

珠海冠宇集团矿产原材料尽责管理政策

适用范围：冠宇集团所有子公司及供应链

认识到在受冲突影响和高风险区域从事钽、锡、钨、金、钴、锂、石墨、铝、铜、镍、锰、硅等矿产资源开采、交易、处理、出口存在可能造成重大不利影响的风险，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负面影响的义务。珠海冠宇集团承诺采纳并广泛传播中国五矿化工进口商会（CCCCMC）发布的《中国负责任矿产供应链尽责管理指南》（以下简称《中国指南》）和经济合作与发展组织（OECD）发布的《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责管理指南》（以下简称《OECD 指南》）相关内容，并将其纳入与供应商签订的合同或协议之中。为此，我们承诺遵守以下国际文书：

- a) 《国际人权宪章》，包括《公民权利和政治权利国际公约》及《经济、社会及文化权利国际公约》；
- b) 《联合国商业与人权指导原则》；
- c) 《经济合作与发展组织跨国企业准则》；
- d) 《国际劳工组织关于跨国企业和社会政策的三方原则宣言》
- e) 《经济合作与发展组织负责任商业行为尽职调查指南》

并承诺在商业活动中积极识别并避免以下风险：

一、严重侵犯人权的行为

我们既不容忍也不以任何方式获利于、助长、协助或便利任何一方实施：

1. 任何形式的酷刑，残忍、不人道和有辱人格的待遇；
2. 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，强迫任何人从事的非本人自愿提供的劳动或服务；
3. 最恶劣形式的童工；
4. 其他严重侵犯和践踏人权的行为，如大规模性暴力；
5. 战争罪或其他严重违反国际人道法的行为，反人类罪或种族灭绝。

风险管理策略

如果我们有合理理由认为上游供应商从有严重侵犯人权行为的任何一方采购或与之存在关联，我们将根据公司所处供应链位置，立即采取措施中止或终止公司供应链与该上游供应商的合作。

二、直接或间接支持非国家武装团体

我们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或设备等。这些武装团体或关联方：

1. 非法控制矿址，或以其他方式控制运输路线、矿产资源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资源交易点非法征税或者勒索钱财或矿资源；
3. 对中间商、出口企业或国际贸易商非法征税或勒索。

风险管理策略

如果我们有合理理由认为上游供应商从向非国有组织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联，我们将根据公司所处供应链位置，立即采取措施中止或终止公司供应链与该上游供应商的合作。

三、直接或间接支持公共或私人安全武装

1. 我们杜绝向非法控制矿区、运输路线以及供应链上游参与方在矿区入口、通往矿区的沿线或矿产资源交易点非法征税、勒索钱财或矿产资源；我们拒绝对中间商、出口企业或国际贸易商非法征税或勒索钱财的公共或私人安全武装提供直接或间接支持。
2. 我们认为，矿区及其周边地区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、保护矿区或运输路线以使合法的开采和交易不受干扰。
3. 在我们或我们供应链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，这类安全武装须和国际认可标准一致。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。

风险管理策略

如果我们发现在一定程度上存在这类风险，将根据企业在供应链上的位置，立即与供应商和利益相关方一起制定、采取和实施风险管理计划，从而使得为公共或私人安全武装提供直接或者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奏效，我们将终止或中断与上游供应商的合作。

四、行贿受贿及矿产原产地的欺诈性失实陈述、洗钱和向政府支付的各项费用

1. 我们不提供、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。
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。
3. 如果我们有理由认为，存在因开采、交易、处理、运输或出口在矿址入口、运输路线沿线，或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产资源所引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。
4. 我们承诺采取有效措施，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，保存高于适用法律法规中金额上限的现金交易记录。
5. 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产资源开采、交易、出口相关的合法税收、费用和特许费，并承诺根据企业在供应链上所处位置，对此类支付进行披露。

风险管理策略

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、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或中断与上游供应商的合作。

五、对环境、气候及人类健康的不利影响

在高风险区域开展采购或开展经营活动时，我们承诺遵守当地各国家和地区的环保、气候、人类健康相关法规，不会获利于、协助、便利于任何助长以下方面相关不利影响的

行为：

- 空气污染（包括温室气体）
- 水
- 土壤
- 生物多样性
- 有害物质
- 噪音和震动
- 设施安全
- 能源使用
- 废物及残留物

风险管理策略

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、国际组织、

民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或中断与上游供应商的合作。

六、与人权、劳工权利、劳资关系相关的风险

在高风险区域开展采购或开展经营活动时：

1. 我们不会获利于、协助、便利于任何为其直接或间接雇员或生产现场的任何人员提供威胁到生命的职业健康与安全环境的一方。
2. 我们禁止一切形式的强迫劳动，包括但不限于债役（包括债务质役）或契约劳动、非自愿或剥削性监狱劳动、奴役或贩卖人口，禁止聘用童工，我们不会雇佣、获利于、便利于低于东道国法律或法规规定的最低工作年龄的儿童。如果东道国没有相关的法律或法规规定，则最低工作年龄为 16 岁。遵守所有法律和法规对未成年工人进行保护。
3. 我们不会获利于、协助、便利于任何助长歧视、骚扰和非人道行为。不对员工实施暴力、基于性别的暴力、性骚扰、性虐待、体罚、精神或身体胁迫、霸凌、公开羞辱或言语侮辱等严苛的非人道行为；亦不得威胁要实施任何此类行为；不因人种、肤色、年龄、性别、性取向、性别认同或性别表现、种族或国籍、身心障碍、怀孕、宗教、政治派别、工会成员身份、受保护的退伍军人身份、受保护的遗传信息或婚姻状况等在招聘和雇佣过程中歧视或骚扰员工。
4. 我们承诺遵守企业所在地法律和法规的工作时间并支付符合标准的薪酬。
5. 我们承诺尊重结社和言论自由、尊重集体谈判权利，建立供应链申诉及身份保护机制，保障沟通渠道的畅通。

风险管理策略

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、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或中断与上游供应商的合作。

七、社区生活，包括土著人民的社区生活的不利影响

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何对当地社区生活，包括土著人民的社区生活造成负面影响的行为，这些负面行为包括

- 在未获得当地人和土著人自由、事先和知情同意（FPIC）的土地上开采资源；
- 不尊重和保护当地人和土著人的文化和遗产；
- 损害当地人传统文化进行开采作业。

风险管理策略

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、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或中断与上游供应商的合作。

本政策自发布之日起生效

2025/6/16

Zhuhai CosMX Group Responsible Mineral Material Supply Chain Policy

Scope: All subsidiaries of CosMX Group and its supply chain

Recognizing the risks of significant adverse impacts associated with the mining, trading, processing, and exporting of mineral resources such as tantalum, tin, tungsten, gold, cobalt, lithium, graphite, aluminum, copper, nickel, manganese, and silicon in conflict-affected and high-risk areas, and acknowledging our obligation to respect human rights, avoid contributing to conflict, and prevent negative environmental and social impacts, Zhuhai CosMX Group commits to adopting and widely disseminating the relevant provisions of the China Due Diligence Guidelines for Responsible Mineral Supply Chains (hereinafter referred to as the China Guidelines) issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (hereinafter referred to as the OECD Guidance) issued by the Organisation for Economic Co-operation and Development (OECD). These commitments will be incorporated into contracts or agreements with suppliers.

To this end, we pledge to uphold the following international instruments:

- 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 UN Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;
- The OECD Due Diligence Guidance for Responsible Business Conduct.

We further commit to actively identifying and mitigating the following risks in our business operations:

1. Gross Human Rights Violations

We neither tolerate nor profit from, contribute to, assist, or facilitate any party in the commission of:

- Any form of torture, cruel, inhuman, or degrading treatment;
- Any form of forced or compulsory labor—defined as work or service exacted from any person under threat of penalty and for which the person has not volunteered;
- The worst forms of child labor;
- Other gross human rights violations and abuses, such as widespread sexual violence;
- War crimes, other serious violations of international humanitarian law, crimes against humanity, or genocide.

Risk Management Strategy

If we have reasonable grounds to believe that an upstream supplier sources from or is linked to any party involved in gross human rights violations, we will immediately take measures to suspend or terminate the cooperation between the company's supply chain and such upstream supplier based on the company's position in the supply chain.

2. Direct or Indirect Support to Non-State Armed Groups

We do not tolerate any direct or indirect support to non-state organized armed groups through the mining, transportation, trade, processing, or export of mineral resources. "Direct or indirect support" includes, but is not limited to:

- Purchasing resources from illegal armed groups or their affiliates;
- Making payments to them;
- Providing logistical support or equipment.
- These armed groups or their affiliates may:
- Illegally control mining sites, transportation routes, mineral trading points, or upstream actors in the supply chain;
- Illegally impose taxes, extort money, or demand mineral resources at mine entrances, along transportation routes, or at trading points;

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- Illegally tax or extort middlemen, exporters, or international traders.

Risk Management Strategy

If we have reasonable grounds to believe that an upstream supplier sources from or is linked to any party providing direct or indirect support to non-state armed groups, we will immediately take measures to suspend or terminate the cooperation between the company's supply chain and such upstream supplier based on the company's position in the supply chain.

3. Direct or Indirect Support to Public or Private Security Forces

A) We strictly prohibit any direct or indirect support to public or private security forces that:

- Illegally control mining areas, transportation routes, or upstream participants in the supply chain;
- Impose illegal taxes, extort money, or demand mineral resources at mine entrances, along transportation routes, or at mineral trading points;
- Illegally tax or extort intermediaries, export companies, or international traders.

B) We recognize that the role of public or private security forces in and around mining areas or along transportation routes should be limited to upholding the rule of law, including:

- Protecting human rights;
- Ensuring the safety of miners, equipment, and facilities;
- Securing mining sites or transport routes to enable lawful extraction and trade without disruption.

C) Contractual Compliance with International Standards

If our company or any entity in our supply chain enters into agreements with public or private security forces, we commit to—or will stipulate—that such forces must comply with internationally recognized standards. Specifically, we will:

- Implement vetting policies to ensure that individuals or security units with known records of gross human rights violations are not employed.

Risk Management Strategy

If we identify risks in this regard, we will—based on our position in the supply chain—immediately collaborate with suppliers and stakeholders to develop, adopt, and implement a risk management plan to mitigate or eliminate the risk of direct or indirect support to such security forces.

If the risk management plan fails to produce results within six months, we will terminate or suspend cooperation with the upstream supplier.

4. Bribery, Fraudulent Misrepresentation of Mineral Origin, Money Laundering, and Government Payments

A) Prohibition of Bribery and Fraud

- We neither offer, promise, give, nor solicit bribes, and we resist any demand for bribes.
- We will not engage in bribery to conceal or falsify the origin of minerals, misrepresent mining, trading, processing, transportation, or export activities, or evade taxes, fees, or royalties owed to governments.

B) Anti-Corruption Measures

- We prohibit bribery in all business activities and transactions, including those conducted by agents and third parties.
- We establish clear standards and approval procedures for gifts and hospitality.
- We strive to promote responsible business practices with all partners.

C) Combating Money Laundering

If we have reason to believe that money laundering risks exist due to illegal taxation or extortion at mining sites, along transportation routes, or in supplier transactions, we will support or implement measures to effectively eliminate such practices.

D) Preventing Money Laundering & Terrorist Financing

We commit to taking effective measures to avoid involvement in money laundering or terrorist financing, including:

- Verifying and disclosing the identities of suppliers, customers, and beneficial owners;
- Monitoring transactions for unusual or suspicious activity;
- Maintaining records of cash transactions exceeding legally prescribed thresholds.

E) Transparent Government Payments

We will ensure that all legally required taxes, fees, and royalties related to mineral extraction, trade, and export in conflict-affected and high-risk areas are paid to governments. Based on our position in the supply chain, we commit to disclosing such payments where applicable.

Risk Management Strategy

Depending on our position in the supply chain, we commit to collaborating with suppliers, central/local governments, international organizations, civil society, and affected third parties to implement measurable improvements and track performance within a reasonable timeframe to prevent or mitigate risks.

If risk mitigation measures prove ineffective, we will temporarily suspend or terminate cooperation with the upstream supplier.

5. Adverse Environmental, Climate and Human Health Impacts

When conducting procurement or business operations in high-risk areas, we are committed to ensuring compliance with all applicable national and regional environmental regulations.

We will not profit from, assist in, or facilitate any activities that contribute to adverse environmental and public health impacts, including but not limited to:

- Air pollution (including greenhouse gas emissions)
- Water, soil, and biodiversity degradation
- Hazardous substances contamination
- Noise and vibration pollution
- Unsafe facility operations

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- Unsustainable energy use
 - Improper waste and residue management

Risk Management Strategy

Depending on our position in the supply chain, we will collaborate with suppliers, central/local governments, international organizations, civil society, and affected third parties as appropriate. Our goal is to implement measurable improvements and monitoring mechanisms within a reasonable timeframe to prevent or mitigate adverse impacts.

Should risk mitigation measures prove ineffective, we will temporarily suspend or discontinue cooperation with the upstream supplier.

6. Human Rights, Labor Rights, and Labor Relations Risks

When conducting procurement or business operations in high-risk areas:

A) Occupational Health & Safety

We will not profit from, assist, or facilitate any party that provides life-threatening occupational health and safety conditions for its direct/indirect employees or any personnel at production sites.

B) Prohibition of Forced & Child Labor

We prohibit all forms of forced labor, including debt bondage, indentured labor, involuntary prison labor, slavery, or human trafficking.

We do not employ or benefit from child labor. The minimum employment age follows host country laws (or 16 years if no law exists).

We strictly adhere to all legal protections for young workers.

C) Non-Discrimination & Humane Treatment

We prohibit discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity, ethnicity, nationality, disability, pregnancy, religion,

political affiliation, union membership, veteran status, genetic information, or marital status.

We forbid violence, gender-based violence, sexual harassment, abuse, corporal punishment, mental/physical coercion, bullying, humiliation, or verbal abuse.

D) Fair Wages & Working Hours

We commit to complying with local laws on working hours and providing fair compensation meeting legal standards.

E) Freedom of Association & Grievance Mechanisms

We respect freedom of association, collective bargaining rights, and open communication.

We establish confidential grievance mechanisms for supply chain workers.

Risk Management Strategy

Aligned with our supply chain position, we will collaborate with suppliers, governments, international organizations, and civil society to implement measurable risk mitigation within reasonable timeframes. Failure to achieve improvement will result in suspension or termination of upstream supplier relationships.

7. Adverse Impacts on Community Livelihoods, Including Indigenous Communities

When conducting procurement or production activities in high-risk areas:

A) Free, Prior, and Informed Consent (FPIC)

We will not profit from, assist, or facilitate any operations that:

- Extract resources from lands without obtaining the Free, Prior, and Informed Consent (FPIC) of local and indigenous communities;
- Disrespect or fail to protect the cultural heritage of local and indigenous peoples;
- Undermine traditional cultural practices through mining operations.

B) Protection of Community Rights

We commit to:

- Respecting the rights, traditions, and livelihoods of local and indigenous communities;
- Ensuring that our activities do not disrupt community well-being or access to essential resources (e.g., water, land).

Risk Management Strategy

In alignment with our position in the supply chain, we will collaborate with suppliers, governments, international organizations, and civil society to implement measurable actions within a reasonable timeframe to prevent or mitigate adverse impacts.

If risk mitigation measures prove ineffective, we will suspend or terminate cooperation with the upstream supplier.

This policy becomes effective immediately upon publication

2025/6/16