我们有合理理由认为该风险存在，即相关方正从实施上述所规定的严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或中断与该相关方的合作。

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 committing serious abuses.

二、非国家武装团体/Non-state Armed Groups

公司在矿物原料开采、运输、交易、处理及出口等经营活动中，不容忍任何通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供直接或

间接的支持。通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供“直接或间接的支持”，包括且不限于从非法的有组织武装团体或其关联方购买资源，向其付款，或以其他方式向其提供后勤支援，这些武装团体或者关联方：

The company does not tolerate any direct or indirect support to non-state organized armed groups through the extraction, transport, trade, handling or export of mineral resources. Direct or indirect support to non-state organized armed groups through the extraction, transport, trade, handling or export of mineral resources includes, but not limited to, procuring resources from, making payments to or otherwise providing logistical assistance to illegal organized armed groups or their affiliates who:

1、非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制；

Illegal control extraction sites or otherwise control transportation routes, points where mineral resources are traded and upstream actors in the supply chain;

2、在矿区入口、矿区运输路线、矿产资源交易地等进行非法征税、勒索钱财或掠夺资源；

Illegally tax or extort money or mineral resources at the points of access to extraction sites, along transportation routes or at points where mineral resources are traded;

3、对中间商、出口企业或国际贸易商非法征税或勒索。

Illegally tax or extort intermediaries, export companies or international traders.

对向非国家武装团体提供直接或间接支持的风险管理：

Regarding risk management of direct or indirect support to non-state armed groups:

如果我们有理由认为，相关方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，我们将立即中止或中断与该相关方的合作。

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 group.

三、公共或私人安全武装/Public or Private Security Forces

公司认识到，高风险区域的矿区及周边地区、运输道路沿线的公共或私人安全武装的作用仅是依法保障权益，包括保护矿工、维护设备和设施安全、保护矿区合法运营及运输路线不受非法干扰。

The company recognizes that the role of public or private security forces at the extraction sites and/or surrounding areas and/or along transportation routes at high-risk areas should be solely to protect rights and interests in accordance with the law, including providing security to workers, maintaining equipment and facilities, protecting the

extraction site or transportation routes from interference with legitimate extraction and trade.

公司承诺不向非法控制矿址、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。

The company commits not to provide 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.

公司承诺与供应链上的任何公共或私人安全武装的合作遵循《安保和人权自愿原则》，对于公共或私人安全武装，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。同时我们与当地政府、国际组织和民间社会组织开展合作，避免或最大限度地降低本公司雇佣的公共或私人安全武装给当地社区或弱势群体带来的不利影响。

The company commits that any cooperation with public or private security forces in the supply chain will follow the Voluntary Principles on Security and Human Rights. For public or private security forces, we will support or take measures using screening policies to ensure that individuals or security forces with known records of serious human rights violations are not employed. Meanwhile, we will engage with local authorities, international organizations and civil society organizations to avoid or minimize the adverse impacts on local communities or vulnerable groups due to the employment of public or private security forces.

对公共或私人安全武装的风险管理：

Regarding risk management of public or private security forces:

如果我们发现在一定程度上存在此类风险，将根据该公共或私人安全武装在供应链上所处的具体位置，立即与供应商和利益相关方一起制定、采用和实施风险管理计划，从而使风险得到遏制或降低。如果风险管理计划实施六个月未奏效，我们将中止或中断与该公共或私人安全武装的合作。

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.

四、腐败、洗钱和向政府支付的各项费用/Corruption, Money Laundering and Fees Paid to the Government

公司不提供、承诺、给予或索要任何贿赂，并且抵制索贿，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、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。

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

公司禁止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序；尽最大努力促进与所有业务伙伴间负责任的商业实践。

The company prohibits bribery in all business practices and transactions, including those of agents and other third parties. The company will set standards and approval procedures with respect to the offer or acceptance of gifts; and uses the greatest efforts to promote responsible business practices with all business partners.

公司承诺采取有效措施，防止卷入洗钱或为恐怖主义融资。公司将确保向政府支付所有与矿产资源开采、交易、出口相关的合法税收、费用和特许费。

The company commits to take effective measures to prevent the involvement in money laundering or financing of terrorism. The company will ensure that all legal taxes, fees and royalties related to the mineral resources extraction, trade and export are paid to the government.

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《采掘行业透明度行动计划》（EITI）中的各项原则对此类支付进行披露。

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

对腐败、洗钱和向政府支付的各项费用的风险管理：

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

根据公司在供应链上所处的具体位置，我们承诺与供应商、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之目的，对绩效进行改善或跟踪。风险降低措施实施六个月未奏效，我们将中止或中断与上述相关方的合作。

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, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. 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.

五、人身安全与职业健康/Personal Safety and Occupational Health

公司承诺，在从事矿物原料开采、运输、交易、处理及出口等经营活动中，不会直接或间接支持、参与和关联任何存在严重威胁人身安全和严重职业健康的行为。

The company commits that it will not directly or indirectly support, participate in and associate with any activities that seriously threaten personal safety and occupational health in the process of material extraction, transport, trade handling and export.

公司承诺，将采取有效措施，保持员工、承包方和其他相关方在工作中的身心健康，防止由于不当的工作条件，包括噪音和振动、不安全的建筑、化学品和机械设备等造成健康伤害，并持续改善工作环境。

The company commits to take effective measures to maintain the physical and mental health of employees, contractors and other interested parties, and to prevent health damage caused by improper working conditions, including noise and vibration, unsafe construction, chemicals and machinery, and to continue to improve working environment.

对人身安全与职业健康的风险管理：

Regarding risk management of occupational health and safety:

如果我们有合理理由认为相关方与存在严重威胁人身安全和职业健康的任何一方采购或与之存在关联，我们将立即中止或中断与该相关方的合作。

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 life threatening occupational health and safety conditions.

六、反对歧视与结社自由 Non-discrimination and Freedom of Association

我们承诺招聘和雇佣员工时，不得因种族、宗教信仰、年龄、国籍、性取向、性别、性别认同和性别表现、婚姻状况、怀孕、政治派别或残障等其他类似因素而歧视他人。

We commit to non-discrimination in hiring and employing employees, without any prejudice based on race, religion, age, nationality, sexual orientation, gender, gender identity and expression, marital status, pregnancy, political affiliation, or disability.

我们承诺在法律允许范围内，不得干涉、阻挠或禁止员工组建或加入各类组织、选举代表、参与集体谈判以及开展各项合法活动。

We ensure that, within the bounds of the law, we do not interfere, obstruct, or prohibit employees from forming or joining various organizations, electing representatives, participating in collective negotiations, and engaging in other lawful activities.

七、关于环境保护/Regarding Environmental Protection

在进行采购或生产作业时，我们不会获利于、协助、便利于任何给周围土壤、空气和水的状况造成重大不利影响，严重违反当地相关法律法规的一方或从该处采购或与之存在关联。我们将支持或采取措施定期评估，降低采矿对土壤、空气、水造成的不利影响。

土壤、空气、水不利影响包括不限于：

- (i) 土壤，包括土壤污染、土壤侵蚀、土地利用和土地退化；
- (ii) 空气，包括温室气体排放等空气污染；
- (iii) 水，包括海底和海洋环境，包括水污染、用水、水量（洪水或干旱）和获取水的机会；

During procurement or production operations, we will not profit from, assist with, or facilitate significant adverse impacts regarding ambient soil, air and water conditions, or source from or be linked to any party with gross violation of local laws and regulations. We will support or take actions to evaluate periodically to minimize the adverse impacts of extraction regarding soil, air and water.

Adverse impacts on soil, air, and water include, but are not limited to:

- (i) Soil, including soil contamination, soil erosion, land use, and land degradation;
- (ii) Air, including air pollution such as greenhouse gas emissions;
- (iii) Water, including seabed and marine environments, encompassing water pollution, water use, water volume (floods or droughts), and access to water.

我们承诺将致力于提高能源效率，使用清洁能源，并最大程度地减少能源消耗与温室气体排放。

We commit to improving energy efficiency, using clean energy, and minimizing energy consumption and greenhouse gas emissions to the greatest extent possible.

有害物质管理：当识别和控制释放到环境中会造成危险的化学物质及其他材料，确保这些物质得到安全处理、运输、存储、使用、回收或再利用和处置。

Hazardous Substance Management: When identifying and controlling hazardous chemicals and other materials that could be released into the environment, we ensure these substances are handled, transported, stored, used, recycled or reused, and disposed of safely.

废弃物管理：我们承诺在经营、工业加工和清洁设施中产生的废水、固体废物和残渣在排放或处置前，应当按照法规要求对其进行监测、控制和处理。

Waste Management: We commit to monitoring, controlling, and treating wastewater, solid waste, and residues generated from operations, industrial processing, and cleaning facilities in accordance with regulatory requirements before discharge or disposal.

生物多样性保护：我们承诺在供应链中致力于保护生物多样性，避免因自身的经济活动影响野生动物、植物生态系统。

Biodiversity Conservation: We commit to protecting biodiversity in our supply chain, avoiding impacts on wildlife and plant ecosystems due to our economic activities.

八、关于资源开采（保护土著权益支持社区发展） Regarding Exploitation of Resources (Protecting Indigenous rights and supporting community development)

我们不参与、不容忍、也不受益于在未获得当地人和土著人自由、事先和知情同意或在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源。

We do not participate in, tolerate, or profit from the exploitation of resources from land where the free, prior and informed consent of local and indigenous peoples has not been obtained, a legal title, lease, concession, or license has been obtained illegally, or national laws have been violated.

社区发展：我们承诺保护并支持当地社区的发展。

Community Development: We are committed to protecting and supporting the development of local communities.

九、关于文化、遗产保护和法定保护区 Regarding Culture, Heritage Protection and Legally Protected Areas

我们不参与、不容忍、也不受益于从不尊重、不保护当地人和土著人文化和遗产，或损害当地人传统文化和遗产以及在法定保护区的采矿作业中开采或采购资源。

We do not participate in, tolerate, or profit from extracting or sourcing resources from mining operations where the culture and heritage of local and indigenous peoples have not been respected and protected, or where traditional cultures and heritage of local peoples have been harmed.

**关于反对歧视与结社自由、环境保护、资源开采、文化、遗产保护风险管理：
Regarding Risk Management of Non-discrimination and Freedom of Association,
Environmental Protection, Exploitation of Resources, Culture, Heritage Protection :**

如果我们有合理理由认为存在此类风险，我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关的具体风险。如果风险降低措施实施六个月未奏效，我们将中止或中断与上述相关方的合作。

If we have reasonable grounds to believe that such risks exist, we will immediately work with suppliers and other stakeholders to develop, adopt, and implement a risk management plan based on the company's specific position in the supply chain to prevent or mitigate the identified risks. If the risk mitigation measures fail to be effective within six months, we will suspend or terminate cooperation with the relevant parties.

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。公司结合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》，经济合作与发展组织（OECD）《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责管理指南》以及负责任矿产倡议（RMI）编制的《矿产供应链全球负责任采购尽职调查标准—所有矿产》，建立尽责管理体系并对相应风险进行管理。公司根据 OECD 指南五步法框架建立尽责体系管理。尽责管理步骤如下：

The company has developed a due diligence management system to manage the associated risks, in accordance with the "Chinese Due Diligence Guidelines for Mineral Supply Chain" by CCCMC, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains (All Minerals) developed in by Responsible Minerals Initiative (RMI). The company establishes a due diligence system based on the five-step framework of the OECD Guidance. The due diligence management steps are as follows:

- 1、建立完善的企业风险管理体系；
Establish strong risk management systems;
- 2、供应链风险的识别和评估；
Identify and assess risk in the supply chain;
- 3、针对已经识别的风险制定并实施应对策略；
Design and implement a strategy to mitigate identified risks;
- 4、对供应链中已识别的关键环节开展独立第三方评估与审核；
Carry out independent third-party audit in the supply chain;

5、每年对供应链风险管理过程和结果进行报告；

Report on process and results of supply chain due diligence management each year.

6、社区参与；

Community Participation;

7、适时提供条件或开展合作进行补救。

Providing for or cooperating in remediation when appropriate.

该政策以及供应链尽责管理标准适用于公司以及公司所有供应商及其上游参与方，供应商及其上游参与方应根据自身情况建立适宜的供应链尽责管理体系。公司将采取积极措施将政策传递给供应商，并纳入与供应商签订的合同和协议之中，政策自发布之日起生效。腾远钴业将每年对政策进行审查以确认是否需要更新，最新政策将于公司官网公布。

This policy and the supply chain due diligence standards apply to the company, all its suppliers, and their upstream participants. Suppliers and their upstream participants should establish an appropriate supply chain due diligence management system based on their specific circumstances. The company will take proactive measures to communicate the policy to suppliers and incorporate it into the contracts and agreements signed with them. The policy will take effect from the date of its release. Tengyuan Cobalt will review the policy annually to determine if updates are necessary, and the latest policy will be published on the company's official website.

赣州腾远钴业新材料股份有限公司

2025 年 10 月 15 日

Ganzhou Tengyuan Cobalt New Material Co.,Ltd

15-October-2025