

KMC 负责任矿产供应链尽责管理政策

KMC Responsible Mineral Supply Chain Due Diligence Policy

Kamativi Mining Company Pvt Ltd（以下简称“KMC公司”或“我们”）认识到锂材料开采、交易、处理、出口等经营活动过程中可能产生重大的社会和环境风险，并认识到公司有尊重人权、不助长冲突的义务、消除和管控相关风险的责任。为此，我们根据并参考经济合作与发展组织（OECD）发布的《关于来自受冲突影响和高风险区域的矿石的负责任供应链尽责管理指南》（第三版）及《欧盟电池与废电池法规》制定本公司《负责任矿产供应链尽责管理政策》（以下简称“政策”），我们承诺采纳并广泛推广本政策，并将其纳入与供应商签订的合同和/或协议之中。并根据上述指南中附录一中所列明的五个步骤进行相关的尽职调查工作。我们承诺遵守联合国相关制裁决议，遵守适用执行此类决议的国内法律，不参与任何会为冲突提供帮助或便利的行为。

Kamativi Mining Company Pvt Ltd (hereinafter referred to as “KMC” or “we”) recognizes that the mining, trading, processing, and export of lithium materials may involve significant social and environmental risks, and acknowledges our obligation to respect human rights, not contribute to conflicts, and our responsibility to eliminate and control related risks. To this end, we have formulated this Responsible Mineral Supply Chain Due Diligence Policy (hereinafter referred to as “the Policy”) based on and with reference to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) and the EU Battery and Waste Battery Regulation. We commit to adopting and widely promoting this Policy and incorporating it into contracts and/or agreements signed with suppliers. We will conduct relevant due diligence in accordance with the five steps listed in

Annex I of the above guidance. We commit to complying with relevant United Nations sanctions resolutions, applicable domestic laws implementing such resolutions, and not engaging in any activity that would provide assistance or facilitation to conflicts.

我们承诺在锂精矿供应链运营实践中识别和管理以下风险，本政策适用于KMC公司以及所有与开采相关的供应商：

We commit to identifying and managing the following risks in our lithium concentrate supply chain operations. This Policy applies to KMC and all suppliers involved in mining.

一、与矿产开采、运输、或交易有关的严重侵权行为

Serious Human Rights Abuses Associated with the Extraction, Transport, or Trade of Minerals

在受冲突影响和高风险区域开展采购或经营活动时，我们既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施：

When sourcing or operating in conflict-affected and high-risk areas, we will neither tolerate nor profit from, contribute to, assist with, or facilitate in any way the commission by any party of:

（一）任何形式的酷刑、残暴、不人道或有辱人格的待遇；

Any form of torture, cruel, inhuman, or degrading treatment;

（二）任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚相威胁，强迫任何人从事的非本人自愿提供的劳动或服务；

Any form of forced or compulsory labor, meaning work or service exacted from any person under the threat of penalty and for which such person has not offered themselves voluntarily;

（三）最恶劣形式的童工；

The worst forms of child labor;

(四) 战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪；

War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide;

(五) 其他严重侵犯和践踏人权的行为，如普遍的性暴力行为。

Other gross human rights violations and abuses such as widespread sexual violence.

风险管理Risk Management

如果我们有合理理由认为该风险存在，即上游供应商存在以上任意侵权行为，或上游供应商与正在实施以上所规定的严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或中断与该上游供应商的合作。

If we have reasonable grounds to believe that such risks exist — namely, that an upstream supplier is committing any of the above abuses, or is sourcing from, or linked to, any party committing such abuses — we will immediately suspend or terminate cooperation with that upstream supplier.

二、直接或间接支持非法的有组织团体和公共或私人安全武装行为

Direct or Indirect Support to Illegal Armed Groups and Public or Private Security Forces

我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括且不限于从非国家武装团体或其关联方购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方：

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling, or export of minerals. Such “direct or indirect support” includes, but is not limited to, buying minerals from, making payments to, or otherwise

providing logistical assistance or equipment to non-state armed groups or their affiliates.

Such armed groups or affiliates:

(一) 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体；

Illegally control mine sites, or otherwise control transportation routes, mineral trading points, and upstream actors in the supply chain;

(二) 在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产；
Illegally tax or extort money or minerals at mine site entrances, along transportation routes, or at mineral trading points;

(三) 对中间商、出口企业、或国际贸易者非法征税或勒索。
Illegally tax or extort intermediaries, exporters, or international traders.

风险管理 Risk Management

如果我们有合理理由认为，上游供应商从向非国有组织武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier is sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups, we will immediately suspend or terminate cooperation with that supplier.

三、关于公共或私人安全武装

Concerning Public or Private Security Forces

我们同意根据本条下列关于对公共或私人安全武装的风险管理规定，杜绝向非法控制矿址、运输路线以及供应链上游行为主体，在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易者非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

We agree, in accordance with the risk management provisions below, to avoid providing direct or indirect support to public or private security forces that illegally control mine sites, transportation routes, or upstream supply chain actors, or that illegally tax or extort money or minerals at mine site entrances, along transportation routes, at mineral trading points, or from intermediaries, exporters, or international traders.

我们认可，矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

We recognize that the role of public or private security forces at mine sites, in surrounding areas, and/or along transportation routes should solely be to uphold the rule of law, including safeguarding human rights, protecting mine workers, equipment, and facilities, and ensuring that legitimate mining and trade are not disrupted.

在我们或我们供应链上的任何企业与公共或私人安全武装签订了合约的情况下，我们承诺或者将规定，在与这类安全武装进行合作的过程中将遵守《安全与人权自愿原则》的规定。尤其是，我们将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

In cases where we or any enterprise in our supply chain contracts with public or private security forces, we commit, or will require, compliance with the Voluntary Principles on Security and Human Rights when cooperating with such forces. In particular, we will support or take measures to apply screening policies to ensure that individuals or security force units known to have committed serious human rights abuses are not hired.

我们将支持或采取措施与中央或地方政府、国际组织和民间组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

We will support or take measures to work with central or local governments, international organizations, and civil society organizations to find feasible solutions to enhance the transparency, proportionality, and accountability of security payments made to public security forces.

我们将支持或采取措施与当地政府、国际组织和民间组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响，尤其是对小作坊矿工的负面影响，在这种情况下，供应链上的矿产是通过小作坊或小规模采矿的方式（ASM）开采。

We will support or take measures to engage with local governments, international organizations, and civil society to avoid or minimize adverse impacts that the presence of public or private security forces at mine sites may have on vulnerable populations, especially artisanal miners, in cases where minerals in the supply chain are sourced through artisanal or small-scale mining (ASM).

风险管理 Risk Management

如果我们发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使前文中所述的为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，我们将暂时停止或中断与上游供应商的合作。我们发现在一定程度上有可能存在有违本条上述最后两段内容的行为的情况下，将采取同样的应对措施。

If we identify such risks to a certain extent, we will, depending on our position in the supply chain, promptly develop, adopt, and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risks of providing direct or indirect support to public or private security forces as described above. If the risk management plan

proves ineffective after six months, we will temporarily suspend or terminate cooperation with the upstream supplier. If we identify a potential risk of violating the last two paragraphs above, we will take the same measures in response.

四、关于行贿受贿及矿产原产地的欺诈性失实陈述

Bribery and Fraudulent Misrepresentation of Mineral Origin.

我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

We will not offer, promise, give, or demand any bribes, and will resist solicitation. We will not bribe to conceal or falsify the origin of minerals or to misrepresent taxes, fees, and royalties payable to governments for mineral extraction, trade, processing, transport, and export.

（一）关于洗钱

On Money Laundering

如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

If we have reason to believe there is a risk of money laundering arising from, or connected to, minerals obtained through illegal taxation or extortion at mine site entrances, along transportation routes, or at upstream suppliers' trading locations, we will support or take measures to contribute to effectively eliminating money laundering.

（二）关于向政府支付的税收、费用及特许费

Regarding taxes, fees and royalties paid to the government

我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》（EITI）中的各项原则对此类支付进行披露。

We will ensure that all legal taxes, fees, and royalties related to the extraction, trade, and export of minerals from conflict-affected and high-risk areas are paid to governments, and we commit to disclosing such payments in accordance with our position in the supply chain and the principles of the Extractive Industries Transparency Initiative (EITI).

风险管理 Risk Management

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时停止或中断与上游供应商的合作。

Depending on our position in the supply chain, we commit to cooperating, as appropriate, with suppliers, central or local government authorities, international organizations, civil society, and affected third parties to take significant steps within a reasonable timeframe to prevent or mitigate adverse risk impacts and to improve or monitor performance. If risk mitigation measures prove ineffective, we will temporarily suspend or terminate cooperation with upstream suppliers.

五、关于职业健康与安全

Occupational Health and Safety

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何为其直接和 / 或间接，雇员和/或在其生产现场的任何人员提供威胁到生命的职业健康与安全环境的一方， 或从该方处采购或与之存在关联。

When sourcing or producing in high-risk areas, we will not benefit from, assist with, or facilitate any party that provides, directly or indirectly, to employees and/or any persons on their production sites, an occupational health and safety environment that threatens life; nor will we source from or be associated with such parties.

风险管理 Risk Management

如果我们有合理理由认为上游供应商提供威胁到生命的职业健康和安全环境的任何一方采购或与之存在关联，我们将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier sources from, or is associated with, any party providing life-threatening occupational health and safety conditions, we will immediately suspend or terminate cooperation with that supplier.

六、关于人权与环境保护

Human Rights and Environmental Protection

我们承诺在经营活动及供应链管理中尊重并保护人权，保障员工和社区的安全、健康与尊严，禁止一切形式的歧视、强迫劳动和童工行为。

We commit to respecting and protecting human rights in all business activities and supply chain management, ensuring the safety, health, and dignity of employees and communities, and prohibiting all forms of discrimination, forced labor, and child labor.

我们要求所有供应商同样遵守国际公认的人权标准，包括公平待遇、结社自由、安全工作条件及合理报酬。

We require all suppliers to adhere to internationally recognized human rights standards, including fair treatment, freedom of association, safe working conditions, and reasonable compensation.

我们承诺在矿产开采、加工、运输及出口过程中，遵守环境保护法律法规，防止污染，减少温室气体排放，保护自然生态系统。

We commit to complying with environmental protection laws and regulations throughout the extraction, processing, transport, and export of minerals, preventing pollution, reducing greenhouse gas emissions, and protecting natural ecosystems.

我们将推动能源和资源的高效利用，鼓励回收与再利用，持续改进生产和运营环节的环境绩效。

We will promote efficient use of energy and resources, encourage recycling and reuse, and continuously improve environmental performance in production and operations.

我们将把人权与环境风险纳入供应链尽职调查范围，识别并减缓可能造成社会冲突、生态破坏、水土污染和气候变化等风险。

We will integrate human rights and environmental risks into our supply chain due diligence, identifying and mitigating risks such as social conflict, ecological degradation, water and soil pollution, and climate impacts.

公司将积极参与社区建设与生态修复，减少采矿活动对环境和社会的不利影响，并与政府、社区和社会组织合作，促进包容性和可持续发展。

The company will actively participate in community development and ecological restoration, minimizing the adverse impacts of mining on the environment and society, and will cooperate with governments, communities, and social organizations to promote inclusive and sustainable development.

风险管理Risk Management

如发现上游供应商存在严重侵犯人权或破坏环境的行为，我们将立即中止或中断与该供应商的合作。

If we identify serious human rights violations or environmental damage by an upstream supplier, we will immediately suspend or terminate cooperation with that supplier.

七、政策传播及实施

Policy Communication and Implementation

本公司将本政策函件告知有关供应商，并要求本公司的供应商将此政策传达给其上游，以确保本公司的供应链中不出现助长冲突、侵犯人权尤其是儿童权益的情形，并定期将尽责管理情况向本公司汇报。本公司还将本政策纳入与供应商签订的合同和/或协议之中。

We will communicate this Policy to relevant suppliers and require our suppliers to convey it to their upstream partners to ensure that our supply chain does not contribute to conflict or violate human rights, particularly children's rights, and to report due diligence performance to us regularly. We will also incorporate this Policy into contracts and/or agreements signed with suppliers.

本公司呼吁所有从事矿产开采、处理、贸易、出口的企业或者使用相关制品的企业一起建立负责任供应链尽责管理体系，避免助长冲突和侵犯人权，尤其是儿童权益。

We call on all enterprises engaged in mineral extraction, processing, trading, export, or using relevant products to work together to establish responsible supply chain due diligence systems to avoid contributing to conflict and human rights abuses, especially violations of children's rights.

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Signed by: 叶建国

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