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紫金矿业集团股份有限公司企业标准

Zijin Mining Group Co., Ltd. Corporate Standard

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人权政策

Human Rights Policy

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HUMAN RIGHTS POLICY

1. INTRODUCTION

Zijin Mining Group Co., Ltd. (hereinafter referred to as "Zijin Mining", "we" or the "Company") is firmly committed to respecting and protecting human rights, and advocates a working environment characterized by freedom, equality, safety and dignity. This Policy is designed to clarify the Company's core positions and firm commitments on human rights protection, and provide unified guidance and norms for its global business operations, supply chain management and community collaboration. The Company prohibits all forms of human trafficking, forced labor or modern slavery, strictly prohibits the use of child labor, and opposes any form of discrimination and harassment. It respects and safeguards employees' legitimate rights and interests in the human rights areas such as working conditions (including reasonable working hours, fair remuneration and benefits, occupational health and safety, training and development, etc.), freedom of association and the right to collective bargaining. The Company strives to create a fair and impartial human rights protection environment for the stakeholders including employees, communities and suppliers, and fully integrates the principles of human rights protection into all aspects of corporate governance, operation and management, as well as the entire value chain.

2. SCOPE

This Policy applies to all business operations and activities of the Company, its directly affiliated units, and wholly-owned or controlled subsidiaries, covering business entities, management, employees, suppliers, contractors, and other relevant parties throughout the entire project lifecycle, including exploration, development, operation, mine closure, and post-closure management. The Policy is applicable simultaneously to the Company's global business activities such as investments, mergers and acquisitions, and due diligence processes, and shall serve as a key criterion for supplier selection. Zijin Mining will promote compliance with this Policy among value chain partners (including suppliers, contractors, etc.). Any violation of this Policy may jeopardize the violator's business relationship with Zijin Mining and could even result in the termination of such cooperation.

3. REFERENCES

- a) United Nations Sustainable Development Goals (SDGs)
- b) Ten Principles of the United Nations Global Compact
- c) United Nations Guiding Principles on Business and Human Rights (UNGPs)
- d) Universal Declaration of Human Rights (UDHR)
- e) United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
- f) International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability
- g) Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- h) International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and related conventions
- i) Voluntary Principles on Security and Human Rights (VPSHR)
- j) World Gold Council (WGC) Responsible Gold Mining Principles (RGMPs)

4. MANAGEMENT APPROACH

Zijin Mining adheres to the *United Nations Guiding Principles on Business and Human Rights (UNGPs)*, core international human rights conventions, as well as international initiatives and standards including the *Voluntary Principles on Security and Human Rights (VPSHR)* and the *OECD Guidelines for Multinational Enterprises*. We ensure respect for human rights, conflict prevention, and the promotion of responsible supply chain management in our global operations.

The Company's Board of Directors has established a Strategic and Sustainable Development (ESG) Committee, which oversees the overall coordination of human rights protection, risk management, and related work. The Company's *Corporate Code of Conduct* details the codes and fundamental principles we follow in business interactions with various stakeholders, and clearly defines respect and protection of human rights as a key component of corporate governance. The Company has established and continuously improved internal audit and oversight mechanisms related to human rights, conducts regular assessments to enhance human rights performance, and ensures the continuous optimization and improvement of human rights management capabilities.

To ensure the effective implementation of this policy, balance the interests of all parties, and achieve continuous optimization, we are committed to building a systematic stakeholder engagement mechanism. Based on the stakeholder mapping and analysis, this mechanism systematically identifies and assesses the degree of impact and influence weight of each party in human rights issues, and further formulates targeted communication and consultation strategies. We will focus on the demands of marginalized and vulnerable groups, conduct substantive communication throughout the policy formulation, implementation, and evaluation processes, and effectively integrate their feedback into the decision-making process to enhance the inclusiveness and effectiveness of the policy.

4.1 Risk Assessment

Zijin Mining regards Human Rights Due Diligence (HRDD) as the core management tool for fulfilling human rights protection requirements. It identifies, assesses, addresses and monitors potential and actual human rights impacts arising from its operations and supply chains, thus forming a closed-loop management system for continuous improvement. In accordance with the *UN Guiding Principles on Business and Human Rights (UNGPs)*, the Company establishes a human rights risk assessment system covering all business scenarios. It conducts regular reviews of all its business units to identify key risk areas including forced labor, child labor, community rights, indigenous peoples' rights, and occupational health and safety, and formulates clearly prioritized management measures accordingly.

4.2 Risk Control

Based on the findings of Human Rights Due Diligence (HRDD), Zijin Mining establishes a hierarchical and categorized risk control mechanism. It incorporates major risks into the corporate and asset-level risk monitoring systems, and implements dynamic tracking and feedback. For high-risk operating units (e.g., those located in conflict-affected areas and regions with active artisanal and small-scale mining), the Company explicitly requires the establishment of standardized human rights risk management processes, which are integrated into the overall corporate risk management framework. In the supply chain segment, the Company conducts human rights risk screening based on factors such as region and product type, implements supplier access reviews and ongoing supervision, and takes remedial actions such as terminating cooperation with suppliers identified with major risks.

To enhance the effectiveness of risk control, Zijin Mining emphasizes the transparency and communication of human rights performance. It regularly discloses management progress and conducts early and substantive engagement with potentially affected groups (including local communities, indigenous peoples and employees) to mitigate power imbalances and build long-term relationships based on mutual trust. The Company actively collaborates with industry organizations, civil society and government agencies to jointly promote the development and implementation of responsible business conduct standards, and continuously improves its human rights risk management system.

4.3 Grievance and Remedy Mechanism

Zijin Mining regards the grievance and remedy mechanism as a key management tool for identifying, preventing, and rectifying human rights risks and non-compliant practices. In strict adherence to international standards such as the *United Nations Guiding Principles on Business and Human Rights (UNGPs)*, the Company has established and continuously improved the grievance mechanism, conducting regular assessments of its operational effectiveness. In terms of mechanism design, the Company upholds the principles of legality, accessibility, fairness, and transparency, and establishes diverse, multilingual grievance channels. This ensures that internal and external stakeholders worldwide—including employees, community members, and suppliers—can easily submit grievances or reports. To guarantee the effective implementation of the mechanism, Zijin Mining assigns a professional team responsible for community relationship management and stakeholder communication, ensuring timely responses to all grievances. The Company commits to strictly protecting the confidentiality of report information and the identity of reporters, and explicitly prohibits any form of retaliation. Where verified non-compliant practices are confirmed, the Company will take corrective actions and disciplinary measures in accordance with laws and regulations, and initiate rectification plans as appropriate. The internal grievance mechanism does not prejudice the right of employees and relevant parties to safeguard their legitimate interests through judicial, administrative, or other statutory channels.

The Company is always committed to preventing and mitigating adverse impacts that operational activities may have on employees, communities, and other stakeholders. To this end, Zijin Mining has formulated comprehensive remediation measures, such as the immediate cessation of improper conduct, restoration of damaged property or the environment, and provision of financial compensation or rehabilitation support (including psychological counseling, vocational training, or resettlement services). Meanwhile, the Company draws lessons from each grievance to continuously optimize policies and processes, ensuring the transparency and impartiality of the remediation process.

The Company respects and protects the legitimate rights and interests of human rights defenders, strictly prohibits any threats, suppression, or retaliation against them, and provides equally accessible grievance and remedy support for the legitimate claims of human rights defenders.

5. HUMAN RIGHTS RELATED AREAS MANAGEMENT

5.1 Prohibition of Child Labor

We firmly prohibit the use of child labor and require all operating units to strictly comply with the minimum working age requirements stipulated in the laws and regulations of respective countries and international labor conventions. The Company has established a comprehensive recruitment screening mechanism to prevent the accidental hiring of child labor, and mandates that contractors, suppliers, and third-party recruitment agencies also prohibit child labor. We encourage employees, community members, and relevant parties to actively report child labor incidents.

In the event that child labor is identified, Zijin Mining will immediately cease the child's work, transfer them to a safe and appropriate environment, and arrange for health checks as soon as possible. Based on the actual circumstances of the child, the Company will calculate and pay the due remuneration, and provide appropriate financial compensation to cover potential physical and psychological harm. Meanwhile, the Company will ensure the affected child safely returns to their place of residence and provide educational support for children who have not completed compulsory education.

For internal personnel directly responsible for the accidental hiring of child labor, Zijin Mining will take serious disciplinary action in accordance with the Company's rules and regulations, including warnings, demotions, or even termination of employment. If a contractor violates this prohibition, the Company will order an immediate cessation of the infringing act, take necessary remedial measures in accordance with relevant procedures, and decide whether to terminate the cooperative relationship based on the severity of the violation.

5.2 Prohibition of Forced Labor

Zijin Mining firmly opposes all forms of forced labor in all business activities. This stance applies to our holding companies, joint ventures, associated companies, suppliers, contractors, and partners. We reject any practices of forced labor, labor trafficking, and modern slavery, including the refusal to accept or use bonded labor, indentured labor, enslavement, or human trafficking. The Company explicitly prohibits requiring job applicants to pay recruitment fees for employment, and strictly forbids recruiting or engaging individuals through violence, threats, fraud, detention of identity documents, collection of deposits or guarantees, or other such means. The Company explicitly prohibits imposing unreasonable restrictions on employees' freedom of movement within the workplace or their right to leave the Company.

Our recruitment activities strictly adhere to the principles of freedom and informed consent, ensuring that all employees sign labor contracts voluntarily and have the right to terminate the contractual relationship after the statutory notice period. In the event that forced labor is identified, Zijin Mining will take immediate action, including terminating the forced practice, notifying the responsible persons of relevant units, and formulating and implementing preventive and corrective measures. We will arrange health checks for affected employees, bear all related costs, and pay remuneration and provide necessary compensation in accordance with laws and company regulations. Additionally, we reserve the right to terminate cooperation with any supplier, contractor, or partner involved in forced labor to ensure that our business activities are fully compliant with ethical and legal standards.

5.3 Ensure Occupational Health and Safety

Zijin Mining aims to achieve the goal of "zero fatalities and zero occupational diseases" for employees and contractors. We continuously improve our safety management system, effectively control occupational health and safety risks associated with production and business operations, and steadily enhance our occupational health and safety performance to safeguard the health and well-being of employees, contractors, and communities where our projects operate. For further details on occupational health and safety protection, please refer to Zijin Mining's *Health, Safety and Security Policy*.

5.4 Freedom of Association and Collective Negotiations

We firmly safeguard employees' freedom of association and explicitly commit not to interfere with or restrict employees' right to voluntarily form or join trade unions in accordance with the law. We will not take any retaliatory actions such as dismissal or salary reduction against employees for their participation in trade union activities. We also respect employees' willingness to voluntarily withdraw from trade unions, ensuring that the entire process of association is based on employees' true intentions. We attach great importance to employees' democratic rights: trade unions represent employees to negotiate and sign the Collective Labor Contract and Collective Wage Agreement with the Company, effectively protecting employees' legitimate rights and interests in areas such as employment, wages and benefits, rest and leave, occupational health and safety, and social insurance.

The Company is committed to conducting sincere consultations with worker representatives, extensively soliciting opinions, and optimizing plans. In the event of major operational changes or other matters that may have adverse impacts on employees, the Company will notify employees in advance and minimize negative impacts to the greatest extent possible on the premise of compliance with laws and regulations. For further details on employee rights and interests, please refer to Zijin Mining's *Employment and Labor Policy*.

5.5 Non-Discrimination, Anti-Harassment and Anti-Bullying

Zijin Mining maintains a "zero-tolerance" stance towards inappropriate behaviors in the workplace, including discrimination, bullying, intimidation, and harassment. We firmly safeguard the equal rights, interests, and dignity of all employees. The Company is committed to treating every employee fairly, regardless of nationality, race, ethnicity, gender, marital status, pregnancy, disability, religious belief, cultural background, or other legally protected characteristics unrelated to job performance. We strive to build an inclusive, diverse, and mutually respectful workplace environment.

To strengthen risk prevention, the Company popularizes knowledge on anti-discrimination and

anti-harassment through systematic education and training, fosters a company-wide consensus on "zero tolerance for workplace sexual harassment," and establishes and improves a prevention and joint disposal mechanism for inappropriate workplace behaviors to mitigate relevant risks at the source. Meanwhile, the Company ensures unobstructed complaint and reporting channels, encouraging employees to report violations either under their real names or anonymously. For verified inappropriate behaviors, disciplinary actions—ranging from warnings to termination of employment—will be imposed in accordance with the personnel management regulations of the respective unit, based on the nature and severity of the violation. If the behavior is suspected of violating laws, the victim may claim compensation in accordance with the law, and the Company will fully cooperate in safeguarding their rights. Criminal acts such as physical assault and sexual assault will be directly referred to judicial authorities for handling.

5.6 Protection of Vulnerable Groups

Zijin Mining has always attached great importance to safeguarding the legitimate rights and interests of vulnerable groups in areas where it operates, including women, persons with disabilities, indigenous peoples, ethnic minorities, low-income households, and other disadvantaged community groups. We are committed to creating equal opportunities for their employment, development, and social participation, and minimizing the potential adverse impacts of business operations.

Through diverse methods such as questionnaires, on-site visits, and in-depth interviews, the Company identifies the actual needs of vulnerable groups in areas including employment, livelihoods, education, and healthcare. We continuously optimize the design of internal systems such as recruitment and promotion to ensure that local vulnerable groups have access to a fair and inclusive employment and development environment. For key business processes such as resettlement, land acquisition, and social investment, the Company places special emphasis on strengthening the protection of vulnerable groups' rights and interests. Through mechanisms including meaningful participation, regular communication, reasonable compensation, and accessible remedies, we ensure that vulnerable groups do not bear a disproportionate share of adverse impacts from business operations and effectively safeguard their legitimate rights and interests.

5.7 Respect for Indigenous Peoples' Rights

Zijin Mining places high priority on protecting the legitimate rights of indigenous peoples in its operational areas. Guided by the values of diversity, equality and inclusion, we deeply uphold respect for their human rights and cultural heritage rights, and strive to fully integrate into the development of local communities.

The Company complies with the laws and regulations of host jurisdictions and references international norms such as the *United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)* and the International Finance Corporation (IFC) Performance Standards. Based on the "Free, Prior and Informed Consent (FPIC) principle" and through substantive consultation, we actively engage in equal and inclusive communication and cooperation with indigenous communities. We fully recognize and respect the cultural traditions of indigenous peoples, their profound connection to the land, and their livelihoods dependent on natural resources. Through various practical initiatives, we are committed to building a community of mutual trust, mutual benefit, and collaborative development, ensuring that all cooperation processes are standardized and compliant, and outcomes are fair and impartial.

5.8 Addressing Human Rights Risks in Artisanal and Small-Scale Mining

We have always paid close attention to the issues faced by Artisanal and Small-Scale Mining (ASM), and continuously strived to enhance environmental protection and occupational health and safety management, aiming to minimize impacts on surrounding communities, residents, and employees (including contractors). We recognize that traditional artisanal mining is an important economic pillar for local residents in project areas, yet the sector faces numerous challenges—such as lack of basic health and safety protection, insufficient training, poor ventilation, lack of safety equipment, improper use of chemicals, and outdated facilities. Additionally, the widespread participation of women and children, as well as control by illegal armed groups in some regions, not only threatens worker safety but also fuels serious human rights issues including child labor and forced labor.

We remain vigilant against illegal and human rights-violating acts such as intrusion, theft, and assault. We support and participate in the formalization of artisanal and small-scale mining led by local governments, providing training, technical, and business operation support to improve operating conditions for legally operating groups. Through formalized ASM activities, we aim to safeguard local livelihoods.

We commit to not purchasing or using any mineral products of unknown origin or associated with illegal ASM, child labor, or forced labor. We will strengthen supply chain due diligence to ensure our supply chain has no links to illegal or human rights-violating ASM practices. We proactively cooperate with government agencies, industry associations, and local communities to mitigate potential safety, environmental, and human rights risks posed by ASM, and strive to achieve a balanced win-win outcome between protecting community livelihoods and upholding human rights.

5.9 Justifiable and Legitimate Use of Force

Zijin Mining adheres to the *Voluntary Principles on Security and Human Rights (VPSHR)*, and identifies factors that could lead to human rights violations as a core focus in security risk assessments. The Company consistently prioritizes peaceful approaches, actively de-escalates various conflicts, and ensures the continuous stability of production and business operations while safeguarding the safety of personnel, assets, and information.

The Company commits that the use of force in any circumstance must adhere to the fundamental principles of legality, necessity, proportionality, and respect for human rights. We strictly align with relevant UN guidelines on the use of force and firearms by law enforcement officials, international humanitarian law, and the UN Code of Conduct for Law Enforcement Officials. The Company has established a full-cycle security management system: in the recruitment of security personnel, we conduct comprehensive assessments of their professional experience, technical competence, and emotional management skills, while rigorously verifying for any history of human rights violations; we deliver regular specialized training covering core modules such as human rights protection, conflict de-escalation techniques, appropriate use of force, and approaches to engaging vulnerable groups; we have established a robust supervision and accountability mechanism to regulate the conduct of security personnel throughout all processes, ensuring their adherence to human rights principles, proper use of force, and provision of special protection for vulnerable groups.

In addition, the Company actively collaborates with public security authorities to promote the core value of respect for human rights among managers, employees, human rights defenders, and community members. We firmly oppose abuse of power and inhumane treatment, and fully safeguard the implementation of the non-discrimination principle and the security of personal privacy. Through initiatives such as the regular issuance of security risk alerts, implementation of travel risk management, and utilization of public opinion monitoring and risk intelligence platforms, we provide scientific support for the design of security systems and management decision-making.

5.10 Upholding Human Rights in the Supply Chain

Zijin Mining is committed to building a responsible supply chain that respects human rights. We collaborate exclusively with partners who share the same values, and compliance with the Supplier Code of Conduct serves as a core prerequisite for establishing cooperative relationships.

We explicitly require all business partners to resolutely prohibit serious human rights violations, including forced labor, modern slavery, and human trafficking (such as bonded labor and involuntary prison labor). Partners must strictly adhere to the principle of voluntary employment and safeguard employees' right to terminate labor contracts voluntarily in accordance with statutory notice periods. For mineral mining and processing operations in conflict-affected and high-risk areas, the Company incorporates the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* into relevant supply contracts, ensuring business activities comply with international human rights norms.

Zijin Mining requires its suppliers to prohibit the use of child labor and all forms of forced labor as well as other serious human rights violations, through contractual clauses or the signing of the "Corporate ESG Responsibility Agreement". It also advocates that customers and partners adopt consistent standards. For any relevant party that violates the aforementioned principles, the Company will

demand that it take timely remedial actions; in the event of serious human rights violations, Zijin Mining reserves the right to terminate cooperation so as to ensure the sustainability of the supply chain and the fulfillment of social responsibilities.

To raise human rights awareness across the supply chain, Zijin Mining provides human rights training to relevant parties, and encourages suppliers to ensure that their partners provide a safe and healthy working environment and comply with the labor, environmental and business ethics standards advocated by the Company. For more details on human rights protection in the supply chain, please refer to Zijin Mining's *Responsible Supply Chain Policy*.

5.11 Improving Community Economy and Environment

Zijin Mining is committed to promoting the coordinated development of community economies and the environment. We actively support various initiatives aimed at mitigating the potential negative impacts of mining activities, and fully integrate human rights protection into the entire process of community operations and environmental governance.

The Company focuses on core human rights issues including the health and safety of employees and communities, diversity and inclusion, gender equality, and involuntary resettlement. We have established and improved a community stakeholder engagement mechanism to build mutually trusting, pragmatic, and harmonious coexisting community relationships, proactively preventing, mitigating, and remediating various human rights impacts associated with our operations. For scenarios involving involuntary resettlement, the Company strictly adheres to international standards, systematically manages social and environmental risks, fully safeguards the living conditions and livelihood restoration of affected groups, and strives to achieve steady improvements in their quality of life.

We deeply recognize that ensuring the public's right to a clean, healthy, and sustainable environment is a core human right, which is inseparable from responsible mining practices. Zijin Mining actively participates in climate change response actions, continuously advances efficient resource utilization, pollution prevention and control, and ecological restoration. We always prioritize respect for human rights in development, promote positive environmental and social cycles, and ensure that corporate operations are highly aligned with environmental governance, human rights protection, and sustainable development goals. For more details, please refer to Zijin Mining's *Ecological and Environmental Protection Policy* and *Community Policy*.

6 SUPPLEMENTARY PROVISIONS

6.1 Approval Authority: This policy is approved by the Zijin Mining Board of Directors' Executive and Investment Committee and takes effect from the date of issuance.

6.2 Language: This policy is prepared in both Chinese and English. In case of any discrepancy between the two versions, the Chinese version shall prevail.

6.3 Interpretation: This policy is interpreted by the Zijin Mining ESG Office.