

## 负责任全球矿产供应链的尽责管理政策

### **Due Diligence Policy for a Responsible Global Supply Chain of Mineral**

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to adverse impacts to society, CNGR commits to adopt and widely disseminate the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Chinese Guidance), Edition 2 published by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), and incorporate it into its contracts and agreements with suppliers. This policy provides a reference for conflict-sensitive procurement activities throughout the mineral supply chain. CNGR commits not to engage in any activity that would contribute to the conflict and to abide by relevant UN sanctions, Or, where applicable, comply with domestic laws implementing such resolutions and respect the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Edition 3 published by the OECD (OECD Guidance) on disclosure of information.

The objective minerals of due diligence for CNGR:Nickle/Cobalt/Manganese/Lithium.

This Policy is applicable for CNGR Advanced Material Co.,LTD and all of its controlling subsidiaries.

认识到在“受冲突影响和高风险区域”从事矿产资源开采、交易、处理、出口存在可能造成重大不利影响的风险，并认识到我们有尊重人权、不助长冲突和不对环境和社会产生不利影响的义务，中伟承诺采纳并广泛传播《中国矿产供应链尽责管理指南》第二版的相关内容，并将其纳入到与供应商签订的合同和协议之中。这一政策为矿产供应链全过程涉及冲突敏感的采购活动以及供应商提高风险意识提供参考。中伟承诺不从事任何会为冲突提供资助的活动，承诺遵守联合国相关制裁决议，或者在适用情况下，遵守执行此类决议的国内法律，并尊重《经济合作与发展组织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职调查指南》（第三版）有关信息公开的建议。

中伟供应链尽责管理矿产种类：镍、钴、锰、锂  
本政策适用于中伟新材料股份有限公司及其所有控股子公司。

### ***Regarding serious abuses associated with the extraction, transport or trade of minerals:***与矿产开采、运输、或交易有关的严重侵权行为:

1. While sourcing from, or operating in high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:在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:

- i. the worst forms of child labour (Hazardous work is one of the worst forms of child labour);最恶劣形式的童工（危害性工作是最恶劣形式童工中的一种）
- ii. any forms of torture, cruel, inhuman and degrading treatment;任何形式的酷刑、残暴、不人道和有辱人格的待遇；
- iii. any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;任何形式的强迫或强制劳动，即以惩罚相威胁，在他人非自愿的情况下迫使从事一切劳动或服务；
- iv. other gross human rights violations and abuses such as widespread sexual violence;其他严重侵犯和践踏人权的行爲，如普遍的性暴力行爲；
- v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行爲

***Regarding risk management of serious abuses:***对严重侵权行为的风险管理

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.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第1条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。

***Regarding direct or indirect support to non-state armed groups:***关于直接或间接支持非国家武装团体

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:我们不会容忍任何通过矿产开采、运输、交易、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、交易、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，支付费用，或以其他方式为其提供后勤支援或设备等。
  - i. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or 非法控制矿区，或以其他方式对运输路线、矿产资源交易地、以及供应链的上游行为主体进行控制；并/或
  - ii. illegally tax or extort money or minerals resources at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or 在矿区入口、通往矿区沿线或矿产资源交易地非法征税或者勒索钱财或自然资源；并/或
  - iii. illegally tax or extort intermediaries, export companies or international traders.对中间商、出口企业或国际贸易商非法征税或勒索。

***Regarding risk management of direct or indirect support to non-state armed groups:*** 对向非国家武装团体提供直接或间接支持的风险管理

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups. 如果我们认为, 上游供应商从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。

***Regarding public or private security forces:*** 关于公共或私人安全武装:

5. We agree to eliminate, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders. 我们杜绝向非法控制矿区、运输路线以及供应链上游参与方; 在矿区入口、通往矿区的沿线或矿产资源交易点非法征税、勒索钱财或矿产资源; 对中间商、出口企业或国际贸易商非法征税或勒索钱财的公共或私人安全武装提供直接或间接支持。
6. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade. 我们认可, 矿区及/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、保护矿区或运输路线以使合法的开采和交易不受干扰。
7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with internationally recognised standards. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired. 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, 这类安全武装须和国际认可标准一致。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。
8. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved. 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。
9. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites. 我们将支持或采

取措施，与当地政府，国际组织和民间社会组织开展合作，供应链上的矿产资源通过小作坊或小规模采矿方式开采的，避免或最大限度地降低公共或私人安全武装驻扎在矿区给弱势群体带来的不利影响，尤其是对小作坊的不利影响。

***Regarding risk management of public or private security forces:***对公共或私人安全武装的风险管理:

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.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，立即与供应商和利益相关方一起制定、采用和实施风险管理计划，从而使第五段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奏效，我们将中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违背第8段和第9段行为的情况下，将采取同样的应对措施。

***Regarding bribery and fraudulent misrepresentation of the origin of minerals:***关于行贿受贿及矿产原产地的欺诈性失实陈述:

11. We will not offer *directly or indirectly*, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export, *or failing to follow relevant international standards and conventions for anticorruption*.我们不会直接或间接地提出、承诺、给予或索要任何贿赂，并且抵制索贿，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、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或不遵守相关国际反腐败标准和惯例。

***Regarding money laundering:***关于洗钱:

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers. 如果我们有理由认为，存在因开采、交易、处理、运输或出口在矿区入口、运输路线沿线、或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产

资源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。

***Regarding the payment of taxes, fees and royalties due to governments:***关于向政府支付的税收、费用及特许费：

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with internationally recognised transparency standards.  
我们将确保向政府支付所有高风险区域矿石开采、交易、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，对此类支付根据国际认可的透明度标准进行披露。

***Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:***对行贿受贿及矿产原产地的欺诈性失实陈述、洗钱及向政府支付的税收、费用、特许费的风险管理

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation of 6 months.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。风险降低措施实施六个月未奏效，我们将中止或中断与上游供应商的合作。

***Regarding occupational health and safety:***

关于职业健康与安全

15. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and / or indirect employees and / or any person present on the party's operations. 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。

***Regarding risk management of occupational health and safety:***

关于职业健康与安全的风险管理：

16. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing life threatening occupational health and safety conditions as defined in paragraph 15. 如果我们有合理理由认为上游供应商提供如 15 条中所定义的威胁到生命的职业健康和安全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。

***Regarding child labour:***关于童工

17. While sourcing from, or operating in high-risk areas, we will not employ, profit from, assist with, or facilitate, or source from, or be linked to, any party employing, profiting from, assisting with, or facilitating the employment of children under the minimum working age which is legally prescribed by the host country laws and regulations. If there is no relevant host country law or regulation, the minimum working age shall be 16 years. 在高风险区域开展采购或开展经营活动时，我们将不会雇佣、获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业而提供便利或跟其采购或与其有关联。如果东道国没有相关的法律或法规规定，最低工作年龄为 16 岁。

***Regarding risk management of child labour:*** 关于童工的风险管理

18. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party employing children as defined in paragraph 17. 如果我们有合理理由认为该风险存在，即上游供应商正从第 17 条所规定的任何一方雇佣童工进行采购或与该方有关联，我们将立即中止或中断与该供应商的合作。

***Regarding Environmental Protection:***关于环境保护

19. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate significant adverse impacts regarding ambient soil, air and water conditions, or source from or be linked to any party with gross violation of local laws and regulations. We will support or take actions to evaluate periodically to minimize the adverse impacts of extraction regarding soil, air and water. 在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何给周围土壤、空气和水的状况造成重大不利影响，严重违反当地相关法律法规的一方或从该处采购或与之存在关联。我们将支持或采取措施定期评估、降低采矿对土壤、空气、水造成的不利影响。

***Regarding Exploitation of Resources:***关于资源开采

20. We do not participate in, tolerate, or profit from the exploitation of resources from land where the free, prior and informed consent of local and indigenous peoples has not been obtained, a legal title, lease, concession, or license has been obtained illegally, or national laws have been violated. 我们不参与、不容忍、也不受益于在未获得当地人和土著人自由、事先和知情同意或在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源

**Regarding Culture, Heritage Protection and Legally Protected Areas:**

关于文化、遗产保护和法定保护区

21. We do not participate in, tolerate, or profit from extracting or sourcing resources from mining operations where the culture and heritage of local and indigenous peoples have not been respected and protected, or where traditional cultures and heritage of local peoples have been harmed. 我们不参与、不容忍、也不受益于从不尊重、不保护当地人和土著人文化和遗产，或损害当地人传统文化和遗产以及在法定保护区的采矿作业中开采或采购资源。

**Regarding Risk Management of Environment, Culture, Heritage :**关于环境、文化、遗产的风险管理

22. If we have proper reasons to believe that such a risk exists, we will immediately work with suppliers and other stakeholders to develop, adopt and implement risk management plans based on where the enterprise's specific position in the supply chain is. In order to prevent or mitigate the specific risks related to infringement of land rights, leading to significant adverse environmental impact or local cultural heritage damage. If the risk mitigation measures do not work, we will suspend or terminate our cooperation with upstream suppliers 如果有合理理由认为存在此类风险，我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低侵害土地权利、引发重大不利环境影响或与当地文化遗产破坏相关的具体风险。风险降低措施未起作用的，我们将中断或终止与上游供应商的合作。

**Dissemination of the Policy:**政策传播

The Company informs the supplier of this policy and asks the suppliers to communicate this policy to their upstream . 本公司将本政策告知供应商，并要求供应商将此政策传达给其上游。

CNGR Advanced Material Co.,Ltd.

中伟新材料股份有限公司

January., 1st, 2023

2023 年 1 月 1 日

Working hours in a week shall not exceed the limit of local law. Employees should be allowed at least one day off per seven-day week.

5、工资与福利：供应商应遵照地方及国家法律规定，给员工提供合理的工资及福利，包括关于最低工资、加班时间和其它补偿相关的法律。所有员工的工资不得低于法定最低工资。

5. Wage and Benefit: supplier shall provide its employees reasonable wage and benefit according to the local and national laws and regulations, including those relating to minimum wages, overtime hours and other elements of compensation. The wages of all the employees shall not be less than the statutory minimum wage.

6、歧视：供应商在招聘和雇佣员工时，不得因种族、宗教信仰、年龄、国籍、性取向、性别、性别认同和性别表现、婚姻状况、怀孕、政治派别或残障等其它类似因素而歧视他人。不得要求员工或应聘者接受带有歧视性质的医学检查。

6. Discrimination: Supplier shall not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, disability and etc. Supplier shall not require its employees or applicants undertake medical examination with discriminatory nature.

7、结社自由：在法律允许范围内，供应商不得干涉、阻扰或禁止员工组建或加入各类组织、选举代表、参与集体谈判以及开展各项合法活动。

7. Freedom of Association: Supplier shall not interfere, obstruct or forbid its employees to establish or join all kinds of organizations, electing representatives, participating in collective bargaining and carrying out any legal activities.

## 第二章 健康与安全

### Provision 2: Health and Safety

1、职业安全：供应商应通过合理的工程设计、过程控制和预防维护来识别、评估、消除安全隐患。应当向员工提供与工作相关且适当的个人防护装备，并开展相关培训和指导。



1. Occupational safety: Supplier shall identify, assess and eliminate safety hazards through reasonable engineering design, process control and preventive maintenance. The supplier shall provide its employee with proper personal protective equipment relevant to the work as well as relevant training and guidance.

2、应急管理：供应商应识别并评估紧急情形和紧急事件，并通过实施应急方案及应对程序将其影响降到最低，包括：紧急报告、员工通知和撤离程序、员工训练与演习、适当的火灾侦测及扑灭设备、充足的出口设施和复原计划。此类计划和程序应尽可能减少对人身、环境和财产的危害。

2. Emergency Preparedness: Suppliers shall identify and assess potential emergency situations and events, and implement emergency plans and response procedures to minimize their impact, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property at the greatest extent.

3、工伤和疾病：供应商应当制定合适的程序和体系以预防、管理、跟踪和报告工伤和疾病，包括以下规定：鼓励员工报告；对工伤和疾病案例进行分类和记录；提供必要的医疗服务；调查案例并采取纠正措施以消除影响；帮助员工重返工作。

3. Occupational Injury and Illness: Supplier shall have procedures and systems in place to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

4、生活条件：供应商应当为员工提供干净的卫生间设施、饮用水以及清洁食物准备、储藏与用餐设施。供应商或劳工代理机构提供的员工宿舍应保持洁净安全，并提供适当的紧急出口、洗浴热水、充足的供暖和通风，以及合理的出入方便的私人空间。

4. Living Conditions: Supplier shall provide workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Worker dormitories provided by the supplier or a labor agent shall be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate heat and ventilation, and reasonable personal space along with reasonable entry and exit privileges.

5. 健康与安全信息沟通：供应商应向员工提供以员工主要语言授课的适当的健康安全培训。健康与安全相关信息应张贴在现场醒目处。

5. Health and safety information communication: Supplier shall provide workers with appropriate safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

6. 机器防护：供应商须对生产设备和其他机械进行安全危害评估，并为可能导致员工受伤的机械提供物理防护装置、连锁装置及屏障，并正确进行维护。

6. Safety Guarding: supplier shall evaluate its production and other machinery for safety hazards, provide physical protection devices, interlocks and barriers, where machinery presents an injury hazard, and properly maintain them.

### 第三章：环境

#### **Provision: Environment**

1、供应商应遵守所有与环保相关的法律法规。

1. Supplier shall comply with all applicable laws and regulations regarding environment.

2、防止污染及节约资源：应在源头上或通过实践（如改进生产、维护和设施工艺、替换材料、节约资源、材料回收和再利用等）减少和消除所有类型的资源耗费和污染（包括水和能源）。

2. Pollution Prevention and Resource Reduction: The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

3、有害物质：供应商应当识别和控制释放到环境中会造成危险的化学物质及其他材料，确保这些物质得到安全处理、运输、存储、使用、回收或再利用和处置。

3. Hazardous Materials: Supplier shall identify and manage chemicals and other materials posing a hazard if released to the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

4、 供应商应保护您的员工和邻居的生命及健康， 以及由于您的工艺和产品固有的风险所涉及的公众。

4. Supplier shall protect life and health of its employees and neighbors, as well as the public involving from inherent risk from processes and products.

5、 控制和处理废水及固体废物： 供应商在经营、 工业加工和清洁设施中产生的废水及固体废物在排放或处置前， 应当按照要求对其进行监测、 控制和处理。

5. Control and Disposal of Wastewater and Solid Waste: For the wastewater and solid waste which are generated during the operation, manufacturing, and facility cleaning, supplier shall monitor, control and treat them according to the requirement before being discharged or disposed.

6、 气体排放： 供应商在经营过程中产生的挥发性有机化学物质、 腐蚀性气体、 微粒、 臭氧消耗化学物质以及燃烧副产品等废气在排放之前， 应当按照相关要求对其进行鉴别、 监测、 控制和处理。

6. Air Emissions: according to relevant requirements, supplier shall identify, monitor, control and treat the VOCs, corrosive gases, particulates, Ozone-depleting chemicals and Combustion by-products which are generated by the manufacturing process before discharging.

7、 材料限制： 供应商应当遵守有关在产品中以及制造过程中禁用或限用某些特定物质（包括回收和处置标志）的相关法律、 法规和客户要求。

7. Materials Restrictions: Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

8、 能源消耗和温室气体排放： 应在工厂和/或公司级跟踪和记录能源消耗以及所有相关的类别 1 和类别 2 温室气体的排放情况。 供应商应探索开发有成本效益的方法以提高能源效率， 并最大程度地减少能源消耗与温室气体排放。

8. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Suppliers

are to look for cost- effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

#### 第四章：道德规范

##### **Provision 4: Ethics**

1、商业诚信：供应商应采取零容忍政策，禁止任何形式的贿赂、洗钱、恐怖主义融资、腐败、敲诈勒索和挪用公款行为。所有业务交易均应确保透明并应在参与者业务账目和记录中准确反映。应推行监督和强化程序以确保符合反腐败法的要求。

1. Business Integrity: Supplier shall have a zero tolerance policy to prohibit any and all forms of bribery, money laundering, terrorist financing, corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Participant's business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

2、信息公开：供应商应依照适用法规和主要的行业惯例公开有关商业活动、组织结构、财务状况、劳工、健康与安全与环境的信息。

2. Disclosure of Information: Supplier shall disclose the information regarding its business activities, structure, financial status, labor, health and safety, and environmental practices according to applicable laws and prevailing industry practices.

3、社区参与：鼓励供应商参与社区活动，以推动社区的社会和经济发展。

3. Community Engagement: Supplier is encouraged to join the community activities to promote social and economic development.

4、身份保护和无报复政策：供应商须建立匿名投诉机制，确保举报者身份的机密性和匿名性，禁止报复行为。

4. Identity Protection and Non-retaliation: Supplier shall establish an anonymous complaint mechanism to ensure the confidentiality, anonymity of whistleblower is protected, and prohibit retaliation.

5、知识产权保护：供应商应尊重知识产权，保护客户信息的安全。

5. Protection of Intellectual Property: Supplier shall respect intellectual property rights and safeguard customer's information.

6、反垄断及反不正当竞争：供应商应遵守所有适用的国家和国际反垄断和贸易控制的法规。合作伙伴不得独自或伙同其他合作伙伴进行垄断市场或不正当竞争的行为。

6. Anti-Trust and Unfair Competition: Supplier shall comply with all applicable national and international regulations of anti-trust and trade control. Partner is prohibited to have monopoly or unfair competition alone or with other partners.

7、负责任的矿物采购：具体要求请参照此行为准则的补充《负责任全球矿产供应链尽责管理政策》，这个政策的补充是完全按照《中国矿产供应链尽责管理指南》和《经济合作与发展组织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》而制定的。

7. Responsible Sourcing of Minerals: Regarding detailed requirement, please refer to the supplement of this Code of Conduct, “Supplier Standard for Responsible Sourcing of Mineral” which is fully aligned with *Chinese Due Diligence Guidance for Responsible Mineral Supply Chains* and the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* .

## 第五章：公司治理

### Provision 5: Company Management

1、管理责任和义务：供应商应设有 ESG 部门或类似岗位，直接向行政管理层报告，承担并拥有管理企业的社会和环境合规要求的责任及权力。

1. Management Responsibilities and Obligations: supplier shall set up a ESG Department or similar position that reports directly to executive management who has the responsibility and authority to manage social and environmental compliance requirements for the business.

2、风险评估与管理：供应商应制定并维护和识别与业务相关的劳工权利与人权、健康与安全、环境、商业道德及法律合规风险的制度，并执行适当的程序和控制措施来缓解已识别的风险。

2. Risk Assessment and Management: Supplier shall develop and maintain a procedure to identify the risks in labor and human rights, health and safety, environmental, business

ethics, and legal compliance associated with its operations; implement appropriate procedures and controls to mitigate the identified risks.

3、 信息沟通：供应商应拥有向员工、下级供应商和客户清晰、准确传达其绩效、实践、政策和期望等相关信息的流程。

3. Information Communication: Supplier shall have processes to accurately communicate with employees, vendors and customers about the practices, policies and expectations.

4、 纠正措施流程：对于通过内部和外部审核、评估、检查、调查或评审等发现的不足或违规行为，供应商应拥有及时开展纠正措施的流程。

4. Corrective Action Process: Supplier shall have a process to correct any deficiencies or violations timely identified by an internal or external audit, assessment, inspection, investigation, or audit.

我们期待您的承诺，并携手一起为企业供应链的可持续发展做出贡献。

We expect your commitment and we hold on together to contribute to the sustainable development of the corporate supply chain.

CNGR Advanced Material Co.,Ltd.

中伟新材料股份有限公司

January, 1st, 2023

2023 年 1 月 1 日