KMC 2025 年度矿产供应链尽责管理报告

KMC Annual Mineral Supply Chain Due Diligence Management Report 2025

报告期间 / Reporting Period: 2025 年 1 月 1 日至 12 月 31 日 / January 1 to December 31, 2025

编制部门 / Prepared by: 业务部 /Business Department

复核部门 / Reviewed by: 综合部及相关责任部门 / Admin Department and Relevant Responsible Departments

批准机构 / Approved by: KMC 高级管理层 / KMC Senior Management

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1 公司简介与报告范围 / Company and Reporting Scope

KMC（Kamativi Mining Company Pvt Ltd）位于津巴布韦北马塔贝莱兰省，为四川雅化实业集团股份有限公司旗下子公司。公司拥有并运营 Kamativi 锂矿项目，主要开展锂矿石开采、选矿加工及精矿出口业务。

KMC (Kamativi Mining Company Pvt Ltd), located in Matabeleland North Province, Zimbabwe, is a subsidiary of Sichuan Yahua Industrial Group Co., Ltd. The company owns and operates the Kamativi Lithium Project, primarily engaging in lithium ore mining, mineral processing, and concentrate export operations.

本报告披露 2025 年度矿产供应链尽责管理体系、风险识别、应对措施及运行结果，范围包括矿区和加工设施、矿产交易、运输和出口，以及相关承包商、安保服务和上述活动对工人、社区及其他相关方的冲突与人权影响，并覆盖冲突与高风险区域（CAHRA）的相关风险。2026 年度改进安排在第 6 节单独列示。

This report discloses the mineral supply chain due diligence system, risk identification, mitigation measures, and operational results for 2025. The scope includes mining areas and processing facilities, mineral trading, transportation, and export, as well as relevant contractors, security services, and the conflict and human rights impacts of these activities on workers, communities, and other stakeholders, covering risks associated with Conflict-Affected and High-Risk Areas (CAHRAs). Improvement arrangements for 2026 are listed separately in Section 6.

矿场及业务信息 / Mine Site and Operational Details

- **矿场名称 / Mine Name:** Kamativi 露天锂矿 / Kamativi Open-pit Lithium Mine

- **矿场位置 / Location:** 津巴布韦北马塔贝莱兰省 / Matabeleland North Province, Zimbabwe
- **采矿特许权 / Mining Concession:** MINING LEASE NO.12
- **核心采区坐标 / Core Mining Area Coordinates:** 18°19′50.47″S, 27°3′28.16″E
- **开采模式 / Mining Method:** 露天台阶开采，以自产锂矿石为原料 / Open-pit bench mining, utilizing self-produced lithium ore as feedstock
- **报告期运营责任人 / Operational Lead:** 叶建国，总经理 / Ye Jianguo, General Manager

主要下游交易对象为雅化集团锂盐加工企业。供应链从矿区开采和选矿加工延伸至陆路运输、出口口岸和下游加工环节，跨境运输包括经莫桑比克的路线。
The primary downstream transaction counterparties are lithium salt processing enterprises under Yahua Group. The supply chain extends from mine extraction and mineral processing to road transport, export ports, and downstream refining, with cross-border transport including routes via Mozambique.

2 矿产来源与供应链追溯 / Mineral Origin and Traceability

报告期内，KMC 生产所需原矿来源于第 12 号采矿租约范围内的自有采矿活动，未开展外购矿石业务。公司对开采、进厂、加工、库存和发运实施来源与流转管理，对非授权接收、来源不明、计量和库存异常，以及手工和小规模采矿（ASM）相关边界风险保持监测。外部来源矿产在接收前纳入来源识别及风险审查，并与自产矿产分别记录。
During the reporting period, run-of-mine ore required for KMC's production originated entirely from self-owned mining activities within Mining Lease No. 12, with no external ore purchasing. The company implemented origin and flow management across extraction, plant intake, processing, inventory, and dispatch, maintaining monitoring over unauthorized intake, unknown origin, measurement and stock discrepancies, and boundary risks related to Artisanal and Small-Scale Mining (ASM). Any external-origin minerals are subject to origin verification and risk screening prior to receipt, and recorded separately from self-produced minerals.

来源与流向管理 / Origin and Flow Management

采矿部记录开采地点、数量和日期，相关部门保存进厂接收、加工、库存及发运资料。业务部按销售批次对应合同、承运方、路线、出口单据和买方信息。质技及生产管理人员按产品、期间、重量和含水率口径核对收发与库存；选矿物料平衡结合原矿、精矿、尾矿、品位及回收率分析，计量与盘点差异纳入异常处理。
The Mining Department records extraction locations, quantities, and dates, while relevant departments maintain plant intake, processing, inventory, and dispatch logs. The Business

Department links individual sales batches to contracts, carriers, routes, export documentation, and buyer details. Technical, quality, and production management personnel reconcile dispatches and inventory by product, period, weight, and moisture content; mineral processing mass balance is analyzed considering run-of-mine ore, concentrates, tailings, grade, and recovery rates, with measurement and physical count variances managed through exception procedures.

财务部与业务部核对采矿、交易、运输和出口涉及的政府税费及其他付款，识别公共或私营安保力量、其他武装团体相关的资金和实物支持风险。付款记录包括收款方、日期、金额或数量、用途、审批与凭证，异常收费、被迫付款、第三方代付及缺少正式票据的事项进入专门核查。相关矿产来源、流向和参与方信息向下游买方、审核员及受命收集 CAHRA 矿产信息的区域性或全球性制度化机制提供。

The Finance Department and Business Department reconcile government taxes, fees, and other payments related to mining, trading, transport, and export, identifying risks of financial or in-kind support related to public/private security forces or other armed groups. Payment records capture payees, dates, amounts/quantities, purposes, approvals, and vouchers; irregular charges, extortion, third-party payments, and transactions lacking official receipts undergo targeted verification. Relevant mineral origin, flow, and participant information is provided to downstream buyers, auditors, and regional or global institutional mechanisms mandated to collect CAHRA mineral information.

2025 年度主要运行结果 / Summary of 2025 Operational Results

管理事项 / Operational Area	**2025 年度运行结果 / 2025 Operational Results**
矿产来源 / Mineral Origin	原矿来源为 Kamativi 矿山自产矿，报告期内未开展外购矿石业务。持续监测来源、接收与 ASM 边界风险。Run-of-mine ore originated from Kamativi self-mined ore; no external ore purchasing occurred during the reporting period. Origin, intake, and ASM boundary risks were continuously monitored.
生产与流转 / Production & Flow	矿源管理覆盖开采、进厂、加工、库存、销售及发运，并与销售批次和出口资料衔接。统一产品、期间及干湿基口径，分析计量与库存差异。Origin management covered mining, intake, processing, stock, sales, and dispatch, aligned with sales batches and export

管理事项 / Operational Area	2025 年度运行结果 / 2025 Operational Results
	documents. Product, period, and dry/wet weight baselines were standardized to analyze measurement and stock variances.
付款与安保 / Payments & Security	政府税费、特许费、运输清关及安保服务费纳入合同、审批和财务管理；资料与业务背景衔接仍有不足。归集收款方、用途、资金及实物支持资料，核查异常收费和第三方代付。Government taxes, royalties, transport clearance, and security fees were managed via contracts, approvals, and financial controls; document alignment with operational context requires enhancement. Payee, purpose, financial, and in-kind support data were collated to audit irregular fees and third-party payments.
参与和申诉 / Engagement & Grievance	已开展承包商访谈并运行申诉机制；普通工人及部分社区和弱势群体的参与覆盖仍需扩大。公司直接受理安保及承包商相关申诉，跟踪处理和补救效果。Contractor interviews were conducted and a grievance mechanism was operated; engagement coverage for general workers, select communities, and vulnerable groups requires expansion. KMC directly handled security- and contractor-related grievances, tracking resolution and remedy effectiveness.
风险计划与监测 / Risk Plan & Monitoring	制度、访谈、申诉及部分整改已有运行记录；连续监测和冲突风险措施效果评价仍是改进重点。持续事项转入 2026 年度计划，执行月度记录和季度效果评价。Operating records were established for policies, interviews, grievances, and partial corrective actions; continuous monitoring and evaluation of conflict risk mitigation effectiveness remain

管理事项 / Operational Area	2025 年度运行结果 / 2025 Operational Results
	key focus areas. Ongoing items carried over into the 2026 plan, with monthly tracking and quarterly reviews.
岗位能力与沟通 / Competency & Communication	已建立合同、人权承诺及培训安排，部分承包商培训覆盖和考核记录仍不完整。关键岗位培训与现场抽查结合，风险信息传达到一线工人和社区。Contractual provisions, human rights commitments, and training plans were established; training coverage and assessment logs for certain contractors remain incomplete. Key role training was combined with site audits, delivering risk information to frontline workers and communities.

报告期内，公司形成了来源管理、承包商访谈、申诉及部分整改的运行记录。下一阶段的重点是提高付款和运输资料的衔接程度、相关方参与覆盖及风险措施的效果评价能力。申诉结果及统计期间在第 5 节列示。

During the reporting period, the company established operational records for origin management, contractor interviews, grievances, and partial corrective actions. Priorities for the next phase include strengthening alignment between payment and transport records, expanding stakeholder engagement coverage, and building capacity to evaluate mitigation effectiveness. Grievance outcomes and logging periods are detailed in Section 5.

3 尽责管理体系 / Due Diligence Management System

3.1 政策与管理依据 / Policies and Management Standards

公司参考 OECD《受冲突影响和高风险地区矿石负责任供应链尽职调查指南》第三版，并依据 IRMA 负责任采矿标准第 3.4 章识别和管理冲突及相关人权风险。公司承诺不明知或故意造成、助长或参与武装冲突和人权侵害，不向非法控制矿区或运输路线、非法征税或实施敲诈的武装团体及公共或私营安保力量提供直接或间接支持。

The company references the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) and identifies and manages conflict and related human rights risks in accordance with Chapter 3.4 of the IRMA Standard for Responsible Mining. The company commits to not knowingly or intentionally

cause, contribute to, or participate in armed conflict or human rights abuses, and to not provide direct or indirect support to armed groups or public/private security forces that illegally control mine sites/transport routes, levy illegal taxes, or commit extortion.

尽责管理覆盖 OECD 指南附件二所列风险，包括严重侵犯人权、支持非国家武装团体、公共或私营安保力量相关风险、贿赂和矿产原产地欺诈、洗钱，以及税费和特许费支付。公司将人权保护、反腐败、来源追溯及依法缴纳税费纳入业务管理，并向客户提供相关尽责管理信息。

Due diligence covers risks specified in Annex II of the OECD Guidance, including severe human rights abuses, support to non-state armed groups, risks associated with public or private security forces, bribery and fraudulent misrepresentation of mineral origin, money laundering, and payment of taxes, fees, and royalties. The company incorporates human rights protection, anti-corruption, origin traceability, and statutory tax payments into operational management, providing relevant due diligence information to customers.

3.2 组织架构与职责 / Organizational Structure and Responsibilities

根据《关于明确矿产供应链尽责管理小组等相关机构人员的决定》（KMC 业务字【2025】2 号），总经理对矿产供应链尽责管理负责，审批政策、重大风险应对及资源安排；总经理助理统筹协调。业务部组织风险评估、矿产来源与交易追溯、业务参与方核查、运输管理、风险计划及监测汇总。

Pursuant to the *Decision on Clarifying Personnel for the Mineral Supply Chain Due Diligence Team and Related Bodies* (KMC Biz [2025] No. 2), the General Manager holds ultimate responsibility for supply chain due diligence, approving policies, major risk responses, and resource allocations; the Assistant General Manager coordinates overall execution. The Business Department leads risk assessments, origin/transaction traceability, partner verification, transport management, risk planning, and monitoring consolidation.

综合部负责人权和劳工信息收集、利益相关方参与、申诉协调、培训及报告传达；采矿部负责开采活动和来源记录；财务部负责付款审核与凭证管理；质技部负责检测、计量及相关生产资料；安生部、后勤部及相关部门负责现场和安保风险控制。评估工作结合人员的专业知识、经验、培训和实际分工开展，专业性较强的事项引入相关人员支持或复核。高级管理层接收风险评估、风险管理计划及监测结果，并决定重大风险和持续改进事项。

The Admin Department oversees human rights and labor data collection, stakeholder engagement, grievance coordination, training, and report communication. The Mining Department manages mining activity and origin logs; the Finance Department manages payment auditing and vouchers; the Technical & Quality Department oversees testing, measurement, and production data; the Safety Production Department, Mine Support Department, and related departments control site and security risks. Assessments are conducted based on staff expertise, experience, training, and functional assignments, with

external or specialist support engaged for technical matters. Senior Management receives risk assessments, risk management plans, and monitoring findings, deciding on material risks and continuous improvement actions.

3.3 管理文件与运行机制 / Governance Documents and Operational Mechanisms

公司已建立《负责任矿产供应链尽责管理政策》（KMC 业务字【2025】3 号）、《供应链尽责管理制度》（KMC 业务字【2025】5 号）、《供应链风险识别与评估办法》（KMC 业务字【2025】4 号）、《申诉管理程序》，并配套实施人权、劳动、反腐败和反洗钱管理要求。相关文件纳入受控管理，并随业务和风险变化更新。

The company has enacted the Responsible Mineral Supply Chain Due Diligence Policy (KMC Biz [2025] No. 3), *Supply Chain Due Diligence Management System* (KMC Biz [2025] No. 5), Supply Chain Risk Identification and Assessment Measures (KMC Biz [2025] No. 4), and Grievance Management Procedures, alongside human rights, labor, anti-corruption, and anti-money laundering requirements. Controlled documents are updated in line with operational and risk shifts.

尽责管理按照建立管理体系、识别和评估风险、制定并执行风险应对策略、在供应链适当环节支持独立第三方审核、公开报告的五个步骤组织。业务部汇总业务与风险信息，责任部门执行措施并保留运行记录，管理层评价风险变化、措施效果和资源需求。公司通过合同要求、岗位培训和现场监督向承包商传达相关政策。

Due diligence follows the 5-step framework: establishing management systems, identifying and assessing risks, designing and implementing risk response strategies, supporting independent third-party audits at appropriate supply chain points, and publicly reporting. The Business Department consolidates risk data, responsible departments execute actions and maintain records, and management evaluates risk trends, effectiveness, and resource needs. Policies are communicated to contractors via contract clauses, job training, and field oversight.

3.4 独立审核与管理评审 / Independent Audits and Management Reviews

公司在供应链适当环节配合独立第三方审核，向相关审核提供矿产来源、交易、付款及风险管理资料，并将审核意见纳入管理改进。2026 年，KMC 接受 REA 开展的 IRMA 第一阶段文件评估，相关意见与年度管理评审决定共同纳入后续工作。

The company cooperates with independent third-party audits at appropriate points in the supply chain, providing mineral origin, transaction, payment, and risk management documentation, and integrating audit findings into management improvements. In 2026, KMC underwent Stage 1 IRMA document assessment conducted by REA, with recommendations integrated alongside management review decisions into ongoing work.

2025 年度管理评审于 2026 年 1 月 5 日组织，评审关注风险识别、来源与交易管理、付款、安保、参与和申诉，以及措施执行和资源配置。本报告修订期间，公司同

步更新管理评审报告、风险评估、风险管理计划及量化指标体系，2026 年度工作据此衔接执行。

The 2025 Management Review took place on January 5, 2026, focusing on risk identification, origin/trade management, payments, security, engagement, grievances, action execution, and resource allocation. Concurrent with this report revision, the company updated management review reports, risk assessments, risk plans, and quantitative indicator frameworks to guide 2026 operations.

4 CAHRA 识别与冲突风险评估 / CAHRA Screening and Conflict Risk Assessment

4.1 筛查范围与风险背景 / Screening Scope and Risk Context

公司将津巴布韦矿区及实际经莫桑比克的运输活动纳入 CAHRA 尽责管理范围，以矿区、运输路线、口岸、停靠点和业务关系为具体评估对象。筛查综合考虑治理薄弱、政治与社会紧张、武装暴力、非法收费、人权及安保状况，并分析这些因素与公司付款、安保、社区、矿源和物流活动的联系。

The company incorporates its mining operations in Zimbabwe and transport activities via Mozambique into enhanced CAHRA due diligence, evaluating mine sites, transport corridors, border posts, stops, and business relationships. Screening evaluates weak governance, socio-political tensions, armed violence, illegal fees, human rights, and security environments, linking these factors to company payments, security, community, feedstock, and Mine Support Department activities.

风险背景信息来自联合国机构、政府及研究机构发布的资料、相关地区冲突和治理信息、地方社会经济情况，以及工人、司机、社区和其他相关方反馈。区域层面的信息用于识别风险背景，地点和路线信息用于分析公司活动的实际暴露；评估结合信息的地域、时间和可信度形成判断。

Risk context data is drawn from UN agencies, governments, research institutions, regional conflict/governance reports, local socio-economic data, and feedback from workers, drivers, communities, and stakeholders. Macro-level information defines context, while site and route data analyzes actual exposure, forming judgments based on geographic, temporal, and credibility factors.

津巴布韦矿区的管理关注包括就业和机会分配、土地及资源使用诉求、政府及安保付款、ASM 边界接触等。莫桑比克部分地区的冲突与历史边缘化、贫困、青年就业不足及资源和发展机会分配不均等因素相互影响，可能通过运输安全、检查站、异常收费及沿线社区关系影响业务。公司以实际路线和接触对象分析相关影响，持续调整重点监测区域和控制措施。

Management priorities at the Zimbabwe mine include employment/opportunity distribution, land/resource claims, government/security payments, and ASM boundary contact. Conflicts in parts of Mozambique stem from historical marginalization, poverty, youth

underemployment, and unequal resource/development opportunities, potentially affecting operations through transit security, checkpoints, irregular fees, and corridor community relations. KMC analyzes impacts along actual corridors, adjusting priority monitoring areas and controls accordingly.

4.2 主要风险及管理情况 / Key Risks and Management Status

编号 / ID	业务环节 / Operational Segment	主要风险 / Key Risk
R01	**政府税费、清关、检查站及安保付款** Government Taxes, Clearance, Checkpoints, & Security Payments	非法收费、勒索、间接或不当资金支持、贿赂及洗钱。Extortion, bribery, money laundering, indirect or improper financial support.
R02	**门禁、周界、社区事件及安保服务** Access Control, Perimeter, Community Incidents, & Security Services	过度用力、不当拘留、歧视、报复及非法控制或敲诈。Excessive force, unlawful detention, discrimination, retaliation, illegal control/extortion.
R03	**招聘、用工、土地资源使用及社区关系** Recruitment, Labor, Land/Resource Use, & Community Relations	机会分配和诉求处理引发矛盾；强迫劳动、最恶劣形式童工等严重侵害。Tensions over opportunity distribution and grievance handling; forced labor and worst forms of child labor.
R04	**矿产来源、接收、加工、交易及 ASM 边界** Mineral Origin, Intake, Processing, Trade, & ASM Boundaries	非授权接收、虚假来源、库存异常、利益流向不明及边界冲突。Unauthorized intake, fraudulent origin, stock

编号 / ID	业务环节 / Operational Segment	主要风险 / Key Risk
		discrepancies, unclear benefit flows, boundary conflict.
R05	**跨境运输、口岸及沿线停靠和检查站** Cross-border Transport, Ports, Stops, & Checkpoints	司机及沿线社区受害、异常滞留、非法收费及冲突支持。Harm to drivers/community, abnormal delays, illegal fees, and conflict support.

上述五类风险与《冲突与高风险区域（CAHRA）风险评估总结报告》《冲突风险管理计划》保持一致。2025 年度运行显示，基础控制已经建立，付款和路线资料整合、参与覆盖、岗位培训及连续监测仍有改进空间。公司据此安排后续行动，并结合现场情况、事件和申诉反馈评价剩余风险及措施效果。

5 利益相关方参与与申诉 / Stakeholder Engagement and Grievances

5.1 参与范围与意见回应 / Scope of Engagement and Response

公司将区域背景信息与受影响群体意见共同用于风险识别。背景信息包括政府部门、研究或专业机构、独立专家及熟悉当地情况的组织提供的资料；受影响群体包括矿山和承包商工人、运输司机、安保人员、社区男性和女性、儿童代表及其他弱势群体。沟通采用参与者能够理解的语言，并保护独立表达、个人身份和保密信息。儿童相关意见通过适当代表及保护安排收集。

The company combines regional context information with affected group feedback to identify risks. Contextual data is provided by government bodies, research/specialist institutions, independent experts, and local organizations; affected groups include mine/contractor workers, drivers, security staff, community men/women, child representatives, and vulnerable groups. Engagement uses accessible languages and protects independent expression, personal identities, and confidential information. Views concerning children are collected through appropriate representatives and protective arrangements.

2025 年度已开展承包商工人访谈并通过申诉机制收集相关方意见。现有参与主要覆盖承包商及部分社区代表，普通工人、女性、儿童代表和其他弱势群体的覆盖仍有不足。公司将就业和机会分配、承包商用工、安保行为及诉求处理作为重点沟通议

题，分别由综合部、业务部和相关责任部门组织回应；涉及招聘、现场行为和处理程序的问题纳入相应管理措施，参与范围和措施效果作为 2026 年度跟踪重点。
In 2025, contractor worker interviews were conducted and stakeholder feedback was gathered through grievance channels. Current engagement primarily covered contractors and select community representatives, while coverage for general workers, women, child representatives, and other vulnerable groups required expansion. Key topics included employment/opportunity distribution, contractor labor practices, security conduct, and grievance resolution, addressed by the Admin Department, Business Department, and responsible units. Issues concerning recruitment, site behavior, and grievance procedures were built into mitigation actions, with engagement scope and effectiveness designated as 2026 tracking priorities.

5.2 申诉渠道与处理结果 / Grievance Channels and Outcomes

公司依据《申诉管理程序》受理员工、承包商工人、社区及其他相关方对冲突、付款、安保和人权问题的关切。申诉可通过意见箱、热线电话或电子邮箱提交，也可匿名反映。综合部负责协调受理和跟踪，责任部门开展调查、落实处理措施，并在程序规定的时限内向能够联系的申诉人反馈。
The company processes concerns from employees, contractor workers, communities, and stakeholders regarding conflict, payments, security, and human rights under the Grievance Management Procedures. Grievances can be submitted via suggestion boxes, hotline, or email, with anonymous reporting permitted. The Admin Department coordinates intake and tracking, responsible departments investigate and execute measures, and feedback is delivered to contactable complainants within defined procedure timelines.

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公司提供必要的语言和沟通协助，保护申诉人及相关人员，禁止报复。针对安保或承包商的申诉可直接提交 KMC。涉及利益冲突的事项由未涉事人员处理，必要时取得外部专业支持。处理过程包括事实调查、意见沟通、措施落实、补救及结果反馈；申诉人可对处理结果提出复核请求。公司申诉机制不限制任何人使用司法、行政或其他合法救济渠道。
The company provides language and communication assistance, protecting complainants and individuals from retaliation. Grievances concerning security or contractors may be submitted directly to KMC. Matters involving conflicts of interest are assigned to non-conflicted personnel, with external professional support engaged as needed. Resolution involves fact-finding, consultation, measure execution, remedy, and feedback; complainants may request a review of outcomes. The grievance mechanism does not restrict access to judicial, administrative, or other legal remedies.

本报告采用的 2025 年 1 月 7 日至 9 月 5 日申诉记录共 29 项，其中 26 项标记为已解决，其余 3 项纳入持续跟踪。上述数量对应所列统计期间。公司结合案件性质、措施落实、当事人反馈及重复发生情况评价处理效果，并对涉及冲突、安保和严重人权侵害的线索单独评估和跟踪。

For the period from January 7 to September 5, 2025, 29 grievances were recorded, of which 26 were marked as resolved and 3 remained under ongoing tracking. These figures correspond strictly to the specified period. Resolution effectiveness is evaluated based on case nature, execution, stakeholder feedback, and recurrence, with red flags involving conflict, security, or severe human rights abuses evaluated and tracked separately.

6 2026 年度改进与监测安排 / Improvement and Monitoring Arrangements for 2026

序号 / No.	工作重点 / Focus Area	行动及预期成果 / Actions & Expected Outcomes	责任部门 / Responsible Unit	完成节点 / Timeline
1	**风险评估与记录衔接** Risk Assessment & Alignment	按 R01、R04、R05 更新矿区及实际运输路线风险，归集来源、交易、付款及异常事项，形成可追溯的评估与处理结果。Update mine and transit risks under R01, R04, R05; consolidate origin, trade, payment, and exception logs into traceable assessments and outcomes.	业务部牵头；财务部、采矿部、质技部配合 Business Dept (Lead); Finance, Mining, Tech Depts	T 后 30 日内 Within T+30 days
2	**参与和安保申诉** Engagement & Security Grievances	围绕 R02、R03 扩大工人、社区及弱势群体参与，共同讨论目标和措施；检查公司申诉渠道的可及性并跟踪意见处理。Expand worker, community, and vulnerable group engagement around R02 and R03; verify grievance channel accessibility and track resolution.	综合部牵头；业务部、后勤部及相关部门配合 Admin Dept (Lead); Business, Mine Support Department & related units	T 后 60 日内 Within T+60 days

序号 / No.	工作重点 / Focus Area	行动及预期成果 / Actions & Expected Outcomes	责任部门 / Responsible Unit	完成节点 / Timeline
3	**监测与有效性** Monitoring & Effectiveness	执行统一风险管理计划及16项量化指标，完成月度监测、异常处置和首轮措施效果评价。Implement unified risk plan and 16 quantitative indicators; perform monthly tracking, exception handling, and first-round effectiveness review.	业务部牵头；各风险责任部门执行 Business Dept (Lead); Responsible risk units	T后30日内启动；90日内完成首轮复核 Launch T+30d; First review within T+90d
4	**人员能力与培训** Competency & Training	开展评估人员和关键岗位能力评价，覆盖安保、司机、付款审核及现场管理人员；结合培训、考核与现场抽查评价效果。Evaluate competencies for assessors and key roles (security, drivers, payment auditors, site managers); assess effectiveness via training, exams, and audits.	综合部、业务部；相关部门配合 Admin Dept, Business Dept, & related units	T后60日内 Within T+60 days
5	**信息传达与披露** Information Sharing & Disclosure	向管理层提交评估、计划和监测结果，向工人和社区反馈相关发现，更新年度公开报告并保留沟通反馈和发布记录。Submit assessments, plans, and tracking results to management; report findings to workers/communities;	业务部、综合部 Business Department, Admin Department	报告批准后30日内完成本轮传达和公开报告更新；此后按季度报告 Update within 30 days of approval;

序号 / No.	工作重点 / Focus Area	行动及预期成果 / Actions & Expected Outcomes	责任部门 / Responsible Unit	完成节点 / Timeline
		update public report and retain records.		quarterly thereafter

上述安排与2025年度管理评审报告保持一致，由业务部统筹，各责任部门负责人落实。T为本次修订所配套的《冲突风险管理计划》经批准生效之日。公司为日常核查、社区沟通、必要翻译、岗位培训和数据整理配置人力与时间，专业评估及特定风险处置按需要安排外部支持，相关费用纳入年度尽责管理预算并按授权程序执行。重大风险调查、保护和补救优先获得资源保障。

The above schedule aligns with the *2025 Management Review Report*, coordinated by the Business Department and implemented by department heads. "T" denotes the approval date of the companion Conflict Risk Management Plan. KMC allocates personnel and time for routine checks, community outreach, translation, training, and data compilation, engaging external specialist support for specialized assessments or risk mitigation as needed under the annual due diligence budget. Material risk investigation, protection, and remedy receive priority resource allocation.

监测目标与管理复核 / Monitoring Targets and Management Reviews

公司采用16项量化指标，覆盖安保人员审查、严重侵权线索、申诉措施落实、运输异常、路线筛查、机会分配、社区事件、来源追溯、库存差异、ASM处置、年龄核查、不当付款、税费凭证及措施有效性。来源追溯、关键岗位审查培训及到期措施落实等过程指标以100%为管理目标，异常事件结合性质、影响及重复发生情况分析。

The company tracks 16 quantitative indicators covering security screening, severe abuse red flags, grievance action delivery, transit anomalies, route screening, opportunity distribution, community incidents, origin traceability, stock variances, ASM handling, age verification, improper payments, tax vouchers, and mitigation effectiveness. Process indicators (e.g., origin tracing, security screening/training, scheduled actions) target 100% compliance, while exception events are evaluated based on severity, impact, and recurrence.

各责任部门按月记录监测结果，业务部统一复核统计范围、期间及分子分母，并按季度向高级管理层报告。无适用对象、记录缺失及结果未核实分别标识，不计入达标结果。措施效果结合运行记录、现场情况和受影响者反馈评价，对效果不足的措施调整责任、方法和期限。

Responsible units log monthly monitoring results; the Business Department verifies statistical scope, periods, numerators, and denominators, reporting quarterly to Senior Management. Non-applicable instances, missing records, or unverified results are flagged separately and excluded from compliance totals. Measure effectiveness is evaluated through operating records, field conditions, and stakeholder feedback, with adjustments made to responsibilities, methods, or timelines where performance is insufficient.

重大风险响应与补救 / Material Risk Response and Remedy

对冲突、严重人权侵害、非法收费或不当资金支持等可信线索，公司立即开展核查、报告和必要保护。对于严重侵权或支持非国家武装团体的合理风险，公司立即暂停或终止相关业务关系；其他风险按其性质采取有目标、有期限的减缓措施，并根据实施效果决定继续合作、暂停或终止。

Upon receiving credible red flags concerning conflict, severe human rights abuses, illegal fees, or improper financial support, the company immediately initiates verification, reporting, and protective measures. Where reasonable risks indicate severe abuses or support to non-state armed groups, relevant business relationships are suspended or terminated immediately; for other risks, targeted, time-bound mitigation is pursued, with decisions to maintain, suspend, or terminate based on implementation results.

如发现公司在不知情或非故意情况下参与武装冲突或严重侵犯人权，公司立即停止或改变导致问题的行为，缓解或补救影响，并按人权尽职调查安排开展外部监测。受影响者的保护与补救纳入处置过程。

If the company inadvertently or unintentionally contributes to armed conflict or severe human rights abuses, it will immediately cease or alter the responsible conduct, mitigate or remedy impacts, and institute external monitoring under human rights due diligence frameworks. Protection and remedy for affected parties are integrated into the response process.

7 年度结论与公开信息 / Annual Conclusion and Public Information

2025 年，KMC 围绕自产矿开采、加工及销售运输业务建立了矿产供应链尽责管理制度和部门职责，开展来源管理、承包商访谈、申诉处理及部分整改工作。现行体系与公司业务范围总体适宜，基础控制已进入运行。年度工作反映出付款与路线信息衔接、相关方参与覆盖、岗位能力和措施有效性评价方面的改进需求。

In 2025, KMC established mineral supply chain due diligence policies and departmental responsibilities tailored to its self-mined extraction, processing, sales, and transport operations, carrying out origin management, contractor interviews, grievance handling, and

corrective actions. The system is suited to the operational scope, with baseline controls active. Operational performance highlights areas for improvement in payment-route record alignment, stakeholder engagement coverage, role competencies, and mitigation effectiveness evaluation.

公司将上述事项纳入风险管理计划和 2026 年度监测安排，按照责任、目标、期限和效果评价持续跟踪。风险评估至少每年更新一次；重大安保或冲突事件、严重侵权线索、运输路线或矿源变化、重要承包商变化，以及新增建设和生产活动触发专项评估。

The company has integrated these priorities into the risk management plan and 2026 monitoring arrangements, tracking progress against responsibilities, targets, timelines, and effectiveness reviews. Risk assessments are updated at least annually, with ad-hoc evaluations triggered by major security/conflict incidents, severe abuse red flags, route or feedstock shifts, key contractor changes, or new construction and production activities.

高级管理层定期审阅风险评估、风险管理计划和监测结果，决定措施调整及必要资源。业务部会同综合部将与各方有关的发现、应对措施和监测结果传达至矿山员工、承包商工人及受影响社区，并将反馈用于后续评估和行动。

Senior Management regularly reviews risk assessments, risk plans, and monitoring findings to determine strategy adjustments and resource allocations. The Business Department and Admin Department communicate relevant findings, actions, and tracking results to mine staff, contractor workers, and local communities, feeding stakeholder input into future assessments and actions.

报告公开与沟通 / Report Disclosure and Communication

本报告经 KMC 高级管理层批准后，通过公司网站 www.kamativi.cn 公开。公司按年度披露尽责管理进展，公开内容包括管理体系、风险识别、应对措施、运行结果和后续安排。

Upon approval by KMC Senior Management, this report is made publicly available on the company website (www.kamativi.cn). The company discloses due diligence progress annually, covering governance systems, risk identification, response measures, operational outcomes, and future plans.

报告修订日期为 2026 年 9 月 15 日。公司保存历次公开版本及发布记录，公开信息与受控报告和配套管理资料保持一致。公开披露保护个人隐私、举报人安全及合理商业秘密。

This report version was revised on September 15, 2026. KMC maintains historical published versions and release logs, ensuring public disclosures match controlled reports and internal records while protecting individual privacy, whistleblower safety, and commercial secrets.

公司接受客户、社区、员工、承包商及其他相关方对本报告和尽责管理工作的意见，反馈由业务部与综合部协同处理，并纳入下一轮管理评审。

The company welcomes feedback on this report and due diligence activities from customers, communities, employees, contractors, and stakeholders. Inquiries are processed jointly by the Business Department and Admin Department, feeding into the next management review cycle.

有关本报告的反馈可通过电话 **+263773718612**，或电子邮箱 **KMC@scyahua.com**、**esg@scyahua.com** 提交。

Feedback regarding this report may be submitted via phone at **+263773718612** or email at **KMC@scyahua.com** / **esg@scyahua.com**.

批准人签字 / Approved by: Person 