

## 负责任矿产采购政策

### Responsible Mineral Procurement Policy

认识到在“受冲突影响和高风险区域”从事矿产资源开采、交易、处理、出口存在可能造成重大不利影响的的风险，并认识到我们有尊重人权、不助长冲突和不对环境和社会产生不利影响的义务，我们承诺采纳并广泛传播《中国矿产供应链尽责管理指南》相关内容，并将其纳入到与供应商签订的合同和协议之中。这一政策为矿产供应链全过程涉及冲突敏感的采购活动以及供应商提高风险意识提供参考。我们承诺不从事任何会为冲突提供资助的活动，承诺遵守联合国相关制裁决议，或者在适用情况下，遵守执行此类决议的国内法律，并尊重《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)有关信息公开的建议。

Recognizing the risk of significant adverse impacts associated with mining, trading, processing, and exporting mineral resources in “conflict-affected and high-risk areas” and our obligations to respect human rights, not to contribute to conflict, and not to have an adverse impact on the environment and society, we are committed to adopting and broadly disseminating the content of the “Due Diligence Management Guidance for China’s Mineral Supply Chains” and incorporating it into our contracts and agreements with suppliers. We are committed to adopting and widely disseminating the China Mineral Supply Chain Due Diligence Guidance and incorporating it into our contracts and agreements with suppliers. This policy informs conflict-sensitive procurement activities throughout the mineral supply chain and supplier risk awareness. We are committed to not engaging in any conflict-financing activities, to complying with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions, and to respecting the recommendations of the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Ore from Conflict-Affected and High-Risk Areas (third edition) with regard to disclosure of information.

为此，我们承认在商业活动中识别并避免以下风险：

We recognize the need to identify and avoid the following risks in our business activities：

#### 一、与矿产开采、运输、或贸易有关的严重侵权行为

Seerious violations related to mineral extraction, transportation, or trade

在“受冲突影响和高风险区域”开展采购或经营活动时，我们既不会容忍也不会以任何方式获利于、帮助或便利任何一方实施以下行为：

- a. 任何形式的酷刑，残忍、不人道和有辱人格的待遇；
- b. 任何形式的强迫或强制劳动（强迫或强制劳动是指以惩罚作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务）；
- c. 最恶劣形式的童工
- d. 其他严重侵犯和践踏人权的行为，如普遍的性暴力行为；
- e. 战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪。

When sourcing or operating in “conflict-affected and high-risk areas”, we will neither tolerate nor in any way benefit, aid or facilitate any of the following acts by any party.

- a. Any form of torture, cruel, inhuman and degrading treatment.
- b. Any form of forced or compulsory labor (forced or compulsory labor is defined as labor or services extracted from any individual under the threat of punishment and not voluntarily provided by that individual) ;
- c. The worst forms of child labor
- d. Other gross violations and abuses of human rights, such as widespread sexual violence.
- e. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

#### **对严重侵权行为的风险缓解策略 Risk mitigation strategies for grave violations**

如果我们有合理理由认为该风险存在，即上游供应商正从实施上述严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或终止与该供应商的合作。

If we have reasonable grounds to believe that there is a risk that an upstream supplier is purchasing from, or is associated with, any of the parties committing the serious infringements described above, we will immediately suspend or terminate our cooperation with that supplier.

#### **二、关于直接或间接支持非国家武装团体 On direct or indirect support to non-State armed groups**

我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括且不限于从非国家武装团体或其关联方”购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。

We will not tolerate any direct or indirect support to non-State armed groups through the extraction, transportation, trade, handling or export of minerals. Direct or indirect support to non-State armed groups through mineral extraction, transportation, trade, handling or export includes, but is not limited to, the purchase of minerals from, payment to, or other provision of logistical support or equipment to non-State armed groups or their affiliates.

这些武装团体或关联方可能存在如下侵权行为：

- a. 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链上游行为主体；并/或
- b. 在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产，并/或
- c. 对中间商、出口企业、或国际贸易商非法征税或勒索。

These armed groups or affiliates may commit the following abuses.

- a. Illegally controlling mine sites, or otherwise controlling transportation routes, mineral trading points, and upstream actors in the supply chain. and/or
- b. Unlawfully taxing or extorting money or minerals at the entrance to a mine site, along transportation routes, or at the point of sale of minerals ; and/or
- c. Unlawfully taxing or extorting money or minerals from intermediaries, exporters, or international traders.

### **对向非国家武装团体提供直接或间接支持的风险缓解策略 Risk mitigation strategies for direct or indirect support to non-State armed groups**

如果我们有理由认为，上游供应商从向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或终止与该供应商的合作。

We will immediately suspend or terminate cooperation with an upstream supplier if we have reason to believe that the supplier procures from or has a relationship with any party that provides direct or indirect support to non-State armed groups.

### **三、关于公共或私人安全武装 On public or private security arms**

我们杜绝向非法控制矿址、运输路线以及供应链上游行为主体，在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易商非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

我们认可，矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

在我们或我们供应链上的任何企业与公共或私人安全武装签订合约的情况下我们承诺 或将规定，这类安全武装需被公认的处理公共或私人安全武装的国际标准和指导性文件所认可。尤其是，我们将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

我们将支持或采取措施与中央或地方政府、国际组织和民间社会组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

我们将支持或采取措施与当地政府、国际组织和民间社会组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响，尤其是对手工采矿矿工的负面影响。

We eliminate the provision of direct or indirect support to public or private security forces that illegally control mining sites, transportation routes and actors upstream in the supply chain, illegally tax or demand money or minerals at the entrance to mining sites, along transportation routes or at the point of trade in minerals, or illegally tax or extort money or minerals from intermediaries, exporters or international traders.

Direct or indirect support from public or private security forces that illegally tax or extort money or minerals from intermediaries, exporters or international traders.

We recognize that the role of public or private security forces on and/or around mining sites and/or along transportation routes is solely to uphold the rule of law, including by safeguarding human rights, protecting miners, the security of equipment and facilities, and protecting mining sites or transportation routes so that legitimate mining and trade are not disrupted.

Where we, or any business in our supply chain, contract with public or private security forces, we are committed to, or will require, that such security forces be recognized by accepted international standards and guidance documents dealing with public or private security forces. In particular, we will support or take steps to apply screening policies to ensure that individuals or security forces known to have committed serious human rights abuses are not recruited.

We will support or take steps to work with central or local governments, international organizations and civil society organizations to find workable solutions on how to improve transparency, proportionality and accountability in the cost of armed security for public safety.

We will support or take measures to engage with local governments, international organizations and civil society organizations to avoid or minimize the negative impacts of the presence of armed

public or private security forces at mining sites on vulnerable groups, particularly artisanal miners.

#### **对公共或私人安全武装的风险缓解策略Risk mitigation strategies for public or private security arms**

如果我们发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，我们将暂时中止或终止与上游供应商的合作。

If we find that such risks exist to some extent, we will immediately develop, adopt and implement risk management programs for upstream suppliers and other stakeholders, depending on the company's specific position in the supply chain, so that the risk of providing direct or indirect support to public or private security forces can be contained or mitigated. If the risk management program has been in place for six months and is not working, we will suspend or terminate our cooperation with the upstream supplier.

#### **四、关于行贿受贿及矿产原产地的欺诈性失实陈述Fraudulent misrepresentation of bribery and origin of minerals**

我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

We will not offer, promise, carry out or demand any bribe and will resist the temptation to pay bribes for the purpose of concealing or falsifying the origin of minerals and misrepresenting the taxes, fees and royalties due to the Government for activities such as mining, trading, processing, transporting, exporting and so on.

#### **五、关于洗钱Money laundering**

如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

If we have reason to believe that there is a risk of money laundering arising from or related to the extraction, trade, handling, transportation or export of minerals obtained through illegal taxation or extortion at the entrance to a mine site, along a transportation route, or at a place

where upstream suppliers trade in minerals, we will support or take measures to contribute to the effective elimination of money laundering.

#### **六、关于向政府支付的税收、费用及特许费** **On taxes, fees and royalties paid to the Government**

我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照所在国关于向政府部门缴纳的税费信息公开的要求对此类支付进行披露。

We will ensure that all legitimate taxes, fees and royalties associated with the extraction, trade and export of minerals from conflict-affected and high-risk areas are paid to the government and commit to disclosing such payments based on the company's position in the supply chain and in accordance with the requirements of the country in which it is located for the disclosure of information on taxes and fees paid to the government.

**对行贿受贿及矿产原产地的欺诈性失实陈述、洗钱及向政府支付的税收、费用、特许费的风险缓解策略**  
**Risk mitigation strategies for bribery and fraudulent misrepresentation of the origin of minerals, money laundering, and taxes, fees, and royalties paid to governments.**

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的的目的，对绩效进行改善或跟踪。若风险降低措施六个月未起作用的，我们将暂时中止或终止与上游供应商的合作。

Depending on the company's specific position in the supply chain, we commit to work with suppliers, central or local government authorities, international organizations, civil society and affected third parties, as appropriate, to improve or track performance with the aim of taking significant measures to prevent or mitigate negatively impacted risks within a reasonable timeframe. If the risk reduction measures have not worked for six months, we will temporarily suspend or terminate the cooperation with the upstream supplier.

#### **七、关于职业健康安全** **About Occupational Health and Safety**

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何为其直接和/或间接雇员和/或在其生产现场的任何人员提供威胁到生命的职业健康与安全环境的一方，或从该方处采购或与之存在关联。

When sourcing or manufacturing in high-risk areas, we will not profit from, assist, facilitate, source from or be associated with any party that provides a life-threatening occupational health

and safety environment for its direct and/or indirect employees and/or any personnel at its manufacturing sites.

#### **对职业健康安全风险的缓解策略 Risk mitigation strategies for OHS**

如果我们有合理理由认为上游供应商如上述所定义的威胁到生命的职业健康和安全环境的任何一方采购或与之存在关联，我们将立即中止或终止与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier such as any party purchasing or associated with a life-threatening occupational health and safety environment as defined above, we will immediately suspend or terminate our cooperation with that supplier.

#### **八、关于环境保护 On environmental protection**

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何给周围土壤、空气和水的状况造成重大不利影响，严重违反当地相关法律法规的一方或从该处采购或与之存在关联。我们将支持或采取措施定期评估、降低采矿对土壤、空气、水造成的不利影响。

When sourcing or producing in high-risk areas, we will not benefit from, assist, or facilitate sourcing from or association with any party that causes significant adverse impacts on the condition of the surrounding soil, air, and water, and that is in material breach of relevant local laws and regulations. We will support or take steps to periodically assess and minimize the adverse effects of mining on soil, air and water.

#### **对环境保护的风险缓解策略 Risk mitigation strategies for environmental protection**

如果我们有合理理由认为存在此类风险，我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低侵害土地权利、引发重大不利环境影响或与当地文化遗产破坏相关的具体风险。若风险管理计划六个月内未取得明显效果，我们将中断或终止与上游供应商的合作。

If we have reasonable grounds to believe that such risks exist, we will immediately develop, adopt and implement a risk management program with our suppliers and other stakeholders, depending on the company's specific location in the supply chain, to prevent or mitigate specific risks of infringement of land rights, significant adverse environmental impacts or damage to local cultural heritage. If the risk management program does not achieve tangible results within six months, we will interrupt or terminate the cooperation with the upstream supplier.

#### **九、政策传播 Policy dissemination**

本政策适用于山东睿思精密工业有限公司及其控股所有子公司以及供应链。

本公司将本政策告知供应商，并要求供应商将此政策传达给其上游，以确保本公司的 供应链中不出现助长冲突和侵犯人权(尤其是儿童权益)的情形。

This policy applies to Shandong Raystek Precision Industrial Co., Ltd and all of its controlled subsidiaries as well as its supply chain.

The Company communicates this policy to its suppliers and requests that suppliers communicate this policy to their upstreams to ensure that situations that contribute to conflict and human rights abuses (especially children's rights) do not occur in the Company's supply chain.

#### **十、责任矿物范围Scope of responsible minerals**

冲突矿产：在刚果及其周围国家和地区境内的锡（Sn）、钨（WU）、钽（Ta）、金（Au）金属矿物。这些地区的大部分采矿活动与冲突的武装组织有关（资助），导致该地区长期不稳定、开采已造成严重的人权与环保问题。这4种金属矿物简称为3TG。

责任（相关）矿产：钴、云母、锂、镍、石墨、铜、铝或我司通知的任何其他矿物。

Conflict minerals : Tin (Sn), tungsten (WU), tantalum (Ta), and gold (Au) metallic minerals in the Congo and surrounding countries and regions. Much of the mining activity in these areas is associated with (financed by) armed groups in conflict, leading to chronic instability in the region and serious human rights and environmental concerns as a result of the mining. These four metallic minerals are referred to as the 3TGs.

Responsible (relevant) minerals : Cobalt, Mica, Lithium, Nickel, Graphite, Copper, Aluminum or any other minerals as notified by our Division.