



YANLING JINCHENG TANTALUM & NIOBIUM CO., LTD.

炎陵县今成钽铌有限公司

SME Pioneer Park, Yanling, Zhuzhou, Hunan, China 412500

湖南省株洲市炎陵县中小企业创业园 412500

电话(Tel): +86-731-26283298 传真(Fax): +86-731-26283298

www.jinchengtn.com

Company Supply Chain Policy

Yanling Jincheng Tantalum & Niobium Co., Ltd. is a manufacturer specialized in producing Tantalum ingot, Niobium bar and Niobium ingot. Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we are fully in support of the Responsible Minerals Initiative-Responsible Minerals Assurance Process and we have established strong management systems in line with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals in Annex II and put it into full implementation. We commit to refraining from any action which contributes to the financing of conflict. This policy on responsible sourcing Ta material will be disseminated and incorporated in contracts and/or agreements with our suppliers.

- While sourcing from, or operating in, conflict-affected and 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:
 1. any forms of torture, cruel, inhuman and degrading treatment;
 2. 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;
 3. the worst forms of child labour;
 4. other gross human rights violations and abuses such as widespread sexual violence;
 5. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

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

- 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:
 1. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;
 2. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;
 3. illegally tax or extort intermediaries, export companies or international traders.



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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.

- 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.

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. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation from the adoption of the risk management plan.

- Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments, 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 governments for the purposes of mineral extraction, trade, handling, transport and export. We will support efforts, or take steps, to contribute to the effective elimination of money laundering

Duly in compliance with our Supply Chain Policy, we are committed to

- following the RMI-RMAP standard on monitoring the supply chain in order to assure that Yanling Jincheng Tantalum & Niobium Co., Ltd. will responsibly purchases materials from conflict regions.

-working closely with our suppliers to set up a responsible supply chain policy in line with the OECD's Due Diligence Guidance for Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas and Responsible Minerals Initiative's Responsible Minerals Assurance Process.

Our management team takes the responsibility for carrying this policy into effect, aiming at permanently being a responsible and reliable member of the supply chain. Should you have any question regarding this policy, please contact us without hesitation.

Email: ireneguan@jinchengtntn.com

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Revision History

Rev 3 April 30th, 2021

Rev 2 December 23rd, 2020

Rev 1 June 15th, 2019

Policy established: June 1st, 2018



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公司负责任供应链政策

炎陵县今成钽铌有限公司是一家专业生产钽锭、铌条和铌锭的生产厂家。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，我们支持响应 RMI-RMAP（负责任矿物计划-负责任矿物审验流程）标准，并根据 OECD（经济合作与发展组织）发布的《OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas》中附录 II，将其应用于管理体系当中并全面落实，我们承诺不从事任何会为冲突提供资助的活动，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。

● 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. 任何形式的酷刑，残忍、不人道和有辱人格的待遇；
2. 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；
3. 最恶劣形式的童工；
4. 其他严重侵犯和践踏人权的行爲，如普遍的性暴力行为；
5. 战争罪或其他严重违反国际人道主义法的行爲，反人类罪或种族灭绝罪

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上述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。

● 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：

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的上游行为主体；
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；
3. 对中间商、出口企业、或国际贸易者非法征税或勒索。



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如果我们有理由认为，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。

- 我们杜绝向公共或私人安全武装提供直接或间接支持。

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，从而遏制或降低为公共或私人安全武装提供直接或间接支持的风险。如果风险管理计划实施未起作用，我们将暂时停止或中断与上游供应商的合作。

- 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，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；我们将支持或采取措施，为有效消除洗钱行为做出贡献。

为充分遵守本供应链政策，我们忠于以下原则：

——遵照 RMI-RMAP 标准监控供应链，确保炎陵县今成钽铌有限公司负责任地采购来源于冲突地区的原料。

——结合《OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas》与 RMI-RMAP 标准，密切与各供应商合作并建立负责任的供应链。

我们的管理层对实施此供应链政策承担责任，致力于长期成为整个供应链里负责任且值得信赖的一员。如有任何关于此政策的疑问，请详询我司。

邮箱：ireneguan@jinchengtn.com

电话：+86-731-26283298

修订历史

于 2021 年 4 月 30 日第三次修订

于 2020 年 12 月 23 日第二次修订

于 2019 年 6 月 15 日第一次修订

政策确立于 2018 年 6 月 1 日