



Q/ZJ

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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负责任供应链政策

Responsible Supply Chain Policy

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Responsible Supply Chain Policy

1. INTRODUCTION

Zijin Mining Group Co., Ltd. (hereinafter referred to as "Zijin Mining", "we" or "the Company") adheres to the vision of "a globally significant producer of green mineral materials, respected and recognized by the international community". We are committed to collaborating with suppliers¹ to jointly promote responsible business practices in line with commercial ethics. This policy sets out clear requirements for responsible supply chain² management, which all suppliers are required to comply with and actively implement.

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. These provisions also apply 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) International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability
- f) 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
- g) International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and related conventions
- h) Voluntary Principles on Security and Human Rights (VPSHR)
- i) Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains
- j) World Gold Council (WGC) Responsible Gold Mining Principles (RGMPs)

¹ The term "suppliers" mentioned in this Policy refers to various enterprises, organizations, and individuals that provide production materials, products, technical services, labor support, or other related services to Zijin Mining and its subsidiaries at all levels.

² The term "supply chain" mentioned in this Policy refers to the system consisting of all activities, organizations, actors, technologies, information, resources, and services involved in the process of minerals from their source to end consumers (with reference to the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*).

4. MANAGEMENT APPROACH

We have established a top-down governance structure for responsible supply chain management. Under the guidance of the Strategic and Sustainable Development (ESG) Committee of the Board of Directors, the governance is led by the Vice President in charge of responsible supply chains, who reports to the ESG Management Committee. At the headquarters level, a dedicated professional team for responsible supply chain management has been formed through the collaboration between the Marketing Department and the ESG Office.

Each business division drives its subsidiaries to fulfill supply chain management responsibilities. Trading enterprises, smelting and processing enterprises, and mining enterprises establish management systems tailored to their respective business characteristics, and cooperate with upstream and downstream partners to jointly strengthen supply chain management.

4.1 Risk Management

Zijin Mining pays attention to risks such as corruption, human rights, conflicts, environment, occupational health and safety, climate change, and product quality in its global supplier network. The Company identifies categories of supply chain risks by recognizing key suppliers (based on the quantity, amount, and type of supplied materials, etc.), and formulates corresponding supply chain management methods accordingly. If a supplier is found to have risks, a risk management plan will be immediately formulated and implemented according to its position in the supply chain to contain or mitigate the risks. For suppliers with extremely high risks, Zijin Mining will immediately suspend or terminate cooperation.

4.2 Supply Chain Due Diligence

Zijin Mining has established a systematic responsible supply chain management system in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains*. The Company adopts the due diligence framework specified in the aforementioned guidelines, implementing end-to-end control encompassing risk identification, assessment, mitigation, monitoring, reporting, and independent auditing to ensure supply chain transparency and sustainability. Guided by the principle of continuous improvement, we collaborate closely with suppliers and stakeholders to develop targeted risk mitigation measures. Through regular evaluation of supplier due diligence outcomes, we have established a supplier "black and white list" management mechanism, which serves as the basis for determining the continuation of cooperation. In addition, when market conditions change, the Company will conduct additional risk assessments to ensure that the supply chain consistently maintains high standards of sustainability.

4.3 Supplier Code of Conduct

Zijin Mining is committed to conducting business in accordance with all applicable laws, regulations and the highest ethical standards. We pledge to operate with professionalism, honesty and integrity in all business transactions and relationships, and prohibit any activities that may adversely affect the Company's integrity and reputation.

We formulate the "Supplier Code of Conduct" in accordance with international standards and norms as well as the Company's relevant policies and rules, and require suppliers to comply with it. Any violation of this Code by a supplier may impair its business relationship with Zijin Mining; in serious cases, it will directly lead to the termination of the cooperative relationship. Suppliers shall conduct their activities in accordance with the following guidelines:

- a) Compliance with laws and regulations. Compliance with all applicable laws and regulations in the places of operation is a prerequisite for cooperation with Zijin Mining.
- b) Active fulfillment of business ethics. Legally handle trade secrets, patents, trademarks, copyrights, or scientific and technological engineering data, databases, customer information, and any unpublished financial data and reports. Conduct cooperation and competition in a fair, transparent and honest manner; establish sound business ethics management and supervision systems to prevent unfair competition and corrupt practices; and refrain from using false information or other fraudulent means to gain improper

competitive advantages. Neither offer nor accept bribes or any form of corrupt practices to obtain undue benefits. Neither influence stakeholders in exercising their functions through banquets, kickbacks, gifts or other means. Establish reporting mechanisms and whistleblower protection systems, and refrain from any form of retaliation against whistleblowers.

- c) Protection of the ecological environment. Have no records of environmental pollution incidents or penalties for environmental violations in past operations. Implement green and clean production, ensure that all pollutants are treated and disposed of in accordance with laws and regulations, gradually increase the proportion of clean energy use, and ensure that product design and production meet relevant green and environmental protection standards and requirements. Establish and strengthen low-carbon management systems, proactively carry out product carbon footprint accounting and emission reduction work, and ensure that carbon footprint levels meet or exceed industry averages.
- d) Protection of workers' human rights. Prohibit the use of child labor and all forms of forced or compulsory labor, and respect and protect employees' various fundamental rights. Eliminate slave labor, and ensure working hours do not exceed the limits stipulated by relevant laws and regulations. Respect employees and treat them equally. Firmly oppose and resist discrimination, bullying, harassment, intimidation, and other such behaviors. Do not engage in discrimination in employment or promotion based on factors such as race, religion, age, nationality, gender, marital status, or pregnancy, and do not require employees or job applicants to undergo discriminatory medical examinations. Recognize and respect employees' legitimate rights to freedom of association and collective bargaining. Safeguard employees' legitimate interests in aspects such as wages, benefits, rest and leave, and social insurance.
- e) Provision of safe and healthy workplaces and services. Actively promote ISO 45001 occupational health and safety management system certification, enhance employees' safety and health awareness, and train and motivate employees to work in a safe and responsible manner. Establish a sound working environment, prevent occupational hazards to employees, and standardize occupational health monitoring. Conduct safety risk assessments for all construction and operation activities, and strictly follow safety operating procedures. Possess the ability to respond to emergencies such as sudden natural disasters, work safety accidents and environmental pollution incidents, so as to minimize casualties, environmental damage and social impact.
- f) Respect the culture, traditions and beliefs of local communities, and respect the rights of indigenous peoples to participate and to be informed. Establish appropriate communication and complaint mechanisms with communities, attach importance to their concerns and properly address reasonable demands.
- g) Regulate business conduct in conflict-affected and high-risk areas. When conducting business in conflict-affected and high-risk areas (as defined in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*), refrain from profiting, aiding, abetting or facilitating, in any way, any party to commit: any form of torture, cruel, inhuman or degrading treatment; any form of forced or compulsory labor; use of child labor; other serious violations and abuses of human rights; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide. Neither directly nor indirectly support illegal organized armed groups or public or private security forces. Prohibit bribery, corruption, money laundering and other activities in all business operations and transactions.
- h) Establishment of compliant and transparent complaint mechanisms. Clarify procedures and feedback timeframes to ensure that the legitimate rights and interests of all stakeholders, including communities and employees, are effectively protected.

4.4 Supplier Onboarding Assessment and Review

Zijin Mining is committed to fostering long-term, stable cooperative relationships with suppliers. To this end, we have established a unified supplier onboarding, evaluation, and management system, which covers businesses including material procurement and commodity trading.

Admission and Evaluation Mechanism: In accordance with the *Supplier Management Measures for Material Procurement* and the *Management Rules for Purchase, Sale and Trading of Commodity In bulk*, the Company has established clear admission standards and a negative list. During the admission process, the Company conducts comprehensive evaluations of suppliers from three dimensions: environmental protection, social responsibility, and corporate governance. Suppliers are also required to sign ESG responsibility agreements, committing to comply with the Company's Code of Corporate Conduct and relevant policies. Suppliers with significant ESG risks are strictly prohibited from admission; specific types of suppliers may be included in the qualified supplier list (whitelist) only after passing centralized reviews or on-site inspections.

Dynamic Management and Collaboration: The Company uniformly manages global suppliers through an intelligent procurement and sale platform, sharing its sustainable development concepts and policies, and requiring suppliers to complete relevant learning before proceeding with registration and quotation. In daily management, the Company dynamically tracks supplier performance and assesses supply chain risks through quarterly reviews, annual comprehensive evaluations, access to third-party credit information, collection of usage feedback, and verification of complaints and reports. Regular or irregular on-site inspections and information screening are also conducted to ensure suppliers' continuous compliance.

Risk Disposal and Exit Mechanism: Should any supplier be found to have committed material breaches of contract, violated laws, had quality issues, or posed major safety risks, caused environmental problems, or engaged in bribery, the Company will place such supplier on the list of suspended or prohibited suppliers based on the severity of the circumstances.

4.5 Product Responsibility Management

The Company commits not to purchase, process, or sell conflict minerals. Based on the OECD Five-Step Framework, and in alignment with the requirements of the London Bullion Market Association (LBMA), London Metal Exchange (LME), and the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains*, we have built an extensive responsible supply chain system. Meanwhile, the Company actively promotes due diligence on material origins among its subsidiaries producing "Zijin-branded" gold ingots, silver ingots, cathode copper, and zinc ingots.

With smelters as the core, the Company, on one hand, imposes due diligence management requirements on upstream mines and drives them to fulfill social responsibilities—especially as all owned mines have established sound ESG systems. On the other hand, it cooperates with downstream customers in due diligence efforts, providing due diligence management and investigation information to jointly shape a responsible mineral supply chain.

4.6 Pioneer A Responsible Supply Chain Ecosystem

The Company is committed to jointly promoting ESG development and responsible transformation across the upstream and downstream supply chains. Through regular training, technical support, and exchange activities, we facilitate the delivery and implementation of best practices and international standards, working together to build a more sustainable mineral supply chain ecosystem with significant social value.

5. SUPPLEMENTARY PROVISIONS

5.1 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.

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

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