

海南星之海新材料有限公司

负责任全球供应链尽责管理政策

HAINAN XINGZHIHAI NEW MATERIALS CO., LTD Due Diligence Policy for Responsible Global Supply Chains

海南星之海新材料有限公司（以下简称“海南星之海”、“我们”或“公司”）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,并认识到公司有尊重人权、管控相关风险的责任。为此,我们根据中国五矿化工进出口商会(CCCMC)发布的《中国负责任矿产供应链尽责管理指南》,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》,特制定海南星之海负责任全球供应链尽责管理政策(以下简称“政策”)。

Hainan Xingzhihai New Materials Co., Ltd. (hereinafter referred to as "Hainan Xingzhihai" or "we", or the "Company") recognizes that risks of significant adverse impacts may arise from extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas. We also acknowledge the Company's responsibility to respect human rights as well as to eliminate and control relevant risks. For this purpose, in accordance with the Guidelines for Responsible Mineral Supply Chain Due Diligence in China issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), and with reference to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, we hereby formulate the Company's Hainan Xingzhihai Due Diligence Policy for Responsible Global Supply Chains (hereinafter

referred to as the "Policy").

本政策旨在为矿产资源供应链全过程中的冲突敏感性采购活动及供应商的风险管理提供基本准则。海南星之海承诺严格遵守联合国相关制裁决议及所有适用的国内法律法规，坚决抵制任何可能助长冲突、危害和平的行为，全面履行公司应尽的社会责任与法律义务。

This Policy aims to provide basic guidelines for conflict-sensitive procurement activities and supplier risk management throughout the entire mineral supply chain. Hainan Xingzhihai undertakes to strictly comply with relevant United Nations sanctions resolutions and all applicable domestic laws and regulations, firmly oppose any acts that may fuel conflicts and undermine peace, and fully fulfill the corporate social responsibilities and legal obligations of the Company.

公司承诺在矿产供应链运营实践中识别和管理以下风险：

The Company commits to identifying and managing the following risks in the operational practices of its mineral supply chains:

一、与矿产开采、运输、或交易有关的严重侵犯人权行为 **Severe Human Rights Violations Related to Mineral Mining, Transportation or Trading**

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

When conducting procurement or business operations in conflict-affected and high-risk areas, the Company will not tolerate, benefit from, aid or assist in any manner the commission by any party of the following conducts:

1. 最恶劣形式的童工；

1.The worst forms of child labour;

2. 任何形式的酷刑、残暴、不人道或有辱人格的待遇；

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

3. 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

非本人自愿提供的劳动或服务；

3.Any form of forced or compulsory labour. Forced or compulsory labour refers to labour or service exacted from any person under threat of penalty and undertaken involuntarily;

4. 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为；

4.War crimes, crimes against humanity, genocide and other serious violations of international humanitarian law;

5. 其他严重侵犯和践踏人权的行爲，如大规模性暴力。

5.Other serious human rights abuses and violations, including widespread sexual violence.

降低风险

Risk Mitigation

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犯人权行为，或上游供应商与正在实施以上所规定的严重侵犯人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 has committed any of the above human rights violations, or procures materials from or is associated with any party engaging in the severe human rights violations specified above, we shall immediately suspend or terminate our cooperation with the 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 for Illegal Organized Groups and Public or Private Armed Security Conduct

我们不容忍任何通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供直接或间接的支持，包括但不限于从非法的有组织武装团体或其关联方购买矿产，

向其付款，或以其他方式向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 provided to non-state organized armed groups through the exploitation, transportation, trading, processing or export of mineral resources. This includes but is not limited to purchasing minerals from illegal organized armed groups or their affiliates, making payments to them, or providing logistical support, equipment and other supplies to them by other means. Such armed groups or their affiliates refer to those that:

1. 非法控制矿区，或以其他方式对运输路线、矿产资源交易点、以及供应链中的上游主体进行控制；

1. Illegally control mining areas, or otherwise exercise control over transportation routes, mineral resource trading points, and upstream entities in the supply chain;

2. 在矿址入口、运输路线沿线或矿产资源交易点非法征税、勒索钱财或矿物资源；

2. Impose illegal taxes, extort money or mineral resources at mine entrances, along transportation routes or at mineral resource trading points;

3. 对中间商、出口企业或国际贸易商非法征税或勒索。

3. Levy illegal taxes or conduct extortion against middlemen, export enterprises and international traders.

我们将杜绝向非法控制矿址、运输路线以及供应链中的上游主体，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武装提供直接或者间接支持。

We will put an end to providing direct or indirect support to public or private armed forces that illegally control mine sites, transportation routes and upstream supply chain entities, impose illegal taxes or demand money and minerals at mine entrances, along transportation routes or at mineral trading points, or conduct illegal taxation and extortion against middlemen, export enterprises and international traders.

我们认可，矿址或其周边地区以及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、保护设备和设施安全、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 sole role of public or private armed security forces at or around mine sites and along transportation routes is to uphold the rule of law, including safeguarding human rights, protecting miners, protecting safety of equipment and facilities, and securing mine sites and transportation routes to ensure legitimate mining and trade free from disruption.

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情况下，我们承诺或将规定，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雇用。

Where we or any enterprise within our supply chain enter into contracts with public or private armed security forces, we undertake or will stipulate to comply with the provisions of the Voluntary Principles on Security and Human Rights in the course of cooperation with such security forces. In particular, we will support or adopt measures to implement screening policies to ensure that individuals or armed security units known to have committed serious human rights violations are not recruited.

我们将支持或采取措施与中央或地方政府、国际组织和民间社会组织开展合作，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 cooperate with central or local governments, international organizations and civil society organizations to jointly develop feasible solutions to improve the transparency, proportionality and accountability of security expenses incurred by public armed forces.

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影响。

We will support or take measures to engage with local governments, international organizations and civil society organizations to avoid or minimize the negative impacts on vulnerable groups, especially artisanal miners, caused by the stationing of public or private armed security forces at mine sites.

降低风险

Risk Mitigation

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联，我们将立即中止或中断与该供应商的合作。

我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。在此情况下，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供应商的合作。

If we have reasonable grounds to believe that upstream suppliers source from or are associated with any party that provides direct or indirect support to non-state organized armed groups, we will immediately suspend or terminate cooperation with such suppliers.

We will formulate, adopt and implement risk management plans together with supply chain stakeholders to prevent or reduce the risks of providing direct or indirect support to public or private armed security forces. In such cases, if the risk management plan fails to deliver results within six months, we will suspend or terminate cooperation with the supplier.

三、 贪腐、洗钱和向政府支付的各项费用 **Corruption, Money Laundering and Government Payments**

我们不会提供、承诺、进行或索要任何贿赂，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。

We will not offer, promise, make or solicit any bribes, resist solicitation of bribes, and will not engage in bribery to conceal or falsify the origin of mineral resources, or falsely declare taxes, fees and concession royalties payable to the government arising from mineral resource mining, trading, processing, transportation, export and other activities.

我们禁止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序；尽最大努力促进与所有业务伙伴间负责任的商业实践。

We prohibit bribery in all business activities and transactions, including bribery by agents and other third parties, establish standards and approval procedures for gift-giving and acceptance, and strive to promote responsible business practices with all business partners.

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点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。

If we have reason to believe that there exists a money laundering risk arising from or associated with mineral resources obtained through illegal taxation or extortion at mine entrances, along transportation routes or at upstream suppliers' mineral trading points in the course of mining, trading, processing, transportation or export, we will support or take measures to contribute to the effective elimination of money laundering.

我们承诺采取有效措施，防止卷入洗钱或恐怖主义融资，例如：通过核实和发布供应商、客户身份和实际所有权等，监测异常或可疑活动的交易，保存高于适用的法律法规中金额上限的现金交易记录。

We undertake to take effective measures to prevent involvement in money

laundering and terrorist financing, such as clarifying and disclosing the identity and ultimate ownership of suppliers and customers, monitoring transactions involving abnormal or suspicious activities, and retaining records of cash transactions exceeding the monetary thresholds specified in applicable laws and regulations.

我们将确保向政府支付所有受冲突影响和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，并且承诺根据我们在供应链上所处位置，对此类支付根据所在国关于向政府部门缴纳的税费信息公开的要求进行披露。

We will ensure the payment of all legitimate taxes, fees and concession royalties to the government in relation to ore mining, trading and export of ores in conflict-affected and high-risk areas. We further undertake to disclose such payments in compliance with the local laws and requirements of the host country governing the disclosure of payments made to the government authorities, based on our position in the supply chain.

降低风险

Risk Mitigation

根据公司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、国际组织、民间社会组织以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将中止或中断与上游供应商的合作。

Based on the specific position of enterprises in the supply chain, we undertake to cooperate with suppliers, central or local governments, international organizations, civil society organizations and affected third parties as appropriate to improve or track performance with the aim of adopting measurable measures within a reasonable time frame to prevent or mitigate the risks of adverse impacts. Where risk mitigation measures prove ineffective, we will suspend or terminate cooperation with upstream suppliers.

四、土地权利、排放和小作坊 **Land Rights, Emissions and Artisanal Mining**

我们不参与、不容忍、不受益于在未获得当地人和土著人自由、预先且知情同意的土地上开采资源，包括持有法定所有权、租赁权、特许权或许可证的开采商。我们不参与、不容忍、不受益于当地人和土著人的文化和遗产未受尊重和保护，或损害当地人传统文化的开采作业。

We will not participate in, tolerate or benefit from resource extraction on lands without the free, prior and informed consent of local and indigenous peoples, including by mining operators holding legal ownership, leasehold rights, concessions or permits. We will not participate in, tolerate or benefit from mining operations that fail to respect and protect the culture and heritage of local and indigenous peoples or damage their traditional cultures.

我们不参与、不容忍、不受益于在非法获得所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源。我们确保避免给周围土壤、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，包括制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质，或排放砷和汞。

We will not participate in, tolerate or benefit from resource extraction on lands with illegally obtained ownership, leasehold rights, concessions or permits, or in violation of domestic laws. We shall avoid causing significant adverse impacts on the surrounding soil, air and water environment, or serious violations of relevant local laws and regulations, including the manufacture, trading and use of chemicals and hazardous substances subject to international bans due to their high toxicity to organisms, environmental persistence or potential irreversible ecological impacts, as well as the emission of arsenic and mercury.

我们承诺定期要求供应商评估、降低采矿对土壤、空气、水造成的不利影响。考虑周围土壤、空气和水资源的条件，我们要求供应商采取具有技术、资金可行性和适用性的污

染预防方法与技术，尽力避免、降低、控制污染；按照东道国的相关法律法规要求，对公司排放主要污染物进行监测，随时掌握公司污染状况，并明确记录、公开检测结果；采取控制与减少排放策略。

We undertake to regularly require suppliers to assess and reduce the adverse impacts of mining on soil, air and water. Taking into account the conditions of surrounding soil, air and water resources, we will require suppliers to adopt technically and financially feasible and applicable pollution prevention methods and technologies to strive to avoid, reduce and control pollution; monitor enterprises' discharge of major pollutants in compliance with the requirements of relevant laws and regulations of the host country, keep abreast of corporate pollution status at all times, clearly record and publicly disclose test results; and adopt strategies to control and reduce emissions.

我们确保遵守化学品和有毒物质管理适用的法律要求，避免制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质，其中包括按照最高国际标准严格控制砷和汞的排放，管理氰化物，确保危险物质的处置、贮存和运输符合相关的法律法规，确保在过程中无泄漏、无溢溅或以其他形式释放到环境中。

We ensure compliance with applicable legal requirements for the management of chemicals and toxic substances, and avoid the manufacture, trading and application of chemicals and hazardous substances subject to international bans due to high toxicity to organisms, environmental persistence or potential irreversible ecological impacts. This includes strictly controlling arsenic and mercury emissions in line with the highest international standards, regulating cyanide management, ensuring that the disposal, storage and transportation of hazardous substances comply with relevant laws and regulations, and preventing leakage, splashing or other forms of environmental release during operations.

我们尽合理努力具体关注与小作坊或小规模采矿工相关强迫劳动、童工、不安全工作条件、未受控危险化学品使用和其他重大环境影响的风险，按需寻求与开发区的小作坊或者小规模采矿工建立合作关系。

We will make reasonable efforts to pay specific attention to the risks associated with artisanal or small-scale miners, including forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals and other major environmental impacts, and seek, as appropriate, to establish a cooperative relationships with artisanal or small-scale miners in development areas.

降低风险

Risk Mitigation

如果我们有合理理由认为存在此类风险，我们将根据公司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小作坊或小规模采矿工相关的风险。

If we have reasonable grounds to believe that such risks exist, we will immediately formulate, adopt and implement risk management plans together with suppliers and other stakeholders based on the enterprise's specific position in the supply chain, so as to prevent or mitigate specific risks involving land rights violations, significant adverse environmental impacts, and issues related to artisanal and small-scale miners.

五、助长或接触任何严重过失者的风险 Risks of Facilitating or Associating with Parties Committing Serious Misconduct

我们绝不容忍为任何存在严重过失行为的主体提供便利、购买其产品或与其联系的风险，包括但不限于：

We will not tolerate the risks of facilitating, sourcing from or associating with parties committing serious misconduct, including but not limited to:

1. 违反中国和东道国的法律法规或行业最低标准；

1. Violating the laws and regulations of China and host countries or minimum industry standards;

2. 雇佣低于东道国法律法规规定的最低工作年龄的儿童；如果东道国没有关于最低工作年龄的相关法律法规，则为雇佣低于 16 岁的儿童；

2. Employing children below the minimum working age stipulated by the laws and regulations of the host country; where no relevant laws and regulations on minimum working age exist in the host country, employing children under the age of 16;

3. 不尊重年轻雇工的权益(指任何达到法律限定最低工龄但未达到 18 岁的工人)。

3. Disregarding the rights and interests of young workers (referring to workers who have reached the legal minimum working age but are under 18 years of age).

降低风险

Risk Mitigation

如果我们有合理理由认为上游供应商存在助长或接触任何严重过失者的风险，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，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供应商的合作。

If we have reasonable grounds to believe that upstream suppliers pose risks of facilitating or associating with parties committing serious misconduct, we will formulate, adopt and implement risk management plans together with supply chain stakeholders to prevent or reduce relevant risks. In such cases, if the risk management plan fails to achieve results within six months, we will suspend or terminate cooperation with the supplier.

六、职业健康与安全 Occupational Health and Safety

在受冲突影响和高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何对其直接和/或间接的雇员，和/或在其生产现场的任何人员，存在危及生命的职业健康与安全环境行为的主体，或从该方处采购或与之存在关联。

When conducting procurement or production in conflict-affected and high-risk areas, we will not benefit from, assist or facilitate, nor source from or associate with any party that provides life-threatening occupational health and safety conditions for its direct and/or indirect employees and/or any personnel on its production sites.

降低风险

Risk Mitigation

如果我们有合理理由认为上游供应商从存在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 upstream suppliers source from or are associated with any party that provides life-threatening occupational health and safety conditions, we will immediately suspend or terminate cooperation with such suppliers.

七、《现代反奴隶制法案 2015》 **Modern Slavery Act 2015**

我们承诺在供应链中将严格避免参与、容忍、受益于任何阶段出现过的奴役和人口贩卖行为。

We undertake to strictly refrain from participating in, tolerating or benefiting from slavery and human trafficking at any stage within the supply chain.

降低风险

Risk Mitigation

如果我们有合理理由认为该风险存在，即上游供应商在任何商业活动环节中存在奴役和人口贩卖行为或上游供应商从正在实施以上所规定的严重侵权行为的任意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 the existence of such risks, namely that upstream suppliers engage in slavery and human trafficking in any business link, or source from or are associated with any party committing the serious violations specified

above, we will immediately suspend or terminate cooperation with the upstream supplier.

八、生物多样性保护与生态系统恢复 **Biodiversity Conservation and Ecosystem**

Restoration

我们承诺将遵守欧盟电池法中保护生物多样性的要求，降低对栖息地、野生动物、植物和生态系统(包括生态系统服务)的损害，同时保护当地社区生活，避免对原住民的生活造成影响。

We undertake to comply with the EU Batteries Regulation in protecting biodiversity, reducing harm to habitats, wildlife, plants and ecosystems (including ecosystem services), protecting the livelihoods of local communities and avoiding adverse impacts on indigenous peoples.

我们承诺在整个供应链中尽可能避免、减少并修复对生物多样性和生态系统造成的负面影响。我们不参与、不容忍、不受益于在世界遗产地、法定保护区、关键生物多样性区域及国际公认的生态敏感区进行不符合保护要求的开采、生产或建设活动。

We undertake to wherever possible avoid, reduce and remediate the negative impacts on biodiversity and ecosystem across the entire supply chain. We will not participate in, tolerate or benefit from mining, production or construction activities that fail to meet conservation requirements at World Heritage Sites, statutory protected areas, key biodiversity areas and internationally recognized ecologically sensitive areas.

我们要求供应商评估其活动对栖息地破坏、物种减少和生态系统功能的影响，并采取预防性措施，包括但不限于避免在关键栖息地开展活动、实施生态恢复计划以及降低剩余影响。

We require suppliers to assess the impacts of their activities on habitat fragmentation, species decline and ecosystem functions, and adopt preventive measures including but not limited to avoiding operations in key habitats, implementing ecological restoration plans and reducing residual impacts.

降低风险

Risk Mitigation

如果我们有合理理由认为供应商存在严重破坏生物多样性或导致生态系统持续退化的行为，且在合理期限内未采取有效补救措施，我们将中止或中断与该供应商的合作。

If we have reasonable grounds to believe that suppliers severely damage biodiversity or cause continuous ecosystem degradation and fail to take effective remedial measures within a reasonable period, we will suspend or terminate cooperation with such suppliers.

九、申诉机制 **Grievance Mechanism**

公司接受各相关方对本政策执行的监督。任何相关方（包括但不限于原材料供应商、服务类供应商、员工、社区成员及民间社会组织）可通过以下渠道提交申诉：

The Company accepts supervision from all relevant stakeholders on the implementation of this policy. Any relevant party (including but not limited to raw material suppliers, service suppliers, employees, community members and civil society organizations) may submit grievances through the following channel:

邮箱: HNXZHESG@hnmining.com

Email: HNXZHESG@hnmining.com