江西铜业股份有限公司

2025年铜供应链尽责管理进展报告

我们认识到，在受冲突影响和高风险区域从事矿产资源开采、交易、处理、出口等经营活动可能产生重大的社会和环境风险，并有尊重人权、不助长冲突，消除和管控相关风险的责任。公司秉持负责任的态度，以一个评估周期为界编制发布一次铜供应链尽责管理进展报告，通过展示和推进有效的管理持续增强对供应链的管理能力，以树立负责任的企业形象，同时向供应商沟通明确的行为准则，强化其尽责管理意识和能力。

一、公司信息

公司名称：江西铜业股份有限公司

公司地址：江西省鹰潭市贵溪市冶金大道15号

使用原料：铜精矿、矿产粗铜、回收粗铜、其他金属冶炼副产品

主要产品：阴极铜

LME注册品牌：GUIYE、JCC

报告周期：2025年1月1日-2025年12月31日

二、依据标准

公司遵循以下标准实施矿产物供应链尽责管理：

1)《中国矿产供应链尽责管理指南》（第二版），简称《中国指南》 ；

2)参考《经济发展与合作组织关于来自受冲突影响和高风险区域的矿产的负责任供应链尽责调查指南》（第三版）——简称OECD指南 ；

三、供应链尽责管理实践

江西铜业股份有限公司自2026年5月份启动LME上市品牌负责任采购政策路径转换工作，由政策规定的合规路径B转换至路径A，遵照我国矿产供应链尽责管理领域相关法规要求，并遵守矿源地所在国法规，逐步建立、完善铜矿产供应链尽责管理体系。先后按照《中国矿产供应链尽责管理指南》（第二版）、《经济发展与合作组织关于来自受冲突影响和高风险区域的矿产的负责任供应链尽责调查指南》（第三版）及其他相关标准和要求构建了公司铜矿产供应链尽责管理体系，制定了供应链政策及其他控制文件和透明度系统记录文件，逐步实现系统性、可追溯的供应链尽责管理。具体开展工作如下：

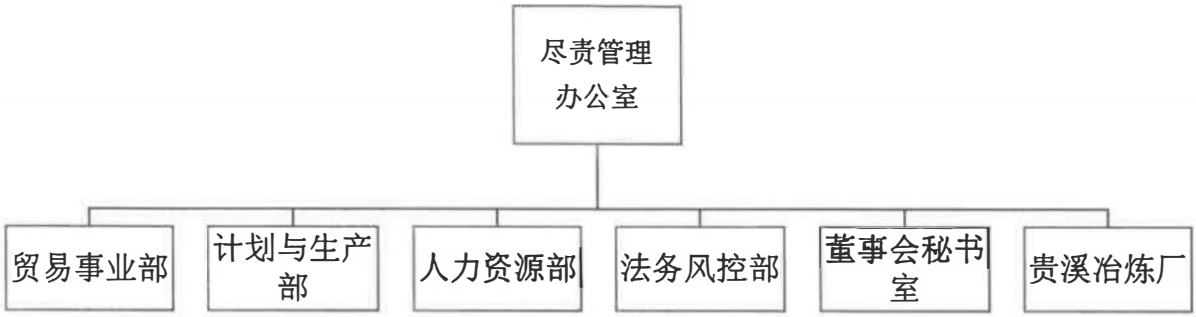
第一步　建立、完善铜矿产供应链尽责管理体系

1.铜矿产供应链尽责政策

为规避使用直接或间接为武装团体提供资金或使他们得益的冲突矿物及/或涉及在高风险和受冲突影响地区进行其他严重侵犯人权行为的冲突矿物，公司依据《中国矿产供应链尽责管理指南》（第二版）、《经济发展与合作组织关于来自受冲突影响和高风险区域的矿产的负责任供应链尽责调查指南》（第三版）及其他相关标准和要求制定了《江西铜业股份有限公司矿产供应链尽责管理政策及申诉机制》，同时向利益相关者（供应商、客户和员工等）广泛传播，此政策公布于公司官网。

2.公司管理体系架构与运行机制

2.1组织结构。公司已构建矿产供应链尽责管理组织架构，实施铜矿产供应链尽责管理的策划、推进和改善，提供必要的资源支持。组建了公司铜矿产供应链尽责管理领导小组及跨部门的尽责管理办公室，任命公司主管生产的副总经理担任领导小组组长，明确了各部门职责。由贸易事业部、计划与生产部、法务风控部、董事会秘书室、人力资源部、贵溪冶炼厂配合尽责管理办公室开展具体工作。组织架构图如下：



为规范供应链尽责管理，公司尽责管理联合办公室相继编制并发布了《江西铜业股份有限公司矿产供应链尽责管理政策及申诉机制》，制定了《供应商行为守则》《尽责管理体系文件和记录控制程序》《矿产供应链风险管理程序》《年度培训计划》《风险管理计划管理程序》《内部评估程序》《尽责管理报告控制程序》《实地评估控制程序》及支持记录文件等30余份文件，

2.2公司按照年度培训计划组织对与公司铜供应链尽责管理相关的人员和部门及供应商开展铜供应链尽责管理专项培训，使其了解和掌握管理理念和工作方法。自启动合规路径转换工作以来，共开展内部培训2次，通过传递尽责管理相关政策文件的方式开展供应商培训1次，由中国五矿化工进出口商会认可的咨询机构派出的老师进行授课，内容包括LME 负责任采购政策及路径解读、建立矿产供应链尽责管理的重要性，公司尽责管理政策、供应商行为守则、申诉机制、《中国矿产供应链尽责管理指南》（第二版）六步骤解读及透明度系统要求、各类供应商、物料追溯要求及方法，包括国内外精矿供应商、回收料供应商、副产品供应商准入、评价，合同中尽责管理条款要求，物料追溯要求及所需提供证据材料要求等内容。公司尽责管理办公室成员及各类供应商初步掌握了尽责管理内容、方法和要求。同时尽责管理办公室定期收集国内外供应链尽责管理信息、资料、动态等，与相关人员共享学习，以提高公司尽责管理的整体能力，

3.供应链透明度管理。公司建立供应链控制和透明度系统(包含：供应链尽责管理程序、制度、结果及相应决策的内部记录等)，用于识别我们所采购铜物料供应链中的上游参与者、原料来源国或地区以及运输路线等关键信息，为开展“警示信号审查”“风险识别与评估”及向关注的第三方传递负责任采购行为信息，同时也为后续工作提供基础信息，

支持和改进体系运行。贵溪冶炼厂建立了物料管理系统（智能工厂系统），每个批次原料进厂信息、品质信息均能够在系统上进行记录、分析和展示，然后通过物料平衡计算，使其保持整体量处于合理范围内。贸易事业部、计划与生产部、贵溪冶炼厂分别按公司“供应商分类管理程序”所确定的职责和内容开展物料透明度管理工作，并配套《供应商合规监测表》等，实现含铜原料从：采购-进入公司-制成品-销售的全过程追溯。以此持续推进公司铜矿产供应链尽责管理的透明化、流程化和规范化。

4.记录保持。公司在《尽责管理体系文件和记录控制程序》中明确规定与铜矿产供应链尽责管理相关的所有记录原则上至少保存 5 年，并在日常业务工作中得以执行。

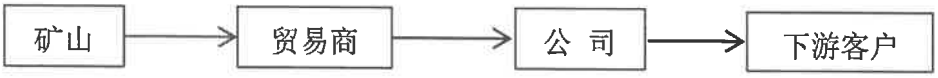
第二步 与供应商合作

公司在建立铜矿产供应链尽责政策时明确了在原料采购过程中可能面临的各种风险，因而结合风险的可接受程度制定了针对性的缓解策略，且向供应商或相关给予展示和沟通。其次，我们制定了《供应商行为守则》，要求供应商签署供应链尽责管理声明和承诺，向供应商传达尽责管理相关责任；制定了《责任合同条款》，把公司铜原料采购的具体核心要求及要点列为合同内容，以契约形势给予遵守。同时，为进一步降低供应链上的风险或对识别出的风险改进绩效给予客观、有效之评价，公司建立《供应商识别问卷(KYS)》《管理政策、风险管理计划、报告征询意见表》，本报告期内陆续向所有一级供应商、部分大客户发出管理政策、申诉机制、风险管理计划、进展报告征询意见表供其填写，部分供应商进行了填写和回复，有待更深入的沟通。

第三步 供应链风险识别与评估

1.公司策划并建立了铜矿产供应链尽责风险管理程序。以此为依据和程序，在此基础上日常工作以《铜矿产供应链尽责风险管理计划》《信息验证程序》《CAHRAs 识别程序》等制度文件增强对进入公司的含铜原料进行风险识别和控制，也通过 KYS 调查表、直接与供应商沟通、查询供应商公开信息等方式和渠道收集供应商相关合规性信息、原料信息、尽责管理信息等。

2.根据以上信息绘制供应链地图框架如下



3. 从武装冲突、人权、治理三个方面，使用如下资源或使用桌面研究和风险矩阵方法对矿产来源地进行风险评估，形成《警示信号识别清单》，使用工具主要包括：

a.联合国维和部队行动、联合国安理会决议文件，以是否存在相关行动和制裁认定；

b.《联合国人类发展指数》， 以极高、高、中人权发展程度认定；

c.《世界银行全球治理指标》，以治理指数定义供应链治理情况；

d.欧盟 CAHRAs 清单、大湖区国家清单、中国外交部、商务部风险警示清单，以名单内外涉及内容判定高低风险。

公司秉持高度的责任感，主动对供应商展开核查。我们重点关注供应商是否严格依照所在国法律要求，以及 EITI 倡议的相关规定，按时、足额地向政府缴纳税费，并按规范进行信息披露。参见：https://eiti.org/countries/。

我们编制了《风险识别和评估报告》，最终结论为：公司绝大部分含铜原料来源于低风险区域，运营规范，风险低；小部分含铜原料来源于高风险地区，经进一步的调查，这些地区的生产商均为中资企业，运行规范，风险较低。

第四步 风险管理与控制

公司制定了《铜矿产供应链尽责管理风险管理计划》，通过以下方式管理风险：

（1）在整个降低可衡量风险的过程中继续开展贸易；

（2）在不断降低可衡量风险的同时暂时中止贸易；

（3）在风险减缓失败或公司有理由认为风险减缓措施不可行或无法接受的情况下，终止与供货商的合作。

工作中我们通过供应链追溯地图、《供应链追溯地图信息表》、《KYS 调查表》、当面与供应商沟通等方式对供应链进行了解和调查，本评估年度内公司铜原料经追溯发现有来自国内的采购，也有部分原料经多级追溯发现来自墨西哥、秘鲁、智利、巴西、印尼、刚果（金）、赞比亚和巴基斯坦。通过 CAHRAs 识别我们进一步了解到，供应链风险主要由国家发展受限或发展水平低造成，仅依靠公司单方面力量无法彻底解决，我们倡议必要时各利益相关方（包括供应链上下游企业、行业组织、相关国家政府等）协同合作，以更有效的方式根治风险源头。对此公司与相关供应商进行了很多有建设性的沟通和协商，讨论风险缓解措施及其可行性，但截止目前进展仍然缓慢，未及预期。

第五步　申诉机制与结果

为及时发现和处理供应链中可能存在的各类风险与隐患，保障利益相关方与公司的顺畅沟通，构建和谐互利的利益关系，公司建立和实施了《江西铜业股份有限公司矿产供应链尽责管理政策及申诉机制》，并在公司网站向公众公布，以收集各利益相关方意见或建议。本评估年度内经收集统计，没有收到各利益相关方的申述意见。因此，本报告期内收到供应商和利益相关的投诉事件为“零”。

第六步 对触发警示信号采购原料的管理

本评估周期内公司含铜原料采购自 102 家一级供应商，其中原产地位于国外的铜原料供应商 29 家，原产地位于国内的铜原料供应商 73 家（其中自有矿山供应商 5 家），原产地涉及中国、秘鲁、墨西哥、智利、巴西、印尼、赞比亚、刚果（金）、巴基斯坦，少部分含铜原料来自于受冲突影响和高风险地区，触发警示信号。公司按照《OECD 指南》和《中国指南》要求开展了加强版的尽职调查，我们了解到来自于受冲突影响和高风险地区的矿物均产自于规范运营的矿山或粗炼厂，这些矿山或粗炼厂部分通过了《中国指南》评估，存在武装冲突、人权、治理相关风险的可能性较小。但是随着公司采购工作的进行,有可能从高风险地区和国家采购铜精矿，为此，我们将从以下几个方面开展相关工作：一是加强对产销监管链或供应链追溯信息的进一步收集和验证。本着从源头识别、降低、控

制风险的意愿，对于来自触发警示信号地区的原料公司将会强化监管力度，通过网络、电话沟通、书面信息查询等方式持续健全、完善供应链信息，并试图摸清楚、搞明白每一批次物料的详细信息，持续把公司尽责管理诉求和压力通过一级供应商向上游多级供应商持续传导；二是将更进一步对触发警示信号原料的原产地信息按《中国矿产供应链尽责管理指南》(第二版)5.1.3.1 及 5.1.3.3 条款 12 项条款要求，尽力持续作更进一步的信息收集和确认；第三，如有可能我们将逐步对所有国外采购的矿物收集其矿产原产地证、矿产的境外运输路线和运输方法、矿山开采量和开采方式等供应链追溯详尽信息，以期建立更完整的追溯系统。今后，公司将逐步开始制定并实施上述措施，建立了实地评估程序，组建了实地评估小组，同时我们将会与五矿商会取得联系，及时将公司可能的实地评估需求汇报给商会，积极参加行业组织的联合实地评估。总之，我们期盼通过上述措施的实施，以加强对触发警示信号的采购原料进行管理，确保公司铜物料的采购不造成供应链政策中承诺的三种类型风险。

第七步 内部评估和独立的第三方评估

为了全面检验公司铜供应链尽责管理体系运行的过程和结果，公司建立了内部评估程序，制定了内部评估计划，开展了内部评估，采取抽样的方法、查阅文件、生产现场走访、管理人员访谈等方法对公司 2025 年 1-12 月份铜供应链尽责管理工作进行了全面的内部评价，发现了部分问题，相关部门进行了原因分析、执行了整改措施，后续将对整改措施的效果进行验证。编制了内部评估报告，全面评价了公司尽责管理工作，总体评价为体系运行基本满足《中国指南》和公司内部管理政策和程序要求。

对铜矿产供应链尽责管理公司不仅在内部持续推动，同时还计划首次接受外部独立第三方的审核评估，以满足利益相关方对公司铜矿产供应链尽责合规、透明的期望。上一周期公司按照 LME 上市品牌负责任采购政策规定的路径 B 开展了第三方审计，审计机构为德勤华永会计师事务所(特殊普通合伙)（Deloitte Touche Tohmatsu Certified Public Accountants LLP），审计结论为 2024 年公司旗下的精炼厂未出现 OECD 红旗信号，出具了审计报告，报告链接：https://www.jxcc.com/fzr/details_518_901.html。本年度外

部评估计划于 2026 年 10 月进行。同时，公司亦按《中国矿产供应链尽责管理指南》（第二版）及公司铜矿产供应链尽责管理体系要求每年开展内部评估。以此循序渐进地从侧面更客观、公允、全面地对公司尽责管理体系的运行进行合理性、有效性评估，也反应公司尽责管理实践取得的成果。同时，提出改善意见和建议，实现持续改进。

第八步 尽责管理过程和结果的报告

本次进展报告为 2025 年度进展报告，今后公司将每年编制上一评估期的铜供应链尽责管理进展报告，并每年在公司网站公布一次。同时，供应链尽责管理相关信息及工作动态也适时在网站发布，为公众及利益相关方履行告知义务。公司承诺在接受《中国矿产供应链尽责管理指南》(第二版)评估后在公司官网公布评估结果及摘要报告。为持续健全、完善、履行公司对铜供应链尽责管理义务，我们依据《中国矿产供应链尽责管理指南》(第二版)及公司铜供应链尽责管理政策及程序之要求，积极、且多渠道地推评估中发现的不符合和需改进项目逐步关闭。

江西铜业股份有限公司在持续完善自身尽责管理的同时，更关注外部供应链合规的最新要求，我们不断加强与上下游企业的沟通、联系与交流，增进互信，积极参加行业会议、论坛及相关培训等，与相关方分享和报告供应链尽责管理的经验和进展，并呼吁铜行业相关方能共建更为持续、健康有效的矿产供应链尽责管理机制。

编　制：　　编制日期：2026 年 9 月 20 日

批　准：　　批准日期：　　年　　月　　日

江西铜业股份有限公司

Jiangxi Copper Corporation Limited

2025 Copper Supply Chain Due Diligence Progress Report

We recognize that mineral resource extraction, trading, processing and export operations in conflict-affected and high-risk areas may give rise to significant social and environmental risks, and that we bear the responsibility to respect human rights, not to contribute to conflict, and to eliminate and manage the relevant risks. Acting in a responsible manner, the Company prepares and publishes a Copper Supply Chain Due Diligence Progress Report once per assessment cycle. By demonstrating and advancing effective management, the Company continuously strengthens its supply chain management capabilities in order to establish a responsible corporate image, while also communicating clear codes of conduct to suppliers and reinforcing their due diligence awareness and capabilities.

I. Company Information

Company name: Jiangxi Copper Corporation Limited

Company address: No. 15 Yejin Avenue, Guixi City, Yingtan City, Jiangxi Province

Raw materials used: copper concentrate, primary blister copper, recycled blister copper, and other smelting by-products

Main product: cathode copper

LME registered brands: GUIYE, JCC

Reporting period: 1 January 2025 – 31 December 2025

II. Applicable Standards

The Company implements mineral supply chain due diligence management in accordance with the following standards:

1) The China Mineral Supply Chain Due Diligence Guidelines (2nd Edition), hereinafter referred to as the "China Guidelines";

2) Reference is made to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition), hereinafter referred to as the "OECD Guidance".

III. Supply Chain Due Diligence Practices

Jiangxi Copper Corporation Limited initiated the transition of its LME listed brand responsible sourcing policy route in May 2026, shifting from Route B to Route A as prescribed by the policy. In compliance with the relevant regulatory requirements in the field of mineral supply chain due diligence management in China, and in observance of the laws and regulations of the countries where the mineral sources are located, the Company has progressively established and improved its copper mineral supply chain due diligence management system. In accordance with the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition), and other relevant standards and requirements, the Company has built its copper mineral supply chain due diligence management system and formulated the supply chain policy and other control documents and transparency system record documents, progressively achieving systematic and traceable supply chain due diligence management. The specific work carried out is as follows:

Step 1: Establish and improve the copper mineral supply chain due diligence management system

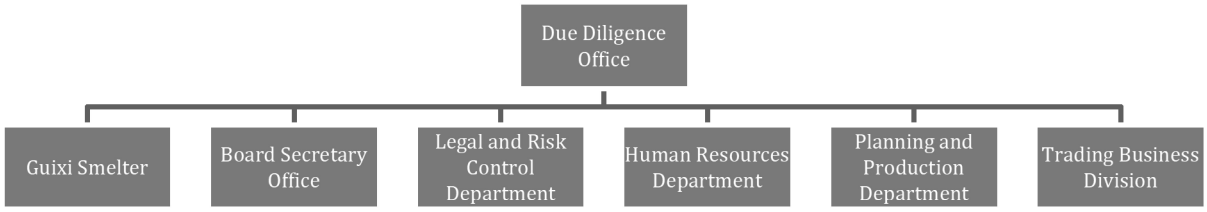
1. Copper mineral supply chain due diligence policy

In order to avoid the use of conflict minerals that directly or indirectly provide funding to armed groups or otherwise benefit them, and/or conflict minerals involving other serious human rights violations in high-risk and conflict-affected areas, the Company has formulated, in accordance with the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition) and other relevant standards and requirements, the "Jiangxi Copper Corporation Limited Mineral Supply Chain Due Diligence Management Policy and Grievance Mechanism". The policy is widely disseminated to stakeholders (suppliers, customers, employees, etc.) and is published on the Company’s official website.

2. Structure and operating mechanism of the Company’s management system

2.1 Organizational structure. The Company has established an organizational structure for mineral supply chain due diligence management, implementing the planning, promotion and improvement of copper mineral supply chain due diligence management and providing

necessary resource support. The Company has established the copper mineral supply chain due diligence management leading group and a cross-departmental Due Diligence Office, appointed the Deputy General Manager in charge of production as the head of the leading group, and defined the responsibilities of each department. The Trading Business Division, the Planning and Production Department, the Legal and Risk Control Department, the Board Secretary Office, the Human Resources Department and the Guixi Smelter cooperate with the Due Diligence Office in carrying out the specific work. The organizational structure is shown below:



To standardize supply chain due diligence management, the Company's joint Due Diligence Office has successively compiled and issued the "Jiangxi Copper Corporation Limited Mineral Supply Chain Due Diligence Management Policy and Grievance Mechanism" and formulated more than 30 documents, including the "Supplier Code of Conduct", "Document and Record Control Procedure for the Due Diligence Management System", "Mineral Supply Chain Risk Management Procedure", "Annual Training Plan", "Risk Management Plan Management Procedure", "Internal Assessment Procedure", "Due Diligence Report Control Procedure", "On-site Assessment Control Procedure" and supporting record documents.

2.2 In accordance with the annual training plan, the Company organizes special training on copper supply chain due diligence for personnel and departments related to the Company's copper supply chain due diligence management, as well as for suppliers, enabling them to understand and master the management concepts and working methods. Since the launch of the compliance route transition work, a total of 2 internal training sessions have been carried out, and 1 supplier training session has been delivered through the dissemination of relevant due diligence policy documents. The training was delivered by instructors dispatched by a consulting institution recognized by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers and Exporters (CCCMC), and covered the interpretation of the LME

responsible sourcing policy and routes, the importance of establishing mineral supply chain due diligence management, the Company's due diligence policy, the supplier code of conduct, the grievance mechanism, the interpretation of the six steps of the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition) and transparency system requirements, the requirements and methods for the admission and evaluation of various types of suppliers (including domestic and overseas concentrate suppliers, recycled material suppliers and by-product suppliers), the due diligence clause requirements in contracts, and the material traceability requirements and the supporting evidence required. Members of the Company's Due Diligence Office and various suppliers have initially mastered the content, methods and requirements of due diligence. At the same time, the Due Diligence Office regularly collects domestic and overseas supply chain due diligence information, materials and developments and shares them with relevant personnel for study, in order to improve the Company's overall due diligence capability.

3. Supply chain transparency management. The Company has established a supply chain control and transparency system (including internal records of supply chain due diligence procedures, systems, results and corresponding decisions), used to identify key information in the supply chain of the copper material we purchase, such as upstream participants, the source countries or regions of raw materials and transportation routes, so as to carry out "warning signs review" and "risk identification and assessment", to convey responsible sourcing conduct information to concerned third parties, and to provide basic information for subsequent work, supporting and improving the operation of the system. The Guixi Smelter has established a material management system (smart factory system), through which the incoming information and quality information of each batch of raw materials can be recorded, analyzed and displayed in the system, and material balance calculation is then carried out to keep the overall quantity within a reasonable range. The Trading Business Division, the Planning and Production Department and the Guixi Smelter respectively carry out material transparency management in accordance with the responsibilities and content determined by the Company's "Supplier Classification Management Procedure", supplemented by documents such as the "Supplier Compliance Monitoring Form", so as to achieve full-process traceability of copper-bearing raw materials from procurement, entry into the Company, production of finished products to sales. This continuously promotes the transparency, process management and standardization of the Company's copper mineral supply chain due diligence management.

4. Record retention. In the "Document and Record Control Procedure for the Due Diligence Management System", the Company explicitly provides that all records relating to copper mineral supply chain due diligence management shall in principle be retained for at least 5 years, and this requirement is implemented in day-to-day business operations.

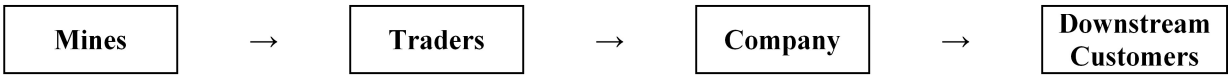
Step 2: Cooperation with suppliers

When establishing the copper supply chain due diligence policy, the Company identified the various risks that may be faced in the raw material procurement process, and accordingly formulated targeted mitigation strategies based on the acceptable level of risk, which are presented and communicated to suppliers or relevant parties. Secondly, we formulated the "Supplier Code of Conduct", requiring suppliers to sign supply chain due diligence declarations and commitments, thereby conveying due diligence responsibilities to suppliers; formulated the "Responsible Contract Clauses", incorporating the specific core requirements and key points of the Company's copper raw material procurement into the contract as contractual terms to be observed. At the same time, in order to further reduce risks in the supply chain or to give objective and effective evaluation of improved performance against identified risks, the Company established the "Supplier Identification Questionnaire (KYS)" and the "Management Policy, Risk Management Plan, Report Consultation Form". During this reporting period, the Company successively sent the management policy, grievance mechanism, risk management plan and progress report consultation forms to all first-tier suppliers and some major customers for completion; some suppliers completed and responded, and more in-depth communication is still required.

Step 3: Supply chain risk identification and assessment

1. The Company planned and established the copper mineral supply chain due diligence risk management procedure. On this basis and in accordance with this procedure, day-to-day work relies on institutional documents such as the "Copper Mineral Supply Chain Due Diligence Risk Management Plan", "Information Verification Procedure" and "CAHRAs Identification Procedure" to strengthen the risk identification and control of copper-bearing raw materials entering the Company, and also collects compliance information, raw material information and due diligence information on suppliers through means and channels such as the KYS questionnaire, direct communication with suppliers, and inquiries into suppliers' public information.

2. Based on the above information, the supply chain map framework is drawn as follows:



3. From the three aspects of armed conflict, human rights and governance, the Company conducts risk assessment of mineral source areas using the following resources or desktop research and risk matrix methods, forming the "Warning Signs Identification Checklist". The main tools used include:

a. UN peacekeeping operations and UN Security Council resolution documents, to determine based on the existence of relevant operations and sanctions designations;

b. The UN Human Development Index, to determine based on very high, high and medium levels of human development;

c. The World Bank Worldwide Governance Indicators, to define the governance situation of the supply chain based on governance indicators;

d. The EU CAHRAs list, the Great Lakes region country list, and the risk alert lists of China's Ministry of Foreign Affairs and Ministry of Commerce, to determine high or low risk based on whether and how the relevant items are covered by the lists.

The Company upholds a high sense of responsibility and proactively conducts verification of suppliers. We focus on whether suppliers strictly comply with the requirements of the laws of their respective countries and the relevant provisions of the EITI initiative, paying their taxes and fees to the government on time and in full, and making information disclosure in accordance with regulations. See: https://eiti.org/countries/.

We have compiled the "Risk Identification and Assessment Report". The final conclusion is: the vast majority of the Company's copper-bearing raw materials come from low-risk areas and are subject to standardized operations with low risk; a small portion of copper-bearing raw materials comes from high-risk areas, and upon further investigation, the producers in these areas are all Chinese-invested enterprises operating in a standardized manner with relatively low risk.

Step 4: Risk management and control

The Company formulated the "Copper Mineral Supply Chain Due Diligence Risk Management Plan" and manages risks through the following methods:

(1) Continuing trade throughout the process of reducing measurable risk;

(2) Temporarily suspending trade while continuously reducing measurable risk;

(3) Terminating cooperation with suppliers where risk mitigation has failed or the Company has reason to believe that risk mitigation measures are impracticable or unacceptable.

In our work, we understand and investigate the supply chain through the supply chain traceability map, the "Supply Chain Traceability Map Information Form", the "KYS Questionnaire", and face-to-face communication with suppliers. During this assessment year, the Company's copper raw materials were found through traceability to include domestic purchases, and some raw materials were found through multi-level traceability to originate from Mexico, Peru, Chile, Brazil, Indonesia, the Democratic Republic of the Congo (DRC), Zambia and Pakistan. Through CAHRAs identification, we further learned that supply chain risks are mainly caused by the restricted development or low development level of countries, which cannot be completely resolved by the Company's unilateral efforts alone. We propose that, where necessary, all relevant stakeholders (including upstream and downstream enterprises in the supply chain, industry organizations, relevant national governments, etc.) cooperate to address the root cause of risks in a more effective manner. To this end, the Company has had many constructive communications and consultations with relevant suppliers to discuss risk mitigation measures and their feasibility, but progress so far remains slow and has not met expectations.

Step 5: Grievance mechanism and results

In order to promptly identify and handle various possible risks and hidden dangers in the supply chain, ensure smooth communication between stakeholders and the Company, and build a harmonious and mutually beneficial relationship of interests, the Company has established and implemented the "Jiangxi Copper Corporation Limited Mineral Supply Chain Due Diligence Management Policy and Grievance Mechanism" and published it on the Company's website to collect opinions or suggestions from stakeholders. As collected and counted during this assessment year, no grievance opinions were received from stakeholders. Therefore, the number of complaint events received from suppliers and stakeholders during this reporting period was "zero".

Step 6: Management of raw materials purchased that trigger warning signs

During this assessment cycle, the Company purchased copper-bearing raw materials from 102 first-tier suppliers, of which 29 copper raw material suppliers have their origin abroad and 73 have their origin within China (including 5 suppliers from the Company's own

mines). The places of origin cover China, Peru, Mexico, Chile, Brazil, Indonesia, Zambia, the DRC and Pakistan. A small portion of the copper-bearing raw materials comes from conflict-affected and high-risk areas and triggers warning signs. In accordance with the requirements of the OECD Guidance and the China Guidelines, the Company carried out enhanced due diligence. We learned that the minerals originating from conflict-affected and high-risk areas are all produced by mines or primary smelters operating in a standardized manner; some of these mines or smelters have passed the assessment under the China Guidelines, and the likelihood of risks related to armed conflict, human rights and governance is relatively low. However, as the Company's procurement work proceeds, it is possible that copper concentrate may be purchased from high-risk areas and countries. To this end, we will carry out relevant work in the following aspects: first, strengthen the further collection and verification of chain of custody or supply chain traceability information. With the intention of identifying, reducing and controlling risks at the source, the Company will strengthen supervision over raw materials originating from areas that trigger warning signs, continuously improve and refine supply chain information through network, telephone communication and written information inquiries, and attempt to ascertain the detailed information of each batch of materials, continuously transmitting the Company's due diligence demands and pressure upward to multiple tiers of upstream suppliers through first-tier suppliers. Second, further collect and confirm the place-of-origin information of raw materials that trigger warning signs, to the greatest extent possible and on an ongoing basis, in accordance with the requirements of clauses 5.1.3.1 and 5.1.3.3 (the 12 clauses) of the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition). Third, where possible, we will gradually collect detailed supply chain traceability information for all overseas-purchased minerals, including mineral place-of-origin certificates, overseas transportation routes and methods of the minerals, and mine production volume and mining methods, with a view to establishing a more complete traceability system. In the future, the Company will gradually begin to formulate and implement the above measures, establish an on-site assessment procedure, and set up an on-site assessment team. At the same time, we will get in touch with the CCCMC, promptly report the Company's possible on-site assessment needs to the chamber, and actively participate in joint on-site assessments organized by industry organizations. In short, we hope that through the implementation of the above measures, we can strengthen the management of purchased raw materials that trigger warning signs and ensure that the Company's procurement of copper materials does not give rise to the three types of risks committed to in the supply chain policy.

Step 7: Internal assessment and independent third-party assessment

In order to comprehensively examine the operation process and results of the Company's copper supply chain due diligence management system, the Company established an internal assessment procedure, formulated an internal assessment plan and carried out internal assessment. Through methods such as sampling, document review, on-site visits to production areas and interviews with management personnel, the Company conducted a comprehensive internal evaluation of its copper supply chain due diligence management work from January to December 2025, identified certain issues, and relevant departments carried out cause analysis and implemented rectification measures, with the effectiveness of the rectification measures to be verified subsequently. An internal assessment report was compiled, comprehensively evaluating the Company's due diligence management work. The overall conclusion is that the operation of the system basically satisfies the China Guidelines and the requirements of the Company's internal management policies and procedures.

Regarding copper mineral supply chain due diligence management, the Company not only continuously promotes it internally, but also plans to undergo its first audit and assessment by an external independent third party, so as to meet the expectations of stakeholders regarding the compliance and transparency of the Company's copper mineral supply chain due diligence. In the previous cycle, the Company carried out a third-party audit in accordance with Route B prescribed by the LME listed brand responsible sourcing policy. The audit institution was Deloitte Touche Tohmatsu Certified Public Accountants LLP. The audit concluded that no OECD warning signs signals were identified at the Company's refinery in 2024, and an audit report was issued. Report link: https://www.jxcc.com/fzr/details_518_901.html. The external assessment for the current year is planned to be carried out in October 2026. At the same time, the Company also carries out internal assessment every year in accordance with the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition) and the requirements of the Company's copper mineral supply chain due diligence management system. In this way, the Company progressively evaluates the reasonableness and effectiveness of the operation of its due diligence management system from a more objective, fair and comprehensive perspective, and reflects the results achieved in its due diligence practices. At the same time, improvement opinions and suggestions are put forward to achieve continuous improvement.

Step 8: Reporting of due diligence process and results

This progress report is the 2025 annual progress report. In the future, the Company will compile the copper supply chain due diligence progress report for the previous assessment period every year and publish it once a year on the Company's website. At the same time, information related to supply chain due diligence management and work developments are also published on the website in a timely manner, fulfilling the Company's obligation to inform the public and stakeholders. The Company undertakes to publish the assessment results and summary report on its official website after the assessment under the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition). In order to continuously improve, refine and fulfill the Company's obligations regarding copper supply chain due diligence management, in accordance with the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition) and the requirements of the Company's copper supply chain due diligence policies and procedures, we actively and through multiple channels push for the gradual closure of the non-conformities and items requiring improvement identified in the assessment.

While continuously improving its own due diligence management, Jiangxi Copper Corporation Limited also pays closer attention to the latest requirements for external supply chain compliance. We continuously strengthen communication, contact and exchanges with upstream and downstream enterprises, enhance mutual trust, actively participate in industry conferences, forums and relevant training, share and report supply chain due diligence experience and progress with relevant parties, and call on relevant parties in the copper industry to jointly build a more sustainable, healthy and effective mineral supply chain due diligence management mechanism.