

宜宾市天宜锂业科创有限公司

负责任矿产供应链尽责管理政策

Yibin Tianyi Lithium Industry Co., Ltd.

Responsible Minerals Supply Chain Due Diligence Management Policy

宜宾市天宜锂业科创有限公司（以下简称“天宜锂业”或“我们”）认识到在受冲突影响和高风险区域从事矿产开采、贸易、处理、出口存在可能形成重大负面影响的风险，并认识到我们有尊重人权、不助长冲突的义务，我们承诺采纳并广泛推广如下受冲突影响和高风险区域矿石负责任采购政策，并将其纳入与供应商签订的合同和/或协议之中。这一政策为从开采到终端用户整个过程中的对冲突敏感的采购活动以及供应商的风险意识提供了基本参考。我们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。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，第二版》以及经济合作与发展组织（OECD）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》，制定本公司“负责任供应链尽责管理政策”（以下简称“政策”）。本政策自颁布起生效并适用于公司自己以及所有提供含锂物料的供应商。

Tianyi Lithium Industry Co., Ltd. (hereinafter referred to as "Tianyi Lithium Industry" or "we") recognizes that mining, trading, processing and exporting minerals in conflict-affected and high-risk areas involve risks that may cause a significant negative impact, and that it's our obligation to respect human rights and contribute to no conflict. We are committed to adopting and widely promoting the following policy for responsible sourcing of minerals from conflict-affected and high-risk areas and to incorporating it into contracts and/or agreements with suppliers. This policy provides a basic reference for conflict-sensitive sourcing activities and supplier risk awareness throughout the entire process, from mining to end-user. We are committed to engaging in no activity that would finance conflict and to complying with relevant UN sanctions resolutions or, where applicable, the domestic laws that implement such resolutions. To this end, we have developed our Responsible Supply Chain Due Diligence Management Policy (hereinafter referred to as "RSCM Policy") in accordance with the "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, Second Edition" issued by the China Chamber of Commerce of Metals,

Minerals & Chemicals Importers & Exporters (CCCMC) and the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition" issued by the Organisation for Economic Co-operation and Development (OECD). This Policy becomes effective upon issuance and applies to the Company itself and all suppliers of materials containing lithium.

公司承诺在锂供应链运营实践中识别和管理以下风险：

The company is committed to identifying and managing the following risks in lithium supply chain operations:

一、与矿产开采、运输、或交易有关的严重侵犯人权行为：

I. Serious human rights violations related to mining, transport, or trading of minerals:

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

When sourcing from or operating in conflict-affected and high-risk areas, we will neither tolerate nor in any way profit from, assist or assist either party in implementing:

最恶劣形式的童工；

1. The worst forms of child labor;

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;

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；

3. Any form of forced or forced labor. Forced or forced labor refers to work or services that are not provided voluntarily by anyone threatened with punishment;

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 or other serious violations of international humanitarian law;

其他严重侵犯和践踏人权的行爲，如大规模性暴力。

5. Other serious violations and abuses of human rights, such as large-scale sexual violence.

对严重侵权行为的风险管理

Risk Management of Serious Violations:

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供应商的合作。

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or associated with, any party committing serious abuses as defined in Paragraph 1.

二、关于直接或间接支持非国家武装团体

II. Direct or Indirect Support to Non-State Armed Groups

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, processing or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, processing or export of minerals includes, but is not limited to, purchasing minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

1. 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;

2. 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；

Commit illegal taxation or extortion of money or minerals at the entrance to the mine site, along the transportation route or at the mineral trading point; or

3. 对中间商、出口企业、或国际贸易商非法征税或勒索。

Commit illegal taxation or extortion of intermediaries, exporters, or international traders.

对向非国家武装团体提供直接或间接支持的风险管理：

Risk Management for Providing Direct or Indirect Support to Non-state Armed Groups

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 an upstream supplier purchases from or is associated with any party that provides direct or indirect support to armed groups of non-State organizations, we will immediately suspend or discontinue cooperation with that supplier. We will work with stakeholders in the supply chain to develop, adopt and implement risk management plans to prevent or reduce the risk of providing direct or indirect support to public or private security forces. In this case, if the implementation of the risk management plan for six months does not work, we will suspend or interrupt the cooperation with the supplier.

三、关于公共或私人安全武装：

III. Public or Private Security Forces:

我们同意根据第十段之规定，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 to eliminate, in accordance with Paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; commit illegal taxation or extortion of 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 from intermediaries, export companies 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 the mine sites and/or surrounding areas and/or along transportation routes shall 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 so that legitimate mining and trade is not interfered.

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。

Where we or any company in our supply chain contract public or private security forces, we promise or we will require that such security forces shall be engaged in accordance with the Voluntary Principles on Security and Human Rights. 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.

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 efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how to improve the transparency, proportionality and accountability of expenditure for 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开采出来的小作坊。

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimise the negative impacts of the presence of public or private security forces at mining sites on vulnerable communities, particularly artisanal miners. In such case, the minerals in the supply chain are extracted by small workshops or through small-scale mining practice.

对公共或私人安全武装的风险管理：

Risk Management for Public or Private Security Forces

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第 8 段和第 9 段内容的行为的情况下，将采取同样的应对措施。

If we find that such risks exist to some degree, we will immediately develop, adopt and implement an upstream suppliers and other stakeholders risk management program, based on the specific position of the company in the supply chain, so that the risks concerning providing direct or indirect support to public or private security forces is curbed or mitigated, as specified in Paragraph 8. If the risk management program has no effect within six months of implementation, we will temporarily suspend or terminate our cooperation with the said upstream suppliers. If we identify any activities that may, to some extent, violate Paragraph 8 and 9, we will take the same measures to respond.

四、关于行贿受贿及矿产原产地的欺诈性失实陈述

IV. Bribery and Fraudulent Misrepresentations of the Origin of Minerals

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 temptation. We will not offer bribes in order to conceal or falsify the origin of minerals, or to misrepresent taxes, fees and royalties payable to governments for the purposes of mineral extraction, trade, processing, transport and export, among other things.

关于洗钱

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 that there is a risk of money laundering arising from or related to the extraction, trade, processing, transportation or export of minerals obtained through illegal taxation or extortion at the entrance to a mine site, along a transportation route, or at an upstream supplier's mineral trading location, we will support or take measures to contribute to the effective elimination of money laundering.

关于向政府支付的税收、费用及特许费

Payment of Taxes, Fees and Royalties to 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 legitimate taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to government. We are committed to disclosing such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI) based on the company's position in the supply chain.

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：

Risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

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。

Based on the specific position of the company in the supply chain, we are committed to working with suppliers, central or local government agencies, international organizations, civil society organisations and affected third parties, as appropriate, to improve or follow up performance with the aim of taking measurable measures, aiming to prevent or reduce the risk of negative impacts over a reasonable time span. If risk reduction measures do not work, we will suspend or discontinue cooperation with the perpetrating upstream supplier.

五、关于职业健康与安全

V. Regarding 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 purchasing or producing in a high-risk area, we will not profit from, assist or facilitate any party that directly and / or indirectly provides a life-threatening occupational health and safety environment for employees and / or any person at their production site, or purchases from or is associated with it.

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 provides procurement or association with any party to a life-threatening occupational health and safety environment, we will immediately suspend or discontinue our cooperation with that supplier.

六、政策传播及实施

VI. Policy Dissemination 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。

The Company informs the relevant suppliers of this policy letter and requests our suppliers to convey this policy to their upstream to ensure that conflicts and violations of human rights, especially children's rights, do not occur in the company's supply chain, and report to the company on a regular basis on due diligence management. The Company also incorporates this policy into contracts and / or agreements with suppliers.

本公司呼吁所有从事锂资源开采、交易、处理、出口的企业或者使用锂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。

The company calls on all enterprises engaged in the extraction, trading, processing and export of lithium resources or the use of lithium-related products to establish a responsible supply chain due diligence management system to avoid prompting conflicts and violations of human rights,



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especially the rights of children.

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