文件编号：JR-SCDD-MIT-R-001-2025-V01	文件名称：矿产供应链尽责管理风险管理计划	执行日期：2025 年 12 月 5 日
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

说明：本风险管理计划为公开文件，计划周期 2025 年 5 月 1 日至 2026 年 4 月 30 日，适用于新疆嘉润资源控股有限公司（简称"嘉润"或"公司"）矿产供应链尽责管理体系。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，与上游矿山、贸易商无直接合同关系。涉及上游供应链的风险管理活动须与亿丰实业协同推进：亿丰实业负责对其一级供应商开展风险缓解工作，嘉润负责厂区内部管控、对亿丰实业的督促和跟踪，以及联合亿丰实业配合第三方评估。本计划发布后须同步抄送亿丰实业，以确保双方协同执行。

新疆嘉润资源控股有限公司

供应链尽责管理风险管理计划

计划周期：2025 年 5 月 1 日—2026 年 4 月 30 日

嘉润遵循《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尽职调查指南》（第三版，以下简称"《OECD 指南》"）、中国五矿化工进出口商会《中国矿产供应链尽责管理指南》（第二版，以下简称"《中国指南》"）步骤三（风险预防和缓解）的要求，以及公司《供应链尽责管理政策》对风险管理计划的规定，制定本风险管理计划。

一、总则

1.1 编制依据

本计划依据《中国指南》（第二版）、《OECD 指南》（第三版）、公司《供应链风险管理计划管理程序》及公司《供应链尽责管理政策》编制，用于规范 2025 年 5 月 1 日至 2026 年 4 月 30 日期间铝供应链风险识别、评估、管控、跟踪全流程工作。

1.2 管理目标

全面防范并管控《中国指南》附录一、《OECD 指南》附录二列明的四大类供应链风险：

— 矿产开采、运输、贸易环节严重人权侵害行为；

— 直接/间接资助非国家武装团体相关风险；

— 公共、私人安保武装相关风险；

— 行贿受贿、原产地虚假申报、洗钱、政府税费缴纳不合规风险。

二、风险管理计划的制定

本计划制定过程中，联合办公室通过以下方式征询了供应商及受影响利益相关方的意见：

— 与亿丰实业召开尽责管理专项沟通会议，就风险缓解策略达成书面共识，相关共识已纳入《委托加工协议补充协议》年度执行评估；

— 向一级供应商等利益相关方发送本文本，收集各方反馈意见；

— 通过公司申诉机制收集外部利益相关方意见；

— 本计划公开发布后，预留不少于 15 个工作日供受影响利益相关方评议和反馈，联合办公室将收集反馈意见并评估是否需要调整计划。

三、公司管理、触发警示信号管理及利益相关方参与

活动内容	负责部门	更新频率
【联合办公室职责】		
制定并定期审阅修订公司《供应链尽责管理政策》	联合办公室	保证长期有效
定期协调召开供应链尽责管理委员会会议	联合办公室	12 个月
定期审阅修订尽责管理政策及程序文件	联合办公室	12 个月
向联合办公室各单位部门提供相关培训	联合办公室	实时
定期制定、发送并汇总联合办公室各单位部门的工作清单	联合办公室	12 个月
定期查收申诉邮件、维护申诉机制	联合办公室	实时
定期开展受冲突影响和高风险区域及警示信号识别	联合办公室	12 个月
落实供应商分类管理程序（与亿丰实业联合开展）	联合办公室	12 个月
前往触发警示信号的供应商处开展实地评估（如需要，协调亿丰实业配合推荐）	联合办公室	12 个月
定期开展风险识别与评估并更新风险识别与评估报告	联合办公室	12 个月
定期制定或更新风险管理计划	联合办公室	12 个月
定期组织尽责管理体系内部评估，必要时制定整改计划	联合办公室	12 个月
定期申请外部第三方审核	联合办公室	12 个月
定期编制尽责管理体系进展报告	联合办公室	12 个月
对体系文件归档并保存（不少于 5 年）	联合办公室	实时
督促亿丰实业按《委托加工协议补充协议》相关要求，向其一级供应商发送并回收 KYS 问卷、监管链信息表等尽责管理文件	联合办公室	12 个月
对亿丰实业提交的供应商信息进行警示信号审查，将审查结果书面告知亿丰实业	联合办公室	12 个月
向亿丰实业传达公司《供应商行为守则》《责任合同条款》等文件要求，督促亿丰实业将上述文件发送至其一级供应商并回收签署版本	联合办公室	12 个月

收取并归档亿丰实业提交的供应商信息文件（来源证明、KYS 问卷、受益所有权声明等），保存期限不少于 5 年	联合办公室	实时
如发现警示信号，通知亿丰实业开展强化信息收集及实地评估准备	联合办公室	实时
说明原料运输路线（依据亿丰实业提供的运输路线信息）	联合办公室	12 个月
向亿丰实业传递选择正规运输路线的要求，并督促其书面确认	联合办公室	12 个月
与五矿商会及亿丰实业就负责任采购政策的实施保持沟通	联合办公室	实时
【其他部门职责】		
提供公司管理架构图（包括企业高层管理人员、董事姓名）	综合行政部	12 个月
提供人员聘用及人力资源管理相关工作的证明文件	综合行政部	12 个月
向政府依法、按期缴纳了税收、费用和特许费	财务部	12 个月
依法披露税费信息	财务部	实时
提供批次原料入库记录及物料平衡核算证明文件	生产管理部	实时
提供原料和成品进销存数据	生产管理部	12 个月
出示加工流程和工艺说明	生产管理部	12 个月
提供产品质检报告/化验单	质检部	实时
提供公司安全生产许可证及职业健康安全管理证明文件	安全管理部	12 个月

四、供应商管理

说明：鉴于嘉润与上游供应商之间无直接合同关系，本节所述“供应商管理”分为两个层次：（1）嘉润对委托方（亿丰实业）的管理——通过《委托加工协议补充协议》实施；（2）亿丰实业对其一级供应商的管理——由亿丰实业具体执行，嘉润负责督促和跟踪。

供应商类型	活动内容	负责部门	更新频率
第一层：嘉润对委托方（亿丰实业）的管理			
亿丰实业 （委托方）	依据《委托加工协议补充协议》要求，督促亿丰实业每批次入厂前提供：原产地证书、供应商名称及地址、运输路线说明、随货质检单及运输单据	亿丰实业 联合办公室	每批次
	每年至少一次要求亿丰实业提供：供应商工商注册证明、受益所有权信息、供应商尽责管理合规声明、关键上游企业清单	亿丰实业 联合办公室	12 个月
	如触发警示信号，要求亿丰实业在 30 个工作日内提供强化信息	联合办公室 亿丰实业	实时

	（含实地评估报告）		
	督促亿丰实业指定尽责管理配合负责人，确保其在 5 个工作日内响应嘉润的信息请求	联合办公室	12 个月
	将亿丰实业年度配合情况纳入尽责管理进展报告，如严重不配合则启动《补充协议》第 5.3 条暂停/终止程序	联合办公室	12 个月
第二层：亿丰实业对其一级供应商的管理（嘉润督促执行）			
潜在供应商	由亿丰实业督促潜在供应商填写《供应商尽责管理评估问卷（KYS 问卷）》、签署《供应商行为守则》及《责任合同条款》；如涉及受冲突影响和高风险区域的矿料，须在商议期限内完成实地评估	亿丰实业执行 嘉润督促	有潜在供应商时
既有供应商 （一般供应商） 矿源地位于 中国境内	由亿丰实业定期更新《供应商行为守则》；若通过贸易商采购，还需签署《责任合同条款》、填写《KYS 问卷》；若供应商未填写问卷或信息不完整，亿丰实业通过公开信息搜集方式补充《中国指南》要求的信息	亿丰实业执行 嘉润督促	每年更新
既有供应商 （重点供应商） 矿源地位于 海外	由亿丰实业定期更新《供应商行为守则》；签署《责任合同条款》；填写《KYS 问卷》；填写《矿源地氧化铝原料监管链信息表》；出现尽责管理风险事故时填写《事故表》并及时沟通	亿丰实业执行 嘉润督促	每年更新
风险供应商 触发警示信号	由亿丰实业开展风险识别和评估，开展强化版尽责管理工作，并开展实地评估；嘉润依据亿丰实业提交的评估结果制定风险管理计划并监督落实；如亿丰无法有效整改，嘉润启动暂停接收相关批次加工委托程序	联合办公室 亿丰实业配合	实时

五、触发警示信号的供应商管理

【当前状态】嘉润已依据《中国矿产供应链尽责管理指南》（第二版）及相关标准对供应链开展警示信号桌面审查。截至本计划发布日，嘉润通过对亿丰实业提供的供应商信息进行审查，未发现触发警示信号的情况。

如未来发现触发警示信号的情况，嘉润将采取以下措施：

1. 立即书面通知亿丰实业，要求其在 30 个工作日内提供强化信息（含供应链链条说明、实地评估报告等）；

2. 联合办公室召开专项会议，评估风险等级，启动风险管理计划制定程序；
3. 如风险属于严重侵权或武装团体关联，立即启动暂停接收相关批次加工委托，并要求亿丰实业采取纠正措施；
4. 如亿丰实业在规定期限内无法完成整改，依据《委托加工协议补充协议》第 5.3 条终止相关原料来源的加工委托关系；
5. 将处理情况纳入年度尽责管理进展报告对外公示。

六、利益相关方参与

公司理解并认可在供应链尽责管理中利益相关方参与的重要性。利益相关方包括但不限于：政府部门、上游企业（含委托方及其供应商）、国际或民间组织、社区。公司鼓励利益相关方参与到此项工作中来，具体措施如下：

活动内容	负责部门	更新频率
政府部门		
确认公司及委托方供应商遵守所在国适用的法律法规	法务部	12 个月
积极跟踪供应商合法合规情况，如发现异常，向当地政府反馈	联合办公室	实时
国际或民间组织		
接受来自国际或民间组织的申诉	联合办公室	实时
与中国五矿化工进出口商会保持沟通	联合办公室	实时
委托方（亿丰实业）协同		
定期与亿丰实业召开尽责管理专项会议，共同审查风险管理计划执行情况	联合办公室	12 个月
将尽责管理体系建设进展及时通报亿丰实业，确保双方协同一致	联合办公室	实时
支持亿丰实业提升其供应商尽责管理能力，提供文件模板及填写指引	联合办公室	按需
社区		
接受来自社区的申诉	联合办公室	实时
积极与亿丰实业及其供应商保持沟通，鼓励其尊重所在社区的人权，努力避免、尽量减少、缓解、纠正因其业务而产生的潜在负面影响和风险	联合办公室	12 个月

七、补充评估机制

依据《中国指南》相关要求，实施风险管理计划后，当现实情况或者供应链出现变化时，须对需要缓解的风险进行监测以及补充评估。具体触发补充评估的情形包括：

— 亿丰实业新增上游供应商或变更原料产地；

— 产地国发生政治动荡、冲突升级或制裁名单更新；

— 月度风险碰头会发现重大异常风险信号；

— 申诉机制收到涉及供应链风险的有效申诉；

— 内部评估或第三方审核发现重大缺陷。

触发补充评估时，联合办公室须在 7 个工作日内启动补充评估程序，评估结果须书面报告委员会主任，并视情况修订本风险管理计划。

八、年度风险缓解指标跟踪

联合办公室按季度跟踪以下核心指标，并纳入年度进展报告对外公示：

指标类别	具体指标	本期目标值	跟踪频次
供应商合规	亿丰实业上游供应商尽责管理文件回收率	100%	每季度
文件准时率	亿丰实业按《委托加工协议补充协议》第 3 条提交批次文件的准时率	100%	每批次
风险事件	触发警示信号的事件数量及处置完成率	零触发；如触发，7 个工作日内启动应对	实时监控
人权合规	厂区内部童工/强迫劳动合规自查完成情况	完成年度自查，无违规	每年
申诉处理	通过申诉机制收到并完成处理的申诉数量	100%在规定时限内处理	每季度
培训覆盖率	联合办公室成员及相关部门人员的尽责管理培训覆盖率	100%	每年
高层汇报	向委员会主任提交年度风险跟踪报告	年度完成	每年
CAHRAs 更新	产地 CAHRAs 识别年度更新完成情况	完成年度识别与更新，记录存档	每年

九、周期收尾与复盘（2026 年 4 月）

— 全面复盘 2025 年 5 月 1 日至 2026 年 4 月 30 日全周期供应链风险台账，汇总供应商整改情况、亿丰实业配合情况、风险变动数据；

— 梳理缓解指标完成情况，形成年度铝供应链风险识别与评估报告，上报委员会并对外公示；

— 结合当期全球矿产局势、几内亚等产地风险变化，制定下一周期（2026.5.1—2027.4.30）风险管理计划框架；

— 积极推进与 CCCMC 的合作，申请内审员资质认定，为引入独立外部评估做准备。

十、审批生效

本《2025—2026 年度矿产供应链尽责管理风险管理计划》依据《中国矿产供应链尽责管理指南》（第二版）第 5.3 条（风险预防和缓解）、《OECD 指南》第三版附录二及公司《供应链尽责管理政策》编制，经公司矿产供应链尽责管理委员会审议通过，自 2025 年 5 月 5 日正式生效实施。

新疆嘉润资源控股有限公司 总经理（签字）：__________________ 公章： 日期：2025 年 12 月 5 日	**抄送确认：玛纳斯县亿丰实业有限公司** 授权代表（签字）：__________________ 公章： 日期：2025 年 12 月 5 日

ENGLISH VERSION

Document No.: JR-SCDD-MIT-R-001-2025-V01	**Document Title**: Mineral Supply Chain Due Diligence Management Risk Management Plan	**Effective Date**: December 5, 2025
Prepared By: Supply Chain Due Diligence Management Joint Office	**Reviewed By**: Feng Wenyuan	**Approved By**: Qi Liancheng

Note: This Risk Management Plan is a public document covering the plan period from May 1, 2025 to April 30, 2026, and applies to the mineral supply chain due diligence management system of Xinjiang Jiarun Resources Holding Co., Ltd. ("Jiarun" or "the Company"). As the sole entrusted processor for Manas County Yifeng Industrial Co., Ltd. ("Yifeng Industrial"), the Company has no direct contractual relationship with upstream mines or traders. Risk management activities involving the upstream supply chain must be carried out jointly with Yifeng Industrial: Yifeng Industrial is responsible for risk mitigation work with its Tier 1 suppliers, while Jiarun is responsible for internal control within its plant, for urging and tracking Yifeng Industrial's performance, and for working jointly with Yifeng Industrial to support third-party assessments. Upon issuance, this Plan must be copied to Yifeng Industrial in parallel to ensure coordinated implementation by both parties.

Xinjiang Jiarun Resources Holding Co., Ltd.

Supply Chain Due Diligence Management Risk Management Plan

Plan Period: May 1, 2025 – April 30, 2026

Jiarun has formulated this Risk Management Plan in accordance with the requirements of Step 3 (Risk Prevention and Mitigation) of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition, hereinafter the "OECD Guidance") and the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) Chinese Due Diligence Guidelines for Mineral Supply Chains (Second Edition, hereinafter the "Chinese Guidelines"), as well as the provisions on risk management plans set out in the Company's Supply Chain Due Diligence Management Policy.

I. General Provisions

1.1 Basis for Preparation

This Plan is prepared in accordance with the Chinese Guidelines (Second Edition), the OECD Guidance (Third Edition), the Company's Supply Chain Risk Management Plan Management Procedure, and the Company's Supply Chain Due Diligence Management Policy, to govern the full process of aluminum supply chain risk identification, assessment, control, and tracking during the period from May 1, 2025 to April 30, 2026.

1.2 Management Objectives

To comprehensively prevent and control the four major categories of supply chain risk set out in Annex I of the Chinese Guidelines and Annex II of the OECD Guidance:

— Serious human rights abuses in connection with mineral extraction, transport, or trade;

— Risks related to direct or indirect financing of non-state armed groups;

— Risks related to public or private security forces;

— Risks of bribery, fraudulent misrepresentation of origin, money laundering, or non-compliant payment of government taxes and fees.

II. Development of the Risk Management Plan

In developing this Plan, the Joint Office solicited the views of suppliers and affected stakeholders through the following means:

— Holding a special due diligence management communication meeting with Yifeng Industrial to reach written consensus on risk mitigation strategies, which has been incorporated into the annual implementation assessment of the Supplementary Agreement to the Processing Agreement;

— Sending this document to Tier 1 suppliers and other stakeholders to collect their feedback;

— Collecting input from external stakeholders through the Company's grievance mechanism;

— Following public release of this Plan, allowing no less than 15 working days for affected stakeholders to review and provide feedback, which the Joint Office will collect and assess to determine whether the Plan needs to be revised.

III. Company Management, Warning Signal Management, and Stakeholder Engagement

Activity	Responsible Department	Update Frequency
[Joint Office Responsibilities]		
Formulate and periodically review and revise the Company's Supply Chain Due Diligence Management Policy	Joint Office	Ongoing, to ensure continued validity
Periodically coordinate and convene meetings of the Supply Chain Due Diligence Management Committee	Joint Office	12 months
Periodically review and revise due diligence management	Joint Office	12 months

policies and procedural documents		
Provide relevant training to all units and departments within the Joint Office	Joint Office	Ongoing
Periodically develop, distribute, and consolidate task lists for all units and departments within the Joint Office	Joint Office	12 months
Periodically check grievance emails and maintain the grievance mechanism	Joint Office	Ongoing
Periodically conduct identification of conflict-affected and high-risk areas and warning signals	Joint Office	12 months
Implement the supplier classification management procedure (conducted jointly with Yifeng Industrial)	Joint Office	12 months
Conduct on-site assessments at suppliers triggering warning signals (coordinating with Yifeng Industrial for recommendations as needed)	Joint Office	12 months
Periodically conduct risk identification and assessment and update the risk identification and assessment report	Joint Office	12 months
Periodically develop or update the risk management plan	Joint Office	12 months
Periodically organize internal assessments of the due diligence management system and formulate corrective action plans where necessary	Joint Office	12 months
Periodically apply for external third-party audits	Joint Office	12 months
Periodically prepare due diligence management system progress reports	Joint Office	12 months
Archive and retain system documentation (for no less than 5 years)	Joint Office	Ongoing
Urge Yifeng Industrial, in accordance with the requirements of the Supplementary Agreement to the Processing Agreement, to send KYS questionnaires, chain-of-custody information forms, and other due diligence management documents to its Tier 1 suppliers and collect the completed versions	Joint Office	12 months
Conduct a warning-signal review of the supplier information submitted by Yifeng Industrial and notify Yifeng Industrial of the review results in writing	Joint Office	12 months
Communicate the requirements of the Company's Supplier Code of Conduct, Responsible Sourcing Contract Clauses, and other documents to Yifeng Industrial, and urge Yifeng Industrial to send the above documents to its Tier 1 suppliers and collect signed versions	Joint Office	12 months
Receive and archive supplier information documents submitted by Yifeng Industrial (proof of origin, KYS questionnaires, beneficial ownership declarations, etc.), retained for no less than 5 years	Joint Office	Ongoing

Where a warning signal is identified, assist the Joint Office in notifying Yifeng Industrial to prepare for enhanced information collection and on-site assessment	Joint Office	Ongoing
Describe raw material transportation routes (based on transportation route information provided by Yifeng Industrial)	Joint Office	12 months
Communicate the requirement to use legitimate transportation routes to Yifeng Industrial and urge its written confirmation	Joint Office	12 months
Maintain communication with the London Metal Exchange and Yifeng Industrial on the implementation of responsible sourcing policy	Joint Office	Ongoing
[Other Departments' Responsibilities]		
Provide the Company's management structure chart (including the names of senior management and directors)	General Administration Department	12 months
Provide supporting documentation for staff recruitment and human resources management work	General Administration Department	12 months
Pay taxes, fees, and royalties to the government lawfully and on schedule	Finance Department	12 months
Disclose tax and fee information as required by law	Finance Department	Ongoing
Provide batch raw material inbound records and mass balance accounting supporting documentation	Production Management Department	Ongoing
Provide raw material and finished product inventory (in/out) data	Production Management Department	12 months
Present processing workflow and process descriptions	Production Management Department	12 months
Provide product quality inspection reports/test reports	Quality Inspection Department	Ongoing
Provide the Company's work safety production license and occupational health and safety supporting documentation	Safety Protection Department	12 months

IV. Supplier Management

Note: Given that Jiarun has no direct contractual relationship with upstream suppliers, "supplier management" as described in this section operates at two levels: (1) Jiarun's management of the entrusting party (Yifeng Industrial) — implemented through the Supplementary Agreement to the Processing Agreement; and (2) Yifeng Industrial's management of its Tier 1 suppliers — carried out by Yifeng Industrial directly, with Jiarun responsible for urging and tracking.

Supplier Type	Activity	Responsible Department	Update Frequency
Tier 1: Jiarun's Management of the Entrusting Party (Yifeng Industrial)			

Yifeng Industrial (Entrusting Party)	In accordance with the requirements of the Supplementary Agreement to the Processing Agreement, urge Yifeng Industrial to provide, prior to each batch's entry into the plant: certificate of origin, supplier name and address, description of transportation route, quality inspection certificate accompanying the goods, and transportation documents	Yifeng Industrial Joint Office	Per batch
	Require Yifeng Industrial, at least once a year, to provide: supplier business registration certificate, beneficial ownership information, supplier due diligence compliance declaration, and list of key upstream entities	Yifeng Industrial Joint Office	12 months
	Where a warning signal is triggered, require Yifeng Industrial to provide enhanced information (including an on-site assessment report) within 30 working days	Joint Office Yifeng Industrial	Ongoing
	Urge Yifeng Industrial to designate a due diligence management liaison to ensure a response to Jiarun's information requests within 5 working days	Joint Office	12 months
	Incorporate Yifeng Industrial's annual level of cooperation into the due diligence management progress report; where cooperation is seriously inadequate, initiate the suspension/termination procedure under Article 5.3 of the Supplementary Agreement	Joint Office	12 months
Tier 2: Yifeng Industrial's Management of Its Tier 1 Suppliers (Urged and Overseen by Jiarun)			
Prospective Suppliers	Yifeng Industrial urges prospective suppliers to complete the Supplier Due Diligence Assessment Questionnaire (KYS Questionnaire) and to sign the Supplier Code of Conduct and the Responsible Sourcing Contract Clauses; where minerals from conflict-affected or high-risk areas are involved, an on-site assessment must be completed	Implemented by Yifeng Industrial Urged by Jiarun	As prospective suppliers arise

	within the agreed timeframe		
Existing Suppliers (General Suppliers) Mineral Origin Located Within China	Yifeng Industrial periodically updates the Supplier Code of Conduct; where procurement is made through a trader, the Responsible Sourcing Contract Clauses must also be signed and the KYS Questionnaire completed; where a supplier has not completed the questionnaire or the information is incomplete, Yifeng Industrial supplements the information required under the Chinese Guidelines through publicly available sources	Implemented by Yifeng Industrial Urged by Jiarun	Updated annually
Existing Suppliers (Key Suppliers) Mineral Origin Located Overseas	Yifeng Industrial periodically updates the Supplier Code of Conduct; signs the Responsible Sourcing Contract Clauses; completes the KYS Questionnaire; completes the Chain of Custody Information Form for Alumina Raw Material by Mine of Origin; and, in the event of a due diligence risk incident, completes an Incident Form and communicates it promptly	Implemented by Yifeng Industrial Urged by Jiarun	Updated annually
At-Risk Suppliers Triggering a Warning Signal	Yifeng Industrial conducts risk identification and assessment, carries out enhanced due diligence management, and conducts an on-site assessment; Jiarun formulates a risk management plan based on the assessment results submitted by Yifeng Industrial and oversees its implementation; where Yifeng Industrial is unable to complete effective corrective action, Jiarun initiates the procedure to suspend acceptance of processing for the affected batches	Joint Office With Yifeng Industrial's Cooperation	Ongoing

V. Management of Suppliers Triggering Warning Signals

[Current Status] Jiarun has conducted a desktop review of warning signals across its supply chain in accordance with the Chinese Guidelines for Due Diligence in Mineral Supply Chains (Second Edition) and related standards. As of the date of issuance of this Plan, Jiarun's review of the supplier information provided by Yifeng Industrial has identified no instances triggering warning signals.

Should any instance triggering a warning signal be identified in the future, Jiarun will take the following measures:

6. Immediately notify Yifeng Industrial in writing, requiring it to provide enhanced information (including supply chain mapping and on-site assessment reports) within 30 working days;
7. The Joint Office will convene a special meeting to assess the risk level and initiate the risk management plan development procedure;
8. Where the risk involves serious rights violations or is linked to armed groups, immediately suspend acceptance of processing for the affected batches and require Yifeng Industrial to take corrective action;
9. Where Yifeng Industrial fails to complete corrective action within the specified timeframe, terminate the processing relationship for the relevant material source pursuant to Article 5.3 of the Supplementary Agreement to the Processing Agreement;
10. Disclose the handling of the matter in the annual due diligence management progress report made available to the public.

VI. Stakeholder Engagement

The Company understands and recognizes the importance of stakeholder engagement in supply chain due diligence management. Stakeholders include, but are not limited to: government authorities, upstream entities (including the entrusting party and its suppliers), international or civil society organizations, and communities. The Company encourages stakeholders to participate in this work, through the following specific measures:

Activity	Responsible Department	Update Frequency
Government Authorities		
Confirm that the Company and the entrusting party's suppliers comply with applicable laws and regulations of their respective countries	Legal Department	12 months
Actively track suppliers' legal and regulatory compliance and report any irregularities to local government authorities	Joint Office	Ongoing
International or Civil Society Organizations		
Accept grievances from international or civil society organizations	Joint Office	Ongoing
Maintain communication with CCCMC	Joint Office	Ongoing
Coordination with the Entrusting Party (Yifeng Industrial)		
Periodically convene special due diligence management meetings with Yifeng Industrial to jointly review implementation of the risk management plan	Joint Office	12 months

Promptly communicate progress on due diligence management system development to Yifeng Industrial to ensure coordination between the two parties	Joint Office	Ongoing
Support Yifeng Industrial in strengthening its supplier due diligence management capacity by providing document templates and completion guidance	Joint Office	As needed
Communities		
Accept grievances from communities	Joint Office	Ongoing
Actively maintain communication with Yifeng Industrial and its suppliers, encouraging them to respect the human rights of local communities and to work to avoid, minimize, mitigate, and remediate potential adverse impacts and risks arising from their operations	Joint Office	12 months

VII. Supplementary Assessment Mechanism

In accordance with the relevant requirements of the Chinese Guidelines, once the Risk Management Plan has been implemented, risks requiring mitigation must be monitored and subject to supplementary assessment whenever actual circumstances or the supply chain change. Circumstances that trigger a supplementary assessment include:

— Yifeng Industrial adds a new upstream supplier or changes a raw material origin;

— Political unrest, escalating conflict, or an update to a sanctions list occurs in a country of origin;

— A material abnormal risk signal is identified at a monthly risk review meeting;

— A valid grievance concerning supply chain risk is received through the grievance mechanism;

— An internal assessment or third-party audit identifies a material deficiency.

Where a supplementary assessment is triggered, the Joint Office must initiate the supplementary assessment procedure within 7 working days, report the assessment results in writing to the Committee Chair, and revise this Risk Management Plan as appropriate.

VIII. Annual Tracking of Risk Mitigation Indicators

The Joint Office tracks the following core indicators on a quarterly basis and includes them in the annual progress report made available to the public:

Indicator Category	Specific Indicator	Target for This Period	Tracking Frequency
Supplier Compliance	Collection rate of due diligence management	100%	Quarterly

	documents from Yifeng Industrial's upstream suppliers		
Document Timeliness	Timeliness rate of batch documents submitted by Yifeng Industrial under Article 3 of the Supplementary Agreement to the Processing Agreement	100%	Per batch
Risk Incidents	Number of incidents triggering a warning signal and rate of completed handling	Zero incidents; if triggered, response initiated within 7 working days	Continuous monitoring
Human Rights Compliance	Completion of internal plant-site self-inspection for child labor/forced labor compliance	Annual self-inspection completed, no violations	Annual
Grievance Handling	Number of grievances received and resolved through the grievance mechanism	100% handled within the specified timeframe	Quarterly
Training Coverage	Due diligence management training coverage for Joint Office members and relevant department personnel	100%	Annual
Senior Management Reporting	Submission of the annual risk tracking report to the Committee Chair	Completed annually	Annual
CAHRAs Update	Completion of the annual update of CAHRAs identification for origins	Annual identification and update completed, records archived	Annual

IX. Period Close-Out and Review (April 2026)

— Conduct a comprehensive review of the supply chain risk register for the full period from May 1, 2025 to April 30, 2026, consolidating supplier corrective action status, Yifeng Industrial's level of cooperation, and risk-change data;

— Review completion of mitigation indicators and produce the annual aluminum supply chain risk identification and assessment report, to be submitted to the Committee and disclosed to the public;

— Taking into account the prevailing global minerals situation and risk changes at origins such as Guinea, formulate the risk management plan framework for the next period (May 1, 2026 – April 30, 2027);

— Actively advance cooperation with CCCMC, apply for internal auditor qualification, and prepare for the introduction of an independent external assessment.

X. Approval and Effectiveness

This 2025–2026 Mineral Supply Chain Due Diligence Management Risk Management Plan has been prepared in accordance with Article 5.3 (Risk Prevention and Mitigation) of the Chinese Guidelines for Due Diligence in Mineral Supply Chains (Second Edition), Annex II of the OECD Guidance (Third Edition), and the Company's Supply Chain Due Diligence Management Policy. It has been reviewed and approved by the Company's Mineral Supply Chain Due Diligence Management Committee and takes formal effect as of May 5, 2025.

Xinjiang Jiarun Resources Holding Co., Ltd. General Manager (Signature): ________________ Company Seal: Date: December 5, 2025	**Copy to and Confirmed by: Manas County Yifeng Industrial Co., Ltd.** Authorized Representative (Signature): ________________ Company Seal: Date: December 5, 2025