



# 负责任矿产供应链尽责管理政策

## Due Diligence Policy for a Responsible Mineral Supply Chain

**Mar. 2025**

上海锦源晟新能源材料集团有限公司（以下简称“公司”“我们”或“锦源晟”）的核心价值观是“诚信、责任、高效、分享”，我们的使命是致力于通过充分发挥科技的力量，研发制造“新材料”，全面助力“新能源”，创造人类绿色美好“新生活”。锦源晟及全体所属子公司充分认识到在高风险区域从事钴、铜、镍、锂等矿产开采、交易、处理、出口存在可能形成重大负面影响的风险，并认识到公司有尊重人权、不对环境和社会产生负面影响的义务，锦源晟承诺采纳中国五矿化工进出口商会（CCCMC）发布的《中国负责任矿产供应链尽责管理指南》（第二版）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职调查指南》（第三版）（以下简称“《OECD 指南》”），建立公司的《负责任矿产供应链的尽责管理政策》，并将其纳入与供应商签订的合同和协议之中。锦源晟将广泛传播该管理政策，并按照此政策在公司矿产供应链中执行。锦源晟及全体所属子公司承诺遵守《OECD 指南》附录 I 中的尽职调查步骤开展尽职调查。

为此，锦源晟承诺在商业活动中识别、管理和避免以下风险：

Shanghai Jayson New Energy Materials Group Co., Ltd. (Jayson) is guided by the core values of “Integrity, Responsibility, Efficiency and Sharing”. Our mission is to fully leverage the power of technology in the research and development of “new materials”, comprehensively support “new energy”, and create a green and beautiful “new life” for humanity. Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting cobalt & copper & nickel & lithium and other minerals from high-risk areas and that we have the responsibility to respect human rights and not contribute to adverse impacts to society, Jayson and all its subsidiary companies commits to adopt the China Due Diligence Guidelines for Responsible Mineral Supply Chains (China Guidance), published by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (2<sup>nd</sup> Edition) (CCCMC) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3<sup>rd</sup> Edition) (OECD Guidance). We will disseminate and incorporate the following policy into contracts and/or agreements with suppliers on responsible sourcing of minerals from high-risk

areas, set up the company's Due Diligence Policy for a Responsible Mineral Supply Chain, which will be included in the contract and agreement signed with the supplier. Jayson will spread this management policy widely and implement it in our company's mineral supply chain according to this policy. Jayson and all its subsidiary companies commit to conducting due diligence in accordance with the due diligence steps outlined in Appendix I of the OECD Guidance.

For this purpose, Jayson commit to identify, manage and avoid the following risks in our business activities.

## I. 严重侵犯人权的行为

### Serious violations of human rights

锦源晟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。

Jayson will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

1. any forms of torture, cruel, inhuman and degrading treatment;
2. 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;
3. the worst forms of child labor;
4. other gross human rights violations and abuses such as widespread sexual violence;
5. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

### 风险管理 Risk management

如果锦源晟有合理理由认为上游供应商有严重侵犯人权行为的任何一方采购或与之存在关联，锦源晟将立即中止或中断与该供应商的合作。

Jayson will immediately suspend or discontinue engagement with upstream suppliers where Jayson identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

## II. 直接或间接支持非法的有组织武装团体和公共或私人安全武装

### **Direct or indirect support to illegal organized armed groups, and non-government or private armed forces**

锦源晟不容忍任何上游供应商关联到通过矿产资源开采、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活动中。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产资源；
3. 对中间商、出口企业或国际贸易商非法征税或勒索。

Jayson will not tolerate any “direct or indirect” support of upstream suppliers to non-state armed groups through the extraction, transport, trade, handling or export of minerals. We will not tolerate any “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; and/or
2. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
3. illegally tax or extort intermediaries, export companies or international traders.

## 关于公共或私人安全武装 **On public or private security forces**

锦源晟将杜绝向非法控制矿址、运输路线以及供应链上游参与方，在矿址入口、运输路线沿线或矿产资源交易点非法征税或勒索钱财或矿产资源，或者向中间商、出口企业或国际贸易商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。我们认可在沿矿区、周边地区和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。

Jayson will eliminate the illegal taxation or extortion of money or mineral resources from the illegally controlled mine sites, transport routes and the upstream participants of the supply chain at the entrance of the mine site, along the route of the transport line, or in the mineral resources trading site, or provide direct or indirect support to public or private security forces that illegally levy taxes or extortion on intermediaries, exporters or international traders. We recognize that the role of public or private security forces along mine sites, surrounding areas and transport routes is only to maintain the rule of law, which include guaranteeing human rights, protecting the safety of miners, equipment and facilities, safeguarding the mines or transportation routes so that legitimate mining and trade are not disrupted.

在锦源晟或我们供应链上的任何企业或商业关系与公共或私人安全武装签订了合约的情况下，锦源晟承诺或者将规定，这类安全武装需被公认的处理公共或私人安全武装的国际标准和指导性文件所认可。尤其是，我们将支持或采取措施，运用筛查政策，以确保不会招募或使用已知侵犯人权的个人或安全武装部队。

Where Jayson, or any business or business relationship in our supply chain has a contract with the public or private security forces, Jayson undertake or will provide that such security forces are recognized by established international standards and guidance documents dealing with public or private security forces. In particular, we will support or take measures to use screening policies to ensure that individuals or security armed units known to have committed human rights violations are not recruited.

锦源晟将支持或采取措施与中央或地方政府、国际组织和民间社会组织开展

合作，共同制定提高公共安全武装安保费用的透明度、相称性和问责性的可行解决方案。如果供应链上的矿产资源通过小作坊或小规模采矿方式开采的，锦源晟将支持或采取措施，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公共或私人安全武装驻扎在矿址给弱势群体带来的不利影响，尤其是对小作坊的不利影响。

Jayson will support or take measures to cooperate with the central or local governments, international organizations and non-governmental organizations to work together to formulate feasible solutions to improve the transparency, proportionality and accountability of the armed security costs of public security. Jayson will provide support or take measures to cooperate with the central or local governments, international organizations and non-governmental organizations, if the mineral resources in the supply chain are exploited through individual workshops or small-scale mining, and the adverse effects of public or private security forces deployed in mines on vulnerable groups should be avoided or minimized, especially on small workshops.

### **风险管理 Risk Management**

如果锦源晟通过尽职调查及信息沟通，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，我们将立即中止或中断与该供应商的合作。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，从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。这些安全武装非法控制矿址、运输路线和供应链上游参与方，在矿址入口、运输线路或矿产交易点非法征税或勒索钱财或矿产资源，或对中间商、出口公司或国际贸易商非法征税或勒索，我们有理由认为存在风险。如果风险管理计划实施未奏效，我们将中止或中断与供应商的合作。

If Jayson conducts due diligence and communication of information and have reasonable grounds to believe that an upstream supplier has purchased or associated with any party that provides direct or indirect support to a non-state organized armed group, Jayson will immediately suspend or discontinue the cooperation with the

supplier. We will establish, adopt and implement risk management plans with the supplier and other stakeholders, in accordance with the specific position of the enterprise in the supply chain, so as to prevent or reduce the risk of providing direct or indirect support to the public or private security forces. Since these security forces illegally control the mine sites, transport routes and upstream participants in the supply chain, conduct illegal taxation or extortion of money or mineral resources at the site entrance, the transport line or the mineral trade point, or collect illegal taxation or extortion from intermediaries, export companies or international traders, we have reason to believe that there is a risk. If the implementation of the risk management plan is not effective, we will suspend or discontinue cooperation with the supplier.



### **III. 腐败行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、 向政府支付的税收和费用及特许费 Corruption bribery and fraudulent misrepresentation of the origin of minerals, money laundering, taxes and fees paid to the government and royalties**

锦源晟不提供、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。

Jayson 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.

锦源晟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。

Jayson will prohibit bribery in all business activities and transactions, including bribery by agents and other third parties, setting standards and approval procedures for gifts, receiving gifts, and doing our utmost to promote responsible business practices with all business partners.

如果锦源晟有理由认为，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起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。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，将现金交易记录保持在适用法律法规的最大金额之上。

If Jayson have reason to believe there is risk of money laundering related to or

associated with the mineral resources of illegal taxation or extortion at the entry of the mine site, the route of the transport line or the upstream supplier's mineral resources trading location, as a result of exploitation, transaction, handling, transportation or export, we will provide support or take measures to contribute to the effective elimination of money laundering. We commit ourselves to take effective measures to prevent involvement in money laundering or terrorist financing, for example, monitor transactions over abnormal or suspicious activities, and keep cash transaction records above the maximum amount of applicable laws and regulations by defining or publicizing the suppliers and customer identities and the actual ownership, etc.

锦源晟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。

Jayson will ensure that all legal taxes, fees and royalties related to the mining, trading and export of mineral resources in conflict and high-risk areas are paid to the government and will be disclosed on the basis of the position of the enterprise in the supply chain.

### **风险管理 Risk Management**

根据锦源晟在供应链上所处的具体位置，定期开展与上游冶炼厂进行沟通确认并核实，同时进行风险管控评估。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。当风险降低措施未起作用的，锦源晟将中止或中断与上游供应商的合作。

In accordance with the specific position of Jayson in the supply chain, we will contact and confirm with the upstream suppliers regularly, conducting risk management and control assessments. To improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. Jayson will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

## IV.关于职业健康与安全

### On occupational health and safety

在高风险地区进行采购或生产时，锦源晟不会获利于、协助、便利于任何为其直接和/或间接雇员和/或在其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，或从该方处采购或与之存在关联。

When purchasing or producing in high-risk areas, Jayson do not benefit, assist, or facilitate the provision of a life-threatening occupational health and safety environment for any of its direct and/or indirect employees and/or anyone at its production site. One party, either purchased from or associated with the party.

#### 风险管理 Risk Management

锦源晟对上游供应进行不定期审核和宣贯，及时提请供应商自律并关注上游供应商的职业健康及生产环境工作。如果锦源晟有合理理由认为上游供应商存在或者是涉及此类风险，锦源晟将立即中止或中断与该供应商的合作。

Jayson conducts irregular audits and publicity of upstream supply, promptly invites suppliers to self-discipline and pay attention to the occupational health and production environment of upstream upstream suppliers. Jayson will immediately suspend or discontinue cooperation with the supplier, if Jayson believe that upstream suppliers exist or are involved in such risks.

## V. 关于童工

### On child labor

在高风险区域开展采购或开展经营活动时，我们将不会雇佣、获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业而提供便利或跟其采购或与其有关联。如果东道国没有相关的法律或法规规定，最低工作年龄为 16 岁。

When purchasing or conducting business activities in high-risk areas, we will not hire, profit from, assist or facilitate the employment of, or be associated with, the employment of children below the minimum working age as stipulated by the laws or regulations of the host country. In the absence of local law, the minimum working age is 16 years old.

### 风险管理/Risk Management

锦源晟对上游供应进行不定期审核和宣贯，及时提请供应商自律并关注上游供应商所在区域的整体用工情况，并作好风险评估和调查。如果锦源晟有合理理由认为此类风险（即上游供应商正从第 V 条所规定的任何一方雇佣童工进行采购或与该方有关联），锦源晟将立即中止或中断与该供应商的合作。

Jayson conducts irregular audits and publicity on in upstream supply, promptly invites suppliers to self-discipline and pay attention to the overall employment situation of the upstream suppliers, and conduct risk assessment and investigation. Jayson will immediately suspend or discontinue cooperation with this supplier if Jayson have reasonable grounds to believe such risks (i.e, upstream suppliers are procuring or affiliated with child labor from any of the parties specified in Article V).

上海锦源晟新能源材料集团有限公司

Shanghai Jayson New Energy Materials Group Co., Ltd.