

印尼德邦镍业有限公司 2025 年度 矿产供应链尽责管理报告

2025 Mineral Supply Chain Due Diligence Report for PT Debonair Nickel Indonesia

Stand 2026 年 04 月

Stand April 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03月31日

The time period covered in this report: April 1, 2025 – March 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：印尼德邦镍业有限公司

Company Name: PT Debonair Nickel Indonesia

CID编号：CID004693

CID Number: CID004693

公司所在地：印尼北马鲁古省，中哈县，中纬达镇，雷利雷夫·沙外村，丹江坞

Company Location: Tanjung Ulie, Lelilef Sawai Village, Central Weda District,

Central Halmahera Regency, North Maluku Province

原料：镍

Raw Material: Nickel

上次评估日期：2025年05月19日-2025年05月22日

Last Assessment Date: May 19-22, 2025

评估期间：2023年12月01日-2025年04月05日

Assessment Period: December 1, 2023 - April 5, 2025

评估公司：UL Responsible Sourcing

Assessment Company: UL Responsible Sourcing

报告链接：

Report Link:

<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/DEBONAIR%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

印尼德邦镍业有限公司遵循以下标准实施矿产供应链尽责管理：

PT Debonair Nickel Indonesia 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
- 《RMI供应链尽责管理PLUS》
Responsible Minerals Initiative supply Chain Due Diligence Plus Module RMAP+

5 尽责管理体系六步框架

5 Six-Step Due Diligence Framework

从2023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。

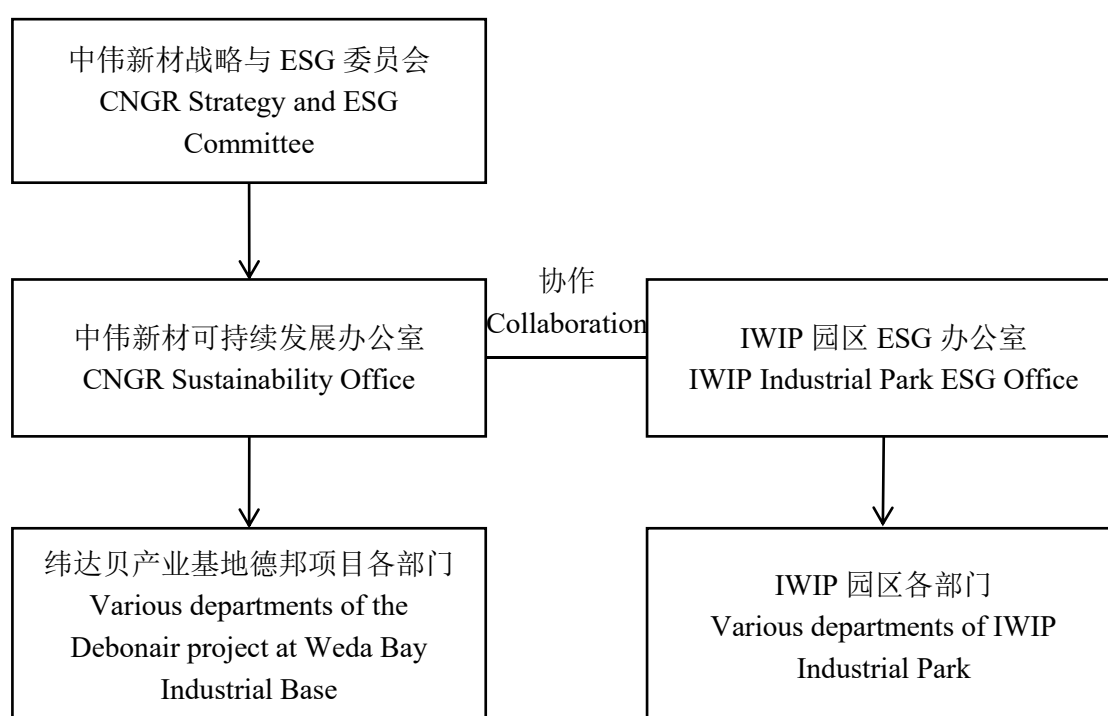
Starting from 2023, the company has implemented mineral supply chain due diligence according to the six-step framework outlined in the OECD Guidance and the Chinese Guidelines. The company actively communicates the due diligence requirements to suppliers, including mines along its supply chain.

5.1 建立完善的企业管理体系

5.1 Establishing a Comprehensive Corporate Management System

印尼德邦镍业有限公司的母公司中伟新材为适应战略需要，提升公司环境、社会责任和公司治理(ESG)绩效，于2023年12月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，矿产供应链尽责管理体系的实施结果纳入绩效考核范围，制定了考核目标与奖惩措施。印尼德邦镍业有限公司的矿产供应链尽责管理工作由中伟新材可持续发展办公室统筹管理，德邦所在IWIP园区ESG办公室进行协作，德邦各部门及IWIP园区各部门全面配合与支持。

PT DEBONAIR NICKEL INDONESIA's parent company CNGR has established a Board Strategy and ESG Committee in December 2023 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. The implementation results of the responsible management system for the mineral supply chain are included in the performance assessment scope, and performance assessment targets and reward and punishment measures have been formulated. The due diligence management of the mineral supply chain of PT Debonair Nickel Indonesia is coordinated by the CNGR Sustainability Office, with the collaboration of the IWIP Industrial Park ESG Office, and with the full cooperation and support of all departments of Debonair and all departments of the IWIP Industrial Park.



印尼德邦镍业有限公司尽责管理组织架构

PT DEBONAIR NICKEL INDONESIA Responsible management of organizational structure

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:

<https://www.cngrgf.com.cn/Upload/Template/web/Files/202605/0c6ac999-0b82-4713-acdf-92833a2e482a.pdf>

德邦在 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。

Debonair 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

5.2.1 CAHRAs 识别与示警信号评估

5.2.1 Identification of CAHRAs and Assessment of Warning Signals

对所有镍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，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。但是本报告期内，可持续发展管理团队前往印度尼西亚，对当地的镍矿山进行了实地走访。在走访中发现矿山尽责管理体系建设并不完善，尽责管理体系相关文件缺失，但是未发现严重侵犯人权、武装冲突等相关高风险。

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. During this reporting period, the sustainability management team, visited nickel mines in Indonesia. During the visit, it was found that the mine's due diligence management system was not well developed, with relevant documentation missing. However, no serious human rights violations or

armed conflicts were identified, and there were no significant high risk • factors.

风险识别与评估结果:

Risk Identification and Assessment Results:

德邦生产所用镍原料均来自印度尼西亚境内，基于德邦的 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 Debonair' s production come from within Indonesia. Based on Debonair' 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.

5.2.2 ESG 风险识别与评估

5.2.2 ESG Risk Identification and Assessment

公司系统性地识别、评估和优先排序供应链中特别是源头矿山的 ESG 风险，确保尽职调查活动聚焦于最严重和最可能发生的风险。遵循“风险为本”原则，基于影响的严重程度（规模、范围、可补救性）和发生可能性进行优先级排序，严重程度优先于可能性。

The company systematically identifies, assesses and prioritizes ESG risks in the supply chain, especially at the source mines. It ensures that the due diligence activities focus on the most serious and likely risks. Following the "risk-based" principle, the risks are prioritized based on the severity (scale, scope, and remedial potential) and the likelihood of occurrence. Severity takes precedence over likelihood.

为保障风险识别全面、客观、权威，公司融合多维度数据开展 ESG 风险研判：一是外部权威 ESG 风险数据，整合全球及区域媒体舆情、行业公开报告、专业风控数据库、行业合规体系标准、学术研究成果、全球 ESG 风险指数等多层级外部信息；二是内部运营数据复盘，深度融合往期风险缓解落地结果、利益相关方申诉与补救处置记录、供应商评估报告、公开披露的 ESG 及合规信息，通过内外数据交叉验证，提升风险识别精准度。同时基于风险严重程度与发生可能性开展加强型 ESG 专项调查，最终完成风险优先级排序。

To ensure comprehensive, objective and authoritative risk identification, the company integrates multi-dimensional data for ESG risk assessment: Firstly, it

incorporates external authoritative ESG risk data, integrating global and regional media public opinions, industry public reports, professional risk control databases, industry compliance system standards, academic research results, global ESG risk indices, etc. from multiple levels of external information; Secondly, it conducts internal operation data review, deeply integrating past risk mitigation implementation results, complaints and remedial handling records from stakeholders, supplier assessment reports, publicly disclosed ESG and compliance information, and through cross-validation of internal and external data, improving the accuracy of risk identification. At the same time, based on the severity and likelihood of risks, it conducts enhanced ESG special investigations, ultimately completing the prioritization of risks.

本报告期经系统化排查，供应链识别 ESG 风险分为高关注重点人权风险及常规轻微管理风险两类，无重大环境、安全、腐败及系统性人权侵害风险，具体如下：

During this reporting period, through systematic investigation, the ESG risks identified in the supply chain were classified into two categories: high-priority key human rights risks and routine minor management risks. There were no major environmental, safety, corruption, or systemic human rights infringement risks. The details are as follows:

(1) 高优先级重点风险

(1) High-priority key risks

供应链上 1 家上游源头矿山存在承包商用工管控漏洞：矿山虽已建立反强迫劳动制度文件，但承包商落地执行不到位，出现外籍务工人员护照被留存、自主支配权受限问题，且矿山未建立完善的承包商人权常态化监控体系，为本报告期最高优先级整改风险。

There was a loophole in the contractor employment management of one upstream source mine in the supply chain: Although the mine had established a document on anti-forced labor, the contractor's implementation was not in place, resulting in problems such as the retention of foreign workers' passports and restricted autonomy of decision-making. Moreover, the mine did not establish a regular monitoring system for contractor human rights. This was the highest-priority rectification risk for this reporting period.

(2) 低优先级轻微管理风险

(2) Low-priority minor management risks

仅存在上游矿山基础性管理短板，无实质性违规危害：一是部分矿山安全指标完成率偏低，安全检查、安全会议、个人防护装备发放等关键指标的实际完成数量与计划存在较大差距；二是大多数矿山 ESG 信息披露不足，透明度低。

There were only basic management deficiencies in the upstream mines, with no substantive violations or hazards: Firstly, the completion rates of some mines' safety indicators were low, with significant discrepancies between the actual completion quantities of key indicators such as safety inspections, safety meetings, and the distribution of personal protective equipment and the planned quantities; Secondly, most mines had insufficient ESG information disclosure and low transparency.

本次高优先级重点风险仅局限于单家上游源头矿山的承包商用工管理环节，

未扩散至其他矿山、原料采购、生产加工、物流销售等公司核心经营链条；低优先级轻微管理风险均集中于上游供应链管理层面，未对公司整体合规运营、生产安全、海外市场准入造成实质性负面影响，整体风险影响范围可控。

The high-priority key risks in this report only focused on the contractor employment management of a single upstream source mine and did not spread to other mines, raw material procurement, production processing, logistics and sales, etc. of the company's core business chains; The low-priority minor management risks were all concentrated in the upstream supply chain management level and did not have a substantive negative impact on the company's overall compliance operation, production safety, and overseas market access. The overall risk impact range was controllable.

5.3 风险管理策略与已识别风险缓解措施

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.

基于上述风险评估结果，公司将采取在降低风险的过程中继续交易的风险管理策略。针对已识别的高优先级重点风险，公司已与矿山进行沟通，并达成一致意见，由矿山制定 CAP 进行整改，公司通过邮件沟通、定期会议等方式定期跟进整改情况。矿山及承包商立即整改，通过收集现场照片、员工护照归还签字登记表等佐证材料，已 100%确认所有外籍员工均已自主持有个人护照，消除证件不当留存隐患。矿山正在完善承包商管理制度体系，对承包商用工行为的现场检查（包括但不限于文件保管、工资支付、工作时间、自由行动等）纳入常规的 EHS 或专项人权审计计划，并为所有相关员工提供人权相关培训。

Based on the above risk assessment results, the company will adopt the risk management strategy of continuing to trade during the process of reducing risks. For the high-priority key risks identified, the company has communicated with the mine and reached an agreement. The mine has formulated CAP for rectification, and the company regularly follows up on the rectification situation through email communication, regular meetings, etc. The mine and the contractor have immediately rectified the issues. By collecting on-site photos, employee passport return registration forms, etc., it has 100% confirmed that all foreign employees have independently held personal passports, eliminating the risk of improper retention of documents. The mine is improving the contractor management system, including including but not limited to document storage, salary payment, working hours, free movement, etc., in the regular EHS or special human rights audit plans, and providing human rights-related

training for all relevant employees.

5.4 独立第三方评估与审核

5.4 Independent Third-Party Evaluation and Auditing

- 公司在 2024 年 1 月、2025 年 5 月开展了 RMI 的 RMAP 和 ESG 审核。
The company conducted RMI's RMAP and ESG assessment in January 2024 and May 2025.
- 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。
The company actively promotes independent third-party audits and second-party audits for upstream mines.

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.

截至 2026 年 6 月 30 日，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。（申诉渠道请参考：

<https://www.cngrgf.com.cn/Upload/Template/web/Files/202605/0c6ac999-0b82-4713-acdf-92833a2e482a.pdf>）

As of June 30, 2026, 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. (For the complaint channels, please refer to:

<https://www.cngrgf.com.cn/Upload/Template/web/Files/202605/0c6ac999-0b82-4713-acdf-92833a2e482a.pdf>)

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.

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