KMC 冲突与高风险区域（CAHRA）风险评估总结报告
KMC CAHRA Conflict Risk Assessment Summary Report
2025 年度评估及 2026 年补充更新
2025 Annual Assessment & 2026 Supplementary Update

年度评估期间 / Annual Assessment Period	2025 年 1 月 1 日至 12 月 31 日 / Jan 1, 2025 – Dec 31, 2025
补充更新范围 / Supplementary Update Scope	2026 年度新增业务及管理改进；更新截止日：2026 年 9 月 15 日 New business & management improvements in 2026; Cut-off: Sep 15, 2026
编制与复核部门 / Departments Involved	编制：业务部；复核：综合部及相关责任部门；批准：KMC 高级管理层 Prepared by: Business Dept; Reviewed by: Admin Dept & relevant depts; Approved by: KMC Senior Management
本版修订日期 / Revision Date	2026 年 9 月 15 日 / September 15, 2026

1 评估背景与目的 1 Background and Purpose

本报告评价 Kamativi Mining Company Pvt Ltd（KMC）采矿、加工、交易及运输活动面临的冲突和相关人权风险，分析公司活动及业务关系可能造成、助长或直接关联的不利影响，确定风险等级、控制重点及后续行动。评估依据为 IRMA 负责任采矿标准第 3.4 章及 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》第三版附件二，结果用于《冲突风险管理计划》、年度管理评审及矿产供应链尽责管理报告。

This report evaluates the conflict and related human rights risks faced by Kamativi Mining Company Pvt Ltd (KMC) in its mining, processing, trading, and transportation activities. It analyzes the adverse impacts that company activities and business relationships may cause, contribute to, or be directly linked to, and determines risk levels, control priorities, and follow-up

actions. The assessment is based on Chapter 3.4 of the IRMA Standard for Responsible Mining and Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition). The results are used for the Conflict Risk Management Plan, annual management reviews, and mineral supply chain due diligence reports.

公司依据 2025 年 9 月 19 日《KMC 受冲突影响和高风险区域（CAHRA）识别表》，将津巴布韦矿山运营地及实际经莫桑比克的运输活动纳入 CAHRA 强化尽责管理范围。地区识别综合考虑冲突、人权、治理及社会经济背景，并落实到矿区、沿线地点和具体业务关系。欧盟 CAHRA 清单作为辅助信息来源，其指示性、非穷尽性与公司自主识别相结合。

In accordance with the 'KMC Conflict-Affected and High-Risk Areas (CAHRA) Identification Table' dated September 19, 2025, the company included its Zimbabwe mine operations and transport activities via Mozambique under enhanced CAHRA due diligence. Regional identification comprehensively considers conflict, human rights, governance, and socio-economic contexts, and is applied to mining areas, transit locations, and specific business relationships. The EU CAHRA list serves as a supplementary information source, combining its indicative, non-exhaustive nature with the company's independent identification.

本次评估维持 CAHRA 强化尽责管理安排，识别资金与付款、安保与强制力使用、社区与劳动关系、矿产来源及 ASM 接触、运输与路线五类风险。安保与强制力使用的剩余风险评为高风险，其余四类评为中风险。管理重点为安保现场行为及申诉可及性、付款与路线资料衔接、受影响群体参与、矿产来源和流转核对，以及风险措施的持续效果评价。

This assessment maintains the enhanced CAHRA due diligence arrangements, identifying five categories of risk: Capital & Payments, Security & Force, Community & Labor Relations, Mineral Origin & ASM Contact, and Transport & Routes. The residual risk for Security & Force Usage is rated as High Risk, while the other four categories are rated as Medium Risk. Key management priorities include security site behavior and grievance accessibility, alignment of

payment and route records, affected group engagement, verification of mineral origin and flows, and continuous evaluation of risk mitigation measures.

2 评估范围与方法 2 Assessment Scope and Methodology

2.1 评估边界 2.1 Assessment Boundary

年度评估以 2025 年度运营资料为基准，2026 年度新增业务与管理改进单独分析。2026 年 1 月 5 日年度管理评审及 2026 年 REA 开展的 IRMA 第一阶段文件评估意见纳入本次更新的管理输入，后续措施按本报告第 6 节实施。

The annual assessment is benchmarked against 2025 operational data, with new business and management improvements in 2026 analyzed separately. Findings from the annual management review on January 5, 2026, and the Stage 1 IRMA document assessment conducted by REA in 2026, were incorporated as management inputs for this update, with follow-up measures implemented according to Section 6 of this report.

核心运营范围为津巴布韦北马塔贝莱兰省 Kamativi 矿山第 12 号采矿租约（MINING LEASE NO.12）范围内的采矿区、选厂、关联设施、员工及承包商营地，以及受矿山活动影响的周边社区。核心采区坐标为 18°19′50.47″S、27°3′28.16″E。评估涉及公司员工、承包商及分包商工人、安保人员、运输司机、社区居民和其他相关群体。

The core operational boundary covers the mining area, processing plant, associated facilities, employee and contractor camps within Mining Lease No. 12 at the Kamativi Mine, North Matabeleland Province, Zimbabwe, as well as surrounding communities affected by mine activities. Core mining coordinates are 18°19'50.47"S, 27°3'28.16"E. The assessment covers company employees, contractor and subcontractor workers, security personnel, transport drivers, community residents, and other relevant stakeholders.

2026 年度补充范围包括钽铌锡回收线及硫酸锂项目。新增施工和生产活动扩大了施工用工、分包管理、土地与资源使用、安保接触、原料与产品管理及运输方面的风险暴露。

项目风险分别纳入 R02、R03、R04 和 R05 管理；建设期重点为用工、社区和现场行为，投产及发运前重点为矿物来源、加工流向、交易对象和运输安排。

The 2026 supplementary scope includes the Tantalum-Niobium-Tin recovery line and the Lithium Sulfate project. New construction and operational activities expanded risk exposures in construction labor, subcontracting management, land and resource use, security contact, raw material and product management, and transport. Project risks are managed under R02, R03, R04, and R05 respectively; focus during construction is on employment, community, and site behavior, while focus prior to commissioning and shipment is on mineral origin, processing flow, counterparties, and transport arrangements.

运输评估覆盖矿产由 KMC 保管或拥有期间的境内道路、跨境口岸、过境路段、转运点及港口，并结合合同、贸易条款和交接安排分析后续业务关系。路线档案关联起讫点、口岸、港口、承运方、使用期间、停靠和交接点，以运单、出口资料、车辆轨迹及司机反馈反映实际运输活动。经莫桑比克的运输活动按具体走廊和接触对象评价。

Transport assessment covers domestic roads, cross-border checkpoints, transit segments, transshipment points, and ports while minerals are under KMC custody or ownership, analyzing downstream business relationships alongside contracts, trade terms, and handovers. Route files link origins/destinations, ports, carriers, usage periods, stops, and handovers, reflecting actual activities via waybills, export documents, vehicle tracking, and driver feedback. Transport via Mozambique is evaluated based on specific corridors and contact points.

原料边界覆盖自产矿开采、进厂接收、加工、库存和发运，并包括外购、委托加工、试验料、历史堆存料或尾矿、退货及第三方矿物进入等可能改变矿源结构的情形。2025 年度原矿以 Kamativi 自产矿为来源，未开展外购矿石业务。来源不明、非授权接收、批次混入及 ASM 边界接触仍纳入风险识别。

The raw material boundary covers run-of-mine extraction, factory intake, processing, inventory, and shipment, as well as scenarios that could alter origin structure (purchases, toll processing, test batches, historical stockpiles/tailings, returns, and third-party inputs). Run-of-

mine ore in 2025 originated solely from Kamativi self-mined ore, with no external purchases. Unidentified sources, unauthorized intake, batch mixing, and ASM boundary contacts remain subject to risk identification.

2.2 识别方法与评级规则

2.2 Identification Methodology and Rating Rules

评估按地区背景、公司活动或业务关系、潜在影响、受影响群体及现有控制五个方面展开。资料包括公开来源、公司生产和交易记录、付款与安保管理资料、现场管理记录、承包商和社区访谈及申诉信息。冲突风险分析重点关注暴力、严重侵害、非法控制或资金支持，以及治理和社会矛盾通过公司活动升级的可能；相关劳动、人权、安保和社区事项与相应管理制度衔接。

The assessment evaluates five dimensions: regional context, company activities/business relationships, potential impacts, affected groups, and existing controls. Data sources include public domain information, production/trade records, payment and security logs, site management records, contractor/community interviews, and grievance logs. Conflict risk analysis focuses on violence, severe abuses, illegal control/financial support, and the potential for governance and social conflicts to escalate through company activities, linking labor, human rights, security, and community matters to corporate management systems.

地区分析区分长期根本原因、近期变化和直接触发因素。长期因素包括治理能力、资源与机会分配、贫困和社会排斥；近期变化包括暴力事件、道路管制及治安安排；直接触发因素包括招聘争议、项目占地、边界接触、安保介入及异常收费。公司结合信息的日期、地点、来源及业务关联程度确定管理重点。

Regional analysis distinguishes between long-term root causes, recent changes, and direct triggers. Long-term factors include governance capacity, resource/opportunity allocation, poverty, and social exclusion; recent changes include violent incidents, road controls, and security arrangements; direct triggers include recruitment disputes, land occupation, boundary

contact, security intervention, and irregular fees. The company prioritizes management based on date, location, source, and operational relevance of information.

风险评价采用高、中、低三级定性方法。固有风险反映现有控制实施前的风险，剩余风险反映现有控制及其实际效果作用后的风险。本次不以缺失数据计零分，也不以制度发布本身作为降级依据。高风险包括存在可信严重风险线索，或持续直接接触可能造成严重、难以补救的伤害而关键控制尚不足以降低该风险的情形；中风险包括存在明确暴露、基础控制已运行但专项改进仍有必要的情形；低风险以接触有限、发生可能性低且控制效果充分得到支持为条件。

Risk evaluation uses a three-tier qualitative method (High, Medium, Low). Inherent risk reflects risk before controls; residual risk reflects risk after existing controls and actual effectiveness. Missing data is not scored as zero, nor is policy issuance alone sufficient for downgrading. High Risk includes credible red flags or continuous direct contact causing severe, irreversible harm where controls remain insufficient; Medium Risk involves clear exposure with basic controls operating but requiring targeted improvements; Low Risk requires limited exposure, low likelihood, and fully supported control effectiveness.

3 地区背景、运营风险与评价结果

3 Regional Context and Operational Risk Assessment

地区背景分析形成以下五类运营风险。各类风险均明确公司接触环节、潜在影响、受影响群体、现有控制和剩余风险。津巴布韦方面，IMF 报告（国别报告 25/282）指出其宏观经济有所稳定，但面临财政压力及治理脆弱性（S1）。莫桑比克方面，UNHCR 报告指出北部暴力扩展至 Nampula 部分地区（S2），UNOPS 分析强调其背景与经济不平衡及社会因素相关（S3）。

Regional analysis identifies five operational risk categories, defining operational contact points, potential impacts, affected groups, existing controls, and residual risk. For Zimbabwe,

IMF reports (Country Report 25/282) note macroeconomic stabilization alongside fiscal pressures and governance vulnerabilities (S1). For Mozambique, UNHCR reports violence expanding into parts of Nampula (S2), while UNOPS links conflict to economic imbalances and socio-historical factors (S3).

风险评估总结表 Risk Assessment Summary Table

编号 / ID	运营环节 / Operational Segment	风险与影响 / Risk & Impact	受影响群体 / Affected Groups	固有/剩余风险 Inherent/Residual
R01	资金与付款 Capital & Payments	政府税费、清关、检查站及安保付款。非法收费、贿赂、洗钱或不当资金支持。 Government fees, clearance, checkpoints, security payments. Extortion, bribery, money laundering, improper financial support.	员工、司机、社区及业务参与方 Staff, drivers, community, business partners	中 / 中 Medium / Medium
R02	安保与强制力 Security & Force	门禁、周界、社区及 ASM 接触、护卫。过度用力、不当搜查拘留、歧视或报复。 Access control, perimeter, community/ASM contact, escorts. Excessive force, unlawful search/detention, retaliation.	工人、居民、司机、ASM 人员及安保 Workers, residents, drivers, ASM, security	**高 / 高 High / High**
R03	社区与劳动 Community & Labor	招聘、用工、采购、土地资源使用及施工。利益分配不当，强迫劳动及童工风险。 Recruitment, labor, procurement, land/resource use, construction. Unfair	工人、居民、女性、青年及弱势群体 Workers, residents,	中 / 中 Medium / Medium

		distribution, forced/child labor risks.	women, youth, vulnerable	
R04	矿源及 ASM Origin & ASM	矿界、原料接收、加工、库存和交易。非授权接收、来源隐瞒、批次混入或冲突。 Boundary, intake, processing, inventory, trade. Unauthorized intake, hidden origin, batch mixing, boundary conflict.	ASM 人员、安保、工人及社区 ASM personnel, security, workers, community	中 / 中 Medium / Medium
R05	运输与路线 Transport & Routes	境内外道路、检查站、转运点及港口。异常收费、勒索、武装控制或路线风险。 Domestic/cross-border roads, checkpoints, ports. Extortion, armed control, route exposure.	司机、沿线居民及服务人员 Drivers, route residents, service personnel	中 / 中 Medium / Medium

4 利益相关方参与与专业复核

4 Stakeholder Engagement and Review

2025 年度已开展部分承包商工人和社区访谈，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、儿童代表及其他弱势群体的意见覆盖仍需扩大。评估据此保留对就业机会、承包商用工、安保行为及诉求处理的持续关注，并将扩大参与和检验措施效果纳入 2026 年度工作。

In 2025, interviews were conducted with select contractor workers and community representatives, with stakeholder feedback gathered through the grievance mechanism.

Engagement primarily covered contractors and select leaders; coverage for general workers, women, children's representatives, and vulnerable groups requires expansion. The assessment maintains continuous focus on employment opportunities, contractor practices, security behavior, and grievance resolution, incorporating expanded engagement into 2026 plans.

参与范围覆盖周边社区普通居民、女性、青年，以及受土地资源使用、招聘采购和运输活动影响的群体。针对员工与社区，公司提供意见箱、电话+263773718612 以及邮箱 KMC@scyahua.com、esg@scyahua.com 等多种申诉渠道。2025 年 1 月 7 日至 9 月 5 日申诉记录共 29 项，其中 26 项已解决，3 项持续跟踪。

Scope of engagement spans local residents, women, youth, and groups impacted by land use, recruitment, procurement, and transport. KMC provides multiple grievance channels including suggestion boxes, phone +263773718612, and emails KMC@scyahua.com / esg@scyahua.com. From Jan 7 to Sep 5, 2025, 29 grievances were logged, with 26 resolved and 3 under ongoing tracking.

5 矿产来源、流向与付款管理

5 Supply Chain Integrity and Payment Controls

2025 年度 KMC 矿物原料来自 Kamativi 自有矿山，未开展外购矿石业务。来源管理覆盖开采地点、日期、数量、进厂接收、加工、存放和发运，并关联经手方、运输路线及销售出口资料。非授权接收、试验料、退货及其他可能改变来源的物料进入单独识别和审核，相关批次与自产矿产分别记录。2026 年度新增项目的原料、加工和产品流向纳入同一追溯体系。

In 2025, KMC mineral feedstocks were derived exclusively from the Kamativi mine, with no external ore purchases. Origin management covers extraction site, date, quantity, plant intake, processing, storage, and dispatch, linking custodians, transport routes, and export documents. Unauthorized receipts, test batches, returns, and other inputs that could alter origin structures

undergo separate auditing and tracking. The 2026 expansion projects are integrated into this identical traceability system.

6 风险改进、监测与管理安排

6 Risk Mitigation and Monitoring

本次评估确定以下改进事项，与《冲突风险管理计划》及量化指标体系使用相同风险编号、责任分工和评价口径。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。严重风险线索及必要保护立即处理，持续改进事项按下表执行。

This assessment establishes the following mitigation action items, sharing risk IDs, department assignments, and evaluation criteria with the Conflict Risk Management Plan. 'T' denotes the effective approval date of the revised Plan. Credible severe risk red flags are handled immediately; ongoing improvements follow the schedule below.

序号 / No.	风险及改进事项 / Risk & Action Item	主要行动与效果评价 / Key Actions & Evaluation	责任与时间 / Responsibility & Timeline
1	R02 安保现场行为及申诉 Security Site Behavior & Grievances	核对安保人员、付款和事件记录；检查申诉可及性；实施培训与抽查。 Audit security logs, payments, incidents; verify grievance access; conduct training & spot-checks.	业务部、后勤部、综合部 T+30 日首轮检查，T+60 日培训 Ops, Logistics, Admin Depts First check: T+30d; Training: T+60d
2	R03 及跨类风险：参与与复核 Engagement & Expert Review	扩大普通工人、女性及弱势群体参与；开展专业复核并讨论衡量方法。 Expand worker/women/vulnerable group engagement; conduct	综合部、业务部 T+60 日完成本轮参与和复核 General & Business Depts

		independent expert review.	Completion: T+60d; Quarterly tracking
3	R01、R05 付款与实际路线 Payments & Actual Routes	归集资金与实物支持、代付及异常收费，衔接运单、口岸及事件轨迹。 Collate financial/in-kind support, third-party payments, charges; link waybills & routes.	财务部、业务部 T+30 日完成首轮归集，按月更新 Finance & Business Depts Initial collation: T+30d; Monthly updates
4	R04 及 2026 新增项目 Origin & 2026 Projects	衔接自产与外来物料边界、库存及交易；对钽铌锡及硫酸锂项目开展评估。 Align feedstock boundaries, inventory, trades; assess Tantalum-Niobium-Tin & Lithium Sulfate projects.	业务部、采矿部、质技部 T+30 日衔接资料，T+60 日完成评估 Ops, Mining, Tech Depts Alignment: T+30d; Assessment: T+60d
5	五类风险连续监测 Continuous Monitoring (K01-K16)	启动 16 项指标基线和月度记录；综合评价剩余风险，向管理层报告。 Launch 16 indicator baselines (K01-K16); evaluate residual risk monthly; report quarterly.	业务部及各责任部门 T+30 日启动，T+90 日首轮复核 Ops & Responsible Depts Launch: T+30d; Review: T+90d

7 评估结论与后续更新

7 Conclusions and Follow-up

KMC 矿山运营地及实际经莫桑比克的运输活动继续纳入 CAHRA 强化尽责管理。公司自产矿业务具有清晰的矿源起点，冲突和相关人权风险仍可通过付款、安保、劳动与社区、矿物接收及运输等环节形成。本次将 R02 安保与强制力使用列为高剩余风险，其余四类列为中剩余风险。

KMC mining operations and transport routes via Mozambique remain under enhanced CAHRA due diligence. While self-mined operations possess a clear point of origin, conflict and human rights risks may still emerge across payments, security, labor/community, mineral intake, and transport. This update classifies R02 (Security & Force) as High Residual Risk, with the remaining four categories classified as Medium Residual Risk.

本次审阅资料未形成 KMC 已支持武装冲突或实施 OECD 附件二严重侵害的已确认事件结论。冲突风险评估至少每年更新一次。新增或扩建项目、矿源变化、新路线、安保和承包商调整或冲突升级均将触发专项更新。

Reviewed materials yielded no confirmed findings that KMC supported armed conflict or committed OECD Annex II severe abuses. Conflict risk assessments are updated at least annually. Expansion projects, feedstock changes, new routes, contractor shifts, or conflict escalations will trigger immediate targeted updates.

批准人签字 / Approved by: 叶建国

批准日期 / Date: 2026 年 9 月 15 日 / YYYY-MM-DD

Scanned with CamScanner

【资料来源与引证 / Data Sources & References】

外部资料来源与信息索引：

S1: IMF, Zimbabwe 2025 Article IV Consultation (Report 25/282, Oct 2, 2025)

S2: UNHCR, Violence spreads across northern Mozambique (Dec 2, 2025)

S3: UNOPS, Resilient crisis recovery in Mozambique (Jun 13, 2024)

方法依据：IRMA Standard v1.0 (2018) Ch 3.4 & OECD Due Diligence Guidance 3rd Ed. Annex II.

External Sources & Reference Index:

S1: IMF, Zimbabwe 2025 Article IV Consultation (Report 25/282, Oct 2, 2025)

S2: UNHCR, Violence spreads across northern Mozambique (Dec 2, 2025)

S3: UNOPS, Resilient crisis recovery in Mozambique (Jun 13, 2024)

Methodology: IRMA Standard v1.0 (2018) Ch 3.4 & OECD Due Diligence Guidance 3rd Ed. Annex II.