



上海睿雄实业集团有限公司
ShangHai Creation Group Co.,Ltd.

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负责任的矿产采购政策

Responsible Mineral Sourcing Policy

一、目的

Purpose

本政策旨在确保公司在矿产（包括但不限于锡、钽、钨、金及其他关键矿产）采购过程中，遵循国际公认的负责任供应链管理原则，减少供应链中可能存在的环境、社会和治理（ESG）风险，推动可持续发展。

This policy aims to ensure that the Company, in the procurement of minerals (including but not limited to tin, tantalum, tungsten, gold, and other critical minerals), adheres to internationally recognized responsible supply chain management principles, mitigates potential Environmental, Social and Governance (ESG) risks within the supply chain, and promotes sustainable development.

二、适用范围

Scope of Application

本政策适用于公司及其所有子公司、供应商和合作伙伴，涵盖矿产及其相关产品的采购、贸易、加工和使用环节。

This policy applies to the Company, all its subsidiaries, suppliers, and business partners, covering the procurement, trading, processing, and utilization of minerals and related products.

三、政策承诺

Policy Commitments



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遵守法律法规

公司严格遵守所在国及国际适用的法律、法规和行业标准，不采购来源不明、违规或非法的矿产。

Compliance with Laws and Regulations

The Company strictly complies with applicable national and international laws, regulations, and industry standards, and does not procure minerals that are of unknown origin, illegal, or non-compliant.

拒绝助长冲突与人权侵害

公司承诺不采购直接或间接资助武装冲突、侵犯人权或存在童工、强迫劳动等情况的矿产。

Avoiding Contribution to Conflict and Human Rights Abuses

The Company is committed to refraining from sourcing minerals that directly or indirectly finance armed conflict, contribute to human rights abuses, or involve child labor and forced labor.

支持负责任的矿产来源

公司优先选择通过第三方认证（如 RMAP 审核通过的冶炼厂/精炼厂）的供应商和矿产来源。

Support for Responsible Mineral Sources

The Company prioritizes sourcing from suppliers and minerals verified through third-party certification, such as smelters and refiners validated by RMAP audits.

环境与社会责任

公司推动供应链伙伴降低环境污染、节约能源、保护生态环境，并尊重社区权益。

Environmental and Social Responsibility

The Company encourages supply chain partners to reduce environmental pollution, conserve energy, protect ecosystems, and respect community rights.



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四、尽职调查措施

Due Diligence Measures

公司将参照 OECD 五步尽职调查框架，开展供应链风险管理：

The Company shall conduct supply chain risk management in alignment with the OECD five-step due diligence framework:

建立健全管理体系

指定合规部门负责矿产采购管理，制定并执行相关制度。

Establish a Strong Management System

Appoint a compliance department to manage mineral sourcing and to develop and implement relevant procedures.

识别与评估风险

要求供应商提供矿产来源信息（如 CMRT 表格），并定期开展风险评估。

Identify and Assess Risks

Require suppliers to provide mineral sourcing information (e.g., CMRT forms) and conduct periodic risk assessments.

制定并实施风险应对计划

对发现的潜在风险，采取纠正、替代或中止合作等措施。

Design and Implement Risk Mitigation Plans

Take corrective, substitution, or termination measures when potential risks are identified.

独立第三方审核

鼓励供应商参与第三方审计，确保信息真实可靠。

Independent Third-Party Audit

Encourage suppliers to participate in third-party audits to ensure authenticity and reliability of information.



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信息披露与透明度

定期公开公司负责任矿产采购的进展和结果。

Disclosure and Transparency

Regularly disclose progress and outcomes of the Company's responsible mineral sourcing practices.

五、供应商要求

Supplier Requirements

供应商必须承诺遵守本政策，配合提供相关数据和证明文件。

Suppliers must commit to complying with this policy and cooperate in providing relevant data and supporting documents.

对未达标或拒绝整改的供应商，公司将采取限制或终止合作的措施。

For suppliers failing to meet requirements or refusing to rectify issues, the Company shall impose restrictions or terminate cooperation.

六、持续改进

Continuous Improvement

公司将不断提升负责任采购管理水平，加强与行业组织、政府和利益相关方的合作，推动建立可追溯、透明、可持续的矿产供应链。

The Company will continuously improve its responsible sourcing management practices, enhance collaboration with industry organizations, governments, and stakeholders, and promote the development of a traceable, transparent, and sustainable mineral supply chain.