人权政策

Human Rights Policy

一、目的

I. Purpose

KAMATIVI MINING COMPANY（以下简称“KMC”）致力于在所有业务运营中尊重和促进人权。公司承诺遵守《国际人权宪章》、国际劳工组织（ILO）核心公约、《联合国工商企业与人权指导原则》（UNGPs）、《安全和人权自愿原则》(VPSHR)》等国际人权框架，确保人权原则融入公司治理、政策和实践。KMC 已建立人权尽责调查机制，定期识别、预防、减缓、追踪和报告运营中可能出现的人权风险，并及时开展补救措施，最大程度避免对人权的负面影响。

本政策自发布之日起,与相关环节（如供应商遴选、合同条款、安保安排及员工管理）必须按照该政策的人权尽职调查和承诺要求进行评审、落实并留档。

KAMATIVI MINING COMPANY (hereinafter "KMC") is committed to respecting internationally recognized human rights throughout its operations. KMC aligns its approach with the International Bill of Human Rights, the core conventions of the International Labour Organization (ILO), the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the Voluntary Principles on Security and Human Rights (VPSHR). KMC implements a human rights due diligence process to identify and assess actual and potential adverse human rights impacts, prevent or mitigate them, track the effectiveness of its responses, communicate how impacts are addressed, and provide for or cooperate in remedy where KMC has caused or contributed to harm.

From the effective date of this policy, supplier selection, contracting, security arrangements and worker management shall be reviewed, implemented and documented in accordance with this policy and the applicable human rights due diligence requirements.

二、适用范围

II. Scope of Application

本政策适用于 KAMATIVI MINING COMPANY 全体员工、客户、供应商、分包商、私人安保等利益相关方。

This policy applies to all KMC employees and workers and sets expectations for customers, suppliers, contractors, subcontractors, private security providers and other relevant stakeholders.

三、相关政策

III. Relevant Policies

3.1 政策承诺

3.1 Policy Commitment

3.1.1 KMC 秉持“诚信、求实、严谨、亲和”的核心价值观，积极识别和管理与公司运营和供应链相关的实际或潜在人权影响。本《人权政策》以联合国《商业与人权指导原则》及国际劳工组织核心公约为基础，结合公司跨部门专业意见与社区、员工、供应商等利益相关方的反馈，并经 RCS 外部人权专家团队评审后制定。公司致力于在社区中发挥积极影响力，营造尊重人权、履行社会责任的企业文化。

3.1.1 KMC adheres to the core values of integrity, truthfulness, rigor and affinity and seeks to identify and manage actual and potential human rights impacts associated with its operations and supply chain. This Human Rights Policy is based on the United Nations Guiding Principles on Business and Human Rights and the ILO core conventions, informed by cross-functional professional input and feedback from communities, workers, suppliers and other stakeholders, and reviewed by the RCS external human rights expert team. KMC aims to contribute positively to communities and foster a corporate culture that respects human rights and fulfils social responsibility.

3.1.2 KMC 坚信尊重和促进人权是负责任矿业运营的核心。我们致力于在津巴布韦的所有业务活动中，遵守《国际人权宪章》、《国际人道法》、国际劳工组织（ILO）核心公约、《联合国工商企业与人权指导原则》（UNGPs）及《公民权利和政治权利国际公约》。KMC 承诺在一切安保活动中尊重国际公认的人权标准，包括生命权、人身安全、免受酷刑、强迫劳动和歧视的自由。

3.1.2 KMC recognizes that respect for human rights is central to responsible mining. In its Zimbabwe operations, KMC is committed to respecting the International Bill of Human Rights, international humanitarian law where applicable, the ILO core conventions, the UNGPs and the International Covenant on Civil and Political Rights. KMC shall respect internationally

recognized human rights in all security activities, including the rights to life and personal security and freedom from torture, forced labour and discrimination.

3.2 安全健康的工作环境

3.2 Safe and Healthy Working Environment

KMC 为员工提供安全、卫生、无歧视的工作场所，确保工作条件符合津巴布韦劳动法和国际劳工标准，保障员工健康与尊严。KMC 在雇佣安保力量时，承诺在维护采矿项目安全的过程中尊重人权；同时 KMC 不会支持被指控侵犯人权、违反国际人道主义法或过度使用武力的公共或私人安保部队。KMC 承诺在使用武力和枪支时遵循《联合国关于使用武力和枪支的基本原则》所倡导的最佳实践：

a. 安保人员应采取一切合理措施，在使用武力前保持克制并优先采用非暴力手段；

b. 若必须使用武力，其程度不得超过严格必要范围，应与威胁程度相称，并与实际情况相适应；

c. 枪支仅应在面临死亡或重伤的紧迫威胁时，用于自卫或保护他人之目的。

KMC provides a safe, healthy and non-discriminatory workplace in accordance with Zimbabwean labour law and applicable international labour standards. In maintaining the safety and security of the mine, KMC shall respect human rights and shall not provide support to public or private security forces credibly implicated in human rights abuses, violations of international humanitarian law or excessive use of force. Any use of force and firearms shall align with the UN Basic Principles on the Use of Force and Firearms:

a. Security personnel shall exercise restraint and use non-violent means wherever possible before resorting to force;

b. Any force used shall be no more than strictly necessary, proportionate to the threat and appropriate to the circumstances;

c. Firearms shall be used only in self-defence or defence of others against an imminent threat of death or serious injury.

3.3 禁止强迫劳动、人口贩运与童工

3.3 Prohibition of Forced Labor, Human Trafficking and Child Labor

公司禁止使用任何形式的强迫劳动、人口贩运或童工。包括但不限于通过威胁、暴力、限制人身自由、扣押身份证件或工资等方式迫使员工工作的行为。所有劳动关系应基于知情、 自愿原则，员工有权在合理通知后自由离职。

KMC strictly prohibits all forms of forced labour, trafficking in persons and child labour. Prohibited practices include coercing a person to work through threats, violence, restriction of movement, withholding identity documents or wages, or other penalties. Employment shall be based on informed and voluntary consent, and workers shall be free to leave employment upon reasonable notice without penalty.

3.4 平等就业机会、反歧视、同工同酬

3.4 Equal Employment Opportunities, Anti-Discrimination, and Equal Pay for Equal Work

KMC 实行机会均等原则，禁止基于种族、性别、宗教、年龄、性取向、残疾、民族或政治倾向的歧视行为。公司确保所有员工在招聘、培训、晋升、薪酬和工作条件方面获得公平待遇。

KMC adheres to the principle of equal opportunity and prohibits discriminatory practices based on race, gender, religion, age, sexual orientation, disability, ethnicity or political affiliation. The company ensures that all employees receive fair treatment in recruitment, training, promotion, compensation and working conditions.

3.5 结社自由与集体协商

3.5 Freedom of Association and Collective Bargaining

KMC 尊重员工自由结社的权利。员工有权自愿加入或退出工会，并通过合法渠道进行集体协商。公司不得干预、压制或打击员工合法组织活动。在运营变更可能对员工造成不利影响时，公司将提前通知并与员工充分协商，尽可能减少影响。

KMC respects workers' rights to freedom of association and collective bargaining. Workers are free to form or join a workers' organization, including a trade union, of their choosing without interference, discrimination or retaliation. KMC shall remain neutral in legitimate organizing efforts and shall provide prior notice and meaningful consultation when operational changes may adversely affect workers.

3.6 反歧视和反骚扰

3.6 Anti-Discrimination and Anti-Harassment

KMC 承诺构建包容、公平的工作环境，禁止任何形式的骚扰、欺凌、威胁、性别暴力等行为。公司定期组织反骚扰培训，建立申诉机制，确保员工在安全、尊重的氛围中工作。

KMC is committed to an inclusive and equitable working environment and prohibits harassment, bullying, threats, gender-based violence and other abusive conduct. KMC provides regular anti-harassment training and maintains an accessible grievance mechanism so that workers can raise concerns safely and without fear of retaliation.

3.7 原住民和文化遗产保护

3.7 Indigenous Peoples and Cultural Heritage Protection

3.7.1 公司尊重原住民的文化传统和生活方式，遵循《联合国土著人民权利宣言》《IL O第 169 号公约》和 FPIC（ 自由、事先和知情同意）原则。

3.7.1 KMC respects the cultural traditions and ways of life of Indigenous Peoples and aligns its approach with the United Nations Declaration on the Rights of Indigenous Peoples, ILO Convention No. 169 and the principle of free, prior and informed consent (FPIC), where applicable.

3.7.2 KMC 设立社区沟通机制，及时听取受影响社区及原住民的意见与建议。

3.7.2 KMC maintains a community engagement mechanism to obtain and consider the views and concerns of affected communities and Indigenous Peoples in a timely and culturally appropriate manner.

3.7.3 尊重原住民的土地、资源、文化和生活方式权益，将原住民的利益纳入项目设计与实施。

3.7.3 Respect the rights of indigenous peoples to their land, resources, culture and way of life, and incorporate the interests of indigenous peoples into project design and implementation.

3.7.4 对与原住民及文化遗产相关的员工进行专项培训。

3.7.4 Provide specialized training for employees related to indigenous people and cultural heritage.

3.8 工时与基本工资

3.8 Working Hours and Basic Salary

公司遵守当地法律规定的工作时间上限，确保员工每七天至少休息一天。超时工作应出于自愿并支付加班工资。公司支付的薪酬不低于法律规定的最低工资，并保障所有应有福利待遇。

KMC complies with applicable legal limits on working hours and provides workers with at least one rest day in every seven-day period. Overtime shall be voluntary and compensated at the

applicable premium rate. Wages shall meet or exceed the applicable legal minimum and workers shall receive all benefits to which they are entitled.

3.9 尊重营运地的自然环境

3.9 Respect the natural environment of the operation site

KMC 承诺尽最大努力减少运营对环境和社区人群健康的负面影响，促进可持续发展。

KMC is committed to making every effort to minimize the negative impacts of its operations on the environment and the health of the local community, and to promote sustainable development.

四 供应链人权管理

IV. Human Rights Management in the Supply Chain

KMC 要求所有供应商、承包商及其分包商遵守本政策，并在合同中明示人权条款。公司定期评估其人权表现，对存在严重人权违规的合作方有权终止合作。公司不会向被可靠指控侵犯人权/过度使用武力的公共或私人安全力量提供财政或后勤支持。

KMC requires suppliers, contractors and subcontractors to comply with this policy and incorporates applicable human rights requirements into contracts. KMC periodically assesses their human rights performance and may suspend or terminate relationships involving serious or unremediated human rights abuses. KMC shall not provide financial or logistical support to public or private security forces credibly implicated in human rights abuses or excessive use of force.

五、 申诉渠道

V. Grievance Channels

KMC 承诺为员工及利益相关者提供有效的申诉和补救机制，确保任何有关人权、劳动条件、社区影响等问题都能被及时、安全、无恐惧地表达，并获得公正处理。

KMC provides an effective complaints and grievance mechanism and access to remedy for workers and stakeholders so that concerns relating to human rights, labour conditions and community impacts can be raised promptly, safely and without fear of retaliation.

Grievances shall be handled impartially, transparently and in a timely manner, with appropriate remedies identified in consultation with affected rights holders.

5.1 内部申述

5.1 Internal Grievance Channels

向上级口头报告；

投入意见箱提交书面申诉信；

发送邮件：KMC@scyahua.com；

拨打举报热线：+263773718612；

社会责任公共邮箱：esg@scyahua.com

Report the concern orally to an immediate supervisor;

Submit a written grievance through the suggestion box;

Send an email to: KMC@scyahua.com;

Call the reporting hotline: +263773718612;

Corporate social responsibility public email: esg@scyahua.com

5.2 行业申诉

5.2 External and Industry Grievance Channels

RCI（关键矿产倡议）：https://www.cccmc.org.cn/

RMI（责任矿产倡议）：https://mineralsgrievanceplatform.org

RCI (Critical Minerals Initiative): https://www.cccmc.org.cn/

RMI (Responsible Minerals Initiative): https://mineralsgrievanceplatform.org

六、说明

VI. Explanation

6.1 本政策每三年由综合部组织评估更新，如有必要可提前调整，其解释权归 KMC。

6.1 The Administration Department shall coordinate an evaluation and update of this policy every three years, or earlier where necessary. KMC is responsible for interpreting this policy.

6.2 本政策 KMC 总经理签署生效， 自下发之日起执行。

6.2 This policy shall come into effect upon the signature of the KMC General Manager and shall be implemented from the date of issuance.