

## 2020 年负责任采购政策

### 2020 Responsible Purchasing Policy

广东致远新材料有限公司致力于成为一家负责任、有担当，创造价值、追求卓越的国际钽铌制造运营商。为充分体现企业的社会责任感及价值观，同时作为 TIC 以及 ITSCI 成员，本公司致力于建立完善的尽责管理体系，承诺严格甄选原料来源，坚决避免采购高风险地区的不合规原料，以防止该区域利益团体因此获利，造成当地持续动乱或冲突升级以及侵犯人权带来的负面影响。为此，本公司特制订如下受冲突影响和高风险地区矿物负责任采购政策并向上下游价值链传播：

Guangdong Zhiyuan New Materials Co., Ltd. is committed to becoming a responsible, value-creating and excellent international Tantalum-Niobium material manufacturer and operator. To fully embody the company's social responsibility and values, as members of the TIC and ITSCI, the company is committed to establishing a sound due diligence management system, strictly selecting the source of raw materials, resolutely avoiding procurement of non-compliant raw materials from high-risk areas so as to prevent benefiting interest groups in the region which results in continuous local unrest or conflict escalation and the negative impact caused by human rights violations. To this end, the company has specially formulated the following policies for responsible procurement of minerals in conflict-affected and high-risk areas and disseminated them to the upstream and downstream value chains:

1、与矿产开采、运输或交易有关的严重侵权行为。在受冲突影响和高风险地区采购或经营活动时，我们不会容忍也不会以任何方式获利、帮助、协助或为任何一方提供便利来实施：

Serious infringements related to mining, transportation or trading of minerals. We will not tolerate and will not profit, help, assist, or provide convenience to any party for procurement or business activities in conflict-affected and high-risk areas:

(1) 任何形式的酷刑，残忍、不人道和有辱人格的待遇；

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

(2) 任何形式的强迫或强制劳动；

Any form of forced or compulsory labor;

(3) 最恶劣形式的童工；

The worst forms of child labor;

(4) 其他严重侵犯和践踏人权的行為；

Other serious violations of human rights;

(5) 其他严重违反国际人道主义法的行為。

Other serious violations of international humanitarian laws.

如果我们有合理理由认为该风险存在，即上游供应商正从实施上述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，我司将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that the risk exists, that is, the upstream supplier is purchasing from any party that commits the serious infringements listed above or is associated with that party, our company will immediately suspend or terminate cooperation with the supplier.

2、直接或间接支持非国家武装团体。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。这些武装团体或关联方行为包括：

Directly or indirectly support non-state armed groups. We will not tolerate any direct or indirect support for non-state armed groups through mineral extraction, transportation, trade, processing or export. The actions of these armed groups or related parties include:

(1) 非法控制矿场，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；

Illegal control of mines, or otherwise control transportation routes, mineral trading points and upstream of the supply chain;

(2) 在矿场入口、运输路线或矿产交易点非法征税或勒索；

Illegal taxation or extortion at mine entrances, transportation routes, or mineral trading points;

(3) 对中间商、出口企业、或国际贸易者非法征税或勒索。

Illegal taxation or extortion of middlemen, export companies, or international traders.

如果我们有理由认为上游供应商正向非国家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 purchasing or has a relationship with any party that provides direct or indirect support to a non-state armed group, we will immediately suspend or terminate cooperation with that supplier.

3、直接或间接支持公共或私人的安全部队。杜绝向非法控制矿场、运输路线以及供应链上游行为主体，在矿场入口、运输路线或矿产交易点非法征税或勒索，或向中间商、出口企业和国际贸易者非法征税或勒索的公共或私人安全武装提供直接或间接支持。我们认可矿场和运输路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、保护矿场或运输路线以使合法的开采和贸易不受干扰。

Support public or private security forces directly or indirectly. Eliminate direct or indirect support to the public or private security forces which impose illegal taxation or extortion on illegally controlled mines, transportation routes and upstream parties in the supply chain, at mine entrances, transportation routes or mineral trading points, or illegal taxation or extortion on middle parties, export companies and international traders. We recognize that the role of public or private security forces in mines and transportation routes is only to maintain the rule of law, including protection of human rights, protection of miners, equipment and facilities, and protection of mines or transportation routes so that legal mining and trade are not disturbed.

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，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未起作用，我们将暂时停止或中断与上游供应商的合作。

If we find that there is such a risk to a certain extent, we will formulate, adopt and implement a risk management plan for upstream suppliers and other stakeholders according to the specific position of the enterprise in the supply chain, so that the risk of direct or indirect support to public or private security forces is

contained or reduced . If the implementation of the risk management plan does not work, we will temporarily suspend or terminate the cooperation with upstream suppliers.

4、关于行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、及不向政府支付的税收、费用、特许费的风险。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原产地而行贿，不会虚报矿产开采、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；我们将支持或采取措施，为有效的消除洗钱行为做贡献。

Risks related to bribery and fraudulent misrepresentation of the origin of minerals, money laundering, and taxes, fees, and royalties not paid to the government. We will not offer, promise, conduct or solicit any bribes, and we will resist temptation; we will not bribe in order to cover up or falsify the origin, nor will we falsely report taxes, fees, and concession mining fees that should be paid to the government related to mining, trade, processing, transportation, export and other activities ; we will support or take measures to contribute to the effective elimination of money laundering.

对于每个供应商，我们会要求对方填写 KYC 并提供钽来源的证明材料，根据我们的风险管理流程评估其风险等级，然后根据尽责管理采购流程（基于负责任矿产审验流程 RMAP 和 OECD 指导原则）进行采购，对于每笔交易会严格审查对应文件并保留记录。我们设立了申诉渠道广泛听取意见并持续改善。我们会广泛推广上述采购政策，包括且不限于供应商、客户、员工以及社区，同时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中国法律，承诺不参与任何会为冲突提供帮助或便利的行为。如未及时达成降低风险采购之效果，我们停止或中断与相关供应商的采购。

For each supplier, we will ask them to fill in KYC and provide proof of Tantalum source, evaluate its risk level according to our risk management process, and then carry out procurement according to our Due Diligence Procurement Process (based on RMAP and OECD guidelines) , and we will strictly review the traceability documents of each transaction and keep records. We have set up a complaint channel to listen to opinions and continue to improve. We will widely promote the above procurement policies, including but not limited to suppliers, customers, employees, and communities. At the same time, we are committed to complying with relevant UN sanctions resolutions, complying with Chinese laws applicable to the implementation of such resolutions, and committing not to provide any assistance or convenience to the conflicts. If the risk of procurement is not reduced in a timely manner, we will suspend or terminate the cooperation with relevant suppliers.

申诉邮箱/ Complaint sent to: richard@zhiyuanm.com

联系人/ Contact: 曾光 Richard Zeng (+86-20-8582 5131)

广东致远新材料有限公司/ Guangdong Zhiyuan New Materials Co., Ltd.

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