

江西铜业股份有限公司

供应链尽责管理政策及申诉机制

江西铜业股份有限公司（以下简称“公司”）深刻认识到，在受冲突影响和高风险区域开展矿产资源开采、交易、加工及出口，可能面临一些潜在不利风险，并认识到我们有尊重人权、不助长冲突、维护环境和社会可持续发展的义务，我们承诺采纳并大力推广《中国矿产供应链尽责管理指南》、《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职调查指南》以及伦敦金属交易所（LME）、伦敦金银市场协会（LBMA）负责任采购政策相关内容。公司将以《中国矿产供应链尽责管理指南》提出的尽责管理六步骤为核心方法论，系统性开展铜供应链的尽责管理工作；针对金、银供应链，则严格遵循《伦敦金银市场协会尽责黄金指南》（LBMA RGG）、《伦敦金银市场协会尽责白银指南》（LBMA RSG）的标准要求推进相关管理。

公司将以积极主动的姿态，深度参与并全力配合各项供应链尽责管理工作，持续优化管理流程、提升管理效能，确保公司所采购的铜、金、银等矿产资源来源合法合规、符合负责任采购的标准与行业准则。为此，公司作出如下郑重承诺：

在供应链运营实践中识别和管理以下风险：

一、与矿产开采、运输或贸易有关的严重侵权行为：

在“受冲突影响和高风险区域”开展采购或经营活动时，我们既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施以下行为：

- a. 任何形式的酷刑，残忍、不人道和有辱人格的待遇；
- b. 任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务；
- c. 最恶劣形式的童工；
- d. 其他严重侵犯和践踏人权的行爲，如普遍的性暴力行为；
- e. 战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪。

风险缓解策略：

如果我们有合理理由认为该风险存在，即上游供应商正从实施上述严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或终止与该供应商的合作。

二、关于直接或间接支持非国家武装团体：

我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的

支持”包括且不限于从非国家武装团体或其关联方购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方可能存在如下行为：

- i. 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体；
- ii. 并/或在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产；
- iii. 并/或对中间商、出口企业、或国际贸易者非法征税或勒索。

风险缓解策略：

如果我们有理由认为，上游供应商从向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或终止与该供应商的合作。

三、关于公共或私人安全武装：

我们杜绝向非法控制矿址、运输路线以及供应链上游行为主体，在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易者非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

我们认可，矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

在我们或我们供应链上的任何企业与公共或私人安全武装签订了合约的情况下，我们承诺或者将规定，这类安全武装需被公认的处理公共或私人安全武装的国际标准和指导性文件所认可。尤其是，我们将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

我们将支持或采取措施与中央或地方政府、国际组织和民间社会组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

我们将支持或采取措施与当地政府、国际组织和民间社会组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响，尤其是对手工采矿矿工的负面影响。

风险缓解策略：

如果我们发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，我们将暂时中止或终止与上游供应商的合作。我们发现在一定程度上有可能存在有违上述内容的情况下，将采取同样的应对措施。

四、关于行贿受贿及矿产原产地的欺诈性失实陈述：

我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、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。

关于洗钱：

如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

关于向政府支付的税收、费用及特许费：

我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置，依照所在国关于向政府部门缴纳的税费信息公开的要求及支持《采掘行业透明度行动计划》（EITI）对此类支付进行披露。

风险缓解策略：

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的风险的目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或终止与上游供应商的合作。对采用风险管理计划后需要降低的风险，我们将额外进行风险评估。若风险管理计划六个月内未取得明显效果，行贿受贿及对矿产产地进行欺诈性失实陈述、洗钱、以及向政府缴纳税款、费用、特许费等行为的风险未能得到遏制或降低的话，我们将暂时停止或中断与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明贸易关系恢复之前改进工作所应达到的绩效目标。

五、供应链尽责管理申诉机制

为了及时识别和处理公司供应链可能存在的助长冲突或人权侵害等风险，保障内外部利益相关方与本公司的顺畅沟通，欢迎所有员工、供应商、客户等利益相关方对我们这一政策提供建议或提出意见，表达疑虑，传递各方的诉求和期望。可通过下列方式进行申诉：

1、可以对哪些问题提起申诉？

符合以下条件的申诉将会被受理：

- 1) 与公司供应链尽责管理相关；
- 2) 公司商业活动或者业务关系违反了《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职调查指南》、《中国矿产供应链尽责管理指南》或公司《供应链尽责管理政策》中的要求，对利益相关方已经造成或可能造成了负面影响；
- 3) 对我们的这一政策提出建议或提供风险线索。

属于以下任意一项的申诉不会被受理：

- 1) 与公司尽责管理无关；
- 2) 申诉证据不足且无法通过合理途径补充的；
- 3) 恶意申诉或为获得竞争优势而发起的申诉；
- 4) 如果申诉的问题不属于公司内部机制所能够解决的范畴，我们将积极协调外部机构解决。

2、谁可以提起申诉？

任何个人或团体，包括但不限于公司客户、供应商、受影响的社区居民、员工等，均可向公司供应链尽责管理办公室提起申诉。

如果申诉由代表受影响方的第三方团体或个人提出，该机构或个人应明确说明其所代表的对象，并提供具备代表权的明确证据。

3、如何提起申诉？

申诉者应填写附件一所示《供应链尽责管理申诉书》。申诉书应通过电子邮件或邮寄至公司供应链尽责管理办公室。

邮箱：zhb@jxcc.com

邮寄地址：江西省南昌市高新区昌东大道 7666 号 计划与生产部

申诉者亦可通过中国五矿化工进出口商会的《采矿业和矿产价值链调解磋商机制》¹进行申诉。



1. 中国五矿化工进出口商会的《采矿业和矿产价值链调解磋商机制》，可参考：
<https://www.cccmc.org.cn/kcxfzxx/zvzx/al/>

供应链尽责管理申诉书

申诉者名称（可匿名）		是否要求保密	
联系电话		电子邮箱	
是否为受委托的第三方		如是，受何人或何团体委托（同时附受委托证明）	
冲突回避	（如需要回避公司供应链尽责管理小组、尽责管理办公室的特定人员，请列出其姓名）		
所遭受（或可能遭受）负面影响的事实和证据，以及其他任何能够支持申诉的信息（可附页，并附申诉证据）：			
您的诉求，以及实现诉求所希望采用的解决方案（明确且可操作的诉求能够帮助我们更快的帮您解决问题）			
申诉者代表签名：			
申诉日期：			

|

Jiangxi Copper Company Limited

Supply Chain Due Diligence Management Policy and Appeal Mechanism

Jiangxi Copper Company Limited (hereinafter referred to as "the company") fully recognizes that engaging in mineral resource extraction, trading, processing, and export in "conflict-affected and high-risk areas" (CAHRAs) may entail potential adverse risks. We acknowledge our obligation to respect human rights, not contribute to conflict, and uphold environmental and social sustainability. We commit to adopting and actively promoting the China Due Diligence Guidelines for Responsible Mineral Supply Chains , the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as well as the responsible sourcing policies of the London Metal Exchange (LME) and the London Bullion Market Association (LBMA).

The company will adopt the six-step due diligence framework outlined in the China Due Diligence Guidelines for Responsible Mineral Supply Chains as the core methodology to systematically conduct due diligence management for the copper supply chain. For gold and silver supply chains, we will strictly adhere to the standards and requirements of the LBMA Responsible Gold Guidance (LBMA RGG) and the LBMA Responsible Silver Guidance (LBMA RSG).

the company will adopt a proactive stance, actively engage in and fully cooperate with all supply chain due diligence management efforts, continuously optimize management processes, enhance management effectiveness, and ensure that the copper, gold, silver, and other mineral resources we procure are sourced legally and in accordance with responsible sourcing standards and industry norms. To this end, the company makes the following solemn commitments:

We identify and manage the following risks in supply chain operations:

I. Serious Abuses Associated with Mineral Extraction, Transport, or Trade

While sourcing or operating in "conflict-affected and high-risk areas," we will neither tolerate nor in any way profit from, assist, support, or facilitate any party in committing:

- a. Any form of torture, cruel, inhuman, and degrading treatment;
- b. Any form of forced or compulsory labor. Forced or compulsory labor means any work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily;
- c. The worst forms of child labor;
- d. Other serious violations and abuses of human rights, such as widespread sexual violence;
- e. War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

Risk Mitigation Strategy:

If we have reasonable grounds to believe that such risks exist, i.e., that an upstream supplier is sourcing from or associated with any party committing the above serious abuses, we will immediately suspend or terminate cooperation with that supplier.

II. Direct or Indirect Support to Non-State Armed Groups

We will not tolerate any direct or indirect support to non-state armed groups through mineral extraction, transport, trade, processing, or export. "Direct or indirect support" to non-state armed groups through mineral extraction, transport, trade, processing, or export includes, but is not limited to, procuring minerals from non-state armed groups or their affiliates, making payments to them, or otherwise providing logistical support or equipment. Such armed groups or affiliates:

- i. Illegally control mine sites, or otherwise control transport routes, points of mineral trade, and upstream actors in the supply chain;
- ii. And/or illegally tax or extort money or minerals at mine site entrances, along transport routes, or at points of mineral trade;
- iii. And/or illegally tax or extort intermediaries, exporting enterprises, or international traders.

Risk Mitigation Strategy:

If we have reason to believe that an upstream supplier is sourcing from or has a relationship with any party providing direct or indirect support to non-state armed groups, we will immediately suspend or terminate cooperation with that supplier.

III. Public or Private Security Forces

We prohibit any direct or indirect support to public or private security forces that illegally control mine sites, transport routes, and upstream actors in the supply chain; illegally tax or extort money or minerals at mine site entrances, along transport routes, or at points of mineral trade; or illegally tax or extort intermediaries, exporting enterprises, or international traders.

We recognize that the role of public or private security forces at mine sites and/or in their surrounding areas and/or along transport routes is solely to uphold the rule of law, including safeguarding human rights, protecting the safety of miners, equipment, and facilities, and securing mine sites or transport routes to ensure that legitimate extraction and trade are not disrupted.

In cases where we or any enterprise in our supply chain enter into contracts with public or private security forces, we commit or will stipulate that such security forces must be recognized by internationally recognized standards and guidance documents for the management of public or private security forces. In particular, we will support or take

measures to implement screening policies to ensure that individuals or security force units known to have committed serious human rights abuses are not employed.

We will support or take measures to cooperate with central or local governments, international organizations, and civil society organizations to jointly identify feasible solutions for improving the transparency, proportionality, and accountability of payments to public security forces for security services.

We will support or take measures to engage with local governments, international organizations, and civil society organizations to avoid or minimize the adverse impacts on vulnerable groups arising from the presence of public or private security forces at mine sites, particularly artisanal and small-scale miners.

Risk Mitigation Strategy:

If we find that such risks exist to a certain degree, we will, depending on our position in the supply chain, immediately develop, adopt, and implement a risk management plan for upstream suppliers and other stakeholders to contain or reduce the risk of providing direct or indirect support to public or private security forces. If the risk management plan proves ineffective after six months of implementation, we will temporarily suspend or terminate cooperation with the upstream supplier. We will take the same responsive measures if we find that there is a certain possibility of non-compliance with the above provisions.

IV. Bribery and Fraudulent Misrepresentation of Mineral Origin

We will not offer, promise, give, or demand any bribes, and will resist solicitations to bribe for the purpose of concealing or falsifying the origin of minerals, or to misrepresent taxes, fees, and royalties due to governments related to mineral extraction, trade, processing, transport, and export.

Regarding Money Laundering:

If we have reason to believe that there is a money laundering risk arising from or associated with the extraction, trade, processing, transport, or export of minerals obtained through illegal taxation or extortion at mine site entrances, along transport routes, or at upstream supplier mineral trading sites, we will support or take measures to contribute effectively to the elimination of money laundering.

Regarding Taxes, Fees, and Royalties Paid to Governments:

We will ensure that all legitimate taxes, fees, and royalties related to ore extraction, trade, and export in conflict-affected and high-risk areas are paid to governments, and commit to disclosing such payments in accordance with the position of the enterprise in the supply chain, the host country's requirements for disclosure of information on payments to government departments, and support for the implementation of the Extractive Industries Transparency Initiative (EITI).

Risk Mitigation Strategy:

Depending on our position in the supply chain, we commit to cooperating, as appropriate, with suppliers, central or local government authorities, international organizations, civil society, and affected third parties, with the aim of taking significant measures within a reasonable timeframe to prevent or reduce risks of negative impacts, and to improve or track performance. If risk reduction measures prove ineffective, we will temporarily suspend or terminate cooperation with upstream suppliers. For risks requiring reduction following the adoption of a risk management plan, we will conduct additional risk assessments. If the risk management plan fails to achieve noticeable results within six months, and risks of bribery, fraudulent misrepresentation of mineral origin, money laundering, and payment of taxes, fees, and royalties to governments are not contained or reduced, we will temporarily suspend or interrupt cooperation with the supplier for a period of at least three months, and simultaneously revise the risk management plan during the suspension period to clarify the performance targets that must be achieved before trade relations can be resumed.

V. Supply Chain Due Diligence Management Appeal Mechanism

In order to promptly identify and address risks in the company's supply chain that may contribute to conflict or human rights abuses, and to ensure smooth communication between internal and external stakeholders and the company, all employees, suppliers, customers, and other stakeholders are welcome to provide suggestions or comments on this policy, express concerns, and communicate their demands and expectations.

Appeals may be filed through the following channels:

1. What issues can be raised in an appeal?

Appeals meeting the following conditions will be accepted:

- 1) Related to the company's supply chain due diligence management;
- 2) the company's business activities or business relationships violate the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the China Due Diligence Guidelines for Responsible Mineral Supply Chains, or the company's Supply Chain Due Diligence Management Policy, and have caused or may cause negative impacts on stakeholders;
- 3) Suggestions on this policy or provision of risk-related leads.

Appeals falling under any of the following categories will not be accepted:

- 1) Unrelated to the company's due diligence management;
- 2) Insufficient evidence and cannot be supplemented through reasonable means;
- 3) Malicious appeals or appeals initiated to gain competitive advantage;
- 4) If the issue raised does not fall within the scope of the company's internal mechanisms, we will actively coordinate with external agencies for resolution.

2. Who can file an appeal?

Any individual or organization, including but not limited to the company's customers, suppliers, affected community residents, and employees, may file an appeal with the company's Supply Chain Due Diligence Management Office.

If an appeal is submitted by a third-party organization or individual representing affected parties, such organization or individual shall clearly identify the party they represent and provide clear evidence of their authority to represent.

3. How to file an appeal?

The appellant shall complete the "Supply Chain Due Diligence Appeal Form" shown in Annex I. The appeal form shall be submitted via email or mail to the company's Office for Supply Chain Due Diligence Management.

Email: zhb@jxcc.com

Mailing Address: **Production Planning Department** No. 7666 Changdong Avenue, High-tech Zone, Nanchang City, Jiangxi Province, China

The complainant may also appeal through the "Mining Industry and Mineral Value Chain Mediation and Consultation Mechanism"¹ of the China Chamber of Commerce for Import and Export of Minerals and Chemicals.

Jiangxi Copper Company Limited

June 26, 2025



¹ The "Mining Industry and Mineral Value Chain Mediation and Consultation Mechanism" of China Chamber of Commerce for Import and Export of Minerals and Chemicals can be referred to:
<https://www.cccmc.org.cn/kcxfzz/zyzx/al/>

Supply Chain Due Diligence Management Appeal Form

Applicant name (can be anonymous)		Do you want to keep it confidential	
telephone, phone		mailbox	
Is it a third-party agent		If so, who or what organization commissioned it (with a certificate of commission attached)	
Conflict avoidance	(If specific individuals from the Corporate Supply Chain Due Diligence Management Team or the Due Diligence Management Office need to be excluded, please list their names.)		
The facts and evidence of the negative effects suffered (or likely to be suffered) and any other information that may support the complaint (pages may be attached, with supporting evidence):			
Your request and the solution you want to implement (clear and actionable requests help us solve your problem faster)			
Signature of complainant representative: Date of appeal:			