



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

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Environmental, Social and Governance (ESG) Policy

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1. Policy Statement

Yanling Jincheng Tantalum & Niobium Co., Ltd. ("the Company") is a professional processor and smelter of tantalum, niobium, tin and gold materials. We recognise that sustainable development anchored by Environmental, Social and Governance (ESG) practices is fundamental to long-term business resilience, trusted global partnerships and responsible mineral stewardship.

This formal ESG Policy establishes our binding commitments across environmental protection, social responsibility and corporate governance. The policy applies to all company operations, staff, contractors, and our entire upstream and downstream supply chain. We align our practices with applicable PRC laws, international standards including the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**, the Responsible Minerals Initiative (RMI) and the Responsible Minerals Assurance Process (RMAP) requirements. We will continuously monitor, review and improve our ESG performance.

2. Environmental Commitments

We strive to minimise the ecological footprint of our smelting, processing and recycling operations.

1. **Compliant Pollution Control:** Strictly implement national environmental regulations and emission standards; maintain valid pollutant discharge permits, deploy continuous monitoring systems for wastewater, waste gas and solid waste, and ensure all discharges meet regulatory limits.
2. **Circular Economy & Resource Efficiency:** Optimise production processes to lift recovery rates of tantalum, niobium and associated metals; actively develop recycling routes for secondary tantalum and niobium scrap. Reduce water, power and chemical consumption year-on-year.



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3. **Waste Management:** Classify, store, transport and dispose hazardous industrial waste in full compliance with legislation. Avoid unregulated stockpiling and illegal discharge.
 4. **Climate Action:** Track energy consumption and greenhouse gas emissions. Explore low-carbon production technology and renewable energy opportunities to support carbon reduction targets.
 5. **Biodiversity & Site Management:** Prevent soil and groundwater contamination; implement site restoration measures where relevant and avoid activities that damage local ecological systems.

3. Social & Human Rights Commitments

We respect human rights, protect employee wellbeing, promote fair labour practices and drive responsible mineral supply chain management.

1. **Workplace Health & Safety (EHS):** Build a zero-harm safety culture. Provide mandatory safety training, suitable personal protective equipment, regular workplace risk assessment, and emergency response protocols to prevent occupational injuries and illnesses.
2. **Fair Labour Standards:** Prohibit child labour, forced labour, discrimination and harassment. Guarantee legal working hours, minimum wages, social insurance and equal opportunities for all employees. Support open, respectful communication between staff and management.
3. **Responsible Minerals Sourcing:** We conduct risk-based supply chain due diligence consistent with OECD five-step framework. We prohibit sourcing tantalum, niobium, tin and gold that directly or indirectly fund armed conflict or are linked to severe human rights abuses in conflict-affected and high-risk areas (CAHRAs). We maintain complete traceability records of raw material origins, cooperate with RMI RMAP audits, and require suppliers to uphold equivalent responsible sourcing standards.
4. **Stakeholder Engagement:** Maintain transparent communication with local communities, clients, suppliers, regulators and business partners. Respond promptly to legitimate concerns.
5. **Community Contribution:** Support local public welfare and sustainable regional economic development where practicable.

4. Governance Commitments



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Sound corporate governance underpins credible ESG delivery and ethical business conduct.

1. **Ethics & Anti-Corruption:** Enforce zero tolerance for bribery, fraud, corruption, money laundering and unethical commercial behaviour. Establish clear reporting channels for suspected violations with protection for whistleblowers.
2. **Compliance & Internal Control:** Abide by all national laws, international trade rules, customer contractual requirements and relevant sanctions regimes. Build robust internal control, document retention and audit systems for procurement, production, logistics and sales.
3. **ESG Accountability:** Senior management bears ultimate responsibility for implementing this ESG Policy. Cross-functional teams oversee ESG risk assessment, target setting, performance tracking, regular internal review and external disclosure.
4. **Transparency:** Provide accurate, truthful ESG and mineral sourcing information to customers, auditors and competent authorities upon legitimate request. Cooperate fully with third-party sustainability and responsible smelter audits including RMI RRA verification.
5. **Supplier ESG Expectations:** Integrate ESG clauses into supplier agreements. Evaluate supplier environmental, labour and responsible sourcing performance and drive continuous improvement across the supply chain.

5. Implementation & Review

- All departments and employees shall observe this Policy. Relevant operational procedures, training and KPIs will be formulated to translate commitments into daily practice.
- This Policy will be formally reviewed at least once every two years, or updated promptly in response to new laws, industry standards and major operational changes.
- Any breach of this Policy will trigger internal investigation and appropriate corrective and disciplinary action.

6. Contact for ESG Enquiries

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环境、社会及治理（ESG）政策

文件版本：V1.0

生效日期：2019 年 9 月 2 日

一、政策声明

炎陵今成钽铌有限公司（以下简称“公司”）是专业从事钽、铌、锡、金物料加工冶炼的企业。公司深知依托环境、社会及治理（ESG）体系实现可持续发展，是企业长期稳健经营、维系全球合作伙伴信任、践行负责任矿产管理的基础。本 ESG 政策明确公司在环境保护、社会责任与公司治理领域的约束性承诺，适用于公司全部生产运营活动、全体员工、合作承包商以及上下游供应链。公司遵守中华人民共和国法律法规，并对标国际通行准则，包括《经合组织受冲突影响和高风险区域矿产负责任供应链尽职调查指南》、负责任矿产倡议（RMI）以及负责任矿产保证流程（RMAP）相关要求。公司将持续跟踪、复盘并不断提升 ESG 管理水平。

二、环境承诺

公司致力于最大限度降低冶炼、加工及再生料回收业务对生态环境造成的影响。

1. 合规污染防治：严格遵守国家环保法规与排放标准，依法持有排污许可，配套建设废水、废气、固废在线监测设施，确保各类污染物稳定达标排放。
2. 资源循环与能效提升：持续优化生产工艺，提高钽、铌及伴生金属综合回收率；积极拓展钽铌再生料回收利用渠道，逐年降低水、电、化学品消耗。
3. 规范废弃物管理：按照法规要求对工业危险废物实行分类、分区存放、合规转运与处置，杜绝违规堆存、非法排污行为。
4. 低碳减排行动：持续统计能耗与温室气体排放数据，探索低碳生产工艺与清洁能源应用，助力降碳目标落地。
5. 厂区生态管控：防范土壤、地下水污染，按需落实场地环境修复措施，杜绝破坏区域生态的生产活动。

三、社会责任与人权承诺

公司尊重基本人权，保障员工权益，推行公平用工制度，落实负责任矿产供应链管理。

1. 职业健康安全（EHS）：树立零伤害安全管理理念，落实强制性安全培训，足额配备劳动防护用品，常态化开展现场风险排查，完善应急预案，防范工伤与职业病。



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2. 公平劳动规范：严禁使用童工、强迫劳动，杜绝歧视、职场骚扰；依法保障员工工时、薪酬、社保权益，搭建管理层与员工顺畅沟通渠道。
3. 负责任矿产采购：按照经合组织五步尽职调查框架开展供应链风险排查。禁止采购直接或间接资助武装冲突、存在严重人权侵害风险，来自冲突及高风险区域的钽、铌、锡、金原料。完整留存原料溯源资料，积极配合 RMI-RMAP 审核，并要求供应商履行同等负责任采购标准。
4. 利益相关方沟通：与地方社区、客户、供应商、监管机构及合作伙伴保持透明沟通，及时回应合理诉求。
5. 社区发展支持：在可行范围内支持地方公益事业，助力区域经济可持续发展。

四、治理承诺

完善的企业治理是落地 ESG 要求、规范商业行为的根基。

1. 商业道德与反腐败：对贿赂、欺诈、腐败、洗钱等违规商业行为采取零容忍。设立违规举报渠道，并保护举报人。
2. 合规与内控管理：遵守国家法律、国际贸易规则、客户合同要求及相关制裁规定。在采购、生产、仓储、销售环节建立完善内控、档案留存与内审机制。
3. ESG 管理责任：高级管理层对本政策落地承担最终责任。跨职能团队负责 ESG 风险识别、目标制定、绩效跟踪、定期内部评审及对外信息披露。
4. 信息透明管理：在合法前提下，向客户、审核机构、主管部门提供真实、准确的 ESG 与矿产溯源资料，全面配合第三方可持续发展审核、负责任冶炼厂核查（含 RMI RRA 评审）。
5. 供应链 ESG 管理：将 ESG 要求纳入供应商合作协议，评估供应商环保、用工、负责任采购表现，推动全供应链持续改善。

五、政策实施与修订

1. 公司各部门、全体员工均须遵守本政策。配套制定管理制度、培训方案及考核指标，将承诺落实至日常运营。
2. 本政策至少每两年正式复审一次；如遇法律法规更新、行业标准调整或重大经营变动，及时修订更新。
3. 任何违反本政策的行为，公司将启动内部调查，并采取相应整改及惩戒措施。

六、ESG 业务咨询联系方式

联系人：Irene Guan 电子邮箱：ireneguan@jinchengtn.com

单位地址：炎陵今成钽铌有限公司