

广东佳纳能源科技有限公司

Guangdong Jiana Energy Technology Co., Ltd.

供应商行为守则

Supplier Code of Conduct

广东佳纳能源科技有限公司（以下简称为“佳纳能源”）制定本《供应商行为守则》（以下简称为“本守则”），旨在与合作伙伴携手预防和解决供应链上的社会和环境风险，并积极促进相关社会与环境问题的解决，争取达到更高的标准，建设负责任的供应链伙伴关系，与佳纳能源共同成长，为实现可持续发展作出贡献。

Guangdong Jiana Energy Technology Co., Ltd. (hereinafter referred to as "Jiana Energy") has formulated this Supplier Code of Conduct (hereinafter referred to as "this Code") with the purpose of collaborating with partners to prevent and address social and environmental risks in the supply chain. We strive to actively promote solutions to relevant social and environmental issues, aiming for higher standards, building responsible supply chain partnerships, and growing together with Jiana Energy to contribute to the achievement of sustainable development.

佳纳能源相信，合规、道德运营和透明是商业成功的基础。因此，在进行原料开采、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，佳纳能源希望所有供应商（下称“公司”）承诺达到以下“基础性要求”，并以实现“鼓励性建议”的标准为努力方向。

Jiana Energy believes that compliance, ethical operations, and transparency are the foundation of business success. Therefore, in all activities related to raw material extraction, transportation, trading, processing, and export - particularly when conducting such operations in conflict-affected and high-risk areas - Jiana Energy expects all suppliers (hereinafter referred to as "the Company") to commit to meeting the following "Fundamental Requirements" while striving to achieve the standards set forth in the "Encouraged Recommendations."

使用说明

Instructions for Use

- 本守则适用于佳纳能源所有原料和产品的供应商，旨在帮助所有供应商和合作伙伴了解并遵循佳纳能源所倡导的负责任、可持续供应链标准。

This Code applies to all suppliers of raw materials and products to Jiana Energy, aiming to help suppliers and partners understand and adhere to the responsible and sustainable supply chain standards advocated by Jiana Energy.

- “基础性要求”指符合《中国负责任矿产供应链尽责管理指南》和《中国对外矿业投资社会责任指引》的相关要求，并有助于更好地满足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》、联合国《工商业与人权指导原则》、国际劳工组织相关公约等国际性标准的要求，其目的在于预防和解决供应链上的社会和环境风险。我们期望佳纳能源和全体供应商均能达到这些要求。

"Fundamental Requirements" refer to compliance with the relevant provisions of the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains and the Chinese Guidelines for Social Responsibility in Outbound Mining Investments, while also facilitating better fulfillment of international standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the UN Guiding Principles on Business and Human Rights, and relevant conventions of the International Labour Organization (ILO). These requirements aim to prevent and mitigate social and environmental risks throughout the supply chain. Jiana Energy expects both itself and all suppliers to meet these standards.

- “鼓励性建议”指高于基础性要求，是佳纳能源建议供应商努力实现的行为标准，这有助于供应商与佳纳能源一同推动社会和环境问题的解决，为可持续发展作出贡献。

"Encouraged Recommendations" represent standards that exceed the Fundamental Requirements. These are aspirational practices Jiana Energy recommends suppliers strive toward, which will help drive collective progress in addressing social and environmental challenges and contribute to sustainable development.

- 佳纳能源声明本公司遵守本守则，并希望佳纳能源所有供应商声明支持本守则，同时建议供应商将本准则传达给其所有供应商，并协助其努力达到其中的要求。

Jiana Energy declares its full compliance with this Code and expects all its suppliers to formally endorse it. Furthermore, we recommend that suppliers communicate this Code to their own suppliers and assist them in meeting its requirements.

- 本守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。

In case of any discrepancies in interpretation between different language versions of this Code, the Chinese version shall prevail as the authoritative text.

- 佳纳能源将定期审阅与修订本守则，定期征求利益相关者的期待与意见。

Jiana Energy commits to periodically reviewing and updating this Code, while consistently soliciting expectations and feedback from relevant stakeholders.

第一篇：人权和劳工权益

Part I: Human Rights and Labor Rights

1. 严重侵犯人权的行为

Severe Human Rights Violations

基础性要求：

Fundamental Requirements:

在开展原料开采、交易、处理、出口等经营活动中，公司既不容忍，也不以任何方式直接或间接支持以下行为：任何形式的酷刑、残暴、不人道和有辱人格的待遇；任何形式的强迫或强制劳动，包括任何形式的人口贩运、抵债劳动和监狱劳动；其他严重侵犯和践踏人权的行；战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

In conducting business activities including raw material extraction, trading, processing, and export operations, the Company shall neither tolerate nor provide any form of direct or indirect support to the following practices: any form of torture, cruelty, inhuman or degrading treatment; all forms of forced or compulsory labor including any type of human trafficking, bonded labor and prison labor; other severe violations and abuses of human rights; war crimes, crimes against humanity, genocide or other grave violations of international humanitarian law.

鼓励性建议：

Encouraged Recommendations:

考虑到严重侵犯人权行为的复杂性和艰巨性，公司宜加强同利益相关方的合作，了解风险的根源和情景，开展人权尽责管理，制定适当的补救措施或解决方案，推动风险的系统性解决。

Recognizing the complexity and challenging nature of severe human rights violations, the company should enhance collaboration with stakeholders to understand the root causes and contextual circumstances of risks, implement human rights due diligence, develop appropriate remedial measures or solutions, and promote systemic resolution of such risks.

2. 童工

Child Labor

基础性要求：

Fundamental Requirements:

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，以两者中高标准为准。公司应采取积极有效措施，防止 18 岁以下儿童从事地下采矿或水下作业、危险机械和工具、超负重搬运以及接触危险物质的工种。避免阻碍儿童接受义务教育和职业培训，或对其健康、安全和道德造成伤害。

The Company shall not employ child labor, particularly in its worst forms, with the minimum working age determined by the stricter standard between host country laws and ILO Convention No. 138. The Company shall implement proactive measures to prevent persons under 18 from engaging in underground mining, underwater operations, hazardous machinery/tool operation, heavy load handling, or exposure to dangerous substances, while avoiding any practices that compromise compulsory education, vocational training, or children's health/safety/moral development.

鼓励性建议：

Encouraged Recommendations:

公司宜加强与上下游企业及政府部门等相关方合作，深入了解童工产生的社会和文化根源，制定童工补救的解决方案，推动童工问题的系统性解决，在这一过程中公司尤宜考虑女童的特殊情况。

The Company should strengthen collaboration with supply chain partners and government agencies to address socioeconomic and cultural root causes of child labor, develop remedial solutions (with particular attention to girls' special circumstances), and promote systemic resolution of child labor issues.

3. 强迫或强制劳动

Forced or Compulsory Labor

基础性要求：

Fundamental Requirements:

公司承诺按照法律法规的要求，反对强迫劳动和人口贩运，不会允许以任何惩罚来威胁、强迫任何人从事非本人自愿的一切劳动或服务。除了明确反对抵债劳动、监狱劳动、胁迫劳动以外，公司认可员工的移动自由不得受限制，员工有就业和择业的自由。公司也不会要求员工将“保证金”或身份证明文件寄存在公司。

The company commits to comply with legal requirements by opposing forced labor and human trafficking, and shall not permit any form of labor or service to be exacted from any person under threat of penalty or involuntarily. In addition to expressly prohibiting bonded labor, prison labor, and coerced labor, the company recognizes employees' freedom of movement shall not be restricted, and employees shall have freedom of employment and occupational choice. The company shall also not require employees to deposit "security bonds" or identity documents with the company.

鼓励性建议：

Encouraged Recommendations:

在缺乏治理能力、外来移民较多的国家或地区运营的公司，可寻求与当地工会、政府进行对话推动问题的解决，并应谨慎使用涉及跨国劳工的劳务中介机构或严格审查与其的合作关系。

Companies operating in countries or regions with weak governance capacity or significant migrant populations may seek to engage in dialogue with local trade unions and governments to promote solutions, and should exercise caution when utilizing labor agencies involving transnational workers or strictly scrutinize such cooperative relationships.

4. 非国家武装团体、私人安全武装支持

Support to Non-State Armed Groups and Private Security Forces

基础性要求：

Fundamental Requirements:

公司在原料开采、运输、交易、处理及出口等经营活动中，不会直接或间接为非国家武装团体提供资金、后勤及设备支持，包括以下非法行为或活动：非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制；在矿区入口、矿区运输路线、矿产资源交易地等进行非法征税、勒索钱财或掠夺资源；对中间商、出口企业或国际贸易商非法征税或勒索。

The company shall not provide any direct or indirect financial, logistical or equipment support to non-state armed groups in its operations including raw material extraction, transportation, trading, processing and export activities, which includes but is not limited to the following illegal activities: unlawful control of mining areas or other means of controlling transportation routes, mineral resource trading locations and upstream actors in the supply chain; imposition of illegal taxes, extortion of money or plundering of resources at mine entrances, mine transportation routes or mineral resource trading sites; or levying illegal taxes or extortion on intermediaries, export enterprises or international traders.

鼓励性建议：

在适用的情况下，建议公司自身做到以上要求，并传递至矿石源头相关方，识别和防止相关风险。

Where applicable, the Company is advised to not only meet these requirements itself but also extend them to relevant stakeholders at the mineral source, ensuring identification and prevention of associated risks.

5. 贿赂、洗钱和税费

Bribery, Money Laundering, and Tax Payments

基础性要求：

Fundamental Requirements:

公司不提供、承诺、给予或索要任何贿赂，并且抵制索贿。不为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。

The company shall not offer, promise, give, or solicit any form of bribe, and shall resist any bribe solicitation. The company shall not engage in bribery to conceal or falsify the origin of mineral resources, or to misrepresent taxes, fees, or royalties payable to governments for activities related to mineral resource extraction, trading, processing, transportation, or export.

公司防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。

The company shall prevent bribery in all business activities and transactions, including those involving agents and other third parties, and shall establish standards and approval procedures for gift-giving and receiving.

公司采取有效措施，防止卷入洗钱或为恐怖主义融资。公司确保向政府支付所有与矿产资源开采、交易、出口相关的合法税收、费用和特许费。

The company shall implement effective measures to prevent involvement in money laundering or the financing of terrorism. The company shall ensure payment of all legally required taxes, fees, and royalties related to mineral resource extraction, trading, and export to governments.

公司在涉及到原料的交易中不使用现金作为结算方式。

The company shall not use cash as a settlement method in any transactions involving raw materials.

鼓励性建议:

Encouraged Recommendations:

公司宜强化采购、招投标和销售制度，增加交易的透明度。

The company should strengthen its procurement, bidding, and sales systems to enhance transaction transparency.

6. 工作时间

Working Hours

基础性要求：

Fundamental Requirements:

公司应采取积极的措施，避免工作时间违反法律法规的要求。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对员工提供较多保护的条款。作为最低标准，公司应确保每 7 天应至少有 1 天休息日；加班应属自愿，且任意为期 7 天的总工作时间不超过 60 小时。

The company shall take proactive measures to prevent violations of legal requirements regarding working hours, ensuring that weekly working hours (including overtime) comply with whichever provisions offer greater employee protection among applicable national laws, International Labour Organization conventions, or collective bargaining agreements, with the minimum standards requiring at least one rest day per seven-day period, voluntary overtime only, and a maximum total working time of 60 hours in any seven-day period.

鼓励性建议：

Encouraged Recommendations:

公司可通过加强生产管理、改善设备工艺以及员工技能等方法提高生产效率，尽量减少加班和工作时间。公司在接收加急订单、客户临时改变订单要求时，宜考虑对工作时间的负面影响。

The company should optimize production efficiency through improved management, equipment/process upgrades, and employee training to minimize overtime needs. When accepting rush orders or accommodating last-minute client changes, the company should consciously evaluate potential impacts on working hours.

7. 工资与福利

Wages and Benefits

基础性要求：

Fundamental Requirements:

公司应遵照所在国家和地区的法律规定和合同要求，给员工提供工资及福利，尤应及时足额以现金方式支付工资。公司支付员工的工资最低应遵守满足国家合法水平、行业水平或集体谈判协议中确定的较高水平的条款。各个工资结算期的工资明细应以书面方式提供。

The Company shall provide employees with wages and benefits in compliance with applicable national/regional laws and contractual requirements, ensuring timely and full payment in cash. The minimum wage paid shall meet the highest standard among: the national legal minimum, industry standards, or collective bargaining agreements. Detailed wage statements shall be provided in writing for each pay period.

鼓励性建议：

Encouraged Recommendations:

在制定薪资和福利制度时，公司宜考虑和反映员工及其家庭成员的需要，为员工支付维持体面生活的劳动报酬，并宜制定计划，确保员工薪酬福利与企业利润同步增长。

When establishing compensation and benefits systems, the Company should consider and reflect the needs of employees and their families, providing remuneration sufficient to maintain a decent standard of living. The Company is encouraged to develop mechanisms to ensure employee compensation grows in parallel with corporate profits.

8. 人权保护

Protection of Human Rights

基础性要求：

Fundamental Requirements:

员工必须受到有尊严和尊重的对待。严禁任何形式的性骚扰、性侵害、体罚、精神或身体胁迫、言语侮辱等行为，亦禁止以任何形式进行威胁。相应的纪律政策和执行程序必须清晰界定并有效传达给全体员工。

Employees must be treated with dignity and respect. Any form of sexual harassment, sexual assault, corporal punishment, mental or physical coercion, verbal abuse, or threats of such behavior is strictly prohibited. Relevant disciplinary policies and implementation procedures must be clearly defined and effectively communicated to all employees.

鼓励性建议：

Encouraged Recommendations:

在严格遵守底线要求的基础上，我们鼓励管理者以身作则，在日常工作中主动示范并倡导尊重与包容的行为。建议定期组织尊重意识培训，并建立安全、保密的反馈渠道。

While strictly adhering to the baseline requirements, we encourage managers to lead by example by proactively demonstrating and promoting respectful and inclusive behavior in their daily work. It is recommended to regularly organize respect-awareness training and establish safe and confidential feedback channels.

9. 歧视

Non-Discrimination

基础性要求：

Fundamental Requirements:

员工应得到尊重。在雇佣、薪酬、接受培训、晋升、终止劳动关系或退休等方面，不得存在因性别或性取向、种族、肤色、年龄、婚姻状况、怀孕与否、宗教、国籍、疾病或残疾导致的歧视。任何员工均不应受到侮辱或体罚，也不应受到身体、性、心理或语言上的骚扰或虐待。应与弱势群体的保护和支持加以区分。

Employees shall be treated with dignity. There shall be no discrimination in employment, compensation, training, promotion, termination of employment or retirement based on gender,

sexual orientation, race, color, age, marital status, pregnancy status, religion, nationality, illness or disability. No employee shall be subjected to humiliation, corporal punishment, or any form of physical, sexual, psychological or verbal harassment or abuse. This shall be distinguished from protective measures and support for vulnerable groups.

鼓励性建议：

Encouraged Recommendations:

公司宜与当地社区、工会、政府以及社会组织接触，了解本土文化和社会规范，了解少数民族、妇女与家庭文化、宗教等传统习俗，促进公司文化的包容性和多元化。

The company should engage with local communities, trade unions, government agencies and social organizations to understand local cultural and social norms, including traditions and customs related to ethnic minorities, women and family culture, and religion, in order to foster an inclusive and diverse corporate culture.

10. 结社自由和集体协商

Freedom of Association and Collective Bargaining

基础性要求：

Fundamental Requirements:

公司遵照所在国家和地区法律赋予员工的权利，尊重员工自愿选择加入和组织工会的权利，以及进行集体协商的权利。

The Company shall comply with all applicable national and regional laws regarding employees' rights, respecting workers' voluntary choice to join or organize trade unions and engage in collective bargaining.

鼓励性建议：

Encouraged Recommendations:

公司宜考虑不同国家与地区的制度背景，了解当地工会制度，与当地或区域工会进行交流。

The Company should consider the institutional contexts of different countries and regions, seek to understand local trade union systems, and engage in dialogue with local or regional trade union organizations.

11. 安全与保护

Safety and Protection

基础性要求：

Fundamental Requirements:

公司须认识到，在高风险区域的矿区及周边地区、运输道路沿线的公共或私人安全武装的作用仅是依法保障权益，包括保护矿工、维护设备和设施安全、保护矿区合法运营及运输路线不受非法干扰。

The Company shall recognize that the role of public or private security forces in high-risk mining areas and surrounding regions, as well as along transportation routes, is strictly limited to legally protecting rights and interests. This includes safeguarding miners, securing equipment and facilities, and ensuring lawful mining operations and transport routes remain free from illegal interference.

公司支持或采取措施不予录用已确认实施过严重侵犯人权行为的公共或私人安全武装，同时与当地政府、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的不利影响。

The Company shall support or implement measures to avoid employing public or private security forces with confirmed records of severe human rights violations. Concurrently, it shall collaborate with local governments, international organizations, and civil society groups to prevent or minimize any adverse impacts on local communities or vulnerable groups caused by security forces engaged by the Company.

鼓励性建议：

Encouraged Recommendations:

在高风险区域或者政府维持稳定、安全能力较弱的地区，公司宜考虑与当地社区和弱势群体进行沟通以传递安全知识。公司宜考虑与当地政府合作，推动小矿山、手采矿转变为正规经济，改善社区居住环境和多元化的经济收入。

In high-risk areas or regions where government capacity to maintain stability and security is limited, the Company should consider engaging with local communities and vulnerable groups to disseminate safety knowledge. Additionally, the Company should explore cooperation with local governments to facilitate the transition of small-scale and artisanal mining operations into the formal economy, while improving community living conditions and fostering diversified economic opportunities.

第二篇：健康与安全

Part II: Health and Safety

1. 职业健康与安全

Occupational Health and Safety

基础性要求：

Fundamental Requirements:

公司应保证工作场所安全，并努力提供干净卫生的工作环境。防止在不保证安全的情况下使其员工接触危险机械、设备或物质。应当向员工提供与工作相关且适当的个人防护装备，并开展相关培训和指导。

The Company shall ensure workplace safety and strive to provide a clean and hygienic working environment. Employees shall not be exposed to hazardous machinery, equipment, or substances without proper safety measures. The Company shall provide job-appropriate personal protective equipment (PPE) and conduct relevant training and guidance.

鼓励性建议：

Encouraged Recommendations:

公司宜考虑到女性员工、怀孕员工、青年工人（合法的工种范围）等不同员工的需求，保证员工的健康与安全。公司宜考虑通过定期培训、张贴宣传画等方式，提升员工的健康与安全意识。公司还宜提高设备和工艺的安全标准，降低风险。

The Company should consider the specific needs of diverse employee groups, including female employees, pregnant workers, and young workers (within legal occupational limits), to safeguard their health and safety. The Company is encouraged to enhance employee health and safety awareness through regular training sessions, safety posters, and other awareness-raising measures. Additionally, the Company should consider upgrading equipment and processes to higher safety standards to mitigate risks.

2. 工伤和疾病

Work-Related Injuries and Illnesses

基础性要求:

Fundamental Requirements:

公司应尊重法律法规的要求，不得在工人在厂内或在工作期间受伤而与其解除劳动合同。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。

The Company shall comply with all applicable laws and regulations, and shall not terminate employment contracts due to workers sustaining injuries within the facility or during work hours. The Company shall establish appropriate procedures and systems to prevent, manage, track, and report work-related injuries and illnesses.

鼓励性建议:

Encouraged Recommendations:

如果涉及到多人伤亡，或者引起社会关注的工伤事件，公司宜在 24 小时内通报给相关政府部门。

In cases of multiple casualties or work-related incidents that attract public attention, the Company should notify relevant government authorities within 24 hours.

3. 机器与设备防护

Machinery and Equipment Safety

基础性要求:

Fundamental Requirements:

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提供物理防护装置、连锁装置及屏障，并正确进行维护。

The Company shall conduct safety hazard assessments for production equipment and other machinery, and shall install and properly maintain physical guards, interlocking devices, and barriers for machinery that may cause injury to employees.

鼓励性建议:

Encouraged Recommendations:

公司宜开展常规性的机器和设备使用培训。在必要的情况下，宜安装机器、设备的监控装置，实时了解运行状况和故障风险。

The Company should provide regular training on the proper use of machinery and equipment. Where necessary, monitoring devices should be installed to track operational status and potential malfunction risks in real time.

4. 小规模采矿与手采矿

Small-Scale and Artisanal Mining

基础性要求:

Fundamental Requirements:

如适用本条款，公司应采取积极措施，充分发挥自身影响力，单独或参与行业项目以致力于持续改善小规模采矿和手采矿的开采条件，为员工提供必要的健康和安全防护设备。

Where applicable, the Company shall take proactive measures to leverage its influence, either independently or through industry initiatives, to continuously improve working conditions in small-scale and artisanal mining operations, while providing necessary health and safety protective equipment for workers.

鼓励性建议：

Encouraged Recommendations:

公司宜致力于改善小规模采矿和手采矿作业方式，逐步升级开采装备和工艺，尽量减少员工对危险采掘机械、危险化学物质的直接接触。

The Company should commit to enhancing small-scale and artisanal mining practices by progressively upgrading extraction equipment and technologies, thereby minimizing workers' direct exposure to hazardous mining machinery and dangerous chemical substances.

5. 生活条件

Living Conditions

基础性要求：

Fundamental Requirements:

公司应努力为员工提供干净的卫生间设施、饮用水以及清洁食物。公司或劳工代理机构提供的员工宿舍应保持人身安全。

The Company shall provide employees with clean sanitation facilities, potable water, and hygienic food. Employee dormitories provided by the Company or labor agencies shall maintain personal safety standards.

鼓励性建议：

Encouraged Recommendations:

公司宜了解员工个人生活、健康营养的情况，逐步满足员工对生活空间和营养的需求。

The Company should assess employees' personal living conditions and nutritional health status, and progressively address their needs for adequate living space and proper nutrition.

6. 危机处理与响应

Crisis Management and Response

基础性要求：

Fundamental Requirements:

公司应识别项目可能发生的危机情况，并制定危机响应机制和计划，以减少对社会和环境的消极影响。

The Company shall identify potential crisis scenarios related to its operations and establish crisis response mechanisms and plans to mitigate negative social and environmental impacts.

鼓励性建议：

Encouraged Recommendations:

公司宜对事故开展根源分析，建立事故档案保留制度。鼓励公司对佳纳能源公开事故报告和事故根源分析结果。

The Company should conduct root cause analyses for incidents and maintain a systematic incident documentation archive. Jiana Energy encourages companies to disclose incident reports and root cause analysis findings to the organization.

第三篇：社区权益

Part III: Community Rights

1. 移民和原住民

Resettlement and Indigenous Peoples

基础性要求：

Fundamental Requirements:

如适用本条款，公司应按照法律法规的要求，拥有项目建设或扩增的法律文件和许可。在扩增或新项目活动中应努力做到避免或最小化非自愿移民。如果涉及到原住民权益，企业应充分尊重原住民的自由、事先和知情同意权。

Where applicable, the Company shall obtain all legally required documents and permits for project construction or expansion. The Company shall make every effort to avoid or minimize involuntary resettlement during expansion or new project activities. When indigenous rights are involved, the Company shall fully respect the principle of Free, Prior and Informed Consent (FPIC) from affected indigenous communities.

鼓励性建议：

Encouraged Recommendations:

公司宜在项目开展前期、中期和后期了解原住民期待，争取原住民的支持和参与。宜在项目初始阶段便制定生计恢复计划。宜设立合理的申诉机制，并保护申诉者正当权益。

The company should engage with indigenous communities during the pre-project, implementation, and post-project phases to understand their expectations and secure their support and participation, develop livelihood restoration plans at the initial project stage, and establish fair grievance mechanisms that protect complainants' legitimate rights.

2. 社区健康与安全

Community Health and Safety

基础性要求：

Fundamental Requirements:

如适用本条款，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。

Where applicable, the Company shall conduct comprehensive assessments of health and safety risks to communities arising from site selection, mining operations, and transportation activities. The Company shall safeguard communities' right to information and implement measures to mitigate identified risks.

鼓励性建议：

Encouraged Recommendations:

社区宜实时公开水、大气以及固体废弃物的影响数据。宜开通沟通渠道，了解社区和民众的情绪和意见，提升与当地社区的信任程度。

The community should disclose real-time impact data on water, air, and solid waste, establish open communication channels to understand community sentiments and opinions, and enhance trust-building with local communities.

第四篇：生态与环境保护

Part IV: Ecology and Environmental Protection

1. 有毒害物质

Hazardous Substances

基础性要求：

Fundamental Requirements:

公司应识别和控制释放到环境中会造成危险的化学物质及其他材料，确保这些物质得到安全处理、运输、存储、使用和处置。

The Company shall identify and control chemicals and other materials that pose environmental hazards, ensuring their safe handling, transportation, storage, use, and disposal.

鼓励性建议：

Encouraged Recommendations:

公司宜采用更加安全、环保的化学品替代传统的有毒害化学品。宜采用更加安全、环保的生产工艺替代传统工艺。宜采用经绿色认证的化学品。

The company should adopt safer and more environmentally friendly chemicals to replace traditional hazardous substances, implement cleaner and more sustainable production processes to substitute conventional methods, and utilize green-certified chemicals.

2. 废水与固体废物

Waste Water and Solid Waste

基础性要求：

Fundamental Requirements:

公司应对所有作业活动产生的废水与非有害固体废物进行有效管控。严禁将未经识别与处理的废水及废弃物直接排放或随意处置。

The company shall effectively manage the wastewater and non-hazardous solid waste generated by all operational activities. Direct discharge or arbitrary disposal of uncharacterized and untreated wastewater or waste is strictly prohibited.

鼓励性建议：

Encouraged Recommendations:

公司应建立并执行系统化的固体废弃物（非有害物质），涵盖从源头识别、过程管理、减量控制到最终负责任处置或回收的全过程。对于作业活动、工业流程及卫生设施产生的各类废水，应在排放或处置前，按要求进行性质识别、监测、管控与处理，并积极推进节水与废水减量措施。公司应对其废水处理系统的运行效能实施定期监测与评估。

The company should establish and implement a systematic management system for solid waste (non-hazardous materials), covering the entire process from source identification, process

management, reduction control, to final responsible disposal or recycling. For all types of wastewater generated by operational activities, industrial processes, and sanitation facilities, it is essential to conduct identification, monitoring, control, and treatment in accordance with requirements before discharge or disposal, while actively promoting water conservation and wastewater reduction measures. The company should regularly monitor and evaluate the operational performance of its wastewater treatment system.

3. 废气排放

Exhaust Emission

基础性要求:

Fundamental Requirements:

公司应确保所有废气排放符合国家及地方的法定限值和排放标准。同时，应获得排放许可，建立并维护废气处理设施，确保其持续有效运行，并对排放物进行必要的监测与记录。

The company shall ensure that all exhaust emissions comply with national and local statutory limits and emission standards. It should also obtain the necessary emission permits, establish and maintain exhaust gas treatment facilities to ensure their continuous and effective operation, and conduct required monitoring and documentation of emissions.

鼓励性建议:

Encouraged Recommendations:

公司可在满足基础排放要求的前提下，建立系统的废气排放管理体系，引入更高效的治理技术或清洁工艺，逐步削减排放总量。

Beyond meeting the basic emission requirements, the company is encouraged to establish a systematic exhaust emission management system, adopt more efficient treatment technologies or cleaner production processes, and progressively reduce total emission volumes.

4. 噪声和震动

Noise and Vibration

基础性要求:

Fundamental Requirements:

公司应确保所有作业活动产生的噪声与震动符合国家及地方的法定限值和标准，并建立必要的监测与控制措施。同时，应对可能受影响的周边社区或环境进行合理评估，并采取有效措施减少不良影响。

The company shall ensure that all noise and vibrations generated by operational activities comply with national and local statutory limits and standards, and implement necessary monitoring and control measures. Additionally, it shall conduct reasonable assessments of potentially affected surrounding communities or environments and take effective measures to mitigate adverse impacts.

鼓励性建议:

Encouraged Recommendations:

公司宜建立系统的噪声与振动管理体系，并优先采用低噪低振动的设备与工艺。鼓励定期向周边社区沟通监测信息，开展前瞻性影响评估与优化；若收到合理投诉，应与利益相关方及专家协商制定缓解方案。

The company should establish a systematic noise and vibration management system and prioritize the use of low-noise and low-vibration equipment and processes. It is encouraged to regularly communicate monitoring information to the surrounding community and conduct proactive impact assessments and optimizations. If justified complaints are received, the company should collaborate with stakeholders and experts to develop mitigation plans.

5. 生物多样性

Biodiversity

基础性要求:

Fundamental Requirements:

公司应识别并评估自身运营对生物多样性（尤其是邻近保护区或生态敏感区时）的潜在影响，且须采取措施避免或减少对受保护物种及生态功能的损害。

The company shall identify and assess the potential impacts of its operations on biodiversity, particularly when adjacent to protected areas or ecologically sensitive zones, and must take measures to avoid or reduce harm to protected species and ecological functions.

鼓励性建议：

Encouraged Recommendations:

公司宜主动制定并实施生物多样性保护战略，如投资本地生态修复项目，以及与科研机构或社区合作开展生物多样性监测与教育。同时，鼓励将生物多样性指标纳入供应链管理体系。

The company should proactively formulate and implement biodiversity protection strategies, such as investing in local ecological restoration projects and collaborating with research institutions or communities to conduct biodiversity monitoring and education. Additionally, it is encouraged to integrate biodiversity indicators into the supply chain management system.

6. 节约资源、能源利用与循环经济

Resource Conservation, Energy Utilization and Circular Economy

基础性要求：

Fundamental Requirements:

公司应尊重法律法规的要求，爱护环境、节约资源和能源。公司应在源头上或通过实践减少和消除不必要的资源耗费，提高资源利用率。公司应在生产活动中优先通过废物预防、减量、再利用和回收等方式，减少资源消耗与废物产生。

The company shall respect the requirements of laws and regulations, protect the environment, and conserve resources and energy. It shall reduce or eliminate unnecessary resource consumption at the source or through practical measures, and improve resource

utilization efficiency. In its production activities, the company shall prioritize reducing resource consumption and waste generation through waste prevention, minimization, reuse, and recycling.

鼓励性建议：

Encouraged Recommendations:

公司宜制定节能减排计划，改善能源管理效率。宜使用可再生能源。宜核算碳排放总量，编制环境信息报告。宜了解和采用国际普遍认可的能源和资源管理倡议、标准及工具。同时，鼓励公司遵循循环经济原则，了解和采用国际普遍认可的能源与资源管理倡议、标准及工具，从产品设计到资源回收构建闭环体系。

The company should formulate energy conservation and emission reduction plans to improve energy management efficiency. It is advisable to utilize renewable energy, calculate total carbon emissions, and compile environmental information reports. The company should also understand and adopt internationally recognized energy and resource management initiatives, standards, and tools. Additionally, it is encouraged to adhere to the principles of the circular economy, understand and adopt internationally recognized energy and resource management initiatives, standards, and tools, and establish a closed-loop system from product design to resource recovery.

第五篇：道德规范

Part V: Ethical Standards

1. 负责任采购

Responsible Sourcing

基础性要求：

Fundamental Requirements:

公司应识别自身对原料和/或中间品的采购，对社会和环境产生的影响，尤其重点关注来自受冲突影响和高风险区域的原料的人权风险，采取有效措施降低供应链的负面影响。

The Company shall assess the social and environmental impacts of its procurement of raw materials and/or intermediate products, with particular focus on human rights risks associated with materials from conflict-affected and high-risk areas and implement effective measures to mitigate negative supply chain impacts.

鼓励性建议：

Encouraged Recommendations:

公司宜识别原料来源地在国家层面的系统风险，了解国家发展水平和治理能力对于上述风险的影响。公司宜了解大矿山、中小矿山和手采矿不同作业方式所导致的童工、职业健康与安全等风险。公司宜定期回顾自身采购实践和供应商绩效。

The Company should evaluate country-level systemic risks in sourcing regions, understanding how national development levels and governance capacity influence such risks, assess differentiated risks (e.g., child labor, occupational health and safety) across large-scale mines, medium/small mines, and artisanal mining operations, and conduct regular reviews of its procurement practices and supplier performance.

2. 公平运营与商业诚信

Fair Operations & Business Integrity

基础性要求：

Fundamental Requirements:

如适用本条款，公司应采取积极措施，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，防止任何形式的贿赂、腐败、敲诈勒索和挪用公款行为。所有业务交易均应在业务账目和记录中准确反映。

Where applicable, the Company shall proactively prevent all forms of bribery, corruption, extortion, and embezzlement at mine access points, transportation routes, mineral trading locations, and all other operational nodes, ensuring all business transactions are accurately recorded in accounting books and records.

鼓励性建议：

Encouraged Recommendations:

公司宜与当地社会组织、已有监督机制开展合作，采用人员监督、拍照或摄像等方式，减少贿赂、腐败等可能性。

The Company should collaborate with local civil society organizations and existing monitoring mechanisms, employing personnel supervision, photo/video documentation and other methods to reduce opportunities for bribery and corrupt practices.

第六篇：管理实施机制

Article VI: Management Implementation Mechanisms

1. 承诺与声明

Commitment & Declaration

基础性要求：

Fundamental Requirements:

公司应公开声明支持本守则，承诺遵守本守则的规定。

The Company shall publicly declare its endorsement of this Code and commit to complying with its provisions.

鼓励性建议：

Encouraged Recommendations:

公司宜公开达到以上要求所开展的行动，并宜鼓励供应商支持本守则。

The Company should disclose actions taken to meet these requirements and encourage suppliers to support this Code.

2. 管理体系

Management System

基础性要求：

Fundamental Requirements:

公司应了解恰当的管理体系对于开展负责任的采购实践的重要意义，采取积极措施，将资源的尽责管理体现在公司运营管理中。

The Company shall recognize the importance of appropriate management systems for implementing responsible sourcing practices and take proactive measures to integrate due diligence of resources into its operational management.

鼓励性建议：

Encouraged Recommendations:

公司宜建立供应链尽责管理体系，定期自我评估管理体系的有效性。宜建立供应链追溯系统和尽责管理信息系统。

The Company should establish a supply chain due diligence management system, conduct regular self-assessments of its effectiveness, and implement supply chain traceability systems and due diligence information systems.

3. 风险识别、防范与减缓

Risk Identification, Prevention & Mitigation

基础性要求：

Fundamental Requirements:

公司应与努力识别、防范和减缓劳工与人权、健康与安全等风险。

The Company shall endeavor to identify, prevent, and mitigate risks related to labor, human rights, health, and safety.

鼓励性建议：

Encouraged Recommendations:

公司宜与社会组织、当地政府、工会和劳工组织、行业专家交流，系统识别并评估风险，将风险进行分类、分级，制定风险减缓时间规划。公司宜建立风险预警系统。公司宜定期回顾风险识别程序及防范和减缓措施。

The Company should engage with civil society organizations, local governments, trade unions, labor organizations, and industry experts to systematically identify and assess risks, categorize and prioritize them, and develop risk mitigation timelines. It should establish a risk early-warning system and regularly review risk identification procedures along with prevention and mitigation measures.

4. 评估与审计

Evaluation & Audit

基础性要求：

Fundamental Requirements:

公司应加强对供应链风险的自我评估和管理评审能力。

The Company shall strengthen its capacity for self-assessment and management reviews of supply chain risks.

鼓励性建议：

Encouraged Recommendations:

公司宜公开自我评估结果、第三方审计结果和纠正措施。积极参与行业行动计划。

The Company should disclose self-assessment results, third-party audit findings, and corrective actions, and actively participate in industry action plans.

5. 信息传递与沟通

Information Disclosure & Communication

基础性要求：

Fundamental Requirements:

公司应清晰并准确向员工、供应商、客户等传递企业政策和合规绩效信息，提高透明度。

The Company shall clearly and accurately communicate corporate policies and compliance performance to employees, suppliers, customers, and other stakeholders to enhance transparency.

鼓励性建议：

Encouraged Recommendations:

公司宜编制供应链尽责管理进展报告或社会责任报告，定期披露改进绩效。并在适当的情况下，考虑向社会公开相关信息。

The Company should prepare supply chain due diligence progress reports or social responsibility reports, regularly disclose improvement performance, and consider making relevant information publicly available when appropriate.