

印尼中伟纳德思科镍业工业有限公司(NNI)
2025 年度矿产供应链尽责管理报告
2024 Mineral Supply Chain Due Diligence
Report for PT Nadesico Nickel Industry

Stand 2026 年 05 月

Stand May 2026



1 背景说明

1 Background

随着全球新能源汽车和动力电池行业快速发展，各国为保护本土制造产业、强化供应链安全，持续完善相关立法，当前呈现“减负”与趋严并行的态势。

As the global new energy vehicle and power battery industries rapidly develop, countries are continuously improving relevant legislation to protect domestic manufacturing and strengthen supply chain security, currently showing a trend of both reducing burdens and tightening regulations.

欧盟层面：《企业可持续发展尽职调查指令》（CSDDD）自2029年起仅适用于员工超5,000人且全球年净营业额超15亿欧元的企业，监管数量预计削减约70%；简化了风险识别流程，删除了气候转型计划要求，放弃建立欧盟统一民事责任机制。德国《供应链尽职调查法》修正案于2025年9月3日通过内阁审议，拟完全取消年度报告义务（追溯至2023年1月1日），长期将被CSDDD取代。《新电池法规》全面取代原电池指令，电池原材料尽职调查义务推迟至2027年8月18日实施；数字电池护照2027年2月18日起强制实施；欧盟委员会预计2026年7月26日前发布尽职调查指南。

EU: The Corporate Sustainability Due Diligence Directive (CSDDD) will apply from 2029 only to companies with more than 5,000 employees and a global annual net turnover exceeding €1.5 billion, reducing the number of regulated entities by approximately 70%. The directive simplifies risk identification procedures, removes the requirement for climate transition plans, and abandons the establishment of a unified EU civil liability mechanism. Germany's amended Supply Chain Due Diligence Act was approved by cabinet on September 3, 2025, eliminating the obligation for annual reporting retroactively from January 1, 2023, and will be fully replaced in the long term by the CSDDD. The new Battery Regulation fully replaces the previous battery directive, postponing obligations for due diligence on battery raw materials until August 18, 2027; digital battery passports will become mandatory starting February 18, 2027; and the European Commission is expected to publish its due diligence guidelines by July 26, 2026.

美国层面：《通胀削减法案》2026年新标准将电池关键矿物溯源比例提升至60%，含“敏感外国实体”材料的电池无法获得税收抵免。

US: The Inflation Reduction Act of 2026 will raise the proportion of traceable key minerals in batteries to 60%, and batteries containing materials from "sensitive foreign entities" will not be eligible for tax credits.

印尼层面：能源与矿产资源部（ESDM）持续强化环境、社会与治理（ESG）原则在国家矿业治理中的应用。政府已将ESG要素正式纳入矿业公司《工作计划与预算》（Rencana Kerja dan Anggaran Biaya，简称RKAB）的评估与审批流程。

Indonesia: The Ministry of Energy and Mineral Resources (ESDM) has been continuously strengthening the application of environmental, social and governance (ESG) principles in the country's mining governance. The government has officially incorporated ESG elements into the assessment and approval process of the "Work Plan and Budget" (Rencana Kerja dan Anggaran Biaya, abbreviated as RKAB) for mining companies.

中国层面：《国务院关于产业链供应链安全的规定》（国令第834号）于2026

年3月31日公布施行，是我国首部供应链安全专项行政法规；《对外贸易法》于2025年12月27日修订通过，2026年3月1日起施行；《网络数据安全条例》自2025年1月1日起施行，整合了网络安全、数据安全、个人信息保护等核心义务。

China: The "Regulations of the State Council on the Security of Industrial Chain and Supply Chain" (Order No. 834) was promulgated and implemented on March 31, 2026, and it is the first special administrative regulation on supply chain security in China; The "Foreign Trade Law" was revised and passed on December 27, 2025, and came into effect on March 1, 2026; The "Regulations on the Management of Network Data Security" came into effect on January 1, 2025, integrating core obligations such as cybersecurity, data security, and personal information protection.

总体而言，供应链尽责管理已从自愿倡议转向法律强制义务。做好印尼镍矿产供应链尽责管理工作，对企业满足各利益相关方要求、保障海外市场准入具有重要战略意义。

Overall, supply chain responsible management has shifted from a voluntary initiative to a legal mandatory obligation. Conducting responsible management of the nickel mineral supply chain in Indonesia is of great strategic significance for enterprises to meet the requirements of all stakeholders and ensure access to overseas markets.

本报告涵盖的时间段：2025年04月01日-2026年04月31日

The time period covered in this report: April 1, 2025 – April 31, 2026

本报告可在中伟新材官方网站ESG板块获取。

This report can be accessed on the ESG section of CNGR's official website.

2 公司信息

2 Company Information

公司名称：印尼中伟纳德思科镍业工业有限公司

Company Name: PT Nadesico Nickel Industry

公司所在地：印度尼西亚中苏拉威西省北莫罗瓦利县东佩塔西亚区文金廷贝村SEI工业园区

Company Location: Bungintimbe Village, East Petasia Sub-district, North Morowali Regency, Central Sulawesi, Indonesia (SEI Industrial Park)

原料：镍、钴

Raw Materials: Nickel, Cobalt

上次评估日期：2025年5月19日-2025年5月21日

Last Assessment Date: May 19, 2025 – May 21, 2025

评估期间：2024年4月1日-2025年4月5日

Assessment Period: April 1, 2024 – April 5, 2025

评估公司：TUV-Rheinland

Assessment Company: TUV-Rheinland

报告链接：

Report Link:

<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/PT.NADESICO%20NICKEL%20Public%20Report.pdf>

3 矿产供应链尽责管理政策&供应商行为准则

3 Mineral Supply Chain Due Diligence Policy & Supplier Code of Conduct

为避免使用直接或间接为武装团体提供资金或使他们得益的冲突矿物及/或涉及在高风险和受冲突影响地区进行其他严重侵犯人权行为的冲突矿物, 公司建立了《负责任的全球矿产供应链尽责管理政策》《供应商行为准则》, 政策已向各利益相关方广泛传播。

To avoid the use of conflict minerals that directly or indirectly finance or benefit armed groups, or involve other serious human rights abuses in conflict-affected and high-risk areas, the company has established the Responsible Global Mineral Supply Chain Due Diligence Policy and the Supplier Code of Conduct, which have been widely disseminated to all stakeholders. The company has updated the Responsible Global Mineral Supply Chain Due Diligence Policy to include environmental protection and risk management related to resource extraction. In the Supplier Code of Conduct, the company has incorporated the United Nations Guiding Principles on Business and Human Rights and the Voluntary Principles on Security and Human Rights as reference standards.

公司制定了《ESG政策》与《人权政策》, 根据《联合国世界人权宣言》、《国际劳工组织关于工作中基本原则和权利宣言》、《联合国工商业与人权指导原则》和联合国全球契约组织的规定尊重人权。

Additionally, the company has formulated an ESG Policy and a Human Rights Policy, committing to respect human rights in accordance with the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, and the provisions of the United Nations Global Compact.

具体政策链接地址: <http://www.cngrgf.com.cn/shzr.html>

Policy Link: <http://www.cngrgf.com.cn/shzr.html>

4 矿产供应链尽责管理标准

4 Mineral Supply Chain Due Diligence Standards

公司遵循以下标准实施矿产供应链尽责管理:

PT Nadesico Nickel Industry adheres to the following standards for implementing mineral supply chain due diligence:

- 《经合组织关于来自受冲突影响和高风险区域的矿产的负责任供应链尽职调查指南》(第3版)-简称OECD指南
OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) - referred to as the OECD Guidance
- 《中国矿产供应链尽责管理指南》(第2版)-简称中国指南
Chinese Due Diligence Guidelines for Mineral Supply Chain (Second

- Edition) - referred to as the Chinese Guidelines
- 《联合国工商业与人权指导原则》
UN Guiding Principles on Business and Human Rights
- 《联合国人权与安全自愿原则》
UN Voluntary Principles on Security and Human Rights
- 《企业识别和解决矿产供应链中最恶劣形式童工问题的实践性行动》
Practical Actions for Identifying and Addressing the Worst Forms of Child Labor in Mineral Supply Chains
- 《全金属尽责调查标准》
All Metal Due Diligence Standards

5 尽责管理体系六步框架

5 Six-Step Due Diligence Framework

从2024年开始，公司按照《OECD指南》和《中国指南》的六步法框架开展矿产供应链尽责管理工作，并积极的向供应链上的矿山等供应商传达尽责管理要求。

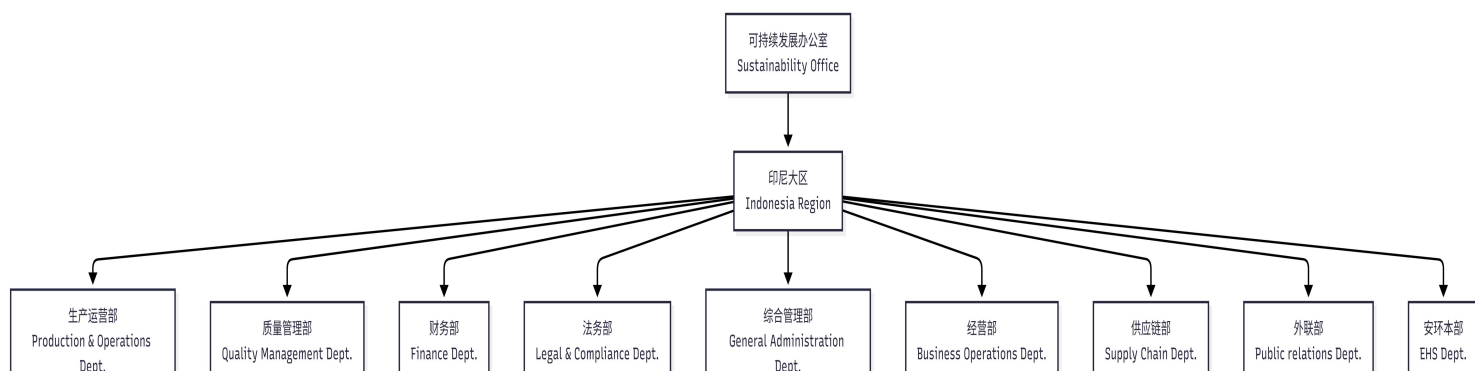
Starting from 2024, We have implemented mineral supply chain due diligence according to the six-step framework outlined in the OECD Guidance and the Chinese Guidelines. The company actively communicates the due diligence requirements to suppliers, including mines along its supply chain.

5.1 建立完善的企业管理体系

5.1 Establishing a Comprehensive Corporate Management System

为适应战略需要，提升公司环境、社会责任和公司治理（ESG）绩效，公司特设立董事会战略与 ESG 委员会。可持续发展办公室在委员会的指导下开展具体工作，负责公司矿产供应链尽责管理体系的实施。NNI的矿产供应链尽责管理工作以可持续发展办公室指导、NNI相关部门进行支持配合的形式来开展。生产运营部、生产管理部、质量部、财务部、综合管理部、应急管理部、采购等相关部门全面配合与支持NNI矿产供应链尽责管理工作。We have established a Board Strategy and ESG Committee to adapt to strategic needs and enhance the company's performance in environmental, social responsibility, and corporate governance (ESG). Under the guidance of the committee, the Sustainability Office is responsible for implementing the company's mineral supply chain due diligence management system.

For PT Nadesico Nickel Industry, the mineral supply chain due diligence management work is carried out under the guidance of the Sustainability Office, with support and cooperation from relevant departments within NNI. The Production Operations Department, Production Management Department, Quality Department, Finance Department, Comprehensive Management Department, Emergency Management Department, and Procurement Department fully cooperate and support NNI's mineral supply chain due diligence efforts.



公司制定了矿产供应链尽责管理相关程序文件，对所有组织架构中的成员以及供应链合作方开展尽责管理专项培训，提高尽责管理的普及度，保障制度落地见效。

The company has formulated relevant procedural documents for responsible management of the mineral supply chain, and has conducted specialized training on responsible management for all members within the organizational structure as well as supply chain partners, aiming to enhance the popularity of responsible management and ensure the effective implementation of the system.

公司建立了供应链控制和透明度体系，进行供应链追溯的管理。公司搜集原料来源国和地区、上游参与者的名字和地址、运输路线和运输方式、矿产或金属的商品名和类型、直接供应商和其他已知上游企业的所有权信息等信息，同时尽可能避免现金交易；公司建立了内部物料管控相关制度，确保原料从进入公司到成品出货阶段进行全过程追溯；公司建立盘点相关制度，按月度进行盘点。

The company has established a supply chain control and transparency system for traceability management. The company collects information such as the country and region of origin of raw materials, names and addresses of upstream participants, transportation routes and methods, product names and types of minerals or metals, ownership information of direct suppliers and other known upstream companies, while avoiding cash transactions whenever possible. The company has established an internal material control system to ensure traceability throughout the entire process, from raw material entry to finished product shipment. Additionally, the company has established an inventory management system, conducting monthly inventory checks.

公司建立了申诉管理流程，并按照申诉管理流程的要求进行申诉管理。申诉渠道请参考：

The company has established the Social Responsibility Complaint Management Process and manages complaints according to the requirements of this process. For the complaint channels, please refer to:

<http://www.cngrgf.com.cn/shzr.html>

NNI 在 2026 年举行了矿产供应链尽责管理相关的管理评审，输出管理评审报告，并对公司的尽责管理体系建设的合理性和有效性、尽责管理的表现进行评审，提出改善意见和建议，由可持续发展办公室跟踪意见和建议的改善进度。

NNI held a mineral supply chain due diligence management review in 2026, producing a management review report. The review assessed the rationality and effectiveness of the company's due diligence management system and its performance, providing recommendations for improvement. The Sustainability Office is responsible for tracking the progress of these improvements.

同时，公司坚定支持实施所在国政府制定或认可的透明度或信息公开要求，如《采掘行业透明度行动计划》（EITI）提出的相关原则及标准，已在《负责任的矿产供应链尽责管理政策&供应商行为准则》中声明；公司向上游供应商提出遵守 EITI 的要求，并得到了供应商的正向回应。

At the same time, the company strongly supports the implementation of transparency or information disclosure requirements set or endorsed by the

government of the host country, such as the principles and standards outlined in the Extractive Industries Transparency Initiative (EITI). These have been stated in the "Responsible Mineral Supply Chain Due Diligence Management Policy & Suppliers' Code of Conduct". The company has requested the upstream suppliers to comply with the EITI requirements and received a positive response from the suppliers.

公司所有涉及尽责管理的文件均保存 10 年以上。

All documents related to due diligence management are retained by the company for over ten years.

5.2 供应链风险的识别和评估

5.2 Identification and Assessment of Supply Chain Risks

对所有镍、钴供应商进行尽责管理。通过可靠的第三方信息、KYS 问卷调查、矿产来源调查、实地评估、申诉机制、客户反馈等方式定期收集供应商相关的信息。报告期内，镍供应商的信息收集对象的覆盖率达到 100%。

Implement due diligence management for all nickel suppliers. Regularly collect relevant information about suppliers through reliable third-party data, KYS questionnaires, mineral sourcing investigations, on-site assessments, grievance mechanisms, customer feedback, etc. During this reporting period, the coverage rate of the information collection targets for nickel suppliers reached 100%..

根据以上信息绘制出供应链地图：

Based on the above information, draw a supply chain map:



根据以上信息绘制出供应链地图，并从武装冲突、人权、政府治理三个方面，依据如下工具进行对矿产来源地进行受冲突影响和高风险区域评估。

Based on the above information, draw the supply chain map, and assess the impact of conflict and high-risk areas in mineral source regions from three aspects: armed conflict, human rights, and government governance, based on the following tools:

使用工具：

Tools to be used:

- 海德堡 “全球冲突晴雨表”
Heidelberg "Global Conflict Barometer"
- 腐败指数
Corruption Index
- 人类发展指数

- Human Development Index
- 欧盟冲突矿物条例 CAHRA 清单
EU Conflict Minerals Regulation CAHRA List
- 多德弗兰克法案
Dodd-Frank Act
- 联合国制裁名单、欧盟制裁名单、美国 OFAC 制裁名单、公司及供应商所在国制裁名单
United Nations sanctions list, The EU sanctions list and the US OFAC sanctions list, sanctions lists of countries where companies and suppliers are located

实地评估:

On-site Evaluation:

镍矿均不属于高风险区域物料，因此无需对供应商进行实地评估。

The nickel ores do not fall into the category of high-risk materials, so there is no need to conduct on-site evaluations of the suppliers.

风险识别与评估结果:

Risk Identification and Assessment Results:

NNI 生产所用镍原料均来自印度尼西亚境内，基于 NNI 的 CAHRAs 识别结果，印度尼西亚不属于 CAHRAs，因此未触发矿源地或中转地示警信号、未触发供应商相关示警信号、未触发特定情况下的示警信号。供应链上的所有供应商都没有受制裁。通过官方公开信息、KYS 问卷调查、矿产来源调查、实地评估、申诉机制、客户反馈等方式，供应链上未发现有任何形式的酷刑，残忍、不人道和有辱人格的待遇，任何形式的强迫劳动，最恶劣形式童工，其他严重侵犯和践踏人权的行为，严重违反国际人道主义法的行为，直接或间接支持非国家武装组织、公共或私人安全武装等相关高风险。因此判断尽责风险较低。

All nickel materials used in NNI's production come from within Indonesia. Based on NNI's CAHRAs identification results, Indonesia is not classified as a CAHRA, so no warning signals were triggered for mineral source areas or transit locations, no supplier-related warning signals were triggered, and no alerts for specific circumstances were raised. None of the suppliers in the supply chain were subject to sanctions. Through official public information, KYS questionnaires, mineral sourcing investigations, on-site evaluations, grievance mechanisms, customer feedback, and other means, no instances of torture, cruel, inhuman, or degrading treatment, any form of forced labor, the worst forms of child labor, or other severe human rights violations, violations of international humanitarian law, or direct or indirect support for non-state armed groups, public or private security forces, or other high-risk activities were found in the supply chain. Therefore, it was concluded that the due diligence risk is low.

5.3 风险管理策略与风险缓解措施

5.3 Develop and Implement Response Policies for Identified Risks

公司针对识别的风险采取以下策略进行风险管理：（1）在降低风险的过程中继续交易；（2）在降低风险的过程中暂时中止交易；（3）如果降低风险的努力失败，或企业有理由认为无法降低风险，或者降低风险的效果无法接受，则终止和供应商的关系。

The company adopts the following strategies to manage risks based on identified risks: (1) Continue trading during the process of reducing risks; (2) Temporarily suspend trading during the process of reducing risks; (3) If the efforts to reduce risks fail, or if the enterprise has reasons to believe that it is impossible to reduce risks, or if the effect of reducing risks is unacceptable, then terminate the relationship with the supplier.

根据目前的风险评估结果，我们采取继续交易的措施，虽然未发现在我司供应链上直接员工存在严重侵犯人权、童工等的风险，但我们会保持关注，积极推动上游矿山的尽责调查与监管链文件的收集，加强对矿山的监督管理。

According to the current risk assessment results, We have taken the measure of continuing the transaction. although there is no serious risk of human rights violations and child labor among direct employees in our supply chain, we will keep an eye on it and actively promote the due diligence management and collection of chain of custody documents for upstream mines, and strengthen the supervision and management of mines.

5.4 独立第三方评估与审核

5.4 Independent Third-Party Evaluation and Auditing

NNI 在 2025 年顺利通过 RMI ESG 审核。公司积极推动上游矿山进行独立的第三方审核以及二方审核。目前已有 2 家矿山已接受二方审核。

NNI successfully passed the RMAP audit and the RMI ESG audit in 2025. NNI actively promotes independent third-party audits and second-party audits for upstream mines. Currently, 2 mine has already accepted second-party audit.

5.5 报告尽责管理过程和结果

5.5 Reporting Due Diligence Processes and Results

2022 年，中伟新材网站升级，建立了可持续发展板块，包含负责任供应链、气候变化、循环经济、合规诚信等内容，并定期更新。2024 年，可持续发展板块更新为 ESG 板块。

In 2022, CNGR upgraded its website and established the sustainability section, which includes content on responsible supply chains, climate change, circular economy, compliance and integrity, and is regularly updated. In 2024, the Sustainability section is updated to the ESG section.

报告期内，公司公布的公开申诉渠道未收到任何与未收到任何矿产供应链尽责管理、人权侵害、安全生产、环境违规等相关申诉，投诉事件处理：0 起。

During the reporting period , the company's publicly announced complaint channels have not received any complaints related to non-compliance with responsible management of the mineral supply chain, human rights violations, safety production, or environmental violations. Complaint handling: 0 cases.

5.6 适时提供条件和合作开展补救

5.6 Providing Conditions and Collaboration for Remediation

公司根据《中国指南》第二版要求，增加了第六步的要求，建立并持续完善申诉与补救机制，以有效处理因公司运营或供应链活动所引发的环境、社会及治理（ESG）方面的不利影响。本报告期内，未发生需要进行补救的事件。

In accordance with the requirements of the second edition of the "Chinese Guidelines", the company has added the sixth step, establishing and continuously improving the appeal and remediation mechanism to effectively handle the adverse impacts on the environment, society and governance (ESG) caused by the company's operations or supply chain activities. During this reporting period, no events requiring remediation occurred.

6 结束语

6 Conclusion

公司聚焦供应链可持续发展建设，携手产业链合作伙伴，以自身行动为号召，践行负责任采购，建立利益相关方问责机制，满足监管合规要求，提升供应链韧性和安全水平。未来，公司将全面加快建立符合国际标准的供应链尽责与合规管理体系，持续践行构建可持续发展的供应链。

The company focuses on the construction of a sustainable supply chain, working closely with industry partners. By setting an example through its own actions, the company practices responsible sourcing, establishes accountability mechanisms for stakeholders, meets regulatory compliance requirements, and enhances supply chain resilience and security. In the future, the company will accelerate the establishment of a supply chain due diligence and compliance management system that meets international standards and continue to build a sustainable supply chain.

CNGR 中伟