

# 英特派铂业股份有限公司

## ITP Co., Ltd.

### 铂金供应链负责任采购政策

#### Responsible Sourcing Policy for Platinum Supply Chain

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，英特派铂业股份有限公司承诺采纳并广泛传播《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》相关内容，并将其纳入到与供应商签订的合同和协议之中。这一政策为铂金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。本政策涵盖的物料类型包括：铂合金相关的物料，适用于英特派铂业股份有限公司及其分公司，铂合金供应商。

Recognizing the potential risks of significant adverse impacts associated with the extraction, trading, processing, and export of mineral resources from “conflict-affected and high-risk areas,” and acknowledging our responsibility to uphold human rights, prevent the escalation of conflicts, and mitigate any negative environmental and social effects, ITP Co., Ltd. is committed to adopting and promoting the principles outlined in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. These principles will be integrated into the contracts and agreements with our suppliers. This policy serves as a reference for all conflict-sensitive procurement activities throughout the platinum supply chain, as well as for raising suppliers’ awareness of risk. We are committed to refraining from engaging in any activities that may finance conflicts, and to complying with relevant United Nations sanctions resolutions, or, where applicable, the domestic laws enforcing such resolutions. The materials covered by this policy include those related to platinum alloys and apply to ITP Co., Ltd., its subsidiaries, and platinum alloy suppliers.

#### 第一类 与严重侵犯人权有关的风险和风险缓解策略

##### I Risks Related to Serious Violations of Human Rights and Risk Mitigation Strategies

##### 第一条 与矿产开采、运输、或贸易有关的严重侵权行为的风险

##### Article 1 Risks of Serious Violations of Rights Related to Mineral Extraction, Transport, 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、协助或便利任何一方实施。

In conducting procurement or business activities in conflict-affected and high-risk areas, we will neither tolerate nor profit from, nor will we assist, support, or facilitate any party involved in such actions.

1. 任何形式的酷刑，残忍、不人道和有辱人格的待遇；

1. Any form of torture, cruel, inhuman, or degrading treatment;

2. 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；

2. Any form of forced or compulsory labor. Forced or compulsory labor refers to any labor or services extracted from an individual under the threat of punishment, and not voluntarily provided by that person;

3. 最恶劣形式的童工；

3. The worst forms of child labor;

4. 其他严重侵犯和践踏人权的行为，如普遍的性暴力行为；

4. Other serious violations and abuses of human rights, such as widespread sexual violence;

5. 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。

5. War crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

## 第二条 关于童工的风险

### Article 2 The Risks of Child Labor

在受冲突影响和高风险区域开展采购或经营活动时，我们将不会雇佣、获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业而提供便利或跟其采购或与其有关联。如果东道国没有相关的法律或法规规定，最低工作年龄为 16 周岁。

In conducting procurement or business operations in conflict-affected and high-risk areas, we will not employ, benefit from, assist, or facilitate the employment of children below the minimum working age set by the laws or regulations of the host country. Additionally, we will not engage in procurement from or form associations with entities involved in such practices. Where the host country has no specific laws or regulations, the minimum working age will be considered as 16 years old.

## 第三条 与严重侵犯人权有关的风险缓解策略

### Article 3 Risk Mitigation Strategies Related to Serious Violations of Human Rights

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，或者雇佣童工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 such a risk exists—specifically, if an upstream supplier is engaged in any of the aforementioned serious violations or is sourcing from or associated with any party that employs child labor—we will promptly suspend or terminate our cooperation with that supplier.

## 第二类 与冲突有关的风险和风险缓解策略

### II Risks Related to Conflicts and Risk Mitigation Strategies

#### 第一条 关于直接或间接支持非国家武装团体的风险

##### Article 1 Risks Related to the Direct or Indirect Support of 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。这些武装团体或关联方可能存在如下侵权行为：

We will not tolerate any direct or indirect support to non-state armed groups through mining, transportation, trade, processing, or export of minerals. Providing direct or indirect support to non-state armed groups through mining, transportation, trade, processing, or export includes, but is not limited to, purchasing minerals from non-state armed groups or their affiliates, making payments to them, or otherwise providing logistical support or equipment to them. These armed groups or affiliates may be involved in the following violations:

1. 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
1. Illegally controlling mining sites, or otherwise controlling transportation routes, mineral trading points, and upstream actors in the supply chain; and/or
2. 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
2. Illegally taxing or extorting money or minerals at mining site entrances, along transportation routes, or at mineral trading points; and/or
3. 对中间商、出口企业、或国际贸易商非法征税或勒索。
3. Illegally taxing or extorting intermediaries, export companies, or international traders.

#### 第二条 直接或间接支持非国家武装团体的风险缓解策略

##### Article 2 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。

If we have reasons to believe that an upstream supplier is procuring from or has any relationship with parties providing direct or indirect support to non-state armed groups, we will immediately suspend or terminate our cooperation with that supplier.

### 第三条 关于公共或私人安全武装的风险

#### Article 3 Risks Related to Public or Private Security Forces

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。

We prohibit providing direct or indirect support to public or private security forces that illegally control mining sites, transportation routes, or upstream agents in the supply chain, illegally tax or extort money or minerals at mining site entrances, along transportation routes, or at mineral trading points, or illegally tax or extort intermediaries, export companies, or international traders.

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。

We acknowledge that the role of public or private security forces at mining sites and/or surrounding areas and/or along transportation routes is solely to uphold the rule of law, including safeguarding human rights, protecting miners, equipment, and facilities, and securing mining sites or transportation routes to ensure that legitimate mining and trade are not disrupted.

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。

In the event that any of our companies or those in our supply chain enter into contracts with public or private security forces, we commit to or will stipulate that such security forces must comply with internationally recognized standards and guidelines for handling public or private security forces. In particular, we will support or take measures to implement screening policies to ensure that individuals or security forces known to have committed serious violations of human rights are not hired.

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。

We will support or take measures to cooperate with central or local governments, international organizations, and civil society organizations to find feasible solutions on how to improve the transparency, proportionality, and accountability of public security force security costs.

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 will support or take measures to interact with local governments, international organizations, and civil society organizations to avoid or minimize the negative impact that the stationing of public or private security forces at mining sites may have on vulnerable groups, especially on artisanal miners.

#### 第四条 关于公共或私人安全武装的风险缓解策略

##### Article 4 Risk Mitigation Strategies for Public or Private Security Forces

如果我们有合理理由认为供应链中存在上述风险，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，从而使该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 have reasonable grounds to believe that the above risks exist within the supply chain, we will immediately develop, adopt, and implement an upstream supplier and other stakeholder risk management plan, based on the specific position of the company in the supply chain, to contain or reduce the risk. If the risk management plan has not been effective after six months of implementation, we will temporarily suspend or terminate cooperation with the upstream supplier.

#### 第三类 与治理有关的风险和风险缓解策略

### III Governance-Related Risks and Risk Mitigation Strategies

#### 第一条 关于行贿受贿及矿产原产地的欺诈性失实陈述风险

##### Article 1 Risks Related to Bribery and Corruption, and Fraudulent Misrepresentation of Mineral Origin

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, give, or demand any bribe, and we resist the temptation to bribe in order to conceal or falsify the origin of minerals, or to underreport taxes, fees, and royalties that should be paid to the government for activities such as mineral extraction, trade, processing, transportation, and export.

#### 第二条 关于洗钱的风险

##### Article 2 Risks Related to 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 reasons to believe that there are money laundering risks associated with minerals obtained through illegal taxation or extortion at mining site entrances, along transportation routes, or at upstream suppliers' mineral trading points, we will support or take measures to contribute to the effective elimination of money laundering activities.

#### 第三条 关于向政府支付的税收、费用及特许费的风险

##### Article 3 Risks Related to 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 the payment of all legitimate taxes, fees, and royalties to the government related to mining, trade, and export of minerals from conflict-affected and high-risk areas. We also commit to disclosing such payments in accordance with the requirements of the country in which the company

operates, based on its position in the supply chain and the transparency requirements for tax and fee payments to government authorities.

#### 第四条 关于与治理有关的风险缓解策略

#### Article 4 Governance-Related Risk Mitigation Strategies

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风险的目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将暂时中止或终止与上游供应商的合作。对采用风险管理计划后需要降低的风险，企业应额外进行风险评估。若风险管理计划六个月内未取得明显效果，行贿、受贿及对矿产产地进行欺诈性失实陈述、洗钱、以及向政府缴纳税款、费用、特许费等行为的风险未能得到遏制或降低的话，企业应暂时停止或中断与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明贸易关系恢复之前改进工作所应达到的绩效目标。

Based on the specific position of the company in the supply chain, we commit to cooperating with suppliers, central or local government authorities, international organizations, civil society, and affected third parties as appropriate, with the aim of taking significant measures within a reasonable timeframe to prevent or reduce risks with negative impacts, and to improve or track performance. If the risk mitigation measures are ineffective, we will temporarily suspend or terminate cooperation with upstream suppliers. For risks that need to be reduced after adopting a risk management plan, the company should conduct additional risk assessments. If the risk management plan does not show significant results within six months and risks such as bribery, corruption, fraudulent misrepresentation of mineral origin, money laundering, and failure to pay taxes, fees, and royalties to the government are not contained or reduced, the company should temporarily suspend or interrupt cooperation with the supplier for at least three months. During this suspension, the risk management plan should be revised, specifying the performance goals to be achieved for improvements before trade relations can be resumed.

#### 第四类 与其他人权以及环境保护相关的风险和风险缓解策略

#### IV Risks Related to Other Human Rights and Environmental Protection, and Risk Mitigation Strategies

##### 第一条 关于职业健康和安全

#### Article 1 Occupational Health and Safety

在进行商业活动中，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影响矿工、直接和间接雇员的身心健康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。

In our business activities, we will not profit from, assist, or facilitate any party that provides occupational health and safety environments that impact the physical and mental health of miners, direct and/or indirect employees, or any personnel at their production sites, nor will we procure from or have any association with such parties.

## 第二条 关于歧视

### Article 2 Discrimination

在进行商业活动中，我们不会与任何存在歧视行为的供应商进行合作，包括基于性别、种族、宗教、年龄、残疾或其他身份特征的歧视。我们不会从该类企业处采购或与之建立关联，确保我们的商业活动促进平等和包容。

In our business activities, we will not cooperate with any suppliers involved in discriminatory practices, including discrimination based on gender, race, religion, age, disability, or other identity characteristics. We will not procure from or establish associations with such companies, ensuring that our business activities promote equality and inclusion.

## 第三条 关于自由结社

### Article 3 Freedom of Association

在进行商业活动中，我们不会与任何限制员工自由结社权利的供应商进行合作，包括阻碍员工组织工会或参与集体谈判的行为。我们不会从该类企业处采购或与之建立关联，确保员工能够自由表达其利益和需求。

In our business activities, we will not cooperate with any suppliers that restrict employees' right to freedom of association, including actions that obstruct employees from organizing unions or engaging in collective bargaining. We will not procure from or establish associations with such companies, ensuring that employees can freely express their interests and needs.

## 第四条 关于社区生活，包括土著居民的生活

### Article 4 Community Life, including the Life of Indigenous Residents

在进行商业活动中，我们不会与任何对社区生活、特别是土著居民的权利和文化造成负面影响的供应商进行合作，包括侵犯其土地、资源或文化遗产的行为。我们不会从该类企业处采购或与之建立关联，确保尊重和保护社区的生活方式。

In our business activities, we will not cooperate with any suppliers that have a negative impact on community life, especially the rights and culture of indigenous residents, including actions that infringe upon their land, resources, or cultural heritage. We will not procure from or establish associations with such companies, ensuring respect for and protection of the community's way of life.

## 第五条 关于环境保护

### Article 5 Environmental Protection

在进行商业活动中，我们不会从任何对周围土壤、空气和水造成重大不利影响的行为中获利，也不会协助或便利任何严重违反当地相关法律法规的一方，或与其进行采购或建立关联。避免废渣、废水、废气排放对水体、土壤、空气的污染。对野生动植物资源和自然地质地貌景观的破坏、危及公民健康和财产损害。

In our business activities, we will not profit from any actions that cause significant adverse effects on the surrounding soil, air, and water, nor will we assist or facilitate any party that seriously violates local laws and regulations, or procure from or establish associations with them. We will avoid pollution of water,

soil, and air caused by waste, wastewater, and emissions. We will also prevent damage to wildlife resources, natural geological landscapes, and threats to public health and property.

## 第六条 风险缓解策略

### Article 6 Risks Mitigation Strategies

如果我们有合理理由认为供应链中存在上述风险，将立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使该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 have reasonable grounds to believe that the above risks exist within the supply chain, we will immediately make, adopt, and implement a risk management plan for upstream suppliers and other stakeholders to contain or reduce the risk. If the risk management plan has not been effective after six months of implementation, we will temporarily suspend or terminate cooperation with the upstream supplier.

为了确保上述风险的充分识别，我公司承诺并确保：

In order to ensure the full identification of the above risks, our Company promises and ensures that:

1、委任负责任供应链的合规风险总监以及合规风险专员负责铂金的风险识别和管理。

1. The appointed Compliance Risk Director and Compliance Risk Officer of the responsible supply chain are responsible for the risk identification and management of platinum .

2、对铂金每一笔来源按照 LPPM 的要求进行充分的识别与记录，确保每一笔物料的可追溯性。

2. Each source of platinum shall be fully identified and recorded according to the requirements of LPPM to ensure the traceability of each material.

3、建立高风险地区和高风险供应链的识别流程，确保供应链中的上游风险被充分的识别。

3. It is necessary to establish the identification process of high-risk areas and high-risk supply chain to ensure that the complaint risk in the supply chain is fully identified.

4、每年对负责铂金尽职调查管理体系的相关员工进行负责任采购采购的相关培训，并保留相应的培训记录。

4. The relevant staff responsible for the platinum due diligence management system shall be trained on responsible sourcing every year with corresponding training records kept.

5、对铂金的供应商进行充分的了解和调查，确保供应商及其最终受益人未被列入任何制裁清单。

5. It is necessary to fully understand and investigate the suppliers of platinum to ensure that the suppliers and their ultimate beneficiaries are not included in any sanctions list.

6、建立负责任采购申诉渠道（wxitp@wxitp.com 电话：0510-83789626）并公布在公司网站（网址 <http://www.wxitp.com/>），以确保任何潜在的风险和或暂未识别的风险被充分的识别。

6. A responsible sourcing complaint channel shall be established (wxitp@wxitp.com /Tel: 0510-83789626) and posted on the Company's



website (website:<http://www.wxitp.com/>) to ensure that any potential risks and risks not identified are fully identified.

本管理政策自发布之日实施，并传达给所有的铂金供应商，发布在公司的网站以便所有利益相关者进行查阅。

The Management Policy shall be implemented upon the date of issuance and conveyed to all platinum suppliers, and posted on the Company's website for all stakeholders to review and consult.

英特派铂业股份有限公司  
ITP Co., Ltd.

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