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Our company recognized the risks of significant adverse impacts which may be associated with extracting, trading, processing, and exporting minerals from conflict-affected and high-risk areas, and that we have the responsibility to respect h0S

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i. illegally control mine sites, transportation routes and upstream actors in the supply chain where minerals are traded; or

ii. illegally tax or extort[13] money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

iii. illegally tax or extort intermediaries, export companies or internal trader.

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.

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 points of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax

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[15]. 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.

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.

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.

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan[16] with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, 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[17].

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes

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[15] Such as Voluntary Principles on Security and Human Rights.

[16] If force majeure events such as tsunamis, earthquakes, fires, epidemics, or wars occur during the implementation of the risk management plan, the timeline may be adjusted accordingly, provided that a written explanation of the situation is given.

[17] In order to mitigate risks after implementing the risk management plan, the company should carry out additional risk assessments. If the risk management plan does not show significant results within six months and if the risk of providing direct or indirect support to public or private security forces has not been contained or reduced, the company should temporarily suspend cooperation with the supplier for at least three months. During this suspension, the company should revise the risk management plan and clarify the performance goals that need to be achieved

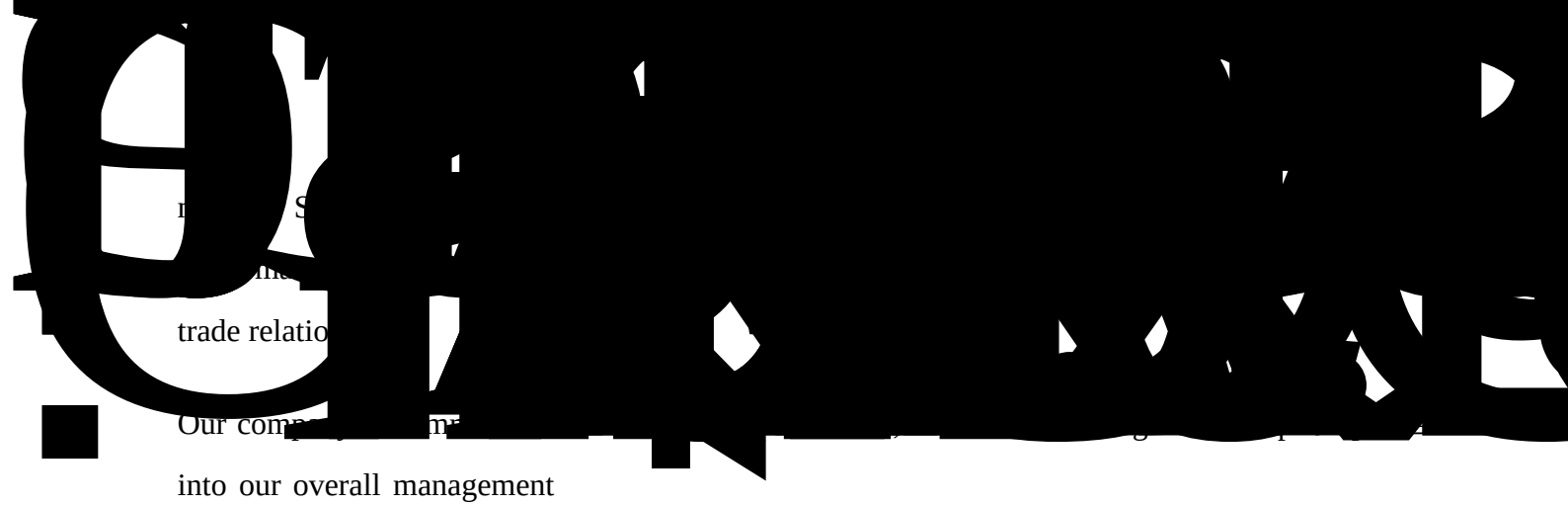
to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export[18].

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.

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 companyôs 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.

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. If within six months from the adoption of the risk management plan there is no significant measurable improvement to prevent or mitigate the risks of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments, companies should suspend or discontinue engagement with the supplier for a minimum of three

[18] See OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997); and the United Nations Convention Against Corruption (2004)



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Our comp[illegible]ve[illegible]ievance [illegible]ch[illegible]n based o[illegible] to promptly identify and address possible risks contributing to conf[illegible] or human rights a[illegible]ses in their s[illegible]ply ch[illegible]in and to ensure smooth communication with in[illegible]al and external stakeholders. Additionally, we participate in the

of the China Chamber of Commerce for Metals, Minerals & Chemicals Importers & Exporters (CCCMC) to effectively resolve disputes, strengthen communication, coordination, and cooperation among all parties, convey the demands and expectations of all parties, and build a responsible, resilient, and sustainable mineral supply chain.

Grievance that meets the following criteria will be accepted:

1) related to supply chain due diligence;

2) business activities or business relationships have caused or may cause negative impacts;

3) business activities or business relationships violate the requirements of

or its

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Grievance will NOT be accepted under any of the following:

1) not related to supply chain due diligence;

2) unable to provide sufficient evidence or witnesses to support the issues; g[illegible]

3) vicious grievance or to gain competitive advantages;

4) if the grievance does not fall within our internal mechanisms' scope, we will actively coordinate with an external organization to resolve it.

Any individual or group, including but not limited to our customers, suppliers, affected community residents, employees, etc., may file a grievance with the compliance team.

Suppose a third-party group or individual files grievance representing affected parties, they shoulh, m"

[redacted]

[redacted]

[redacted]

Name (or anonymity)		Confidentiality	
Contact No.		Email	
If you are third-party or not?		If yes, who you are representing for (authorization letter needed)	
Recuse	If you need to recuse someone from the Compliance team, please list their names:		
Facts and evidence of negative impacts have caused (or may cause) and any other information that would support the complaint: (proof of the complaint needs to be attached)			
Your request and the solution you prefer: (a clear and actionable request will help us to solve your problem faster)			
Signature: Date:			