



紫金铜业有限公司
Zijin Copper Co., Ltd
矿产供应链尽责管理进展报告

紫金铜业有限公司
福建省龙岩市上杭县蛟洋工业园区
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Zijin Copper Co., Ltd.

Progress Report on Due Diligence Management of the Mineral Supply Chain

Zijin Copper Co., Ltd.

Jiao Yang Industrial Park, Shanghang County, Longyan City, Fujian Province, China

21st August, 2023

(This report covers the period from 1st June, 2022 to 31st May, 2023.)

紫金铜业有限公司（以下简称“公司”）坐落于上杭县蛟洋工业园区，由2023年《福布斯》全球上市2000强第284位的紫金矿业集团股份有限公司投资建设，2011年底建成，总投资近百亿元，在省、市、县各级各部门的关心指导与大力支持下，公司现已形成年产40万吨阴极铜、18吨黄金、400吨白银、100万吨硫酸生产规模，同时副产硒、碲、铂、钯、铑等半导体、集成电路所需的稀贵金属，年产值300亿元以上。公司是国家工业产品生态设计示范企业、国家水土保持生态文明工程、工信部绿色制造示范工厂、省智能制造示范项目、省循环经济示范优秀企业。公司生产的“紫金”牌阴极铜在伦敦金属交易所（LME）、上海期货交易所注册；白银在伦敦金银市场协会（LBMA）、上海期货交易所、上海黄金交易所注册。

Located in Jiao Yang Industrial Zone, Shanghang County, Zijin Copper (hereinafter referred as "the Company") is invested and built by Zijin Mining Group Co., Ltd. which is ranked 284 in the Forbes Global 2000 listings in 2022. Zijin Copper was completed at the end of 2011, with a total investment of nearly 10 billion yuan. Under the care and guidance and strong support from various departments at all levels in the province, city and county, the company has now formed an annual output of 400,000 tons of copper cathode, 18 tons of gold, 400 tons of silver and 1 million tons of sulfuric acid production scale, while producing selenium, tellurium, platinum, palladium, rhodium and other rare precious metals required for semiconductors and integrated circuits, with an annual output value of more than 30 billion yuan. The Company is a national industrial product eco-design demonstration enterprise, a

national water and soil conservation ecological civilization project, and a national green manufacturing demonstration factory of the Ministry of Industry and Information Technology, National Ministry of Industry and Information Technology Green Manufacturing Demonstration Factory, Provincial Smart Manufacturing Demonstration Project, Provincial Circular Economy Demonstration Excellent Enterprise. The Company's "Zijin" brand copper cathode is registered with the London Metal Exchange (LME) and Shanghai Futures Exchange; gold and silver are registered with the London Bullion Market Association (LBMA), Shanghai Futures Exchange and Shanghai Gold Exchange.

第一章 公司供应链政策

Part 1: Company Supply Chain Policy

公司认识到在“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、不对环境和社会产生不利影响的义务，公司承诺采纳并广泛传播《中国矿产供应链尽责管理指南》相关内容，并将其纳入与供应商签订的合同和协议之中。该政策为矿产供应链全过程涉及冲突敏感的采购活动以及供应商增强风险意识提供参考。公司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。公司已将供应链政策公示至相关网站。

公示网址：<http://www.zijinty.com/newsshow/274.html>

Recognizing the risks of significant adverse impacts associated with mining, trading, processing, and exporting mineral resources in "conflict-affected and high-risk areas" and our obligations to respect

human rights, not to contribute to conflict, and not to have an adverse impact on the environment and society, the Company is committed to adopting and widely disseminating the relevant parts of the China Mineral Supply Chain Due Diligence Guidance and incorporating it into contracts and agreements with its suppliers. The policy provides a reference for conflict-sensitive procurement activities throughout the mineral supply chain and for suppliers to enhance their risk awareness. The Company commits not to engage in any activities that fund conflict and to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions. The company has published its supply chain policy on its website.

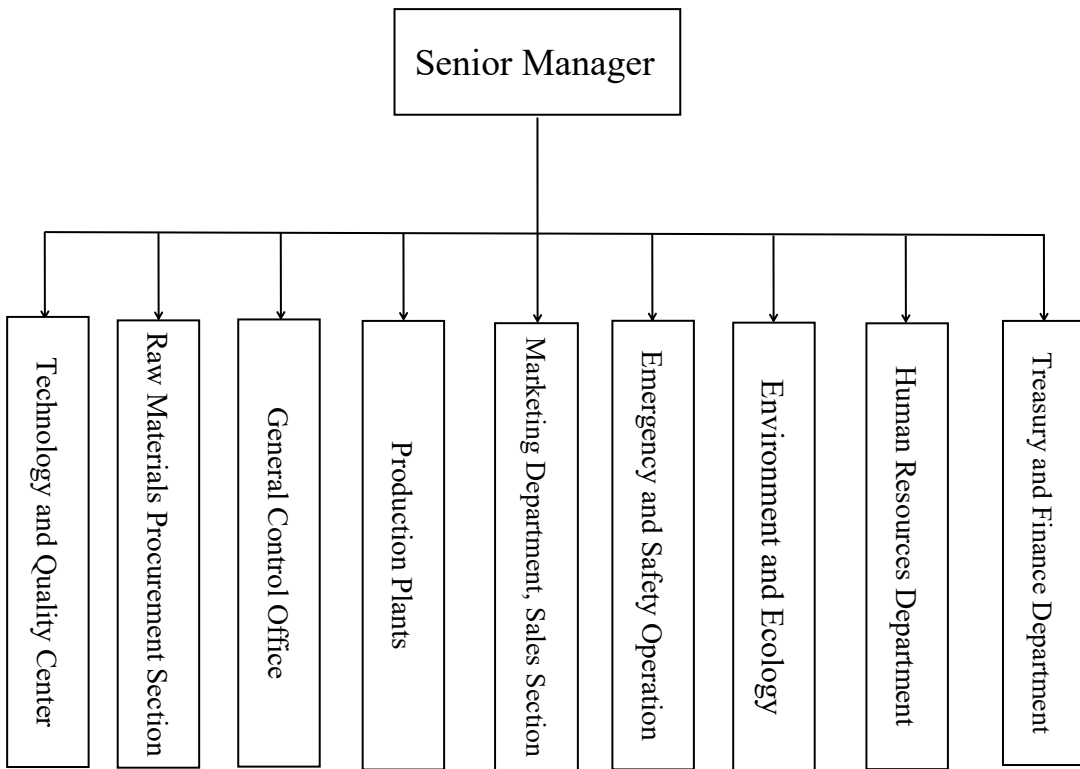
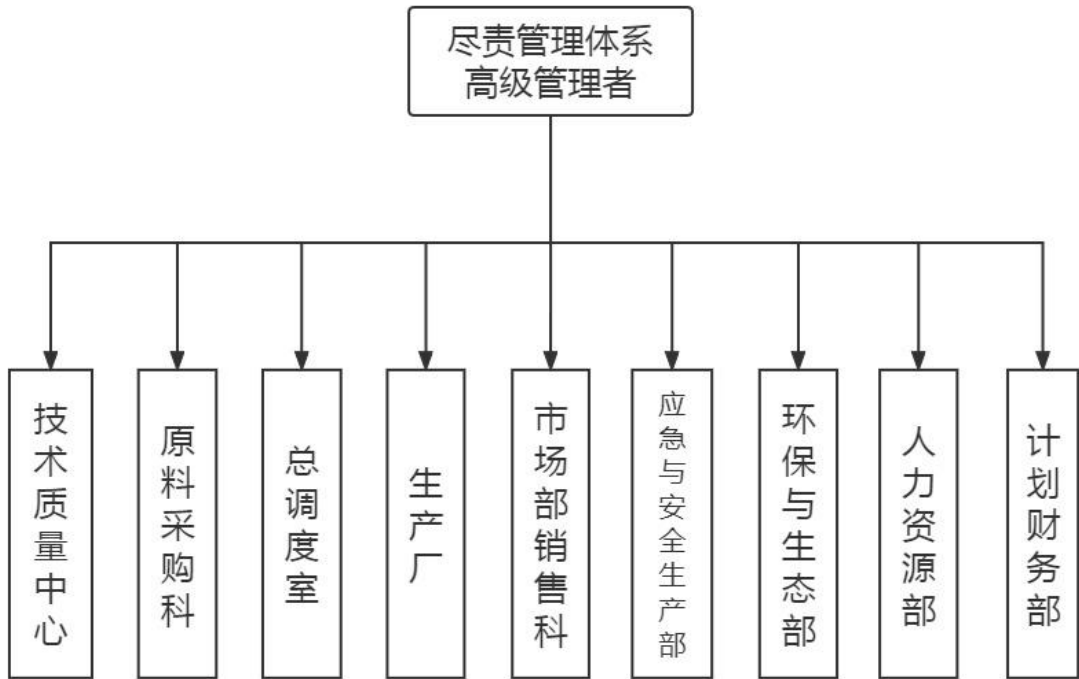
Website: <http://www.zijinty.com/newsshow/274.html>

第二章 公司尽职调查管理体系

Part 2: Company Due Diligence Management System

公司为确保尽责管理体系有效运营与监督，提供充足的内部管理支持和资源，建立了尽责管理组织架构，任命副总经理为尽责管理体系高级管理者，并定义相关部门的尽责管理体系职责和权限。

To ensure the effective operation and supervision of the due diligence system and to provide sufficient internal management support and resources, the Company has established a due diligence management organization structure, appointed the deputy general manager as the Senior Manager of the due diligence management system, and defined the responsibilities and authorities of the due diligence management system of relevant departments.



公司建立了供应链控制和透明度系统，对自身运营和所采购含铜物料充分管控，识别了矿产供应链中的上游参与者、物料来源以及运输路线，所有物料的来料日期、物料名称、批号、物料类型、重量和品位等信息都已保存相应记录。

The Company has established a supply chain control and transparency system to control its operations and the copper-containing materials it purchases, and to identify upstream actors, origin of the minerals, and the transport routes in the mineral supply chain. The records of the date of receipt, material name, batch number, material type, weight and grade of all materials are well retained.

公司每月对原料入库进行核对、现场物料盘点、中间物料转工序处理统计、产销平衡核对，每月进行金属平衡计算，并形成金属平衡报表。

The Company conducts monthly verification of incoming raw material, on-site material inventory, intermediate material transfer processing statistics, production and sales balance verification, monthly metal balance calculation, and formulates a metal balance report.

公司采购的主要原料有铜精矿、粗铜（含铜阳极板），来源于多个国家。

The main raw materials procured by the Company are copper concentrates and crude copper (including copper anode plates), which originate from multiple countries.

公司制定了矿产供应链尽责管理体系培训计划，并于 2023 年 4 月至 5 月期间对《尽责管理体系-中国指南介绍》《尽责管理手册》

《矿产供应链尽责管理评估工具》《识别和评估供应链的风险》等多份政策及文件进行学习，并保留学习记录文件。

The Company has developed a mineral supply chain due diligence management system training plan and a number of policies and documents, including *Due Diligence Management System - Introduction to the China Guidance*, *Due Diligence Management Policy*, *Mineral Supply Chain Due Diligence Management Assessment Tool*, and *Supply chain risks identification and assessment*, has been learned by relevant team from April to May 2023 and learning records were well kept.

公司建立了尽责管理体系内部审核和管理评审程序。于2023年6月7日至9日开展内部审核，保留内部审核计划、签到表、检查表及内部审核报告。对内部审核过程中发现的建议项，建立了优化措施表并进行跟踪。于2023年6月16日开展管理评审，保留签到表、评审记录表，并形成管理评审报告。

The Company has established an internal audit and management review process for its due diligence management system. The internal audit was conducted on 7th-9th June, 2023, and the internal audit plan, attendance sheet, checklist and internal audit report were kept. For the suggestions discovered during the internal audit process, an optimization measure list was established and tracked. A management review was carried out on 16th June, 2023, the attendance sheet and the review record were kept and management review audit was generated accordingly.

通过内部审核和管理评审，公司矿产供应链尽责管理体系是适宜、充分、有效的，公司将不断寻求提升机会以满足公司及相关方的要求。

Through internal audits and management reviews, the Company's mineral supply chain due diligence management system is approved to be appropriate, sufficient, and effective, and the Company will continue to seek opportunities for improvements to meet the requirements of the Company and relevant stakeholders.

公司建立了《矿产供应链尽责管理手册》，明确公司矿产供应链尽责管理体系的所有文件化信息由各相关部门保留至少 5 年。自尽责管理体系建立以来，尽责管理体系相关文件和记录均有专人进行归档保存，科学利用。

The Company has established *the Mineral Supply Chain Due Diligence Management Policy*, which specifies that all documented related to the Company's Mineral Supply Chain Due Diligence Management System shall be retained by all relevant departments for at least five years. Since the establishment of the due diligence management system, documents and records related to the due diligence management system have been filed and archived by specialists for scientific use.

第三章 供应商参与

Part 3 Supplier Engagement

公司对供应商准入提出尽责管理要求，并将公司的尽责管理政策传达给供应商。在与供应商签订的合同或承诺书中均体现尽责管理政策相关要求。

The Company sets out due diligence management criteria for supplier approval and the due diligence management system policy has been communicated to suppliers. The requirements of the due diligence management policy are reflected in the contracts or commitment letters signed with suppliers.

公司于2023年4月23日、27日分别对国外、国内供应商进行线上培训，将尽责管理政策和相关标准进行传达，作为供应商能力建设的一部分，并保留了培训记录。

The Company conducted online training for overseas and domestic suppliers on 23rd & 27th April, 2023 respectively and the due diligence management policy and related standards has been communicated to the suppliers as part of supplier capacity building, and training records were well kept.

第四章 申诉机制

Part 4 Grievance Mechanism

公司制定了矿产供应链尽责管理体系的申诉机制，允许利益相关方针对矿产供应链中的开采、贸易、处理和出口的情况发表意见，并将申诉邮箱和电话公示到公司官网。

The company has developed a grievance mechanism for the Mineral Supply Chain Due Diligence Management System, which allows stakeholders to comment on the mining, trading, processing, and exporting of minerals in the supply chain, and grievance email and phone number are public available on the company's website.

公司建立的申诉渠道如下，并将该渠道公布在公司的网站上：

电话：86-0597-3626837

邮箱: zjtyxsyk@zijinmining.com

公示网址: <http://www.zijinty.com/newsshow/274.html>

The Company has established the following complaint channel, which is posted on the Company's website:

Tel: 86-0597-3626837

E-mail: zjtyxsyk@zijinmining.com

Website: <http://www.zijinty.com/newsshow/274.html>

(一) 申诉范围: 任何内外部的利益相关方可就公司产品中涉及的涵盖在本手册中的物料开采、贸易、处理和出口过程中, 存在的侵犯人权、助长冲突、治理、环境保护和职业健康安全的问题提出意见、建议或申诉。

(i) Complaint Scope: Any internal or external stakeholder may submit comments, suggestions, or complaints regarding human rights abuses, conflict attribution, governance, environmental protection, and occupational health and safety in the extraction, trading, processing and export of materials covered by the policy in relation to the company's products.

(二) 申诉接受: 销售科负责主导本渠道收到的申诉以及相关的处理。依据申诉内容提供给技术质量中心。

(ii) Complaint Acceptance: The Sales Section is responsible for taking the lead in handling the grievances received through this channel. The grievances will be classified and passed to the Technical Quality Centre.

(三) 申诉审查: 所有的申诉必须具有事实依据和真实内容, 不得以虚假内容作为申诉的依据, 且不得恶意诽谤及攻击。

可接收满足以下条件的申诉：

- 1.涉及公司《矿产供应链尽责管理政策》中的风险；
- 2.涉及公司尽责管理体系的缺陷、不一致或不足；
- 3.包括足够的客观证据以合理地支持提交申诉方的指控；
- 4.本着诚信的原则提交。

不接收以下申诉：

- 1.与公司矿产供应链尽责管理不相关项；
- 2.缺少足够的合理支持申诉的客观证据；
- 3.未本着诚信原则。

(iii) Complaint Review: All complaints must have factual basis and true content. False content may not be used as the basis for the complaint, and no malicious slander or attack shall be allowed.

Appeals that meet the following conditions will be received :

1. Relating to the risks in the Company's *Mineral Supply Chain Due Diligence Management Policy*.

2. Defects, inconsistencies or deficiencies related to the company's due diligence management system.

3. Including sufficient objective evidence to reasonably support the allegations made by the submitting party.

4. Submitted in good faith.

The following appeals will not be accepted:

1. Items not relevant to the company's mineral supply chain due diligence management.

2. Lack of sufficient objective evidence that reasonably supports the claim.

3. Failure to act in good faith.

(四) 申诉处理:

(iv) Grievance Handling

1.收到申诉后，销售科在五个工作日内对接收到的申诉内容进行调查并作出判定：拒绝申诉或接受申诉。

1. Upon receipt of a complaint, the Sales Section investigates the content of the received complaint within 5 working days and makes a judgement: reject/accept.

2.经调查属实的申诉，市场部在十五个工作日内确定处理办法，必要情况下与利益相关方进行沟通，确定纠正措施并进行整改。符合申诉条件但不存在该申诉的问题或问题已经解决的，无需采取纠正或改进措施。

2. For complaints that are substantiated after investigation, the Marketing Department determines the handling method within 15 working days and communicates with stakeholders(if necessary), to determine the corrective measures and to implement. If the conditions of the complaint are met but the complaint does not exist or the problem has been solved, no corrective or improvement measures are required.

3.申诉处理完成后五个工作日内将申诉的调查结果，处理办法，纠正措施和结果告知申诉方（通知结果的方式遵循申诉者保护原则）。

3. The complaining party will be notified of the investigation results, handling methods, corrective measures, and results of the complaint within 5 working days after the complaint is processed (the

method of notifying the results follows the principle of protecting the complainant).

信息保护：对于公司收到的所有申诉信息，由市场部销售科专门负责人保存相关信息，未经该负责人同意，禁止向部门以外的人员透露。

Information protection: For all complaint information received by the company, the relevant information will be kept by the person in charge of the Sales section. It is prohibited to disclose it to persons outside the department without the consent of the person in charge.

(五) 申诉者保护：公司在处理申诉时将遵循事实、程序、保密和及时原则，保护申诉者的合法权益，对申诉者的信息进行严格的保密，并承诺不会因为申诉行为对申诉者采取任何形式的报复，对于未能遵守保密原则导致申诉者利益受到损害的，公司将酌情予以处罚或移交司法机关处理。

(v) Protection of complainants: When handling complaints, the company will follow the principles of facts, procedures, confidentiality, and timeliness, protect the legitimate rights and interests of complainants, keep the complainants' information confidential strictly, and promise not to treat complainants because of their complaints. If any form of retaliation is adopted and the complainant's interests are harmed due to failure to comply with the principle of confidentiality, the company will, at its discretion, impose penalties or transfer it to judicial authorities for processing.

公司尽责管理手册中定义了申诉处理程序。公示至今，未收到相关申诉。

The grievance handling procedure is defined in the Company's *Mineral Supply Chain Due Diligence Management Policy*. So far, no relevant complaints have been received.

第五章 风险识别和评估

Part 5 Risk Identification and Assessment

公司向所有供应商发送 KYS 问卷，收集供应商信息，包括经营合法性、股东、实际受益人、高级管理人员、业务运营情况及尽责管理体系实施情况等信息，并对所收集的信息进行了评估和分析。

The Company sent KYS questionnaires to all suppliers to collect supplier information, including business legality, shareholders, actual beneficiaries, senior management, business operations, and implementation of due diligence management systems. All information collected were assessed and analyzed.

公司建立了受冲突影响和高风险区域识别流程，定义了所引用资源判定标准和评估频率。引用资源包括联合国人类发展指数、海德堡晴雨表、脆弱国家指数、多德-弗兰克法案、欧盟法规等。

The Company has established a process for identifying conflict-affected and high-risk areas, defined the criteria for determining the cited resources and the frequency of assessment. Cited resources include the United Nations Human Development Index, the Heidelberg Barometer, the Fragile States Index, Dodd-Frank Act, EU regulations, etc.

公司向所有供应商发送供应链地图问卷，收集供应链信息及运输路线，并依据受冲突影响和高风险区域识别流程对所涉及的国家进行判定，识别并保留了受冲突影响和高风险区域清单。公司建立

供应链警示信号识别程序，完成了警示信号识别，并对触发警示信号的供应商开展加强尽职调查，包括补充信息收集、实地评估等方式。

The Company sent supply chain map questionnaires to all suppliers to collect supply chain information and transport routes, and identified and maintained a list of conflict-affected and high-risk areas based on the process of identifying conflict-affected and high-risk areas to determine the countries involved. The Company established a supply chain red flag identification process, completed the red flags review, and conducted enhanced due diligence on suppliers that triggered the red flags, including supplementary information collection, on-the-ground assessment, etc.

第六章 风险缓解

Part 6 Risk Mitigation

公司建立了如下风险缓解策略：

- 1.在缓解重大风险或风险可控的过程中可选择性继续交易；
- 2.在持续缓解重大风险的过程中暂时中止交易；
- 3.如果缓解风险的努力失败，或公司认为无法缓解风险，或风险无法接受，则终止和供应商的合作关系。

The Company has established the following risk mitigation strategies:

1. Continuing trade throughout the course of measurable risk mitigation efforts.
2. Temporarily suspending trade while pursuing ongoing measurable risk mitigation.

3. Disengaging with a supplier after failed attempts at mitigation or where a company reasonably deems risk mitigation not feasible or unacceptable.

公司根据各供应商风险评估结果，制定相应的风险缓解策略，并制定风险缓解计划和实施监督。

The Company develops appropriate risk mitigation strategies based on the results of each supplier's risk assessment and develops risk mitigation plans and monitors their implementation.

第七章 尽职调查管理体系审核情况

Part 7 Audit of Due Diligence Management System

公司已于 2023 年 6 月 7 日至 9 日组织内部审计，并形成内部审计报告及优化项目表，对建议项已完成整改。

The Company has conducted an internal audit on 7th - 9th June, 2023 and generated an internal audit report and an optimization item list, and rectification of the recommended items has been completed.

公司委托五矿化工进出口商会就 LME 供应链尽责管理体系审核进行了沟通，并于 2023 年 8 月 2 日至 4 日开展了现场评估。

The Company commissioned the China Chamber of Commerce for Metals, Minerals and Chemicals Importers and Exporter (CCCMC) to communicate the LME Supply Chain Due Diligence Management System Audit and an on-site assessment was conducted on 2nd - 4th August, 2023.