



矿产供应链尽职调查管理政策 Supply Chain Due Diligence Policy for Minerals

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，江苏宝众宝达药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》第三版相关内容，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。本政策涵盖的物料类型包括：锂和石灰。

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and that we have the responsibility to respect human rights and not contribute to conflict, Jiangsu Baozong & Baoda Pharmachem Co., Ltd. commits to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the policy of OECD Due Diligence Guidance For Responsible Supply Chains, as representing a common reference for conflict sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit not to get involved in any activities which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions. The types of materials covered by this Policy include: Lithium and Lime.

与矿产开采、运输、或贸易有关的严重侵权行为

Regarding serious abuses associated with the extraction, transport or trade of minerals

1. 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。

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

a.任何形式的酷刑，残忍、不人道和有辱人格的待遇；

a. any forms of torture, cruel, inhuman and degrading treatment;

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；

b. any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;

c.童工及最恶劣形式的童工；

c. child labour and the worst forms of child labour;

d.其他严重侵犯和践踏人权的的行为，如普遍的性暴力行为：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





d. other gross human rights violations and abuses such as widespread sexual violence; 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管理

Regarding risk management of serious abuses

2. 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,我们将立即中止或中断与该供应商的合作。

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above in paragraph 1.

关于直接或间接支持非国家武装团体

Regarding direct or indirect support to non-state armed groups

3. 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:

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

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

a. illegal control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or

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

b. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where mineral are traded; and/or

c.对中间商、出口企业、或国际贸易商非法征税或勒索。

c. illegally tax or extort intermediaries, export companies or internal traders.

对向非国家武装团体提供直接或间接支持的风险管理

Regarding risk management of direct or indirect support to non-state armed groups

4. 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,我们将立即中止或中断与该供应商的合作。

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.





关于公共或私人安全武装

Regarding public or private security forces:

5. 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。

5. We disagree to provide direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. 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。

6. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. 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同的情况下，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。

7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the international widely recognized standards. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. 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。

8. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. 我们将支持或采取措施与当地政府、国际组织和民间组织开展互动，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，在这种情况下，供应链上的矿产是通过小作坊或小规模采矿的方式开采出来的小作坊。

9. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal





miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

对公共或私人安全武装的风险管理

Regarding risk management of public or private security forces

10. 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，从而使第五段中所述的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，我们将暂时停止或中断与上游供应商的合作。我们发现在一定程度上有可能存在有违第8段和第9段内容的行为的情况下，将采取同样的应对措施。

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

关于行贿受贿及矿产原产地的欺诈性失实陈述

Regarding bribery and fraudulent misrepresentation of the origin of minerals

11. 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。

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

关于洗钱

Regarding money laundering

12. 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。

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.





关于向政府支付的税收、费用及特许费

Regarding the payment of taxes, fees and royalties due to governments

13. 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。

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the requirements of host country on the disclosure of tax information paid to government departments.

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、特许费的风险管理

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments

14. 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，我们将暂时停止或中断与上游供应商的合作。

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation. Companies should conduct an additional risk assessment on those risks requiring mitigation after the adoption of the risk management plan.

关于环境保护

Regarding environment protection

15. 在受冲突影响和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，严重违当地相关法律法规的一方或从该处采购或与之存在关联。

15. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate significant adverse impacts regarding ambient soil, air and water conditions, or source from or be linked to any party with gross violation of local laws and regulations. We will support or take actions to evaluate periodically to minimize the adverse impacts of extraction regarding soil, air and water.

关于职业健康安全

Regarding occupational health and safety

16. 在受冲突影响和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/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。





16. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and / or indirect employees and / or any person present on the party's operations.

对环境保护和职业健康安全风险管理

Regarding risk management of environment protection, occupational health and safety

17. 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，我们将暂时中止或中断与上游供应商的合作。

17. We will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of environment protection and occupational health and safety, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

申诉渠道

Complaint Channel

18. 任何内外部的利益相关方可就公司产品中涉及到的涵盖在本政策中的物料的开采、贸易、处理和出口过程中，存在的侵犯人权，助长冲突，治理，环境保护和职业健康安全的问题提出意见、建议或申诉。

18. Any internal or external stakeholders may raise and discuss any comments, suggestions and complaints regarding the human rights, conflicts, governance, environmental protection and occupational health and safety in the process of mining, trading, processing and exporting materials covered by this policy.

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注：本政策自 2024 年 6 月 1 日起开始实施，江苏宝众宝达药业股份有限公司接受各相关方对该政策执行的监督，并建立相关申诉与沟通渠道，各相关方可以通过以下邮件提交相关申诉，邮箱地址为 xiaotao_ma@baozong-baoda.com。

Note: this policy has been implemented since June 1, 2024. Jiangsu Baozong & Baoda Pharmachem Co., Ltd. accepts the supervision of all relevant parties on the implementation of this policy and establishes relevant appeal and communication channels. All relevant parties can submit relevant appeals through the following email address: xiaotao_ma@baozong-baoda.com.

