



## 受冲突影响和高风险区域矿石全球负责任供应链政策

Global responsible supply chain policy for ores in conflict-affected and high-risk areas

东方日升新能源股份有限公司（以下简称“东方日升”或“公司”）始终坚持商业价值与社会责任并重，致力于以更高的道德标准开展业务。公司承诺遵守联合国全球契约、受冲突影响地区和高风险地区矿产供应链的尽职调查指导方针（OECD）、负责任的矿产倡议（RMI）等国际公约，《美国多德-弗兰克法案》第 1502 条规定和行业倡议，以负责任的方式采购产品中使用的钽、锡、钨、金、硅（3TG）等矿产原料，竭力确保所有产品原材料取之有道。Risen Energy Co., Ltd. (hereinafter referred to as "Risen Energy" or "the Company") has always adhered to a balanced approach between commercial value and social responsibility, striving to conduct business according to higher ethical standards. The Company commits to complying with the United Nations Global Compact, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD), the Responsible Mineral Initiative (RMI), and other international conventions, as well as Section 1502 of the U.S Dodd-Frank Wall Street Reform and Consumer Protection Act and industry initiatives. The Company promises to responsibly source minerals such as tantalum, tin, tungsten, and gold (3TG) used in its products, and to ensure that all raw materials are sourced ethically.

东方日升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。

Risen Energy recognizes that engaging in mineral mining, trading, processing and export in conflict-affected and high-risk areas may pose significant negative risks, and recognizes that we have the obligation to respect human rights and not fuel conflicts. We commit to adopting and widely promoting



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the following responsible procurement policies for minerals in conflict-affected and high-risk areas. And incorporate it into the contract and/or agreement signed with the supplier. This policy provides a fundamental reference for conflict-sensitive procurement activities and the risk awareness of suppliers throughout the entire process from mining to end users. We commit not to engage in any activities that would fund conflicts, and to abide by relevant UN sanctions resolutions, or, where applicable, domestic laws governing the implementation of such resolutions.

### 与矿产开采、运输、或贸易有关的严重侵权行为:

1. 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:
  1. When conducting procurement or business activities in conflict-affected and high-risk areas, we will neither tolerate nor benefit from, assist, help or facilitate any party in implementing in any way:
    - a. 任何形式的酷刑，残忍、不人道和有辱人格的待遇
    - a. Any form of torture, cruel, inhuman and degrading treatment
    - b. 任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务
    - b. Any form of forced or compulsory labor. Forced or compulsory labor refers to the labor or service that is extracted from any individual under the threat of punishment and is not voluntarily provided by that person.
    - c. 最恶劣形式的童工;
    - c. The worst form of child labor;
    - d. 其他严重侵犯和践踏人权的行为，如普遍的性暴力行为:
    - d. Other serious violations and trampling of human rights, such as widespread sexual violence:



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e.战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪。

e. War crimes or other serious violations of international humanitarian law, crimes against humanity or crimes of genocide.

### 对严重侵权行为的风险管理

#### Risk management of serious tortious acts

2.如果我们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供应商的合作。

2. If we have reasonable grounds to believe that the risk exists, that is, the upstream supplier is purchasing from or being associated with any party that has committed the serious infringement as stipulated in Article 1, we will immediately suspend or interrupt our cooperation with such supplier.

### 关于直接或间接支持非国家武装团体:

#### Regarding direct or indirect support for non-state armed groups:

3.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:

3. We will not tolerate any direct or indirect support provided to non-state armed groups through mineral exploitation, transportation, trade, processing or export. Providing "direct or indirect support" to non-state armed groups through mineral mining, transportation, trade, processing or export includes but is not limited to purchasing minerals from non-state armed groups or their affiliates, making payments to them, or otherwise providing them with logistical support or equipment, etc. These armed groups or affiliates:

a.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的上游行为主体；并/



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或

a. Illegally controlling mining sites, or otherwise controlling transportation routes, mineral trading points, and upstream actors in the supply chain;

And/or

b.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;并/或

b. Illegally levying taxes or extorting money or minerals at the entrance of the mine site, along the transportation route or at the mineral trading point;

And/or

c.对中间商、出口企业、或国际贸易者非法征税或勒索。

c. Illegally taxing or extorting middlemen, export enterprises, 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:**

4.如果我们认为有理由认为，上游供应商从向非国家武装团体(见第三段中定义)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。

4. If we have reason to believe that an upstream supplier makes purchases from or has a relationship with any party that provides direct or indirect support to a non-state armed group (as defined in Paragraph 3), we will immediately suspend or interrupt our cooperation with such supplier.

### 关于公共或私人安全武装:

#### **Regarding public or private security armed forces:**

5.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。



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5. We agree, in accordance with the provisions of Paragraph 10, to refrain from providing direct or indirect support to public or private security forces that illegally control mining sites, transportation routes and upstream actors in the supply chain, illegally levy taxes or demand money or minerals at the entrances of mining sites, along transportation routes or at mineral trading points, or illegally levy taxes or blackmail middlemen, export enterprises or international traders.

6.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。

6. We recognize that the role of public or private security forces at the mine site and/or its surrounding areas and/or along the transportation routes is solely to uphold the rule of law, including safeguarding human rights, protecting the safety of miners, equipment and facilities, and protecting the mine site or transportation routes to ensure that legitimate mining and trade are not disrupted.

7.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。

7. In the event that we or any enterprise in our supply chain has entered into a contract with public or private security forces, we undertake or will stipulate that the provisions of the Voluntary Principles for Security and Human Rights will be adhered to in the process of cooperating with such security forces. In particular, we will support or take measures to apply screening policies to ensure that individuals or security armed units known to have committed serious human rights violations are not recruited.



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8 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。

8. We will support or take measures to cooperate with central or local governments, international organizations and civil society organizations to jointly find feasible solutions on how to enhance the transparency, proportionality and accountability of armed security costs for public safety.

9. 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。

9. We will support or take measures to interact with local governments, international organizations and civil society organizations to avoid or minimize the negative impact of the presence of public or private security forces at mining sites on vulnerable groups, especially on small workshop miners. In this case, The minerals in the supply chain are mined through small workshops or small-scale mining methods.

### 对公共或私人安全武装的风险管理:

#### **Risk management of public or private security armed forces:**

10. 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。

10. If we find that such risks exist to a certain extent, we will determine the position of the enterprise in the supply chain based on Upon the specific location, immediately formulate, adopt and implement the risk management





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plan for upstream suppliers and other stakeholders, thereby curbing or reducing the risks of providing direct or indirect support to public or private security forces as described in Paragraph 5. If the risk management plan fails to take effect within six months of implementation, we will temporarily suspend or interrupt our cooperation with upstream suppliers. When we find that there may be behaviors that violate the contents of paragraphs 8 and 9 to a certain extent, the same countermeasures will be taken.

### 关于行贿受贿及矿产原产地的欺诈性失实陈述:

#### **Fraudulent and false statements regarding bribery, accepting bribes and the origin of minerals:**

11. 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。

11. We will not offer, promise, conduct or demand any bribes, and resist temptation. We will not offer bribes to cover up or forge the origin of minerals, or falsely report the taxes, fees and concession mining fees that should be paid to the government for activities such as mineral mining, trade, processing, transportation and export.

### 关于洗钱

#### **About money laundering**

12. 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。

12. If we have reason to believe that there is a money laundering risk arising from or related to the mining, trade, processing, transportation or export of



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minerals obtained through illegal taxation or extortion at the entrance of the mine site, along the transportation route, or at the mineral transaction site of upstream suppliers, we will support or take measures to contribute to the effective elimination of money laundering activities.

### 关于向政府支付的税收、费用及特许费:

#### **Regarding taxes, fees and royalties paid to the government:**

13.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。

13. We will ensure that all legal taxes, fees and royalties related to ore mining, trade and export in conflict-affected and high-risk areas are paid to the government, and commit to disclosing such payments in accordance with the principles in the Extractive Industry Transparency Action Plan (EITI) based on the position of the enterprise 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 corruption, fraudulent misrepresentation of the origin of minerals, money laundering, and taxes, fees and franchise fees paid to the government:**

14.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。

14. Depending on the specific position of the enterprise in the supply chain, we commit to cooperating with suppliers, central or local government





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agencies, international organizations, civil society and affected third parties as appropriate, with the aim of taking significant measures within a reasonable time span to prevent or reduce risks with negative impacts, to improve or track performance. If the risk reduction measures fail to work, we will temporarily suspend or interrupt the cooperation with upstream suppliers.