

寒锐钴业负责任矿产供应链供应商行为准则

Supplier Code of Conduct for Responsible Mineral Supply Chain of Hanrui Cobalt

为了更好地与供应链伙伴共同开展负责任运营，最大限度地避免或降低《寒锐钴业负责任矿产供应链尽责管理政策与承诺》中描述的供应链的风险，寒锐钴业特按照《中国负责任矿产供应链尽责管理指南》《中国对外矿业投资社会责任指引》《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（第三版）》中的要求，并参考《联合国工商业与人权指导原则》等相关国际公约与倡议，制定本《负责任矿产供应链供应商行为准则》（以下简称“本准则”）。本准则适用于向寒锐钴业及其子公司出售或为其加工、运输、出口来自受冲突影响和高风险区域的矿石或矿产品的供应商。

To better implement responsible sourcing with our business partners in mineral supply chain and to minimize or avoid risks described in *Policy on Responsible Mineral Supply Chain Due Diligence of Hanrui Cobalt*, we establish Hanrui Cobalt Supplier Code of Conduct (hereinafter “code”) based on *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains* and *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Edition 3* and in conformity with other international conventions or initiatives such as *UN Guiding Principles on Business and Human Rights*. This code applies to companies and people (collectively “suppliers”) who supply ores or mineral-containing products from CAHRAs or services concerning processing, transporting, exporting them for Hanrui and its affiliates.

我们希望供应商遵照本准则，在遵守适用法律法规的基础上，以合规、道德、透明的行为方式运营，争取达到更高标准，建设负责任的供应链伙伴关系，与寒锐钴业共同成长。同时，供应商也应在其供应链中推行本准则中的相应要求。我



们将积极监督供应商的执行情况，任何违反本准则的行为都将损害甚至终止您与寒锐钴业之间的合作关系。

As one of our suppliers, you are expected to be aligned with this code and comply with laws and regulations where applicable. Our goal is to collaborate with you to build a responsible sourcing partnership in mineral supply chain where you need to do business in a lawful, compliant, ethical and transparent way and to improve continuously your compliance performance. You need to flow down the same requirements throughout their supply chains. We will monitor whether you are in compliance with this Code. Any violation of this code will damage and eventually lead to disruption of our cooperation.

本准则适用于南京寒锐钴业股份有限公司、迈特矿业有限公司、寒锐金属(刚果)公司、安徽寒锐新材料有限公司、赣州寒锐新能源科技有限公司，及寒锐钴业的其他子公司的供应商。寒锐钴业拥有对该准则的最终解释权，并本着“持续改进”的原则，根据实际需要进行修订。本准则在不同语言版本间出现理解差异的情况下，均以中文版为准。

This Code is applicable to Nanjing Hanrui Cobalt Co., Ltd, Metal Mines SARL, Hanrui Metal (Congo) Company, Anhui Hanrui New Material Company Limited, Ganzhou Hanrui New Energy Technology Company Limited, and other subsidiaries of Hanrui Cobalt. Hanrui Cobalt reserves final explanation right of this Code and it will be revised periodically to adapt to actual circumstances in line with “on-going improvement”. In the event of any inconsistency between different language versions of this Code, the Chinese version will prevail.

在进行矿物开采、运输、交易、加工及出口等各项活动中，特别是在受冲突影响和高风险地区开展以上活动时，南京寒锐钴业股份有限公司希望供应商努力实现以下要求：

While mining, transporting, trading, processing and exporting minerals or mineral-containing products especially when these activities are conducted in CAHRAs, we expect that you can adhere to following standards:

一、劳工和人权

Part 1 Labor and Human Rights

(一) 童工

1. Child Labor

公司应做到不使用童工尤其是最恶劣形式的童工。用工最低年龄参照驻在国的法律规定，或国际劳工组织138号公约关于最低工作年龄的规定，以两者中较高的为准。防止18岁以下儿童从事地下采矿或水下作业、操作危险机械和工具、超负重搬运以及接触危险物质的工种。公司应意识到小规模采矿和手采矿可能存在的使用最恶劣形式童工的风险，为此公司应采取积极措施，防止出现最恶劣形式的童工问题。

Child labor, in particular the worst form of child labor, must be eliminated in your supply chain. The employees you hire must meet the minimal age required by the local laws or Convention 138 of ILO, whichever higher. It is forbidden that children under 18 years old perform underground mining or underwater work, use dangerous machines or tools, manually lift and transport items of weights that overcome the maximum limits set for them or expose to hazardous substances. You should be aware of the possible risks of using the worst form of child labor in artisanal and small-scale mining and take measure to prevent its appearance in the supply chain.

(二) 强迫或强制劳动

2. Forced or compulsory labor

公司应采取措​​施，防止任何形式的强迫劳动、抵债劳动、服刑人员劳动或非法劳动。公司雇佣合同制员工，意味着公司应承担支付合同工人和/或外籍工人雇佣费(包括招聘费用)的责任。公司不得要求员工将“保证金”或身份证明文件扣押在公司。员工应有就业和择业的自由。

You must prevent any form of forced or compulsory labor, bonded labor, labor from those who serve sentences, or illegal labor. Signing labor contract with your

employees means you have the obligation to pay them (contractual workers and/or expatriate workers) and pay recruitment fees. At no time should workers be denied access to their identity papers and be required to pay a certain amount as deposit. Your employees enjoy freely chosen employment.

(三) 工作时间

3. Working hours

每周的工作时间(包括加班时间)应符合所在国法律、国际劳工组织公约或集体谈判协议中的相关规定。在任何情况下,每周工作时间不能超过相应的法律法规所规定的上限。公司应保证员工每7天至少休息1天。

Working hours per week (including overtime work) must conform to the relevant provisions in domestic laws and regulations, conventions of ILO or collective bargaining agreement. In no event shall hours per work week (including overtime work) exceed the maximum set by applicable law. Workers shall be allowed at least one day off every seven days.

(四) 工资与福利

4. Wage and benefits

公司应遵照所在国家和地区的法律规定,为员工提供工资及福利。公司支付员工的工资最低应符合国家法定水平、行业水平或集体谈判协议中确定的较高水平的条款。

Wage and benefits provided to your employees must comply with all applicable wage laws and regulations. Minimum wages paid must be in conformity with the standard set by domestic laws and regulations, industry average or relevant provisions in collective bargaining agreements, whichever higher.

(五) 歧视

5. Discrimination

公司应认识到员工应得到尊重。不因性别或性取向、种族、肤色、宗教、国籍等原因,在雇佣、薪酬、接受培训、晋升、终止劳动关系或退休等方面采取歧

视性做法。任何员工均不应受到侮辱或体罚，也不应受到身体、心理或语言上的骚扰或虐待。

You must be fully aware that employees must be respected. You shall not engage in or permit discrimination based on race, color, age, gender, sexual orientation, nationality or religion, in hiring and employment practices such as wages and salaries, promotions, access to training, termination of employment relationship, and retirement. No employee should be subject to any physical, mental or verbal harassment or abuses including corporal punishment and stigma.

(六) 结社自由和集体协商

6. Freedom of association and collective bargaining

公司应遵守所在国家和地区相关的法律规定。工人享有加入工会，进行谈判以及集体协商的自由。职工和/或职工代表不应受到歧视，且应能够在工作场所行使其代表职能。

You must observe applicable local laws and regulations. Workers enjoy the freedom to join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly. Workers and/or their representative should be able to exercise their representative function in workplace without fear of discrimination.

(七) 安全与保护

7. Security and protection

在适用的情况下，公司需识别公共或私人安全武装可能带来的人权风险，避免或最大限度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不利影响。

You must identify possible human right risks brought about by public or private security force where applicable and avoid or minimize its adverse impact on local communities or vulnerable groups.

(八) 移民和原住民

8. Immigrants and indigenous people

在适用的情况下，公司应努力做到在项目扩增或新项目活动中避免非自愿移民。如无法避免，应尽力缩小移民规模，并采取恰当的措施减缓负面影响。如果涉及到原住民权益，企业应充分尊重原住民事先自由知情同意权。

You must avoid employing involuntary migrants for your expansion or new projects. If it is inevitable, you must minimize its scale and take measures to reduce negative impact. You must respect free, prior, and informed consent of indigenous people when it involves their rights and interests.

二、健康与安全

Part 2 Health and Safety

(一) 职业健康与安全

1. Occupational Health and Safety

公司应保证工作场所安全，并提供安全的工作环境，包括向员工提供与工作相关且合适的个人防护装备。

You must ensure the security of workplace and make working environment safe, including offering your employees adequate labor protective equipment proper to their work.

(二) 工伤和疾病

2. Occupational Injury and Illness

公司应制定合适的程序和体系以预防、管理、跟踪和报告工伤和疾病。

You must put in place adequate procedure and system to prevent, manage, track and report occupational injury and illness.

(三) 机器与设备防护

3. Machine and equipment safeguarding

公司应对生产设备和其他机械进行安全危害评估，并为可能导致员工受伤的机械安装物理防护装置、连锁装置及屏障，并正确进行维护。

Production and other machinery should be evaluated for safety hazards. You must provide and properly maintain physical guards, interlocks, and barriers for hazards in machinery used by workers.

(四) 小规模采矿与手采矿

4. Artisanal and small-scale mining

在适用的情况下，公司应充分发挥自身影响力，致力于不断改善小规模采矿和手采矿开采条件的项目或参与相关行业项目，为矿工提供必要的健康和安全防护设备。

You need to make continued efforts to, where applicable, launch projects aiming to improving working conditions of artisanal and small-scale mining or participate relevant sectoral projects to provide to miners adequate protective equipment for their health and safety.

(五) 生活条件

5. Living Conditions

公司应为员工提供干净的卫生间设施、饮用水以及清洁食物准备、储藏与用餐设施。公司或劳工代理机构提供的员工宿舍应保证安全。

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by you or a labor agent are to be maintained to be safe.

(六) 社区健康与安全

6. Health and Safety of Community

在适用的情况下，公司应充分考虑矿产选址、开采、运输等活动对社区及民众带来的健康与安全风险，保障社区民众的知情权，并努力减缓风险。

You must take full account of the risks of health and safety to communities and residents generated from site selection, mining, transport and other activities related to mineral exploitation. You need to guarantee the right to know of habitants in communities concerned and make best possible efforts to mitigate risks.

(七) 危机处理与响应

7. Emergency preparedness

公司应该识别项目可能发生的危机情况，建立危机响应机制和计划，从而减少对社会和环境的消极影响。

Potential emergency situations and events are to be identified and assessed, and their adverse impact on society and environment minimized by implementing emergency plans and response procedures.

三、环境保护

Part 3 Environmental Protection

(一) 环境污染及资源利用

1. Pollution Prevention and Resource Recycling

公司应从源头或通过实践（如改进生产、维护和设施工艺、替换材料、节约资源、材料回收和再利用等）减少和消除不必要的资源耗费和环境污染。

Emissions and discharges of pollutants and unnecessary natural resources consumption are to be minimized or eliminated at the source by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; materials substitution; re-use, conservation, recycling or by other means.

(二) 有毒害物质

2. Hazardous Substances

公司须识别和控制释放到环境中会造成危险的化学物质和其他材料，确保这些物质被安全地处理、运输、存储、使用、回收或再利用和处置。

Chemicals and other materials posing a hazard to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

(三) 废水、废气及固体废物

3. Wastewater, Air Emission and Solid Waste

经营活动、工业加工和清洁设施中产生的废水、废气及固体废物在排放或处置前，公司应当按照要求对其进行监测、控制和处理。

Wastewater, air emissions and solid waste generated from operations, processing and sanitary installation must be monitored, controlled and treated as required prior to discharge.

四、道德规范

Part 4 Integrity

(一) 矿产资源的负责任采购

1. Responsible Mineral Sourcing Practices

公司在适用的情况下，应识别矿产资源开采、运输、交易、加工和出口等环节存在的社会和环境风险，尤其重点关注来自受冲突影响或高风险地区的原材料的风险，并采取有效措施防范和减缓风险。

You must identify social and environmental risks relating to exploitation, transport, trade, processing and export of mineral resources, especially those originating from conflict-affected and high-risk areas (CAHRAs) where applicable, and take measures to effectively prevent or mitigate risks.

(二) 公平运营与商业诚信

2. Fair Business and Integrity

公司在适用的情况下，在矿区出入口、矿区运输路线、矿产资源交易地以及其他任何环节中，应禁止任何形式的贿赂、腐败、敲诈勒索和挪用公款行为。

You must prohibit all forms of bribery, corruption, extortion and embezzlement at point of access to mine sites, along transportation routes or at points where minerals are traded, and in other links.

(三) 社区参与

3. Community participation

在适用的情况下，公司在涉及搬迁、施工、开采等活动中应动员社区参与相关决策和活动。建议公司设立合理的申诉机制，保护申诉者正当权益，禁止报复行为。

You must mobilize communities to participate in decision making and activities concerning relocation, construction and mining. You must set up reasonable grievance mechanism, protect lawful rights of those who voice concerns and prohibit any forms of retaliation against them.

五、公司治理

Corporate Governance

(一) 承诺与声明

1. Commitment and Declaration

公司应声明支持本准则，承诺遵守本准则的规定，并鼓励按照更高标准提升合规绩效。

You need to declare that you stay committed to this Code, comply with the rules of this Code, and improve compliance performance aligned with higher standards.

(二) 风险识别与防范

2. Risk Identification and Prevention

公司应识别和评估与业务相关的劳工与人权、健康与安全等风险，并制定相关政策，同时采取适当的程序和控制措施防范和缓解风险。

You must identify and assess risks related but not limited to labor, human rights, health and safety regarding your business activities, adopt relevant policies, and put in place proper procedures and measures to prevent and mitigate those risks.

(三) 评估

3. Assessment

公司应加强自身评估能力，积极参与行业行动计划，保持持续改进。

You must strengthen self-assessment capability through participation into sector action plan to improve your performance continuously.

(四) 信息传递与沟通

4. Information transfer and communication

供应商应清晰、准确地向其员工、供应商和客户传递企业政策、合规绩效等信息，提高透明度。

You must clearly and precisely convey your policies and compliance performance to your employees, suppliers and customers in a clear and precise manner to improve your transparency.

公司（盖公章）：

Company (sealed):

公司代表（签字）：

Representative of Company (Signature):

日期：

Date: