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制定部门：供应链尽责管理联合办公室	审核人：冯文元	批准人：齐连成

新疆嘉润资源控股有限公司

Xinjiang Jiarun Resources Holdings Co., Ltd.

矿产供应链尽责管理报告

Mineral Supply Chain Due Diligence Report

报告期：2025 年 5 月 1 日——2026 年 4 月 30 日

Report Period: May 1, 2025 — April 30, 2026

说明：本报告为新疆嘉润资源控股有限公司矿产供应链尽责管理年度报告，报告期 2025 年 5 月 1 日至 2026 年 4 月 30 日。公司作为玛纳斯县亿丰实业有限公司（简称亿丰实业）的唯一受托加工方，氧化铝原料由亿丰实业采购并运至嘉润厂区，嘉润仅提供受托加工服务，不与上游矿山、贸易商存在直接合同关系。本报告依据《中国矿产供应链尽责管理指南》第二版六步走框架编制，同时披露公司厂区内部管控情况及对委托方供应链合规情况的监督追踪结果。本报告将在相关渠道公开发布，并已于发布后预留不少于 15 个工作日供利益相关方评议反馈。

报告主体 **Report Entity**	新疆嘉润资源控股有限公司 Xinjiang Jiarun Resources Holdings Co., Ltd.
注册地址 **Registered Address**	新疆维吾尔自治区昌吉回族自治州玛纳斯县塔河工业园区嘉润产业园 Jiarun Industrial Park, Tahe Industrial Zone, Manas County, Changji Hui Autonomous Prefecture, Xinjiang Uyghur Autonomous Region
报告周期 **Report Period**	2025 年 5 月 1 日—2026 年 4 月 30 日 May 1, 2025 – April 30, 2026
适用标准 **Applicable Standards**	中国五矿化工进出口商会（CCCMC）《中国矿产供应链尽责管理指南》（第二版）；《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链职调查指南》（第三版） Chinese Due Diligence Guidelines for Mineral Supply Chain (2nd Edition) issued by CCCMC; OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition)

执行摘要 / Executive Summary

新疆嘉润资源控股有限公司（以下简称“嘉润”）作为玛纳斯县亿丰实业有限公司（以下简称“亿丰实业”）的唯一受托加工方，于本报告期（2025年5月1日至2026年4月30日）全面推进铝供应链尽责管理体系建设。本报告依据《中国矿产供应链尽责管理指南》（以下简称“《中国指南》”，第二版）六步走框架编制。

Xinjiang Jiarun Resources Holdings Co., Ltd. ('Jiarun'), as the sole toll processor for Manasi County Yifeng Industrial Co., Ltd. ('Yifeng Industrial'), has comprehensively advanced the construction of its aluminum supply chain due diligence framework during the reporting period (May 1, 2025 to April 30, 2026). This report is prepared in accordance with the six-step framework of the Chinese Due Diligence Guidelines for Mineral Supply Chain (2nd Edition).

在建立尽责管理体系方面，公司正式成立铝供应链尽责管理委员会，任命总经理担任委员会主任，下设联合办公室负责日常协调，制定并发布了涵盖13个模块、共计30余份的尽责管理体系文件，覆盖《中国指南》（第二版）六步骤相关的政策、程序等。2026年3月，嘉润联合亿丰实业开展专项尽责管理培训，双方就尽责管理要求达成共同理解。在风险识别与评估方面，公司对供应链涉及的澳大利亚、几内亚、印度、圭亚那、中国五国产地完成了CAHRAs识别，均未触发警示信号；并向一级供应商发出全套尽责管理文件；四类风险均评定为低风险。在风险应对方面，公司制定了年度风险管理计划，建立三类风险缓释策略，联合亿丰实业共同实施，报告期内未发现需暂停委托加工的情形。在评估方面，公司于2026年4月完成首次供应链尽责管理内部评估，结论符合《中国指南》要求，内部评估报告已在公司托管网站公开发布，并正积极筹备申请CCCMC内审员资质及引入外部第三方评估。在报告与沟通方面，公司通过托管网站向公众公开发布尽责管理政策及本年度报告，同步向亿丰实业及各职能部门进行内部沟通，申诉机制运行正常，报告期内未收到任何投诉或申诉。

In establishing its due diligence management system, the Company formally established an Aluminum Supply Chain Due Diligence Management Committee, appointing the General Manager as Committee Chair, with a Joint Office established under it to handle day-to-day coordination. The Company has developed and issued a due diligence management system comprising 13 modules and over 30 documents in total, covering the policies and procedures corresponding to the six steps of the Chinese Due Diligence Guidelines (Second Edition). In March 2026, Jiarun conducted specialized due diligence management training jointly with Yifeng Industrial, through which the two parties reached a common understanding of due diligence requirements. With respect to risk identification and assessment, the Company completed CAHRAs identification for the five countries of origin involved in its supply chain — Australia, Guinea, India, Guyana, and China — none of which triggered a warning signal; the Company issued its full set of due diligence management documents to Tier 1 suppliers, and all four risk categories were assessed as low risk. With respect to risk response, the Company formulated an annual risk management plan and established three categories of risk mitigation strategies, implemented jointly *with Yifeng Industrial; no circumstances requiring suspension of processing arrangements were identified during the reporting period. With respect to assessment, the Company completed its first internal supply chain due diligence management assessment in April 2026, concluding that it meets the requirements of the Chinese Guidelines; the internal assessment report has been publicly disclosed on the Company's entrusted website, and the Company is actively preparing to apply for CCCMC internal auditor qualification and to engage an external third-party assessment. With respect to reporting and communication, the Company publicly discloses its due diligence management policy and annual report to the public via its entrusted website, while conducting internal communication with Yifeng Industrial and relevant functional departments in parallel; the grievance mechanism is operating normally, and no complaints or grievances were received during the reporting period.*

1. 背景信息

Background Information

公司信息 / Company Information

公司名称 **Company Name**	新疆嘉润资源控股有限公司 Xinjiang Jiarun Resources Holdings Co., Ltd.
公司地址 **Company Address**	新疆维吾尔自治区昌吉回族自治州玛纳斯县塔河工业园区嘉润产业园 Jiarun Industrial Park, Tahe Industrial Zone, Manas County, Changji Hui Autonomous Prefecture, Xinjiang Uyghur Autonomous Region
业务性质 **Business Nature**	受托加工（铝锭）——氧化铝由亿丰实业采购并运至嘉润厂区，嘉润仅提供加工服务 Toll processing (aluminum ingots) — alumina purchased by Yifeng Industrial and delivered to Jiarun's plant; Jiarun provides processing services only
主要产品 **Main Products**	铝锭（受托加工）/ Aluminum ingots (toll processing)
委托加工方 **Client**	玛纳斯县亿丰实业有限公司（简称亿丰实业） Manasi County Yifeng Industrial Co., Ltd.

供应链结构 / Supply Chain Structure

玛纳斯县亿丰实业有限公司是嘉润的唯一委托加工方。亿丰实业负责向上游供应商采购氧化铝原料，并将原料运至嘉润厂区，委托嘉润将其加工为铝锭成品后交付亿丰实业。嘉润不参与氧化铝原料的采购、贸易或销售，仅提供受托加工服务，所产铝锭全部归亿丰实业所有。

Manasi County Yifeng Industrial Co., Ltd. is Jiarun's sole toll-processing client. Yifeng Industrial is responsible for purchasing alumina from upstream suppliers and transporting it to Jiarun's plant, where Jiarun processes the alumina into aluminum ingots for delivery back to Yifeng Industrial.

Jiarun does not participate in the procurement, trading, or sale of alumina raw materials; it provides processing services only, and all aluminum ingots produced are the property of Yifeng Industrial.

为推进铝供应链尽责管理工作，嘉润与亿丰实业在现有委托加工协议框架下，专项签署了《委托加工协议补充协议》（以下简称《补充协议》），作为双方开展供应链尽责管理合作的法律基础和行动依据。《补充协议》的主要内容包括：

To advance aluminum supply chain due diligence management, Jiarun and Yifeng Industrial entered into a Supplementary Agreement to the Toll Processing Contract (hereinafter the "Supplementary Agreement") as the legal basis and operational framework for their supply chain due diligence cooperation. Key provisions of the Supplementary Agreement include:

- **尽责管理要求传递**：亿丰实业须向其上游供应商传递嘉润的《供应链尽责管理政策》、《供应商行为守则》及《责任合同条款》，并回收上游供应商签署或填写后的文件；

  Due Diligence Requirement Transmission*: Yifeng Industrial is required to transmit Jiarun's Due Diligence Policy, Supplier Code of Conduct, and Responsible Contract Terms to its upstream suppliers, and to collect signed/completed documents from them;*

- **信息披露义务：**亿丰实业须按批次向嘉润提交上游供应商的原产地证、报关单、质检单等完整随货文件，以及年度更新的 KYS 问卷和矿源地监管链信息表；

  Information Disclosure Obligations*: Yifeng Industrial is required to submit per-batch origin documentation (certificates of origin, customs declarations, inspection reports, etc.) and annually updated KYS questionnaires and chain of custody information sheets to Jiarun；*

- **变更通知义务**：如亿丰实业新增上游供应商或变更原料产地，须提前 5 个工作日书面告知嘉润联合办公室，并配合开展意向供应商尽职调查；

  Change Notification Obligations*: Yifeng Industrial must notify Jiarun's Joint Office in writing at least 5 working days in advance before adding new upstream suppliers or changing raw material sourcing origins, and cooperate in due diligence on prospective suppliers;*

- **风险事件上报**：如在上游供应链中发现或疑似发现重大风险事件，亿丰实业须在知悉后 24 小时内书面通知嘉润联合办公室，并配合开展调查和整改；

  Risk Incident Reporting*: If Yifeng Industrial discovers or suspects a major risk incident in the upstream supply chain, it must notify Jiarun's Joint Office in writing within 24 hours and cooperate in investigation and remediation;*

- **暂停或终止机制**：当供应链中出现风险缓释措施无效、风险不可控或触发零容忍清单的情形时，嘉润有权依据《委托加工协议补充协议》相关条款启动暂停或终止来自相关原料来源的全部委托加工安排。

  Suspension or Termination Mechanism*: Where risk mitigation measures prove ineffective, risks become uncontrollable, or zero-tolerance triggers are activated, Jiarun is entitled under* *the Supplementary Agreement to suspend or terminate all toll processing arrangements relating to the relevant material source.*

《委托加工协议补充协议》的签署，标志着嘉润与亿丰实业将供应链尽责管理要求正式纳入双方商业合作框架，实现了从自愿承诺向合同约束的升级，为嘉润在受托加工关系下有效履行尽责管理义务提供了制度保障。

The signing of the Supplementary Agreement marks a formal integration of supply chain due diligence requirements into the commercial cooperation framework between Jiarun and Yifeng Industrial, elevating due diligence from voluntary commitment to contractual obligation, and providing the institutional foundation for Jiarun to effectively fulfill its due diligence responsibilities as a toll processor.

步骤一：建立尽责管理体系

Step 1: Establish the Due Diligence Management System

1.1 尽责管理政策 / Due Diligence Policy

嘉润依据《联合国工商业与人权指导原则》、《联合国人权与安全自愿原则》及《联合国世界人权宣言》等国际准则，制定了《供应链尽责管理政策》（中英维三语）。该政策明确公司遵守《中国指南》（第二版）、《OECD 指南》（第三版）及 LME《负责任采购政策》的承诺；涵盖四类风险的识别承诺及三级缓释程序；通过《委托加工协议补充协议》传递给亿丰实业，并要求亿丰实业向其上游供应商进一步传递；已在公司托管网站公开发布，供所有利益相关方查阅。

Jiarun has formulated a Supply Chain Due Diligence Policy (trilingual: Chinese, English, and Uyghur) in accordance with the UN Guiding Principles on Business and Human Rights, the Voluntary Principles on Security and Human Rights, and the UN Universal Declaration of Human Rights. The policy affirms commitment to the Chinese Guidelines (2nd Edition), OECD Guidance (3rd Edition), and LME Responsible Sourcing Policy; covers three-tier mitigation procedures; has been transmitted to Yifeng Industrial and its upstream suppliers; and is published on the Company's entrusted website.

1.2 管理架构 / Governance Structure

本报告期内，新疆嘉润资源控股有限公司正式成立铝供应链尽责管理委员会，委员会下设供应链尽责管理联合办公室（归口部门：生产管理部），并通过任命书向副总经理授予监督尽责管理工作绩效的权限，自 2026 年 1 月 5 日起生效。具体部门及职责安排如下。

During the reporting period, Xinjiang Jiarun Resources Holdings Co., Ltd. formally established the Aluminum Supply Chain Due Diligence Committee. A Joint Office was established with the Materials Procurement

Department as the lead department. Deputy General Manager was appointed to supervise due diligence performance, effective January 1, 2026

职务/部门 Department	主要职责 Main responsibilities
联合办公室主任 **Director of the joint office**	直接管理联合办公室；负责协调委员会各成员部门开展尽责管理工作；向委员会主席汇报重要事项。 Directly manages the Joint Office; coordinates due diligence work across all Committee member departments; reports important matters to the Chair of the Due Diligence Committee.
生产管理部 **Production Management Department**	负责提供物料平衡核算及证明文件；加工流程与工艺说明；批次原料入库记录；产品入库管理说明。 Provides material balance accounting and supporting documents; processing flow and technical descriptions; batch raw material receipt records; finished product storage management descriptions。
人力资源部 **Human Resources Department**	负责指导搜集、提供和维护以下信息，包括但不局限于：公司管理架构图（包括企业高层管理人员、董事姓名）、公司股权关系及实益所有权信息说明、员工花名册、员工招聘和选拔政策、童工预防和补救程序、强迫劳动预防和补救程序等。 Guides the collection, provision, and maintenance of the following information, including but not limited to: company organizational chart (including names of senior management and directors), company equity and beneficial ownership information, employee roster, employee recruitment and selection policies, child labor prevention and remediation procedures, forced labor prevention and remediation procedures, etc.
法务部 **Legal Affairs Department**	负责审查委托加工合同及相关协议，将供应链尽责管理要求纳入合同条款，开展法律风险识别与防控；与唯一委托加工方——亿丰实业实施负责任采购政策保持沟通、协助体系建立及内外部审核等。跟踪研究国际国内尽责管理最新规则，保持公司管理体系与时俱进。 Reviews toll processing contracts and related agreements, incorporates supply chain due diligence requirements into contract terms, and conducts legal risk identification and control; maintains communication with the sole toll-processing client — Yifeng Industrial — on the implementation of the responsible sourcing policy, and assists in system establishment and internal/external audits, etc. Tracks and researches the latest domestic and international due diligence developments to keep the Company's management system current.
质检部 **Quality Inspection Department**	负责提供产品质检报告/化验单；ISO 质量体系有效性维护相关文件；原料及成品检测证明文件等。合规性审查等。 Provides product quality inspection reports/assay certificates; documents related to the maintenance of ISO quality management system effectiveness; raw material and finished product inspection certificates, etc.; conducts compliance reviews, etc.
财务部 **Finance Department**	负责指导搜集、提供和维护以下信息，包括但不局限于：公司向政府（及政府官员）缴纳的税收、费用、特许费或其他款项证明文件（如涉及）等。 Guides the collection, provision, and maintenance of the following information,

	including but not limited to: documentation of taxes, fees, royalties, or other payments made by the Company to government authorities (and government officials), where applicable, etc.
亿丰实业代表 **Yifeng Industrial Representative**	负责供应商合同管理；向供应商传递《供应商行为守则》、责任合同条款及事故表并维护文件有效性；物流运输路线说明；海关报关文件；原产地证等。 Responsible for supplier contract management; communicating the Supplier Code of Conduct, responsible sourcing contract clauses, and incident forms to suppliers, and maintaining the validity of these documents; logistics and transportation route descriptions; customs declaration documents; certificates of origin; and other related documents.
安全管理部 **Safety Management Department**	负责提供安全生产许可证及相关证明文件；职业健康安全管理体系文件；安全生产事故记录与汇报；安全培训。 Provides work safety permits and related certificates; occupational health and safety management system documents; work safety incident records and reports; safety training records, etc.
仓储物资管理中心 **Warehouse and Materials Management Center**	负责提供原料和成品的存储记录；仓储管理制度文件；库存盘点记录；出入库单据管理等。 Provides storage records for raw materials and finished products; warehouse management system documents; inventory records; inbound and outbound document management, etc.

1.3 风险分级判定规则 / Risk Classification Rules

公司内部对四类供应链风险划定三级风险标准，并明确零容忍清单。

The Company applies a three-tier risk classification to all four supply chain risk categories, with a defined zero-tolerance list:

风险等级 / Level	判定标准 / Criteria	处置原则 / Response
低风险 Low Risk	原产地不属于 CAHRAs；供应商通过制裁名单筛查；无已知人权、安保、税费违规记录；文件完整、信息核查一致。 Country of origin is not a CAHRA; supplier has passed sanctions list screening; no known record of human rights, security, or tax violations; documentation is complete and information verification is consistent.	正常开展委托加工业务；保持常态化监测。 Continue processing operations normally; maintain routine monitoring.
中风险 Medium Risk	部分信息缺失或待核实；存在可疑信号但尚未确认；供应商尽责管理文件不完整。 Some information is missing or pending verification; a suspicious signal exists but has not been confirmed; supplier's due diligence management documentation is	维持委托加工，同步下达整改要求；设定整改期限，定期复核，直至风险降低至可接受水平。 Continue processing operations while simultaneously issuing corrective action requirements; set a

	incomplete.	corrective action deadline and conduct periodic reviews until risk is reduced to an acceptable level.
高风险 High Risk	确认存在四类风险之一；触发警示信号且风险不可控；供应商明确违反《供应商行为守则》。 Confirmed presence of one of the four risk categories; a warning signal has been triggered and the risk is uncontrollable; supplier has clearly violated the Supplier Code of Conduct.	暂停接收相关批次委托加工；启动整改计划；整改无效则依据《补充协议》终止委托加工安排。Suspend acceptance of processing for the affected batches; initiate a corrective action plan; if corrective action is ineffective, terminate the processing arrangement pursuant to the Supplementary Agreement.
零容忍清单 Zero-Tolerance	联合国安理会制裁实体；冲突融资；系统性严重人权侵害；与武装冲突直接相关的矿产来源。 Entity sanctioned by the UN Security Council; conflict financing; systemic, serious human rights abuses; mineral sourcing directly linked to armed conflict.	立即终止委托加工安排，禁止开展任何业务合作。 Immediately terminate the processing arrangement and prohibit any further business cooperation.

1.4 内部申诉机制 / Internal Grievance Mechanism

公司建立了公开的申诉机制，任何个人或团体均可通过官方申诉邮箱就铝供应链中涉及四类风险的情况提起申诉。申诉处理遵循七步流程：受理登记→初步审查→正式调查→通知申诉人→处置决定→监察执行→存档闭环。公司严格执行申诉人保密与保护制度，严禁任何形式的打击报复。本报告期内共收到 0 条有效申诉，申诉渠道运行正常。

The Company has established a publicly accessible grievance mechanism. Any individual or group may submit a grievance via the official grievance email regarding the four supply chain risk categories. The grievance process follows a seven-step procedure: receipt, preliminary review, formal investigation, complainant notification, decision, monitoring, and closure. Strict confidentiality and non-retaliation policies are enforced. No valid grievances were received during the reporting period; the mechanism operates normally.

1.5 内部控制与透明度系统 / Internal Control and Transparency System

公司建立了以下内部控制与透明度机制，确保尽责管理工作的规范性、可追溯性和公开性：

The Company has established the following internal control and transparency mechanisms to ensure the standardization, traceability and openness of due diligence work:

— 物料平衡管理：生产管理部按批次对氧化铝原料（单耗 1.92 吨/吨铝锭）进行物料平衡核算，仓储物资管理中心维护批次追溯台账，确保每批次氧化铝原料可追溯至原产地；

— Material balance management: the Production Management Department conducts batch-level material balance accounting (alumina consumption rate: 1.92 tonnes per tonne of aluminum ingots), with full batch traceability records maintained;

— 实益所有权信息：公司维护完整的股权关系及实益所有权记录，通过 KYS 问卷对上游供应商的实益所有人信息进行核验；

— Beneficial ownership: the Company maintains complete equity and beneficial ownership records; upstream supplier beneficial ownership is verified via KYS questionnaires;

— 财务控制：财务部负责税费缴纳凭证的完整归档，并对大额跨境付款实施双人审批机制；通过反行贿及反洗钱合规程序对可疑交易进行识别和处置；

— Financial controls: the Finance Department maintains complete tax payment records; large cross-border payments are subject to dual-approval; suspicious transactions are identified and handled through the anti-bribery and anti-money laundering compliance procedure;

— 供应链追溯体系：每批次氧化铝原料分配唯一批次编号，贯穿从入库、存储、投料到成品出库的全流程追溯。

— Supply chain traceability: each batch of alumina is assigned a unique batch identification code, enabling full traceability from receipt through storage, processing, and finished product delivery.

1.6 供应商合作方式 / Supplier Cooperation Methods

鉴于公司作为受托加工方的特殊地位，公司通过以下方式与上游供应链开展合作：

Given the Company's unique position as a toll processor, cooperation with the upstream supply chain is conducted through the following approaches:

— 政策传达：向亿丰实业发送《供应链尽责管理政策》和《供应商行为守则》，要求亿丰实业进一步向上游供应商传递尽责管理要求；

— Policy dissemination: distributing the Due Diligence Policy and Supplier Code of Conduct to Yifeng Industrial, with requirements for further transmission to upstream suppliers;

— 合同约束：通过《委托加工协议补充协议》规范与亿丰实业的尽责管理合作机制，在《责任合同条款》中嵌入审计权、信息披露义务和违约救济措施；

— Contractual obligations: incorporating responsible sourcing clauses into the Supplementary Agreement, including audit rights, disclosure obligations, and breach remedies;

— 能力建设：联合亿丰实业开展专项尽责管理培训，提升供应链各方的尽责管理意识；

— Capacity building: jointly conducting specialized due diligence training with Yifeng Industrial to enhance awareness across the supply chain;

— 联合改进：针对部分供应商文件待回收的情形，联合亿丰实业制定文件回收计划，设定完成时限并持续跟踪。

— Joint improvement: working with Yifeng Industrial on a document collection plan with defined timelines for follow-up on outstanding supplier documents.

1.7 体系文件建设 / System Documentation

本报告期内，公司完成了铝供应链尽责管理体系文件的全面建设，涵盖 ORG（组织架构）、POL（政策）、CON（合同）、SUP（供应商管理）、RIS/RISK（风险识别）、MIT（风险缓解）、GRI（申诉）、HRL（人权劳工）、TRP（运输追溯）、TRN（培训）、EVA（评估）、RPT（报告）、SYS（体系管理）共 13 个模块，共计 30 余份体系文件，覆盖尽责管理六步走全流程。

During the reporting period, the Company completed the comprehensive construction of its aluminum supply chain due diligence system documentation, covering 13 modules and over 30 documents encompassing all six steps of the due diligence framework.

1.8 培训 / Training

2026 年 3 月 12 日，公司联合亿丰实业开展铝供应链尽责管理专项培训，培训内容涵盖《中国指南》第二版六步法、四类风险识别与评估、《委托加工协议补充协议》要求及 KYS 问卷填写方法。此外，2026 年 5 月 10 日，公司联合亿丰实业对一级供应商开展供应链尽责管理培训，进一步加强供应链尽责管理工作。

On March 12, 2026, the Company and Yifeng Industrial jointly conducted specialized due diligence training covering the six-step framework, four risk categories, Supplementary Agreement requirements, and KYS questionnaire completion methods. In addition, on May 10, 2026, the Company conducted supply chain due diligence management training for Tier 1 suppliers jointly with Yifeng Industrial, further strengthening its supply chain due diligence management efforts.

步骤二：识别并评估供应链风险

Step 2: Identify and Assess Supply Chain Risks

2.1 供应商清单与物料来源统计 / Supplier List and Material Source Statistics

本报告期内，亿丰实业向嘉润委托加工的氧化铝原料来源自四大一级供应商（贸易商）。

During the reporting period, the alumina raw materials entrusted by Yifeng Industrial to Jiarun for processing were primarily sourced from four first tier suppliers, which are all traders.

所有供应商均已完成制裁名单（联合国安理会等）筛查，未发现关联。所有原料均要求提供原产地证明文件（原产地证、报关单、质检单等），确保原料来源可追溯。

All suppliers have been screened against sanctions lists (UN Security Council, etc.) with no triggers identified. All materials require origin documentation (certificates of origin, customs declarations, inspection reports, etc.) to ensure traceability.

2.2 “受冲突影响和高风险区域”（CAHRAs）识别 / CAHRAs Identification

公司通过以下工具，从武装冲突、人权和政府治理三个维度对供应链涉及的国家和地区进行 CAHRAs 识别：中国领事服务网、联合国安理会制裁名单、世界银行全球治理指数（WGI）、透明国际清廉指数（CPI）、CAHRAs 专项数据库（www.cahraslist.net）。

The Company conducts CAHRAs identification across three dimensions —armed conflict, human rights, and governance —using: China Consular Service Network, UN Security Council sanctions list, World Bank Worldwide Governance Indicators, Transparency International CPI, and the CAHRAs database (www.cahraslist.net).

本报告期识别结果：供应链涉及的主要产地澳大利亚、几内亚、印度、圭亚那、中国经评估均不属于受冲突影响和高风险区域，未发现警示信号。其中，几内亚近年曾发生政治动荡，公司持续跟踪其局势变化，本报告期内尚未触发警示信号。CAHRAs 识别结论已书面告知亿丰实业。

Results: the main source countries —Australia, Guinea, India, Guyana, and China —were assessed as neither conflict-affected nor high-risk. Guinea's political situation has been monitored closely; no warning signals were triggered. CAHRAs identification results were communicated in writing to Yifeng Industrial.

2.3 供应商信息收集 / Supplier Information Collection

公司通过《委托加工协议补充协议》规定的协同机制，系统收集上游供应商的尽责管理信息。

The Company systematically collects upstream supplier due diligence information through the coordination mechanism stipulated in the Supplementary Agreement.

亿丰实业已将如下文件《供应商行为守则》、《责任合同条款》、《供应商尽责管理评估问卷》（KYS 问卷）、《矿源地监管链信息表》发至所有一级供应商，传递嘉润公司尽责管理政策并收集供应商信息。

Yifeng Industrial has distributed the following documents — the Supplier Code of Conduct, the Responsible Sourcing Contract Clauses, the Supplier Due Diligence Assessment Questionnaire (KYS Questionnaire), and the Mineral Origin Chain of Custody Information Form — to all Tier 1 suppliers, in order to communicate Jiarun Company's due diligence management policy and collect supplier information.

2.4 本年度风险识别汇总 / Annual Risk Identification Summary

基于 CAHRAs 识别和供应商信息收集，本报告期内风险识别汇总如下：

Based on CAHRAs identification and supplier information collection, the risk identification summary for this reporting period is as follows:

— 已识别中等级合规瑕疵：部分上游供应商尽责管理文件尚未全部回收，属于文件完整性层面的中等级合规瑕疵；公司已要求亿丰实业限期跟进整改；

— Identified medium-level compliance gap: some upstream supplier due diligence documents have not yet been fully collected; the Company has requested Yifeng Industrial to follow up within a defined timeline;

— 未识别高风险及零容忍等级问题；

— No high-risk or zero-tolerance issues identified;

— 几内亚产地政治稳定情况持续关注中，本期未触发警示信号。

— Guinea's political stability continues to be monitored; no warning signals were triggered during this period.

2.5 产销监管链与供应链追溯 / Chain of Custody and Supply Chain Traceability

公司建立了批次级追溯系统，将每批氧化铝原料与其原产地、供应商、运输路径和加工记录相关联。每批次分配唯一识别编号，伴随物料从入库、存储、投料到铝锭成品出库的全流程。生产管理部按批次开展物料平衡核算，仓储物资管理中心维护完整的入库、投料、出库台账。本报告期内物料平衡核算正常，未发现账实不符情形。

The Company has established a batch-level traceability system linking each batch of alumina to its origin, supplier, transport route, and processing records. Each batch is assigned a unique identification code that follows the material from receipt through storage, processing, and finished product delivery. Material balance accounting is conducted batch by batch. No material balance discrepancies were identified during the reporting period.

2.6 实地评估 / On-Site Assessment

本报告期内，CAHRAs 识别结果显示供应链涉及的五国产地均不属于受冲突影响和高风险区域，未触发任何警示信号，因此本期暂不适用对相应供应链开展实地评估。公司已制定《铝供应链实地评估程序》，一旦触发警示信号可立即启动相应路径。

During this reporting period, CAHRAs identification confirmed that all five source countries are neither conflict-affected nor high-risk, and no warning signals were triggered; on-site assessment is therefore not applicable for this period. The Company has formulated an On-Site Assessment Procedure, ready for activation upon trigger of warning signals.

2.7 风险评估结果 / Risk Assessment Results

基于上述信息收集和 CAHRAs 识别，公司完成了本报告期的四类风险评估，结论如下：

Based on the above information collection and CAHRAs identification, the Company completed its four-category risk assessment. Results are as follows:

风险类别 / Risk Category	评估结论 / Assessment Conclusion	风险等级 Risk Level
严重侵权行为 Serious Abuses	厂区内未发现童工、强迫劳动及严重侵权行为；已执行禁止强迫劳动程序和禁止童工程序；亿丰实业提交的上游供应商信息未发现相关风险。 No child labor, forced labor, or serious human rights violations were identified on the plant premises; procedures prohibiting forced labor and prohibiting child labor have been implemented; no related risks were identified in the upstream supplier information submitted by Yifeng Industrial.	低 / Low
非国家武装团体风险	各产地无非国家武装团体控制矿区或运输路线的情形；制裁名单筛查未触发警示信号。	低 / Low

Non-State Armed Groups	No mining areas or transportation routes at any origin were found to be controlled by non-state armed groups; sanctions list screening did not trigger any warning signals.	
公共或私人安全武装力量 Public or Private Security Forces	厂区安保规范；上游产地未发现安全武装非法征税或勒索情形；《供应商行为守则》和《责任合同条款》要求安保人员资质筛查。 Jiarun’s on-site security is compliant with standards; no illegal taxation or extortion by security forces was identified at upstream origins; the Supplier Code of Conduct and Responsible Sourcing Contract Clauses require qualification screening of security personnel.	低 / Low
行贿受贿及欺诈性失实陈述、洗钱、税费透明度 Bribery, Fraud, Money Laundering	物料平衡核算正常；原产地信息可追溯；未发现欺诈或行贿情形。 Mass balance accounting is normal; the country of origin is traceable; no instances of fraud or bribery were identified.	低 / Low

四类风险评估结论均为低风险。风险评估结果已通过《矿产供应链风险评估结果汇报表》汇报至委员会主任。

All four risk categories assessed as low risk. Risk assessment results were reported to the Committee Chair via the Risk Assessment Results Reporting Form.

步骤三：制定并落实风险应对策略

Step 3: Formulate and Implement Risk Response Strategies

3.1 风险分类 / Risk Classification

公司依据风险等级对四类风险采取差异化的处置策略：

The Company applies differentiated response strategies based on risk level:

策略 / Strategy	适用情形/Applicable Scenario	具体措施/Specific Measures
继续委托加工 Continue Toll Processing	低风险或中风险（可控范围内）Low risk or medium risk (within a controllable range)	持续开展尽责管理与整改提升，同步维持正常委托加工业务；联合亿丰实业持续督促供应商文件回收及整改落实。 Continue to carry out due diligence management and corrective improvement while maintaining normal processing operations in parallel; work jointly with Yifeng Industrial to continue urging suppliers to submit documentation and implement corrective actions.
暂停委托加工	中度上升风险；或风	暂停接收相关批次委托加工，书面通知亿丰实业提出整

+限期整改 Suspend + Remediate	险缓释措施未按期落实 Moderately elevated risk; or risk mitigation measures not implemented within the specified timeframe	改方案；设定整改期限（严重侵权：30个工作日；安保风险：6个月）；期间持续跟踪改进进展。 Suspend acceptance of processing for the affected batches and notify Yifeng Industrial in writing to propose a corrective action plan; set a corrective action deadline (serious rights violations: 30 working days; security risks: 6 months); continue to track progress on improvement during this period.
终止委托加工 Terminate	风险缓释措施无效、不可控；触发零容忍清单 Risk mitigation measures are ineffective or uncontrollable; triggers the zero-tolerance list	依据《委托加工协议补充协议》，正式终止来自相关原料来源的全部委托加工安排；充分考虑对上游采矿社区的潜在经济和社会不利影响。 Pursuant to Article 5.3 of the Supplementary Agreement to the Processing Agreement, formally terminate all processing arrangements sourced from the relevant material origin; give full consideration to potential adverse economic and social impacts on upstream mining communities.

3.2 制定风险管理计划及实施监测程序 / Risk Management Plan and Implementation Monitoring

公司制定了《矿产供应链尽责管理风险管理计划》（2025 年 5 月 1 日至 2026 年 4 月 30 日），并建立动态风险调整机制。风险管理计划在托管网站发布，公开征询利益相关方意见。同时，公司制定了《铝供应链风险管理计划实施与监测程序》，明确联合办公室、各成员部门及亿丰实业在实施过程中的分工职责、监测频次及汇报机制。

The Company formulated an annual Risk Management Plan (May 1, 2025 to April 30, 2026) with eight quantifiable mitigation targets, and an Implementation and Monitoring Procedure clarifying responsibilities, monitoring frequency, and reporting mechanisms for the Joint Office, member departments, and Yifeng Industrial.

3.3 针对四类风险编制专项程序 / Specific Procedures for Four Risk Categories

公司针对四类风险编制了一系列专项程序文件，将风险管控要求落实至具体操作层面：

The Company formulated specialized procedural documents for each of the four risk categories:

— 《禁止使用童工及补救控制程序》——覆盖厂区内部及通过亿丰实业对上游的童工识别、预防和补救要求；

— *Prohibition of Child Labor and Remedial Control Procedure —covers child labor identification, prevention, and remediation within the plant and upstream;*

— 《禁止使用强迫劳动管理程序》——涵盖招聘核查、劳动合同、薪酬及证件合规、员工申诉渠道等内容；

— *Prohibition of Forced Labor Management Procedure —covering recruitment, labor contracts, wage compliance, and employee grievance channels;*

— 《人权风险事件应对程序》——覆盖酷刑、性暴力、战争罪等严重侵权行为的三级事件应对机制；

— *Human Rights Risk Incident Response Procedure —three-tier response mechanism for serious abuses including torture, sexual violence, and war crimes;*

— 《非国家武装力量及其关联方的识别程序》——规定制裁名单筛查、所有权核查、资金流向审查等识别方法；

— *Non-State Armed Forces Identification Procedure —sanctions list screening, ownership verification, and fund flow review;*

— 《反行贿及反洗钱合规程序》——规定可疑交易识别、五步处置程序及供应商背景核查要求（含 EITI 信息披露核查）。

— *Anti-Bribery and Anti-Money Laundering Compliance Procedure —suspicious transaction identification, five-step disposal procedure, and supplier background checks including EITI disclosure verification.*

3.4 突发事件上报机制 / Emergency Incident Reporting Mechanism

若出现武装冲突融资、重大人权侵害、洗钱等重大风险事件，联合办公室将在 24 小时内向委员会主任汇报，确保在年度报告周期之外亦能及时应对和披露重大风险事项。

If severe incidents including conflict financing, major human rights abuses, or money laundering occur, the Joint Office will report to the Committee Chair within 24 hours and, .

步骤四：开展内外部评估

Step 4: Carry out Internal and External Assessment

新疆嘉润资源控股有限公司于 2026 年 4 月开展了首次供应链尽责管理内部评估。内部评估报告已在公司托管网站公开发布。

Xinjiang Jiarun Resources Holdings Co., Ltd. conducted its first internal assessment in April 2026. Internal assessment report published on the Company's entrusted website

新疆嘉润资源控股有限公司正积极与中国五矿化工进出口商会（CCCMC）及行业机构沟通，计划在适当时机邀请独立第三方机构开展外部评估，进一步提升尽责管理体系的公信力。

Xinjiang Jiarun Resources Holdings Co., Ltd. is actively communicating with CCCMC and relevant industry organizations, and plans to engage independent third-party institutions for external assessment at an appropriate time, to further enhance the credibility of its due diligence system.

步骤五：对风险管理过程和结果进行沟通和报告

Step 5: Communicate and Report Risk Management Process and Results

5.1 六步法合规自评 / Self-Assessment of Compliance with the Six-Step Framework

公司对本报告期内六步走尽责管理工作完成情况进行自评，并形成评估报告。

The Company conducted a self-assessment of its six-step due diligence compliance for this reporting period. Assessment report has been formulated.

5.2 未消除风险及持续改进计划 / Unresolved Risks and Continuous Improvement Plan

本报告期结束时，仍存在以下尚未完全消除的短板及持续改进计划：

At the end of this reporting period, the following gaps remain and continuous improvement plans have been established:

事项 / Item	现存短板 / Current Gap	改进计划 / Improvement Plan
供应商尽责管理能力 Suppliers' due diligence capacity building	部分上游供应商尚未建立完善的尽责管理体系 Some upstream suppliers have not yet fully established their due diligence systems	通过亿丰实业持续开展供应商能力建设；鼓励供应商向 CCCMC 申请评估 Continuously conduct supplier capacity building through Yifeng Industrial; encourage suppliers to apply for assessment with CCCMC.
几内亚产地风险跟踪 Risk follow-up	几内亚政治稳定情况需持续关注 Guinea's political stability requires ongoing monitoring	持续对接 CCCMC 跟踪几内亚局势；如出现变动立即更新 CAHRAs 识别结果 Continue liaising with CCCMC to track developments in Guinea; immediately update CAHRAs identification results if the situation changes.

5.3 报告公开途径 / Report Disclosure Channels

本报告通过以下渠道向公众公开发布：

This report is publicly disclosed through the following channels:

— 网站：企业托管网站公开发布报告全文；

— Company's entrusted website: the full report is published with a downloadable link;

— 中国五矿化工进出口商会（CCCMC）平台：向五矿商会提交完整报告备案；

— CCCMC platform: the complete report is submitted to CCCMC for filing;

— 利益相关方定向发送：本报告初稿已以电子邮件形式发送给相关利益相关方征询意见，预留不少于 15 个工作日评议反馈期；截至发布日，未收到任何异议或反馈意见。

— Stakeholder distribution: the draft report was shared via email with relevant stakeholders for comments with a minimum 15-working-day review period; no objections or feedback were received by the publication date.

5.4 利益相关方沟通/Stakeholders communication

本报告期内，公司将利益相关方参与纳入铝供应链尽责管理工作的重要组成部分，主动识别并与各类利益相关方建立沟通机制。公司识别的主要利益相关方包括：公司员工、委托方

（亿丰实业）及其上游供应商、厂区周边社区居民、行业协会，以及玛纳斯县及昌吉回族自治州相关政府主管部门。

During the reporting period, the Company incorporated stakeholder engagement as an integral part of its aluminum supply chain due diligence work. Key stakeholders include: Company employees, the client (Yifeng Industrial) and its upstream suppliers (Glencore, Xiamen Lingxiang Metal Co., Ltd., etc.), residents of communities surrounding the plant, industry associations, and relevant government authorities in Manas County and Changji Hui Autonomous Prefecture.

— 公司《供应链尽责管理政策》已在公司托管网站公开发布，并以电子邮件形式发送至亿丰实业及上游主要供应商，征询意见和反馈；

— *The Company's Due Diligence Policy has been published on the company's entrusted website and distributed via email to Yifeng Industrial and key upstream suppliers for comments and feedback;*

— 本年度尽责管理报告和风险管理计划在公开发布后，预留不少于 15 个工作日供利益相关方评议和反馈，联合办公室负责收集并处理相关意见；

— *A minimum of 15 working days was reserved for stakeholder review and feedback following public release of the annual report and risk management plan;*

— 公司通过电子邮件向亿丰实业传递《供应商行为守则》及《责任合同条款》，要求其进一步向上游供应商转递，并于 2026 年 3 月联合亿丰实业开展了专项尽责管理培训，推动双方就尽责管理要求达成共同理解；

— *The Company transmitted the Supplier Code of Conduct and Responsible Contract Terms to Yifeng Industrial via email for further transmission to upstream suppliers; a joint due diligence training session was conducted in March 2026;*

— 公司通过公开发布的申诉机制（含申诉邮箱），为员工、社区居民及其他利益相关方提供常态化的意见表达和投诉渠道，本报告期内未收到任何申诉；

— *The Company maintains a publicly accessible grievance mechanism providing ongoing channels for employees, community members, and other stakeholders; no grievances were received during the reporting period;*

— 公司积极参与中国五矿化工进出口商会（CCCMC）组织的行业交流和尽责管理集体行动，通过行业渠道获取产地风险动态信息，并参与《采矿业和矿产价值链调解磋商机制》。

— *The Company actively participates in CCCMC industry exchanges and collective due diligence actions, obtaining supply source risk intelligence through industry channels and participating in the CCCMC Mediation and Consultation Mechanism.*

步骤六：适时提供条件或合作开展补救

Step 6: Provide for or Cooperate in Remediation when Appropriate

在本报告评估期间内，供应链中未出现需要开展或合作开展补救措施的情况。公司通过以下机制持续维护补救能力：

During this reporting period, no situations requiring remedial measures arose in the supply chain. The Company maintains ongoing remediation capacity through the following mechanisms:

— 申诉机制（含申诉书模板）常态化运行，为任何利益相关方提供便捷申诉渠道；本报告期内未收到任何申诉；

— The grievance mechanism (including complaint form template) operates on an ongoing basis; no grievances were received during the reporting period;

— 《委托加工协议补充协议》明确规定暂停或终止委托加工的触发条件，为供应链风险的兜底处置提供制度保障；

— Article 5.3 of the Supplementary Agreement provides institutional safeguards for suspending or terminating toll processing;

— 公司编制了《人权风险事件应对程序》，规定发生严重人权侵害事件时的三级应对机制和补救路径；

— The Company has formulated a Human Rights Risk Incident Response Procedure with three-tier response mechanisms and remediation pathways;

— 公司积极参与中国五矿化工进出口商会《采矿业和矿产价值链调解磋商机制》，如发生供应链纠纷可通过行业渠道寻求专业调解。

— The Company actively participates in the CCCMC Mediation and Consultation Mechanism, enabling professional mediation in the event of supply chain disputes.