

KMC 2025 年矿产供应链尽责管理报告

KMC Annual Mineral Supply Chain Due Diligence Management Report 2025

1. 公司简介

I. Company Overview

KMC 公司 (Kamativi Mining Company) 位于津巴布韦马塔贝莱兰北省，是一家从事锂矿开采、加工与出口的矿业公司。公司拥有并运营 Kamativi 锂矿项目，矿产资源全部为自有开采，无外部矿石采购行为。

KMC (Kamativi Mining Company), located in Matabeleland North Province, Zimbabwe, is engaged in the mining, processing, and export of lithium ore. The company owns and operates the Kamativi lithium project and sources 100% of its raw materials from its own mining operations without purchasing minerals from external suppliers.

一般矿场信息	
已检查的矿场 (参数): Mines inspected (parameters):	津巴布韦 KAMATIVI 露天锂矿 KAMATIVI open-pit lithium mine in Zimbabwe
主要采矿活动的 GPS 坐标: GPS coordinates of major mining activities:	18° 19'50.47"S 27° 3'28.16"E
省/区: Province/Region:	北马塔贝莱兰省 (Matabeleland North Province)
特许矿区或矿主名称:	MINING LEASE NO.12

Name of the concession mining area or mine owner:	
矿场开采的原料: Raw materials extracted from the mine:	锂矿石 lithium ore
作业情况如何? How is the work going?	露天台阶开采 Open-pit bench mining
负责的运营经理姓名: Name of the responsible operations manager:	叶建国 Ye Jianguo
矿场所有人姓名: Name of the mine owner:	KAMATIVI MINING COMPANY
矿场所采矿物的主要买方: The main buyers of the minerals mined at the mine site:	Yahua Lithium (Ya an) Co., Ltd

2. 供应链结构

II. Supply Chain Structure

KMC 的矿产供应链是一个完全自产自销的封闭式供应链 (closed-loop supply chain)。公司 100% 的矿石原料均来自自有矿区开采，不从任何外部来源购买矿石或半成品。

因此，KMC 不存在任何上游矿产供应商 (zero upstream mineral suppliers)，也不存在外部矿源风险。

KMC's mineral supply chain is a fully self-owned, closed-loop system, where 100% of mineral raw materials are sourced from the company's own mining operations.

KMC has no external mineral suppliers and no upstream procurement, eliminating external origin or supply risks.

3. 尽责管理体系建设

III.Establishment of Due Diligence System

3.1 对标标准

3.1 Standards Followed

KMC 的尽责管理体系参照以下国际框架建立：

1.OECD《受冲突影响与高风险区域的矿石负责任供应链尽职调查指南》(第三版)

2.欧盟冲突矿产法规 (EU Conflict Minerals Regulation)

3.中国负责任矿产采购倡议 (RMI/RMAP 原则)

4.IRMA 相关要求

KMC's due diligence system is established in accordance with:

1.OECD Due Diligence Guidance for Responsible Supply Chains of Minerals (3rd Edition)

2.EU Conflict Minerals Regulation

3.Responsible Minerals Initiative (RMI/RMAP) framework

4.Relevant IRMA requirements

3.2 组织机构

3.2 Governance Structure

KMC 建立了供应链尽责管理小组 (Due Diligence Management Team)，成员来自：

Diligence Management Team has been established with representatives from:

- 总经理 General Manager

- 业务部 Business Department
- 财务部 Finance Department
- 综合部 Admin Department
- 安全生产部 Safety Production Department
- 质量技术部 Quality and Technology Department
- 采矿部 Mining Department

该小组负责制定政策、识别风险、开展培训、监督承包商、编写年度报告。

The team is responsible for policy development, risk identification, training, contractor supervision, and preparation of the annual report.

3.3 制度建设

3.3 Policy Development

过去一年，公司发布或更新以下制度：

In the past year, the company has issued or updated the following policies:

《负责任矿产供应链尽责管理政策》

Responsible Mineral Supply Chain Due Diligence Policy

《供应链尽责管理制度》

Supply Chain Due Diligence Management System

《申诉控制程序》

Appeals Control Procedure

《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》

Decision on Defining the Members of the Mineral Supply Chain Due Diligence

Management Team and Related Bodies

《反贿赂反贪污政策》

Anti-bribery and anti-corruption policies

《童工与未成年工控制程序》

Procedures for Controlling Child Labor and Underage Workers

《员工结社自由和集体谈判管理控制程序》

Freedom of Association and Collective Bargaining Control Procedure

《反洗钱与反恐怖融资政策》

Anti - Money Laundering and Counter-Terrorist Financing Policy

《人权政策声明》

Human Rights Policy Statement

《防止强迫劳动、歧视及骚扰控制程序》

Procedure for Preventing Forced Labour, Discrimination, and Harassment

4. 风险评估与风险识别

IV.Risk Assessment and Identification

4.1 风险评估范围

4.1 Scope of Assessment

虽然 KMC 无外部矿产供应商，但根据 OECD 要求，公司仍需对自身运营开展风险评估：

Although KMC has no external mineral suppliers, OECD and EU regulations require the company to assess risks within its own operations.

- 1.严重人权风险
- 2.非国家武装团体风险
- 3.公私安保力量风险
- 4.税务与腐败风险
- 5.原产地真实性风险
- 6.环境和一般 ESG 风险

7.出口环节的运输路线相关风险。

Although KMC has no external mineral suppliers, the company conducted annual due diligence risk assessments on the following OECD-mandated areas:

- 1.Serious human rights abuses
- 2.Non-state armed group involvement
- 3.Public or private security forces
- 4.Corruption and tax-related risks
- 5.Mineral origin authenticity
- 6.Environmental and general ESG risks
- 7.Risks associated with transportation routes in the export process.

4.2 风险评估方法

4.2 Assessment Methods

公司在本年度进行了：

- 实地矿区考察
- 随机访谈
- 文件审查
- 风险矩阵评估
- 申诉渠道检查
- 承包商人权核查

The company conducted:

- On-site mine assessment
- Random interviews; Document review
- Risk matrix evaluation
- Grievance mechanism checks

- Contractor human rights verification

4.3 风险结果总结

4.3 Summary of Risk Findings

根据本年度实地考察、访谈、文件审查及评估：

- 未发现任何 OECD 附录二中列明的不可接受风险。
- 未发现童工、强迫劳动、武装团体控制、非法征税等行为。
- 安保人员未发生暴力、冲突或滥用行为。
- 所有矿产均来自 KMC 自有矿区，无虚假原产地风险。
- 税费按时缴纳，无贿赂洗钱迹象。

矿产品运输路线未经过非法武装团体控制区域，运输过程中未发现非法征税、勒索或与武装冲突相关的行为，未识别出对运输人员、沿线社区或其他利益相关方造成严重人权风险的情形。

According to on-site inspections, interviews, and document reviews:

- No OECD Annex II unacceptable risks were identified.
- No child labor, forced labor, armed group presence, or illegal taxation were detected.
- No violent or abusive behavior by security forces occurred.
- All minerals originate from KMC-owned mines with no misrepresentation of origin.
- Taxes were paid properly with no signs of bribery or money laundering.

The mineral transport route did not pass through areas controlled by illegal armed groups, and no illegal taxation, extortion, or armed conflict-related activities were found during the transport process. No situations posing serious human rights risks to transport personnel, communities along the route, or other stakeholders were identified.

总体评估：KMC 属低风险运营企业。

Overall rating: KMC is a low-risk operation.

5. 风险缓解与管理措施

V.Risk Mitigation and Management

5.1 对所有承包商开展了尽责管理和人权培训，共覆盖 6 家承包商。

All contractors received due diligence and human rights training.

5.2 在年度尽责管理过程中，公司通过实地考察、承包商访谈和文件审查，识别出若干管理和控制层面的改进事项。上述事项不构成《OECD 尽职调查指南》附录二所列明的不可接受风险，但公司仍制定并实施了相应的风险缓解和整改措施。

During the annual due diligence process, the company identified several areas for improvement in management and control through on-site inspections, contractor interviews, and document review. These areas do not constitute unacceptable risks as listed in Appendix II of the OECD Due Diligence Guidelines, but the company has still developed and implemented corresponding risk mitigation and corrective measures.

具体包括 Specifically, these include::

1.个别承包商安全及人权培训记录不完整;

Incomplete safety and human rights training records for some contractors;

2.个别作业区域安全标识张贴不到位;

Inadequate safety signage in some work areas;

3.尾矿库（TSF）需持续加强环境与技术监测;

Continuous strengthening of environmental and technical monitoring of tailings dams (TSFs);

4.个别安保承包商初期未设置正式申诉渠道。

Initially, some security contractors did not establish formal complaint channels

针对上述事项，公司已制定整改行动计划，明确责任部门、整改措施和完成时限，并对整改进展进行持续跟踪。

Regarding the above issues, the company has developed corrective action plans, clearly defining responsible departments, corrective measures, and completion deadlines, and has continuously tracked the progress of the corrective actions.

截至本报告出具时，相关整改措施均已落实完成，包括补齐培训记录、完善安全标识、加强尾矿库监测以及建立申诉渠道。经复查确认，相关风险已得到有效缓解，不存在未关闭的整改事项。

As of the date of this report, all relevant corrective measures have been implemented, including supplementing training records, improving safety signage, strengthening tailings dam monitoring, and establishing complaint channels. A review has confirmed that the relevant risks have been effectively mitigated, and there are no outstanding corrective measures.

5.3 进行矿区完整的现场风险审核，未发现重大风险。

A full mine-site due diligence audit was conducted, with no major risks identified.

6. 结论

VI. Conclusion

KMC 的供应链尽责管理体系在 2024–2025 年度有效运行，公司能够持续满足 OECD 指南和欧盟法规的要求。

The KMC due diligence system operated effectively during 2024–2025 and continues to comply with OECD and EU requirements.

公司不存在任何不可接受风险，整体风险等级为低。

No unacceptable risks were identified; the overall risk level is low.

公司将继续提升环境管理、人权保护与可持续治理能力。

KMC will continue strengthening environmental management, human rights protection, and sustainable governance.