

Zijin Mining Group Gold  
Smelting Co., Ltd  
Enterprise standards

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Gold Supply Chain Due  
Diligence Policy (trial)

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Zijin Mining Group Gold Smelting Co., Ltd

## **Zijin Mining Group Gold Smelting Co., Ltd. Gold Supply Chain**

### **Due Diligence Policy**

Zijin Mining Group Gold Smelting Co., Ltd. clearly recognizes the adverse effects of mining, processing and importing and exporting metal products from conflict areas and high-risk areas, and also clearly recognizes our responsibility to respect human rights and not support conflicts. Zijin Mining Group Gold Smelting Co., Ltd. must adopt a gold supply chain policy that incorporates the risks and risk management measures outlined in Annex II of the OECD Due Diligence Guidance (OECD Annex II), and extends to addressing adverse ESG factors in the Refiner's primary gold supply chain, and strictly abides compliance with environmental, health, safety and labour regulation in country of operation and/or company policy, and actively participates in the due diligence work of the gold supply chain, and ensures that the source of gold is legal. To this end, we make the following commitments:

#### **1. Adopt a zero-tolerance policy for human rights violations caused by mining, transportation or trading of metals:**

- 1.1 Any forms of torture, or inhuman and degrading treatment;
- 1.2 Any forms of compulsory labour, that is, forcing anyone to work or provide services in a threatening manner, rather than voluntarily;
- 1.3 Worst forms of child labour;
- 1.4 Sexual violence or other gross human rights violations;

1.5 War crimes, or other serious crimes against International Humanitarian Law, against humanity, and for causing genocide.

If we confirm that the upstream supplier has violated any of the above, we will immediately suspend or suspend transactions and contact with this supplier.

**2. Adopt a zero-tolerance policy for acts directly or indirectly supported by illegitimate non-state armed groups, or public or private security forces:**

2.1 Illegally control mines, sites, traders or other intermediaries, and transport routes through the supply chains;

2.2 Illegally tax or extort money or minerals through the supply chains.

**3. Do not propose, promise, give or request bribes or kickbacks to individuals, government officials, customers, suppliers or any other organizations in any way, and do not falsely report the origin of gold.**

**4. Comply with taxes, fees and royalties due to governments related to mineral extraction, trade and export from Conflict-Affected and High-Risk Areas (CAHRAs).**

**5. Adopt a zero tolerance policy towards money laundering, terrorism financing, and contribution to conflict behaviors.**

**6. Adopt a zero tolerance policy for adverse ESG factors that do**

**not comply with environmental, health, safety and labour regulation in country of operation and/or company policy.**

6.1 Environmental management, including:

6.1.1 Failure to comply with air, water, land pollution and incident management plans and water stewardship policies (especially in water scarce and stressed areas);

6.1.2 Unauthorised sourcing from World Heritage Sites and Protected Areas.

6.2 The storage, handling, and disposal of hazardous chemicals (including mercury and cyanide) do not comply with international Cyanide Management Code.

6.3 Failure to comply with management of labour issues, including remuneration, working hours, collective bargaining, discrimination, diversity, disputes and safeguarding of workers.

6.4 Failure to comply with Community engagement and management programmes (land acquisition and community resettlement, cultural heritage sites and indigenous people, closure planning and safeguarding of vulnerable populations).

6.5 Failure to comply with management of business integrity and ethical conducts, and failure to support the implementation of relevant initiatives such as the Extractive Industry Transparency Initiative (EITI).

If we confirm that the upstream supplier has violated any of the

above, we will immediately suspend or suspend transactions and contact with this supplier.

**7. Require our employees, suppliers and business partners to abide by the above policies and take necessary measures to ensure the implementation of the above policies.**

Zijin Mining Group Gold Smelting Co., Ltd. is willing to accept the supervision of customers and related organizations, and welcomes suppliers and stakeholders to provide suggestions on the above policies.