KMC Human Rights Due Diligence

Public Summary

KMC 人权尽职调查公开摘要

This summary presents KMC's updated human rights findings, actions and follow-up arrangements for workers, communities and other interested parties. This assessment identified seven significant human rights issues. Land use, insufficient grievance mechanisms (inadequacy of safe reporting channels), and labor disputes involving contractors require continuous monitoring of their impacts and remediation status, while the other issues reflected in the questionnaire responses remain subject to factual verification.

本摘要向员工、社区及其他相关方公开 KMC 最新人权调查发现、应对措施和后续安排。本次评估识别了七项显著人权议题。土地使用、申诉安全感不足及承办商劳动争议需要持续跟踪影响及补救情况，其他问卷所反映的问题仍需开展事实核验。

October 2026 Update 2026 年 10 月更新版

KAMATIVI MINING COMPANY (PRIVATE) LIMITED
卡玛蒂维矿业有限公司

Assessment period: 1 September 2025 to 31 August 2026
Survey: 1 to 10 September 2026 | Update baseline: 30 September 2026
评估期间：2025 年 9 月 1 日至 2026 年 8 月 31 日
问卷调查：2026 年 9 月 1 日至 10 日 | 更新基准：2026 年 9 月 30 日

1 Commitment and scope

1 公司承诺与评估范围

KMC respects internationally recognised human rights, including the rights to fair treatment, freely chosen employment, safe and healthy work, freedom of association, collective bargaining and effective remedy. KMC prohibits child labour, forced labour, discrimination, harassment and retaliation. These expectations extend to business partners connected with the mining project.

KMC 尊重国际公认人权，保障公平待遇、自由择业、安全健康的工作环境、结社自由、集体谈判及获得有效补救等权利，禁止童工、强迫劳动、歧视、骚扰和报复，并向与矿山项目有关的商业伙伴传递相同要求。

The assessment covers the Kamativi Mine in Hwange District, Zimbabwe: mining, blasting, processing, tailings, transport, water, power, security and related business relationships, including subcontracting and electricity procurement. It includes the new tantalum-niobium-tin and lithium sulphate lines and potentially affected people outside the mining lease. Senior management oversees the work; General Administration coordinates it with operational functions and Group ESG support.

评估覆盖津巴布韦 Hwange 地区 Kamativi 矿山的采矿、爆破、选矿、尾矿、运输、供水输电、安保及相关商业关系，包括分包和电力采购；纳入新建钽铌锡、硫酸锂生产线及矿权范围外可能受影响的人员。高级管理层负责监督，综合部会同各业务部门组织实施，集团 ESG 提供专业支持。

2 How salient issues were identified

2 显著人权议题的识别方法

The assessment follows the UN Guiding Principles on Business and Human Rights and Chapter 1.3 of the IRMA Standard for Responsible Mining v1.0, with Guidance Document v1.3 of November 2024. It considers internationally recognised rights, including the ILO fundamental principles and rights at work, and applicable Zimbabwean requirements.

本次评估依据联合国《工商企业与人权指导原则》、IRMA《负责任采矿标准》v1.0 第 1.3 章及 2024 年 11 月《指导文件》v1.3 开展，结合国际公认人权、国际劳工组织工作中的基本原则和权利，以及津巴布韦适用要求。

KMC used three questionnaires and information on employment, grievances, project changes, environmental and social conditions, and cultural heritage to identify concerns. Records review, confidential interviews and site checks are used to verify specific signals. Follow-up consultation examines the experiences of affected people and whether proposed responses address their concerns.

KMC 通过三类问卷，结合用工、申诉、项目变更、环境社会条件及文化遗产资料识别问题，并通过记录核查、保密访谈及现场检查核验具体线索。后续咨询关注受影响者的实际经历，以及拟采取措施能否回应其关切。

Respondent group **调查对象**	**Valid responses** **有效问卷**	**Female respondents** **女性受访者**
KMC employees KMC 员工	109	8

Respondent group 调查对象	Valid responses 有效问卷	Female respondents 女性受访者
Contractor workers 承包商员工	164	10
Community residents 社区居民	65	38
Total 合计	338	56

Eight of the 65 community respondents were identified as potentially vulnerable. This is a subset of the community sample, not an additional group or a count of persons with disabilities. Women, children through appropriate representatives, older people, persons with disabilities, temporary and migrant workers, land users and traditional custodians receive particular attention in follow-up.

65 名社区受访者中，8 人被列为潜在弱势群体，属于社区样本的子集，不另行计数，也不等同于残障人数。后续跟进重点关注女性、通过适当代表参与的儿童、老年人、残障人士、临时及外来工、土地使用者和传统守护者。

Priority is based on harm to people: its scale, the people affected and how difficult it is to restore their rights. KMC's screening matrix multiplies likelihood and severity scores of 1 to 5: 1–5 is low, 6–14 medium and 15–25 high. Severe or irreversible impacts and credible serious-abuse signals receive priority regardless of the matrix product. The assessment contains 58 group–issue records, consolidated into seven salient issues; the records are not incident counts.

优先程度以对人的伤害为依据，分别考虑伤害程度、受影响范围及恢复权利的难度。KMC 采用可能性与严重性各 1 至 5 分的乘积进行筛查：1—5 分为低、6—14 分为中等、15—25 分为高。严重或不可逆影响及可信的严重侵害线索，不受乘积分值限制，均优先处理。本次评估形成 58 条群体议题记录，归纳为七项显著议题；记录数量不代表事件数量。

Questionnaire answers describe perceptions, experiences or observations. They do not by themselves confirm violations, establish causation or demonstrate the absence of harm. The sample is not established as statistically representative of the whole workforce or community population; differences by gender or vulnerability require targeted follow-up.

问卷答复反映受访者的认知、经历或观察，不能单独用于认定侵害、判断因果关系或证明不存在损害。现有样本尚不能证明对全体员工或社区人口具有统计代表性；性别及弱势处境带来的差异，需要通过针对性回访核验。

3 Salient human rights issues
3 显著人权议题

KMC is giving priority attention to the following seven issues. Wages and working time, and land, livelihoods and cultural heritage, are included as high priorities in line with the detailed risk assessment. Potential serious abuse receives priority protection and investigation even before responsibility has been finally determined.

KMC 重点跟进以下七项议题。根据详细风险评估，工资工时以及土地、生计和文化遗产均纳入高优先级管理。对可能涉及严重侵害的线索，在最终责任尚未确定前即优先落实必要保护和调查。

HR01 Safe reporting and access to remedy
HR01 申诉安全感及有效补救

Contractor workers and community residents expressed concerns about confidentiality, adverse treatment and limited feedback on complaints. Knowing a channel exists does not necessarily mean feeling safe to use it. KMC will review outstanding cases, test direct and anonymous access, improve outcome feedback and check for retaliation. Women, junior workers and people dependent on an employer or supervisor need safe contact options that bypass those implicated.

承包商员工及社区居民对申诉保密、受到不利对待以及处理结果反馈不足表达了顾虑。知晓渠道并不必然意味着能够安心使用。KMC 将复核未结事项，测试直接及匿名渠道的可及性，改进结果反馈并核查报复风险，为女性、低职级人员及依赖雇主或主管者提供可绕开涉事人员的安全联系方式。

HR02 Discrimination harassment and abuse of authority
HR02 歧视骚扰及滥用职权

The questionnaires contain accounts of disrespectful language, unfair treatment, threats and misuse of authority. These require confidential fact-finding; multiple selections do not establish a number of victims or incidents. KMC will protect complainants and witnesses, investigate without implicated supervisors and correct harmful conduct. Follow-up also covers threats and improper use of force in security interactions. Training and contractor oversight will address respectful treatment, non-retaliation and recurrence.

问卷反映了不尊重言语、不公平对待、威胁及滥用职权等情况，需要通过保密调查核实；多选答复不能直接统计为受害人数或事件数。KMC 将保护申诉人和证人，避开涉事主管开展核验并纠正有害行为，同时关注安保接触中的威胁和不当使用武力，将尊重他人、禁止报复及防止复发纳入培训和承包商监督。

HR03 Suspected forced labour child labour or exploitation
HR03 疑似强迫劳动童工或其他剥削

Contractor questionnaire signals lack sufficient employer, time, location and conduct details to confirm or exclude abuse. KMC will check original response options and then verify age, recruitment fees, identity-document retention, deductions, overtime and freedom to leave across contracting tiers. Verified abuse requires cessation, protection and appropriate remedy. Any child-protection response must avoid exposing the child to greater harm through dismissal alone.

承包商问卷中的相关线索缺少充分的雇主、时间、地点和行为细节，现阶段不能据此认定或排除侵害。KMC 将先核对原题选项，再对各层级承包和分包用工核验年龄、招聘收费、扣证、扣款、加班及离职自由。查实侵害后停止相关行为、保护当事人并提供适当补救；涉及儿童时，不以简单清退使其陷入更大危险。

HR04 Occupational safety and basic working conditions

HR04 职业健康安全及基本工作条件

Contractor responses raise concerns about personal protective equipment, safety training, drinking water, toilets, working hours and rest. The follow-up covers KMC employees as well as contractor workers, particularly outdoor, high-risk and newly assigned workers. Safety and Production will inspect high-risk work areas, stop unsafe work where necessary and verify correction before restart. Monthly checks will track conditions and worker feedback.

承包商答复反映个人防护用品、安全培训、饮水、厕所、工时及休息方面的疑虑。后续检查同时覆盖 KMC 员工和承包商工人，重点关注露天、高风险及新上岗人员。安全生产部将检查高风险作业点，必要时停止不安全作业，验证整改后恢复，并通过月度检查跟踪现场条件和工人反馈。

HR05 Wages working time and employment information

HR05 工资工时及劳动信息

Some contractor workers reported late payment, unclear payslips or uncertainty about working time and rest. KMC will compare payroll, attendance, overtime and payment records, including cash receipts checked with workers confidentially. Verified arrears, underpayments and improper deductions require correction. Quarterly checks will also cover written employment terms, applicable collective agreements and freedom of worker representation.

部分承包商工人反映工资迟发、工资单不清楚，或对工时及休息安排存在疑问。KMC 将交叉核对工资表、考勤、加班和支付记录；现金支付结合签收记录与工人保密确认核验。查实的欠付、少付及不当扣款应予纠正。季度检查同时关注书面用工条件、适用集体协议及员工自主代表权。

HR06 Community health safety and environmental concerns

HR06 社区健康安全及环境诉求

Residents raised concerns about risk information, reported health or safety events and responses to environmental issues. KMC will investigate locations, exposure and causation, covering blasting, traffic, dust, water, tailings and dam safety, construction and historical mine openings. Current information does not establish that KMC has displaced community water use. Community water support does not replace assessment of water quantity, quality, access or safety.

居民对风险告知、所报告的健康安全事件及环境问题回应提出了关切。KMC 将核验地点、暴露及因果关系，覆盖爆破、交通、粉尘、水资源、尾矿及坝体安全、施工和历史矿井。现有信息不能证明 KMC 挤占社区用水；社区供水支持也不能替代对水量、水质、取水可及性及安全的评估。

HR07 Participation land livelihoods and cultural heritage

HR07 实质参与土地生计及文化遗产

Community feedback shows a gap between consultation and whether concerns receive a substantive response. KMC will explain how comments affect decisions and follow up land, access, grazing and cultural impacts directly with affected users, families and traditional custodians. Land-dependent and female-headed households and other vulnerable people require tailored engagement. Further disturbance must be preceded by appropriate assessment and protection.

社区反馈显示，开展咨询与实质回应关切之间仍有差距。KMC 将说明意见如何影响决策，直接与受影响使用者、家庭及传统守护者跟进土地、通行、放牧和文化影响，对土地依赖家庭、女性户主及其他弱势群体采取适宜的沟通方式，新增扰动前落实相应评估和保护。

4 Recorded impacts and response status
4 已记载影响及处置状态

Land use and livelihoods
土地使用与生计

The lithium sulphate project involves two fallow agricultural plots used by two community members, totalling 15,802 m². KMC has completed an asset inventory and obtained the users' permission. The reported site assessment found no physical relocation of homes or people or interruption of public facilities or water sources for this project. Potential economic displacement and livelihood effects still require follow-up. Alternative agricultural land and livelihood assistance will be addressed as needed; inventory completion and permission do not establish that livelihood restoration is complete.

硫酸锂项目涉及两名社区居民实际使用的两块休耕农田，合计 15,802 平方米。KMC 已完成资产清查并取得使用人许可。该项目现场排查未发现房屋或人口物理搬迁，也未发现公共设施或水源阻断；可能涉及的经济位移及生计影响仍需跟踪，并根据需要协调替代耕地及生计支持。完成清查、取得许可不等同于生计恢复已经完成。

Grave relocation and cultural heritage
坟墓迁葬与文化遗产

Records for existing mining activities show 14 grave relocations in 2025 and 65 in 2026. These are calendar-year figures, not a combined count for this assessment period. The relocations are actual cultural heritage impacts. KMC will review the relocation batches, protection after relocation, family concerns and agreed measures with affected families and traditional custodians. Chingahari Hill and its sacred landscape are managed as critical cultural heritage on a precautionary basis. Direct family consultation and follow-up on cultural and spiritual impacts remain necessary.

既有采矿活动记录显示，2025 年、2026 年分别迁葬 14 座和 65 座坟墓。上述为自然年度数据，不合并作为本评估期间的迁葬总量。迁葬属于已发生的文化遗产影响。KMC 将与受影响家庭及传统守护者复核迁葬批次、迁葬后保护、家庭意见及协商措施。Chingahari 山及其神圣文化景观按关键文化遗产实施预防性管理，仍需直接听取家庭意见并跟踪文化和精神影响。

Labour dispute associated with electricity procurement
电力采购相关劳动争议

A worker strike occurred in late August 2026 at the company constructing the photovoltaic project within the mining area. KMC's business connection is electricity procurement; it did not engage that company as its construction contractor. The due diligence records report that the strike ended, the parties reached an intention to settle and workers signed voluntary return-to-work confirmations. These are interim developments. KMC will use its available influence to follow up settlement implementation, outstanding claims, voluntary return to work and protection from retaliation. Completion of remedy has not been established by the return-to-work records alone.

2026 年 8 月底，矿区内光伏项目承建方发生员工罢工。KMC 与其业务联系为电力采购，并未将其作为自身工程承包商。尽调记录显示，罢工已结束，双方达成和解意向，员工签署了自愿复工确认书，属于阶段性进展。KMC 将运用可施加的影响力，跟踪和解履行、未决诉求、复工自愿性及反报复保护。现阶段不能仅凭复工记录认定补救已经完成。

5 Actions taken and next steps
5 已采取行动及后续安排

KMC has established a Human Rights Policy Statement and procedures addressing employment, anti-discrimination, child and forced labour, grievances and corrective action. The employee handbook supports communication of these requirements. Contractor due diligence questionnaires and partner commitments are used to communicate expectations and identify risks. The September 2026 survey yielded 338 valid responses and informed the seven-issue action plan.

KMC 已建立《人权政策声明》及用工、反歧视、童工与强迫劳动防治、申诉和纠正补救相关程序，并通过《员工手册》传达要求；使用承包商尽调问卷及商业伙伴承诺传递要求、识别风险。2026 年 9 月调查取得 338 份有效答复，相关发现已用于制定七项议题的行动计划。

Existing operational measures include advance blasting notifications, exclusion arrangements, blast monitoring, dust control and post-blast checks. KMC has also provided community water support. Land inventory work and the dispute developments described above are recorded progress. The present findings nevertheless show continuing gaps in confidence in reporting, contractor working conditions and community responses. Verified risk reduction or completion of remedy cannot yet be concluded for all issues.

现有运营措施包括爆破前告知、警戒安排、爆破监测、粉尘控制及爆后检查，公司也已提供社区供水支持。前述土地清查和劳动争议处置情况体现了已记载的进展。但本次调查仍反映申诉信任、承包商劳动条件及社区回应方面的不足，目前尚不能对所有事项作出风险已降低或补救已完成的结论。

Timing **时间安排**	**Action and responsibility** **行动及责任**
Immediate 立即	Protect people exposed to serious harm; investigate serious-abuse signals and stop unsafe work where necessary. Responsible operational functions act with General Administration. 对严重伤害风险采取保护，核查严重侵害线索，必要时停止不安全作业；由相关业务部门会同综合部实施。
By 31 October 2026 2026 年 10 月 31 日前	Complete the first planned verification and action review for the seven issues. General Administration leads HR01–03, HR05 and HR07; Safety and Production leads HR04 and HR06, with relevant functions and contractors. 完成七项议题首轮计划核验及行动复核。综合部牵头 HR01—03、HR05 和 HR07，安全生产部牵头 HR04、HR06，相关部门及承包商协同。
Monthly and quarterly 每月及每季度	Monthly safety and working-condition checks; quarterly labour, grievance and community follow-up and management reporting. 每月检查安全及基本工作条件；每季度跟踪劳工、申诉及社区事项并向管理层报告。
Within six months after correction 整改后六个月内	Follow up with affected people and compare reporting safety, feedback, working conditions and recurrence using consistent measures. 回访受影响者，以一致口径比较申诉安全感、结果反馈、工作条件及问题复发情况。

These dates are action targets, not completion claims. Urgent protection takes precedence. New construction, commissioning, changes in business relationships and new safety or environmental evidence trigger reassessment without waiting for the annual review.

以上日期为行动目标，不代表已经完成；紧急保护优先实施。新增建设、调试、商业关系变化及新的安全环境证据触发及时复评，不等待年度评审。

6 Raising concerns and obtaining remedy
6 反映问题与获得补救

Employees, contractor and subcontractor workers, suppliers, community members and other affected people may raise a concern directly with KMC. They do not have to report through the employer or supervisor involved. Reports may be anonymous. The General Administration Department coordinates receipt, investigation, feedback and follow-up under the current Grievance Control Procedure A2.

员工、承包商及分包商工人、供应商、社区成员和其他受影响者均可直接向 KMC 反映问题，无须经由涉事雇主或主管提交，也可匿名反映。综合部依据现行《申诉控制程序》A2 版统筹受理、调查、反馈及跟踪。

Channel **渠道**	**How to use it** **使用方式**
Email 电子邮箱	KMC@scyahua.com For human rights concerns and comments on this summary. 用于反映人权问题及对本摘要的意见。
In person or in writing 当面或书面反映	Contact KMC General Administration or the Human Rights Coordinator; concerns may also be submitted through suggestion boxes. 向 KMC 综合部或人权协调员当面、书面反映，也可通过意见箱提交。
Review or escalation 复核或升级	Ask General Administration for review or recusal of an implicated handler, or request referral to the Human Rights Manager or senior management. 可向综合部申请复核、要求涉事受理人员回避，或要求提请人权管理者及高级管理层处理。

KMC will provide oral explanation and language assistance where needed, including English, Shona, Ndebele and Chinese, and help people who have difficulty reading, writing, using digital channels or reaching a meeting place. Complainants may use a trusted representative. Confidential information is restricted to personnel who need it for fair handling; retaliation against complainants, witnesses or people expressing concerns is prohibited.

KMC 根据需要提供英语、绍纳语、恩德贝莱语、中文等语言协助及口头说明，帮助阅读、书写、数字渠道使用或到场存在困难的人员表达意见，申诉人也可通过信任的代表反映问题。保密信息仅向公正处理所必需的人员开放，禁止对申诉人、证人及表达关切者实施报复。

KMC communicates the handling steps, expected timeframe, progress and reasons for any extension. Violence, sexual harassment, suspected exploitation and imminent safety threats require prompt protective action and investigation. They must not wait for a routine case deadline. Closure requires evidence of action and delivery of remedy, feedback from affected people where possible, and follow-up on any continuing harm.

KMC 向申诉人说明办理步骤、预计时限、进展及延期理由。涉及暴力、性骚扰、疑似剥削及迫近安全威胁时，及时保护当事人并开展调查，不等待常规办结期限。结案应有行动及补救交付证据，在可行情况下取得受影响者反馈，并跟踪持续影响。

Where KMC causes an impact, it will cease or change the activity and work with affected people on remedy. Where it contributes, it will address its contribution and influence other parties; where directly linked through a business relationship, it will seek action by the responsible party. Remedies may include restoration, repayment, compensation, an apology or other agreed measures appropriate to the harm. Use of KMC's mechanism does not restrict lawful judicial, administrative or other non-judicial remedies; independent mediation may be sought where appropriate.

KMC 造成影响时，将停止或改变有关活动，并与受影响者协商补救；存在促成关系时，处理自身促成作用并推动其他方行动；通过商业关系直接关联时，推动责任方采取措施。根据损害性质，补救可包括恢复、款项退还或补发、补偿、道歉及其他协商措施。使用 KMC 机制不限制当事人寻求合法司法、行政或其他非司法救济，适用时可寻求独立调解。

7 Effectiveness review and external monitoring

7 成效评审与外部监测

KMC will assess results using both records and affected-person feedback: safe access to reporting and outcome feedback; verified correction of wages and working time; safe work, drinking water and sanitation; investigation and response to community concerns; livelihood outcomes and cultural heritage protection; and repeat incidents or unresolved harm. Measures will retain the reporting period, denominator and verification basis. A policy, training attendance, payment or signature alone does not demonstrate effective remedy, and fewer complaints alone does not demonstrate improvement.

KMC 结合记录及受影响者反馈评价成效，重点跟踪安全申诉和结果反馈、工资工时问题的核实纠正、安全作业与饮水卫生、社区问题调查回应、生计结果与文化遗产保护，以及重复事件和未解决影响。指标保留统计期间、分母及核验依据；政策、培训签到、付款或签字均不单独证明补救有效，投诉数量下降也不单独代表改善。

If due diligence repeatedly fails to prevent, mitigate or remedy actual impacts, or fails to prevent KMC's unknowing or unintentional involvement in serious human rights abuse, KMC will fund external monitoring and determine its form and monitors with affected rights holders. Current survey information is insufficient to resolve whether these conditions have been triggered. KMC will review investigations, previous corrections and remedy outcomes and record its decision. Where external monitoring applies, its findings and recommendations will be made public, and the improvement plan communicated to affected people and relevant stakeholders.

如尽职调查反复未能预防、减轻或补救实际影响，或未能防止 KMC 在不知情或无意情况下涉及严重人权侵害，KMC 将承担外部监测费用，并与受影响权利持有人共同确定监测形式及人员。现有问卷信息不足以判断是否已触发上述条件，公司将结合调查、既往整改及补救结果开展评审并记录决定。适用外部监测时，公开其发现和建议，并向受影响者及相关方说明改进计划。

8 Publication feedback and protection of information
8 信息公开反馈与保护

KMC will publish its human rights due diligence report or public summary annually at http://www.kamativi.cn/ and communicate material updates promptly. Workers and communities will also receive relevant findings through accessible meetings, oral explanations and written information in languages they understand. People who participated in the assessment will have an opportunity to review findings relevant to them and comment on the response; KMC will record the comments and its response. Feedback on this summary may be sent to KMC@scyahua.com.

KMC 每年通过 http://www.kamativi.cn/公开人权尽职调查报告或摘要，并及时沟通重大更新；同时以员工及社区可获取、可理解的会议、口头说明和书面信息传达相关结果。参与评估者将有机会复核与其有关的发现，并对处置安排提出意见，公司记录意见及回应。对本摘要的反馈可发送至 KMC@scyahua.com。

Public information is anonymised where needed to protect privacy and prevent retaliation or further harm. Personal identities, sensitive case details and genuinely confidential or safety-sensitive information may be withheld with the reasons recorded. These protections do not conceal material impacts or prevent necessary confidential communication with affected people. Publication and engagement records are retained.

公开信息根据需要作匿名化处理，保护隐私并防止报复或进一步伤害。个人身份、个案敏感细节及确需保密或涉及安全的信息可予删减，并记录理由；不得因此掩盖重大影响，也不妨碍向受影响者提供必要的保密沟通。公司保留发布及沟通记录。

Reporting basis 编制依据

KMC Human Rights Due Diligence Report 2026 Revised Edition; KMC Human Rights Risk and Impact Assessment 2026 Revised Edition.

《KMC 人权尽职调查报告 2026 修订版》及《KMC 人权风险与影响评估报告 2026 修订版》。

IRMA Standard for Responsible Mining v1.0 Chapter 1.3 and Guidance Document v1.3 November 2024.

IRMA《负责任采矿标准》v1.0 第 1.3 章及 2024 年 11 月《指导文件》v1.3。