河南豫光金铅股份有限公司
矿产供应链尽责管理政策

Henan Yuguang Gold and Lead Co., Ltd.
Mineral Supply Chain Responsibility Management Policy

河南豫光金铅股份有限公司（以下简称“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、加工、出口存在可能造成不利影响的风险，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不利影响的义务，我们承诺采纳并广泛传播《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）、《中国矿产供应链尽责管理指南》（第二版）、《LBMA 负责任黄金指南》（第九版）和《LBMA 负责任白银指南》（第二版）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。

Henan Yuguang Gold & Lead Co., Ltd. (hereinafter referred to as the "Company") recognizes that the extraction, trading, processing and export of mineral resources in conflict-affected and high-risk areas carry potential risks of adverse impacts. We acknowledges its obligation to respect human rights, refrain from fuelling conflicts, and avoid adverse environmental and social impacts. We commit to adopting and widely disseminating relevant provisions set forth in *the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)*, *the China Guidance on Due Diligence for Responsible Mineral Supply Chains (Second Edition)*, *the LBMA Responsible Gold Guidance (9th Edition)* and *the LBMA Responsible Silver Guidance (2nd Edition)*, and incorporating such provisions into all contracts and agreements signed with suppliers.

这一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提高风险意识提供参考。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。

This Policy serves as guidance for conflict-sensitive procurement activities across the entire mineral supply chain and helps suppliers raise risk awareness. We commit to refraining from any activities that finance conflict, and to complying with relevant United Nations sanction resolutions as well as domestic laws implementing such resolutions where applicable.

公司承诺在供应链运营实践中识别和管理以下风险：

We commit to identifying and managing the following risks in its supply chain operations:

一、与矿产开采、运输或贸易有关的严重侵权行为：

1. 在“受冲突影响和高风险区域”开展采购或经营活动时，我们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作为威胁榨取的任何个人的、并非该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的行为，反人类罪或种族灭绝罪。

风险缓解策略：

2．如果我们有合理理由认为该风险存在，即上游供应商正从实施上述严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或终止与该供应商的合作。

I. Severe Human Rights Abuses Related to Mineral Extraction, Transportation or Trading

When conducting procurement or business operations in conflict-affected and high-risk areas, we shall neither tolerate nor in any way benefit from, aid, assist or facilitate any party engaging in the following acts:

a. Torture and cruel, inhuman or degrading treatment of any kind;

b. All forms of forced or compulsory labour. Forced or compulsory labour refers to any labour or service exacted from any person under the menace of penalty and for which such person has not offered himself/herself voluntarily;

c. The worst forms of child labour;

d. Other gross human rights violations and abuses, including widespread sexual violence;

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

Risk Mitigation Measures

Where we have reasonable grounds to believe that such risks exist, i.e., an upstream supplier sources minerals from or maintains associations with any party committing the aforesaid severe abuses, we shall immediately suspend or terminate its cooperation with such supplier.

二、关于直接或间接支持非国家武装团体[1]：

3．我们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”包括且不限于从非国家武装团体或其关联方[2]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：

i. 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[3]；并/或

ii. 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[4]；并/或

iii. 对中间商、出口企业、或国际贸易者非法征税或勒索。

风险缓解策略：

4. 如果我们有理由认为，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关系，我们将立即中止或终止与该供应商的合作。

II. Direct or Indirect Support for Non-State Armed Groups

We will not tolerate any direct or indirect support provided to non-state armed groups via mineral extraction, transportation, trading, processing or export. The term "direct or indirect support" for non-state armed groups through mineral extraction, transportation, trading, processing or export includes, but is not limited to, purchasing minerals from or making payments to non-state armed groups or their associated parties , or otherwise supplying logistical support, equipment and other supplies to such groups.

Such armed groups or their associated parties shall satisfy any of the following conditions:

i. Illegally controlling mining sites, or otherwise controlling transportation routes, mineral trading points, and the upstream entities of the supply chain.

or

ii Illegally controlling mining sites, or otherwise controlling transportation routes, mineral trading points, and the upstream entities of the supply chain,

or

iii Illegally imposing taxes or extorting money from middlemen, export enterprises, or international traders.

Risk Mitigation Measures

Where we have ground to believe that an upstream supplier sources minerals from or maintains connections with any party that provides direct or indirect support to non-state armed groups, we shall immediately suspend or terminate cooperation with such supplier.

三、关于公共或私人安全武装：

5．我们杜绝向非法控制矿址、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。[5]

6．我们认可，矿址及/或其周边地区以及/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。

7．在我们或我们供应链上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[6]。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。

8．我们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。

9. 我们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互动，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负面影响，尤其是对小作坊矿工的负面影响，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。

风险缓解策略：

10. 如果我们发现在一定程度上存在此类风险，将根据企业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[7]，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未起作用，我们将暂时中止或终止与上游供应商的合作。[8]我们发现在一定程度上有可能存在有违上述第 8 段和第 9 段内容的情况下，将采取同样的应对措施。

III. Public or Private Security Forces

5.We will absolutely not provide any direct or indirect support to public or private security forces that engage in illegal taxation or solicitation of money or minerals at the mine site entrances, along the transportation routes, or at the mineral trading points, or that carry out illegal taxation or extortion of middlemen, export enterprises, or international traders.

6.We acknowledge that the sole legitimate role of public or private security forces deployed at or around mine sites and/or along transport corridors is to uphold the rule of law, including upholding human rights, safeguarding miners, equipment and facilities, and protecting mine sites or transport routes to ensure unimpeded lawful mining and trade activities.

7.Where we or any enterprise within its supply chain enters into contracts with public or private security forces, we commits to stipulate that such security providers shall comply with internationally recognized standards and guidance governing public and private security actors . In particular, we will

advocate for or implement screening policies to ensure that individuals or security units with a documented record of gross human rights abuses are not engaged.

8.We will pursue or implement cooperation with central or local governments, international organizations and civil society organizations to develop viable solutions for enhancing the transparency, proportionality and accountability of costs associated with public security deployments.

9.We will engage or implement outreach activities with local governments, international organizations and civil society organizations to prevent or minimize adverse impacts of public and private security presence at mine sites on vulnerable groups, particularly artisanal miners, where minerals within the supply chain originate from artisanal and small-scale mining operations.

Risk Mitigation Measures

10.If we identify that such risks exist to a certain extent, we will immediately formulate, adopt and implement risk management plans for upstream suppliers and other stakeholders based on the specific position of the enterprise in the supply chain [In the implementation of the risk plan, if any force majeure factors such as tsunamis, earthquakes, fires, epidemics, wars, etc. occur, the time limit can be adjusted accordingly, but a written explanation will be provided for the situation.] so as to curb or reduce the risk of providing direct or indirect support to public or private security forces. If the risk management plan does not take effect after six months of implementation, we will temporarily suspend or terminate cooperation with upstream suppliers.We have found that in certain cases, where there may be deviations from the content of the 8th and 9th paragraphs mentioned above, the same response measures will be adopted.

四、关于行贿受贿及矿产原产地的欺诈性失实陈述：

11．我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、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。

IV. Regarding Bribery, Corruption and Fraudulent Misstatements Regarding Mineral Origin:

11. We will not offer, promise, undertake or demand any bribes, and we will resist such temptations. We will not engage in bribery to cover up or forge the mineral origin, or to falsely report the taxes, fees and special mining royalties that should be paid to the government for mineral extraction, trade, processing, transportation, export, etc.

五、关于洗钱：

12．如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商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，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

V.Regarding money laundering:

12.If we have reason to believe that there is a risk of money laundering associated with or arising from the illegal taxation or extortion carried out during the mining, trading, processing, transportation or export of minerals at the mine entrance, along the transportation routes, or at the locations where upstream suppliers conduct mineral transactions, we will support or take measures to contribute to the effective elimination of money laundering activities.

六、关于向政府支付的税收、费用及特许费：

13．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进行披露，同时我们也支持《采掘行业透明度行动计划》（EITI）倡议。

风险缓解策略：

14. 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的目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或终止与上游供应商的合作。对采用风险管理计划后需要降低的风险，我们将额外进行风险评估。若风险管理计划六个月内未取得明显效果，行贿受贿及对矿产产地进行欺诈性失实陈述、洗钱、以及向政府缴纳税款、费用、特许费等行为的风险未能得到遏制或降低的话，我们将暂时停止或中断与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明贸易关系恢复之前改进工作所应达到的绩效目标。

VI.Regarding the taxes, fees and concession charges paid to the government:

13. We will ensure that all legal taxes, fees and royalties related to the mining, trading and export of minerals in areas affected by conflicts and high-risk regions are paid to the government. We also commit to disclosing such payments in accordance with the requirements of the information disclosure on taxes paid to government departments by enterprises in the countries where they are located. At the same time, we support the EITI (Extractive Industries Transparency Initiative) initiative.

Risk mitigation strategies:

14.Fourteen Based on the specific position of the enterprise in the supply chain, we commit to cooperating with suppliers, central or local government agencies, international organizations, civil society, and affected third parties as appropriate, with the aim of improving or tracking performance by taking significant measures to prevent or reduce risks with negative impacts within a reasonable time frame. If the risk reduction measures do not work, we will temporarily suspend or terminate cooperation with upstream suppliers. For risks that need to be reduced after adopting the risk management plan, we will conduct additional risk assessments. If the risk management plan does not achieve significant results within six months, risks such as bribery and corruption, fraudulent false statements about mineral origin, money laundering, and paying taxes, fees, and royalties to the government, etc., will not be contained or reduced. In such cases, we will temporarily stop or interrupt cooperation with suppliers for at least three months, and at the same time, revise the risk management plan while temporarily suspending the cooperation. We will also clarify the performance targets that should be achieved during the improvement process before the trade relationship can be resumed.

七、关于对中国或开采国的生态环境、劳工权利、社区和社会造成的负面影响

如果我们有理由认为，存在因开采、贸易、处理、运输或出口环节造成严重环境污染、破坏世界遗产或生态保护区域、严重侵犯人权、强迫劳动等违法行为，并由此触发并造成灾难性 ESG 风险行为，我们将支持或采取措施，为有效消除危害 ESG 风险行为做出积极贡献。

VII. Adverse Impacts on the Ecological Environment, Labor Rights, Communities and Society of China or Host Mining Countries

If we have grounds to believe that illegal acts such as severe environmental pollution, damage to world heritage sites or ecological protected areas, serious human rights violations, forced labor arising from mining, trading, processing, transportation or export activities have occurred and triggered

catastrophic ESG risks, we will adopt relevant measures and make positive contributions to effectively eliminate such ESG-risk-causing behaviors.

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。该政策也适用于公司所有供应商，公司将采取积极措施将政策传递给供应商，政策自发布之日起生效，并将在公司网站公布。

We shall integrate this Policy into its management system and the responsibilities of all relevant departments in line with the principle of continuous improvement. This Policy shall also apply to our all suppliers. we will take proactive measures to communicate the Policy to suppliers. This Policy shall take effect on the date of issuance and be published on our official website.

合规总监/Compliance director：

日　期/Date：2026.6.16

注释：

[1] 企业应参照联合国安理会有关决议对非国家武装团体进行识别。

[2] “关联方”包括供应链上直接与武装团体合作，为矿产开采、贸易、处理提供供便利的贸易商、批发商、中间商及其他各方。

[3] 对矿山、运输路线、矿产交易地、以及供应链上游行为主体进行“控制”是指 i）对开采活动进行监视，包括对进入矿区进行授权，以及/或对下游中间商、出口企业或国际贸易者的销售进行协调；ii）在矿产开采、运输、贸易或销售过程中利用任何形式的强迫或强制劳动；或 iii）在上游企业或矿山担任领导或管理人员，或是享有受益权或其他所有者权益。

[4] 向矿山、运输路线、矿产交易地、或上游企业进行“勒索”是指以暴力或其他手段相威胁，通常以允许开采、使用运输路线、或矿产运输、购买、销售等活动作为筹码，向被勒索人索要并非其自愿支付的金钱或矿产。

[5] 此处所述“直接或间接支持”指的并不是合法形式的支持，合法形式包括企业向其经营所在国政府支付的法定税 收、费用和/或特许开采费。

[6] 例如《安全与人权自愿原则》等国际指导文件。

[7] 实施风险计划中如若遇到海啸、地震、火灾、疫情、战争等不可抗力因素，可相应调整时间期限，但将对情况提供文字说明。

[8] 对采用风险管理计划后需要降低的风险，企业应额外进行风险评估。若风险管理计划六个月内未取得明显效果，为公共或私人安全武装武装提供直接或间接支持的风险没有得到遏制或降低的话，企业应暂时停止与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明合作关系恢复之前改进工作所应达到的绩效目标。

[9] 参见经合组织《关于打击国际商业交易中行贿外国公职人员行为的公约》（1997）和《联合国反腐败公约》（2004）。