

# Zijin Mining Group Co., Ltd.\*

## Corporate Code of Conduct (for Trial Implementation)

### 1. GENERAL PROVISIONS

#### 1.1 Purpose

At Zijin Mining Group Co., Ltd. (“Zijin Mining”, the “Group”, or “we”), we are committed to conducting our business in a fair and ethical manner in order to promote a corporate culture that is socially and environmentally responsible.

The Corporate Code of Conduct (the “Code”) is designed to clearly state the way we conduct ourselves in business with our internal and external stakeholders. It does not cover every issue that may arise, but sets out basic principles how we work and clarifies our core values to choose business partners.

#### 1.2 Basis

The Code is set in line with international standards such as *Ten Principles of the United Nations Global Compact*, *Guiding Principles for Business and Human Rights*, *United Nations Convention Against Corruption*, and *Responsible Gold Mining Principles*.

#### 1.3 General principles

The Code acts as guidance for everyone who works for or with the Group, its directly affiliated entities, and its wholly-owned and controlling affiliated companies, and serves as an important criterion for project investment and supplier selection. We expect our partners to abide by the Code. Any violation of the Code may damage their business relationship with Zijin Mining, or even lead to the termination of cooperation.

### 2. GOVERNANCE

#### 2.1 The compliance with the laws, rules and regulations

We base our actions on the compliance with the laws, rules and regulations. The Code is based on the cardinal idea of legal compliance, both in letter and in spirit. All individuals must respect and obey the laws of the various jurisdictions in which we operate and avoid even the appearance of impropriety.

#### 2.2 The expectations of stakeholders

We respect opinions and expectations of stakeholders. We will actively communicate with stakeholders to better understand and integrate their concerns into our operations.

We will establish a fair, convenient, and efficient complaint and grievance mechanism that enables tracking, management, escalation (if required) and closure of complaints and grievances to solve the problems raised by stakeholders. Meanwhile, we will ensure that stakeholders are informed and

trained on how to utilize the complaint and grievance mechanisms.

### **2.3 Free and fair competition**

We promote free and fair competition. We promote freedom and fairness in business competition and comply with local and international antitrust and anti-competition laws and regulations. We strive to outperform our competitors fairly and honestly through superior performance instead of unethical or illegal business practices

We endeavor to offer high-quality, safe and responsible products and services to our clients. We ensure the authenticity and reliability of transaction data, and reject commercial fraud.

We will not obtain information about competitors or partners by illegal means, or spread false information about competitors. Our employees must not disclose any confidential information about Zijin Mining to current or potential business competitors.

### **2.4 Business ethics and anti-corruption**

We are committed to zero tolerance to bribery, extortion and corruption. We prohibit offering, promising, authorizing, soliciting or accepting monetary or other benefits (directly or indirectly) to individuals or organizations to obtain business advantages. Meanwhile, we prohibit accepting or soliciting any forms of illegitimate benefits. We will launch severe punishments for these illegitimate behaviors.

Employees are not permitted to engage in activities involving kickbacks, facilitation payments, money laundering, secret commission, or the giving or receiving of gifts, hospitality or sponsored travel in circumstances which could violate laws or give rise to undue influence.

### **2.5 The conflicts of interests**

We will avoid the conflicts of interests between the Group and employees. Employees should report all actual, perceived or potential conflicts of interest following the prescribed procedures and apply for avoidance actively, so that these conflicts can be effectively managed through the mechanism of specific relationship management.

### **2.6 Insider trading**

We prohibit insider trading. We prohibit trading in shares or securities based on inside information with significant influence, or supplying that information to others.

We will strictly manage the confidential information of Zijin Mining or other companies related to Zijin Mining. Anyone has confidential information about Zijin Mining or other companies related to Zijin Mining must keep such information confidential and must not use this information for an individual's financial or other personal benefit before it is made public.

### **2.7 The property rights**

We respect the property rights of all parties. We strive to protect our properties from infringements,

meanwhile we will not infringe upon the property of others.

Properties include physical assets and proprietary information. Proprietary information includes trade secrets, patents, trademarks, copyrights, or scientific or technical engineering data, databases, company guides, manuals, client information, salary information and any unpublished financial data and reports.

## **2.8 Whistleblower protection**

We support and protect those who speak-up. No one will be retaliated against in any way for asking questions or voicing concerns about our legal or ethical obligations when acting in good faith. We strive to protect those who speak-up by establishing channels of whistleblowing and anonymous complaints, and establishing whistleblower protection mechanism in avoidance of retaliations.

# **3. SOCIETY**

## **3.1 Occupational health and safety**

We put safety in the first place of our operations. We regard occupational health and safety as the most fundamental human rights and core work of the Group. Adhering to the principle of "Life First", we take "Zero Mortality" as our goal. Every employee has the responsibility to ensure safe work, strictly follow safety instructions and care about the health and safety of others.

We will ensure that our employees work in good physical condition. We are firmly against drugs. No one is allowed to work under the influence of alcohol and employees must work in good physical and mental health after adequate rest.

All employees are responsible for preventing and reporting unsafe behavior to reduce harm and promote a safe workplace if they find that other colleagues' behavior may endanger their own or others' health and safety.

## **3.2 Working conditions**

We strive to create a healthy work environment. We strive to protect employees' physical and mental health. We are committed to eliminate occupational health risks in the workplace and promoting a healthy balance between work and life.

## **3.3 Human rights protection**

We respect all stakeholders' human rights. We do not participate in, tolerate, or profit from any violations of human rights and refuse to cooperate with any parties violate human rights.

We prohibit the use of child labor and any form of forced or compulsory labor and devote to protect the fundamental rights of employees. Meanwhile we will ensure that contractors and suppliers comply with these requirements.

We do not tolerate any behavior that can be perceived as bullying, intimidation, harassment, or discrimination in workplace.

We respect the right to freedom of association and collective bargaining of all employees, as well as the freedom of opinion and expression. We strive to protect labors' rights and interests by offering fair pays, reasonable working schedule and safe working conditions under appropriate policies and regulations.

### **3.4 Labor rights**

We make hiring and promotion decisions fairly. We strive to create a workplace where all employees treat each other with professional courtesy, dignity and respect and in a fair and non-discriminatory manner in all employment or company related dealings.

We do not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability and etc. We do not ask employees or applicants to take medical test of a discriminatory nature.

### **3.5 Indigenous People's rights protection**

We respect Indigenous People's rights. We respect the cultural values, traditions and beliefs of local communities in our operation sites. Our aim is to have an open and honest long-term partnership with those communities that will be mutually beneficial during Zijin Mining's presence and beyond.

We will consult regularly and in good faith with the communities associated with our operations on matters of interest to them, and will take account of their perspectives and concerns through a negotiation mechanism.

We will respect the collective and customary rights, culture and connection to the land of Indigenous Peoples. We will work to obtain their free, prior and informed consent where significant adverse impacts may occur during exploration, project design, operation and closure, including around the delivery of sustainable benefits. We will ensure that we engage with communities in a culturally appropriate manner, and will not engage in commercial practices that do not respect or even harm Indigenous Peoples' culture and heritage.

We will seek to preserve cultural heritage from adverse impacts associated with project activities, including through our impact assessments.

### **3.6 Human rights protection in high-risk areas.**

We oppose violations of indigenous people's human rights by forces in conflict and work to mitigate local human rights risks. We will ensure that when we operate in conflict-affected or high-risk areas our operations do not cause, support or benefit unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law.

We follow the United Nations *Basic Principles on the Use of Force and Firearms* and the *Voluntary*

*Principles on Security and Human Rights.* We affirm that the role of public or private security forces is to provide preventive and defensive security to workers, facilities, equipment and property within legitimate areas in accordance with the rule of law, including laws that guarantee human rights. We will not employ or cooperate with security forces that commit abuses and serious human rights violations.

### **3.7 Community engagement**

We sincerely communicate with local communities. We will establish an efficient community negotiation mechanism with an attitude of honest cooperation and common development. We will ensure that we communicate with communities about their concerns, strive to listen to the voices of all parties, and integrate the communities' requirements into our business operations to reduce the negative impacts on the community.

### **3.8 Community development**

We contribute to the socio-economic advancement of communities associated with our operations. We are committed to maintaining good relationships with the communities in which we operate, prioritizing employment opportunities for community residents, providing partnership opportunities for local businesses, reducing community conflicts, and working to help the sustainable development of communities.

### **3.9 Paying taxes according to law**

We will comply with our obligation to pay the statutory taxes and fees to the host country. We will pay the taxes and royalties required by host country codes. We will seek to ensure that transfer pricing outcomes are in line with fair business practices and value creation.

### **3.10 Responsible political participation**

We follow the principle of responsible political participation. Our employees shall abide by the laws and regulations of the country (region) where they are engaged in political activities, and shall not damage the interests of the Group.

### **3.11. Responsible procurement**

We require that our suppliers and contractors conduct their business responsibly and ethically. We will ensure that our suppliers contractors follow the same policies and principles as Zijin Mining's in business ethics, safety, health, environmental protection, human rights, and etc.

## **4. ENVIRONMENT**

### **4.1 Ecological environment protection**

We will strive to reduce the impact of our operations on the ecological environment. We will

responsibly utilize mineral, energy and water resources by practices such as improving management, modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

We are committed to achieving excellence and improving environmental performance in all our business activities in the whole life cycle of mines from project design to mine closure. This includes identifying opportunities for minimizing waste, contributing to the conservation of biodiversity and applying sound practice to land use planning and rehabilitation, therefore reducing land disturbances and harmful impact on ecological system.

## **4.2 Climate change**

We actively engage in climate change mitigations. We support global climate change agreements and goals, improving mines' and their surrounding communities' resilience against climate change through management of energy consumption and carbon emissions.

We will adopt production processes, raw materials and energy which have minimal environmental impacts. We actively explore energy saving and emission reduction pathway, technologies and methods to coordinate upstream and downstream of the supply chain to achieve reduction goals.

## **5. SUPPLEMENTARY PROVISIONS**

### **5.1 Examination and approval authorities**

The Code shall be deliberated and approved by the Board meeting of the Group and implemented as of the date of promulgation.

### **5.2 Languages**

The Code is written in Chinese and English. In case of any discrepancy between the two languages, the Chinese version shall prevail.

### **5.3 Interpretation**

The Corporate Social Responsibility Department of the Group is responsible for the interpretation of the Code.

*\*The Company's English name is for identification purpose only*