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Our company recognized the risks of significant adverse impacts which may be associated with extracting, trading, processing, and exporting minerals from conflict-affected and high-risk areas, and that we have the responsibility to respect human rights

relevant United Nations sanctions resolutions.

We are committed to identifying and managing the following risks in the supply chain:

[redacted]

We will support efforts, or take steps, to engage with 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.

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.

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan[16] with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, 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[17].

We will not offer, 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

[15] Such as Voluntary Principles on Security and Human Rights.
[16] If force majeure [illegible]

governments

We
laundering where we identify a reas
connected to, the extraction, trade, hand
illegal taxation or extortion of minerals
routes or at points where minerals are tra

We will ensure that all taxes, fees, and r
from conflict-affected and high-risk area
company's position in the supply

performance objectives for progressive improvement that should be met before resuming the trade relationship.

Our company is committed to continuous improvement, and we have integrated this principle into our overall management system and the responsibilities of all relevant departments. We regularly review and update our policy to reflect changes in our operations, supply chain, and other business relationships. This policy applies to all our suppliers as well, and we will take active measures to ensure that they are aware of and adhere to this policy. The policy will come into effect immediately and will be published publicly.

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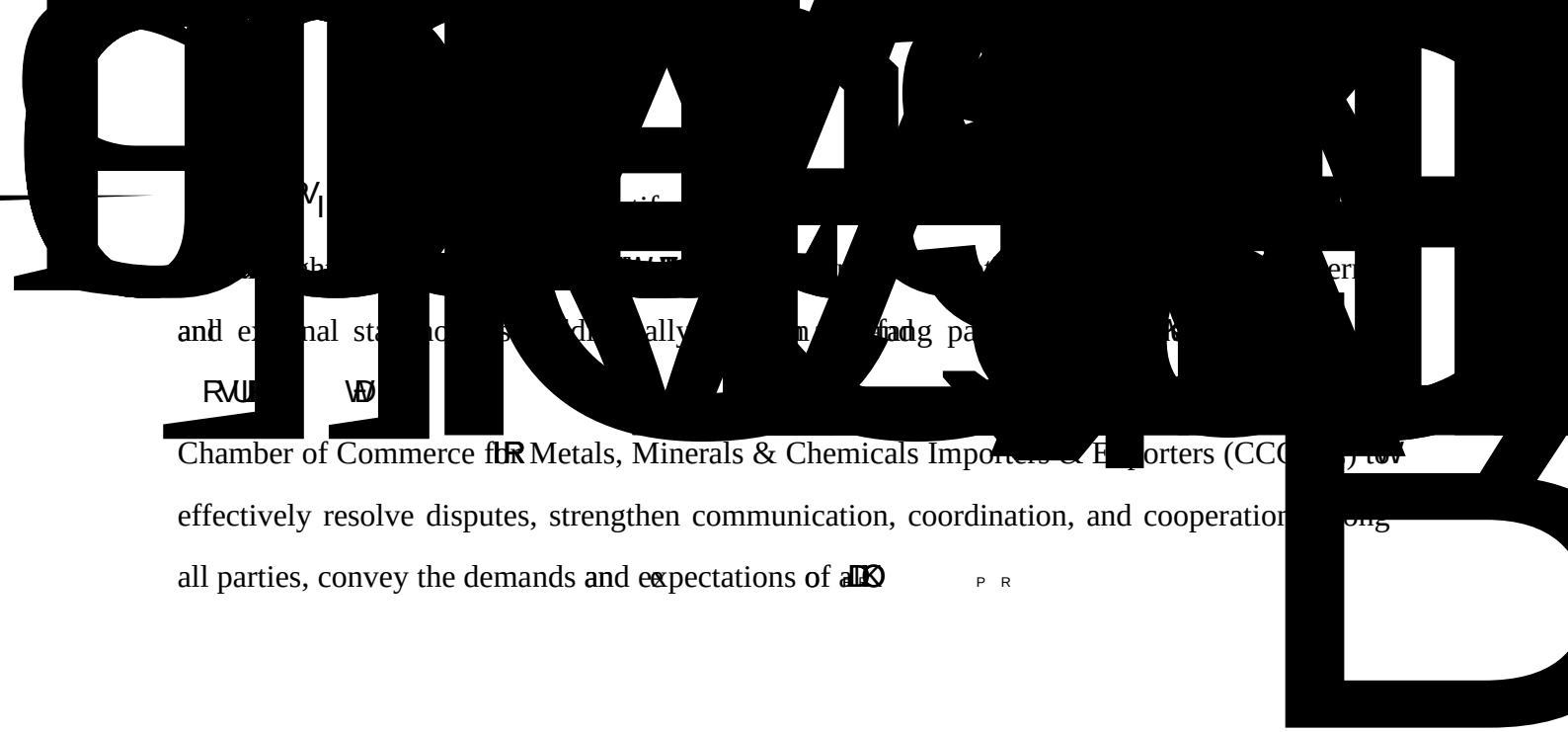
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qiang.pen@nanfangmetal.com

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[19] https://www.cccmc.org.cn/kcxfzzx/zyzx/al/



and external stakeholders, especially [redacted] leading p[redacted]

[redacted]

Chamber of Commerce for Metals, Minerals & Chemicals Importers & Exporters (CCC[redacted]) to effectively resolve disputes, strengthen communication, coordination, and cooperation among all parties, convey the demands and expectations of all [redacted]

Annex I in any language and send it to the compliance team by e-mail or post.

Grievance can also be filed through the ólMediation and Consultation Mechanism for the Mining Industry and Mineral Value Chainô of CCCMC[20].

Annex I - Supply Chain Due Diligence Grievance Form

[20] Note: CCCMC- Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain, please refer to https://www.cccmc.org.cn/kcxfzzx/zyzx/al/