

荆门 **GEM** 新材料有限公司

Jingmen GEM Co., Ltd

钴供应链尽责管理报告

Due Responsible Management Report  
of Cobalt Supply Chain

GEM 国际绿色供应链管理办公室

GEM International Green Supply Chain Management Office

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## 1.0 公司简介 Company Introduction

### 1.1 公司信息 Company Profile

公司名称:	荆门市格林美新材料有限公司
Company name:	Jingmen GEM Co., LTD
CID 编号:	CID003378
CID No:	
公司地址:	中国 湖北省 荆门市高新区 掇刀区迎春大道 3 号
Company Address:	Ying Chun Rd., Jingmen, Hubei, China
使用的原料:	粗制氢氧化钴
Raw Materials:	Crude Cobalt Hydroxide

### 1.2 RMAP 评估总结

上次 RMAP 评估日期:	26 - 27 December 2019
Date of last RMAP evaluation	
评估期间:	26 December 2018 ~ 25 December 2019
Evaluating Period:	
评估公司:	UL
Assessment Company:	
最近评估总结报告网址:	<a href="http://www.gem.com.cn/ResponsibleMineralManagement/index.html">http://www.gem.com.cn/ResponsibleMineralManagement/index.html</a>
Website of the latest assessment summary report	

### 1.3 公司简介 Company Introduction:

荆门市格林美新材料有限公司（以下简称“荆门GEM”）注册资本68.95亿元，是GEM股份有限公司（SZ002340）的全资子公司。

Jingmen GEM Co.,Ltd. (hereinafter referred to as "Jingmen GEM") is a wholly owned subsidiary of GEM Co.,Ltd. (SZ002340) with a registered capital of 6.895 billion RMB.

荆门GEM先后被认定为国家循环经济教育示范基地、国家“城市矿产”示范基地、国家工信部绿色工厂、全国中小学环境教育社会实践基地、国家高技术产业化示范工程、国家技术创新示范企业、高新技术企业、国家知识产权示范企业、博士后科研工作站、院士专家工作站、湖北省循环经济试点企业和湖北省生态文明建设示范基地等荣誉称号，跻身湖北省民营企业制造业前十，为践行中国绿色发展理念，履行社会责任做出了重大贡献。

Jingmen GEM has been identified as national circular economy education demonstration base, national "urban mining" demonstration base, national ministry of green plant, the environmental education of primary and secondary schools across the country social practice base, national high-tech industrialization demonstration project, national technology innovation demonstration enterprises, high-tech enterprises, the state, post-doctoral scientific research workstation, intellectual property rights exemplary enterprises experts academician workstation, circular economy pilot enterprises in Hubei province and Hubei province honorary titles such as

the model of ecological civilization construction, one of the top ten in the private enterprises in Hubei province manufacturing industry, is the practice of the development of Chinese green idea, made a significant contribution to fulfill social responsibility.

荆门GEM主要从事废旧电池、废弃钴镍资源及电子废弃物等报废资源的回收及资源化再利用，循环再造钴、镍、铜、钨、金、银、钯、铑、锗、铟、稀土等25种稀缺资源，年回收处理小型废旧电池占中国总量的10%以上，年回收钨资源占中国原钨开采量的5%，年回收的钴资源超过中国原钴开采量，循环再造的钴镍材料成为世界动力电池的主流原料，为中国循环型社会发展做出了积极贡献，是中国循环经济发展的地理标志，受到国家与各级政府的重大支持。

Jingmen GEM is mainly engaged in waste battery, waste cobalt nickel resources and wastes of electronic scrap recycling and reuse of resources reuse, recycling, cobalt, nickel, copper, tungsten, gold, silver, palladium, rhodium, indium, germanium, and 25 kinds of scarce resources, such as rare earth in recycling waste battery treatment small account for more than 10% of China's total, in recycling tungsten resources accounted for 5% of China's original tungsten mines in recovery of cobalt resources more than the original cobalt mines in China, recycling of cobalt-nickel materials become the mainstream of world power battery raw material, made positive contributions to development of circular economy in China, is China's circular economy development of geographical indication, Received significant support from the state and governments at all levels.

## 2.0 GEM 负责任矿产供应链尽责管理进展

### Progress of Due Responsible Management of Mineral Supply Chain in GEM

#### 2.1 建立完善的负责任矿产尽责管理体系

##### Establish a Elaborate Due Responsible Management System for Mineral Resources

##### 2.1.1 负责任矿产供应链尽责管理政策

###### GEM Due Diligence Policy for a Responsible Global Supply Chain

GEM认识到在高风险区域从事矿产开采、交易、处理、出口存在可能形成重大负面影响的<sup>1</sup>风险，并认识到我们有尊重人权、不对社会产生负面影响的义务。GEM承诺采纳经济合作与发展组织（OECD）发布的《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责管理指南，第三版》（以下简称OECD指南），制定了《GEM负责任全球供应链的尽责管理政策》。本供应链政策涵盖了：

GEM had realized in high-risk areas engaged in mining, trading, processing, export risk of major negative impact can be formed, and realize that we have the obligation of respect for human rights, and no negative impact on society. GEM is committed to adopting the OECD Guidelines for economic co-operation and development (OECD) published by the OECD about Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, third edition (hereinafter referred to as the OECD guidelines), formulated the "GEM Due Diligence Policy for a Responsible Global Supply Chain ". This Supply chain policy covers:

- 《OECD指南》中确定的所有风险；  
All risks identified in the OECD Guidelines
- 将“童工”单独列出，体现GEM对“最恶劣形式的童工”的关注；  
GEM's concern about "the worst forms of child Labor" which is reflected in the isolation of "child Labor"
- 增加了“职业健康与安全”的政策条款，体现GEM对全球供应链“直接和/或间接雇员和/或在其生产现场的任何人员”职业健康与安全的要求。  
The "Occupational Health and Safety" policy provision has been added to reflect GEM's occupational health and safety requirements for "direct and/or indirect employees and/or any personnel on their production sites" in the global supply chain.

在GEM全球供应链中，我们将广泛传播这个政策，并且将这一政策纳入到供应商从高风险区域负责任采购的合同或者协议里面。

In GEM's global supply chain, we disseminate this policy widely and incorporate it into suppliers' contracts or agreements for responsible sourcing from high-risk areas.

GEM承诺一经发现与该供应链政策相冲突的风险，将立即处理。本政策经高级管理层审查和批准，管理层致力于支持本政策的实施。本政策已向相关利益相关者（供应商、客户、员工等）广泛传播，可通过网站：<http://www.gem.com.cn/ResponsibleMineralManagement/index.html> 查阅。

GEM is committed to addressing any risks that are found to be in conflict with its due responsible supply chain management policies. The policy is reviewed and approved by senior management and management is committed to supporting its implementation. This policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees, etc.) and

can be found on the company's website: <http://www.gem.com.cn/ResponsibleMineralManagement/index.html>.

### 2.1.2 GEM负责矿产尽责管理体系 组织架构

#### Organizational Structure of GEM Due Responsible Management system

公司恪守在负责任全球供应链的尽责管理政策方面的承诺，并搭建了以下方面的负责任矿产供应链尽责管理组织架构：

The company adheres to its commitment to responsible management policies for due responsible global supply chains and has established the following responsible management organizational structure for responsible mineral supply chains:

- 公司已任命绿色供应链管理者代表，负责监督尽职调查计划和风险管理的设计和实施。

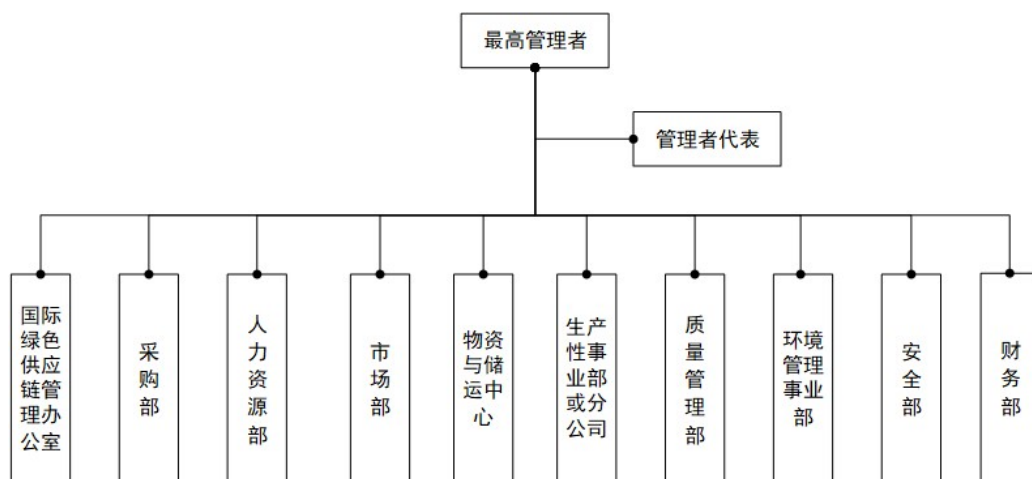
The company has appointed a green supply chain management representative to oversee the design and implementation of due diligence plans and risk management.

- 管理者代表协调相关部门，组织负责任矿产供应链尽责管理工作，包括：

The management representative coordinates relevant departments to organize due responsible management of mineral supply chain, including:

- 建立 负责任矿产尽责管理体系 架构。负责任矿产供应链尽责管理的相关部门包括：国际绿色供应链管理办公室、采购部、人力资源部、市场部、质量管理部、物质储运中心、财务部、环境管理事业部、安全部和生产性事业部。组织架构图如下：

Establish a team for due responsible management system. Include: International Green Supply Chain Management Office, Purchasing Department, Human Resources Department, Marketing Department, Quality management Department, Warehouse, Finance Department, Environmental Management Department, Security Department and Production Department. The organizational chart is as follows:



- 制定部门职责，确保各部门恪尽职守，执行尽职调查计划并报告所发现的任何示警信号和潜在风险。具体见《负责任矿产供应链尽责管理手册》。

Establish departmental responsibilities to ensure accountability, implement due diligence plans and report any warning signs and potential risks identified.

Department responsibilities have been specified in the Responsible Mineral Supply Chain Management Manual.

- 公司按照负责任矿产供应链尽责管理的要求每年对所有相关部门的主要人员开展一次尽职调查管理体系培训。除此之外，我司还会在如下情况组织额外的培训：  
 In accordance with the requirements of due responsible management of mineral supply chain, the company conducts a due diligence management system training for key personnel of all relevant departments every year. In addition, our company will also organize additional training under the following circumstances:
  - 标准发生变化时；  
 When the standard changes;
  - 文件新建或因持续改善活动导致的文件变更时；  
 When a document is newly created or changed as a result of continuous improvement activities;
  - 负责任矿产供应链尽责管理相关工作的人员发生新增、调岗或其它异动时；  
 When personnel responsible for responsible management of mineral supply chain are newly added, transferred or otherwise changed;
  - 需要组织额外培训的其它情况。  
 Other circumstances requiring additional training to be organized.

### 2.1.3 内部控制系统

#### Internal Control System

公司于2020年1月~2020年12月，已更新/新建负责任矿产供应链尽责管理体系的相关文件，使其与《OECD指南》要求保持一致，并深入贯彻RMI和相关方的建议和要求。相关的体系文件清单如下：

From January to December 2020, We has updated/built the relevant documents of responsible mineral supply chain management system to keep it in line with the requirements of OECD Guidelines, and thoroughly implement the suggestions and requirements of RMI and relevant parties. The list of relevant system documents is as follows:

序号 Item	文件编号/版本 Documents No./Version	文件名称 Documents Name	文件描述 Documents Description
1	GEM-MS-RMI C/0	负责任矿产供应链尽责管理手册 Manual of Due Responsible Mineral Supply Chain Management	颁布手册，任命管理者代表，建立组织架构，确定管理职责，传达公司负责任矿产供应链尽责管理的程序、要求和控制方法。 Issue manuals, appoint management representatives, establish organizational structures, define management responsibilities, and communicate the company's procedures, requirements and control methods for responsible management of the mineral supply chain.
2	GEM-RMI/P-01 B/0	矿产供应链尽责管理程序	遵循持续改进和循序渐进的理念，对开采材料从矿山到GEM的矿物生产和贸易过程建立适当的监管或追溯

		<p>Due Responsible Management Procedure for Mineral Supply Chain</p>	<p>链，并根据自身资源及能力协助供应商开展能力建设，以提升尽责管理绩效。包括：</p> <p>Follow the concept of continuous improvement and gradual progress, establish appropriate supervision or traceability chain for mining materials from mine to mineral production and trading process of GEM, and assist suppliers to carry out capacity building according to their own resources and capabilities, so as to improve responsible management performance. Include:</p> <ul style="list-style-type: none"> <li>● 识别供应商与原料来源（所有来源） Identify suppliers and sources of raw materials (all sources)</li> <li>● 识别受冲突影响和高风险地区（仅为文件接口，具体见《识别受冲突影响和高风险地区（CAHRA）程序》） Identification of Conflict-affected and High-risk Areas (document interface only, more detail see CAHRA Procedures)</li> <li>● 识别供应链风险； Identify supply chain risks;</li> <li>● 评估供应链风险； Assess supply chain risks;</li> <li>● 负责任矿产采购的供应商标准； Supplier standards for responsible mineral procurement;</li> <li>● 供应链政策传达； Supply chain policy communication;</li> <li>● 原料交易审查； Audit of raw material transactions;</li> <li>● 内部原料控制； Internal material control;</li> </ul>
3	GEM-RMI/P-02 C/0	<p>识别受冲突影响和高风险地区（CAHRA）程序 Identification of Conflict-Affected and High-risk Areas (CAHRA) Procedure</p>	<p>参照《OECD指南》，根据矿产供应链中受冲突影响和高风险区域的特点，识别存在武装冲突、大范围暴力活动或其他有害于民众的风险。具体包括：</p> <p>Using the OECD Guidelines, identify risks of armed conflict, widespread violence or other harm to the population based on the characteristics of conflict-affected and high-risk areas in the mineral supply chain. Specifically, they include:</p> <ul style="list-style-type: none"> <li>● 警示信号或警告标志； Warning signal or mark;</li> <li>● 评价的信息来源； Sources of information for evaluation;</li> <li>● 分析实际情况；</li> </ul>



			<p>Analyze the actual situation;</p> <ul style="list-style-type: none"> <li>● 内部报告。</li> </ul> <p>Internal report</p>
4	GEM-RMI/P-03 A/0	<p>矿产供应链风险 减缓控制程序 Risk Mitigation Control Procedures for Mineral Supply Chain</p>	<p>当识别到矿产供应链上的风险时，本程序指引制定合适的风险减缓措施，以降低矿产供应链风险。具体包括：</p> <p>When risks in the mineral supply chain are identified, this Procedure guides the development of appropriate risk mitigation measures to reduce risks in the mineral supply chain. Specifically, they include:</p> <ul style="list-style-type: none"> <li>● 风险减缓策略； Risk mitigation strategies;</li> <li>● 风险减缓计划； Risk mitigation plans;</li> <li>● 监测和跟踪风险管理计划； Monitoring and tracking risk management plans;</li> <li>● 内部报告。</li> </ul> <p>Internal report.</p>
5	GEM-RMI/P-04 B/1	<p>申诉管理程序 Grievance Management Procedure</p>	<p>以及时发现和处理供应链中存在的风险与隐患，保障外部利益相关方与本公司的顺畅沟通，提高与利益相关方参与和互动的质量，从而建立和谐互利的利益相关方关系，维护各利益相关方和公司的合法权益，优化企业发展的内外部环境 为目的，规范申诉流程，具体包括：</p> <p>And when found and deal with the risks and hidden dangers existing in the supply chain, the company external stakeholders and smooth communication, improve the quality of and stakeholder participation and interaction, so as to establish harmonious and mutual benefit of stakeholder relations, maintain the legitimate rights and interests of all stakeholders and the company, optimize the internal and external environment of enterprise development, for the purpose of regulating the appeals process, including:</p> <ul style="list-style-type: none"> <li>● 申诉原则； The principle of Grievance;</li> <li>● 申诉范围； Scope of Grievance;</li> <li>● 申诉渠道； Channels of Grievance;</li> <li>● 申诉审查； Review of Grievance;</li> <li>● 申诉处理；</li> </ul>

			<p>Grievance handling;</p> <ul style="list-style-type: none"> <li>● 信息保密; Confidentiality of information;</li> <li>● 申诉者保护。 Protection of complainants.</li> </ul>
6	GEM-RMI/P-05 A/0	<p>负责任矿产尽责管理体系 内部审核控制程序 Internal audit control procedures</p>	<p>验证负责任矿产尽责管理体系是否被有效运作和维持, 是否符合《OECD指南》和相关方的要求, 以便发现问题, 采取纠正措施, 以维持或改进负责任矿产尽责管理体系的有效性和适宜性, 具体包括:</p> <p>Verify that the responsible mineral management system is effectively operated and maintained and complies with the OECD Guidelines and relevant parties' requirements in order to identify problems and take corrective actions to maintain or improve the effectiveness and suitability of the responsible mineral management system, including:</p> <ul style="list-style-type: none"> <li>● 审核频率要求; Audit frequency requirements;</li> <li>● 审核依据; Audit basis;</li> <li>● 审核计划; Audit plan;</li> <li>● 实施内部审核; Carry out internal audit;</li> <li>● 不符合项的改进及验证; Improvement and verification of nonconformance terms;</li> <li>● 内部审核报告。 Internal audit report.</li> </ul>

#### 2.1.4记录保留系统

##### Record keeping system

公司要求与 负责任矿产尽责管理体系 相关的所有记录至少保存5年, 并在《负责任矿产供应链尽责管理手册》中进行规定。

The company requires that all records related to the responsible Minerals Responsible Management system be kept for at least 5 years and specified in the Responsible Minerals Supply Chain Responsible Management Manual.

#### 2.1.5申诉机制

##### Grievance Management

为及时发现和处理供应链中存在的风险与隐患, 保障外部利益相关方与本公司的顺畅沟通, 提高与利益相关方参与和互动的质量, 从而建立和谐互利的利益相关方关系, 维护各利益相关方和公司的合法权益, 优化企业发展的内外部环境, GEM建立《申诉管理程序》, 具体内容及联系方式已公布于公司网站: <http://www.gem.com.cn/ResponsibleMineralManagement/index.html>

To timely discover and deal with risks and hidden dangers existing in the supply chain, the

company external stakeholders and smooth communication, improve the quality of and stakeholder participation and interaction, so as to establish harmonious and mutual benefit of stakeholder relations, safeguard the legitimate rights and interests of all stakeholders and the company, optimize the internal and external environment, the development of the enterprise, establish the "management procedure of appeal" green concrete content and the contact information has been posted on the company website: <http://www.gem.com.cn/ResponsibleMineralManagement/index.html>.

## 2.2 识别和评估供应链风险

### Identify and Evaluate Supply Chain Risks

#### 2.2.1 识别供应商与原料来源

##### Identify suppliers and sources of raw materials

国际绿色供应链管理办公室组织相关部门，按照GEM-RMI/P-01《矿产供应链尽责管理程序》的标准和要求，组织识别所有供应商和原料，并且获取有关原料原产地和监管链的充分文件，以确定每家直接矿产供应商的身份、业务关系类型和业务运营合法性。包括：

International green supply chain management office organize relevant departments, in accordance with the GEM - RMI/P - 01 " Due Responsible Management Procedure for Mineral Supply Chain " the standards and requirements of organization identify all suppliers and raw materials, and get the full file about raw material origin and regulation chain, in order to determine the identity of each mineral suppliers directly, the types of business relationships and operations legitimacy. Include:

- 使用《Know Your Supplier (KYS)》，组织实施基本的供应商调查，以确定各矿产原料供应商的身份、业务关系类型和经营活动的合法性。截止2019年8月，所有正在交易的钴一次原料和二次原料供应商已回传KYS，回复率100%。  
Use Know Your Supplier (KYS) to organize and conduct a basic Supplier survey to determine the identity, type of business relationship, and legality of each mineral raw material Supplier. As of August 2019, all suppliers of cobalt primary raw materials and secondary raw materials that are being traded have returned KYS with a recovery rate of 100%.
- 根据KYS获取的信息，对照相关制裁名单，验明供应商及其受益所有人的身份。当供应商持股超过50%的人员被列入如下制裁名单时，公司禁止与其进行交易。  
According to the information obtained by KYS, the suppliers and their beneficial owners were identified against the relevant sanctions list. The company is barred from trading with suppliers whose shares are more than 50% when they are on the following sanctions list.
  - 美国财政部 OFAC 制裁名单；  
US Treasury Department OFAC sanctions list;
  - 欧盟 EEAS 的综合制裁名单；  
The EEAS consolidated sanctions list;
  - 联合国制裁名单。  
UN sanctions list.

- 原产地评定。根据GEM-RMI/P-01《矿产供应链尽责管理程序》规定的原料类别，按照《适用性和原产地评定流程图》确定是否需要进行原产地评定。  
 Assessment of origin. According to the raw material category stipulated in GEM-RMI /P-01 Due Responsible Management Procedure for Mineral Supply Chain, the origin assessment shall be determined according to the Flowchart of Applicability and Origin Assessment.
- 识别原料来源，形成供应链地图。我司已经整理原产地评定结果，梳理绘制供应链地图。  
 Identify raw material sources and develop a supply chain map. Our company has sorted out the origin assessment results and mapped the supply chain.

### 2.2.2 风险识别（所有来源）

#### Risk identification (all sources)

公司建立的GEM-RMI/P-02《识别受冲突影响和高风险地区（CAHRA）程序》为负责矿产供应链 风险管理的核心文件，其建立了适当的监管或追溯链，识别供应链中的风险，并规定原料交易审查和内部原料控制的方法和要求。

GEM-RMI /P-02 Procedures for Identification of Conflict-Affected and High-risk Areas (CAHRA) established by the company is the core document of responsible mineral supply chain risk management. It establishes appropriate supervision or traceability chain, identifies risks in the supply chain, and provides methods and requirements for raw material transaction review and internal raw material control.

- 评价的信息来源。国际绿色供应链管理办公室根据RMI官网公开的Risk Score Countries Details工具，直接审查警示信号或警告标志的特征。这些警示信号或警告标志与《GEM负责任全球供应链的尽责管理政策》保持一致。  
 Sources of information for evaluation. The International Green Supply Chain Management Office directly reviews the characteristics of warning signals or warning signs according to the Risk Score Countries Details tool published on RMI's official website. These warning signs or signs are consistent with GEM Due Diligence Policy for a Responsible Global Supply Chain.
- RMI官网公开的Risk Score Countries Details工具 识别出的风险等级共包括四个等级，见下表：  
 The Risk levels identified by the Risk Score Countries Details tool published on RMI's official website include four levels, as shown in the table below:

序号 Item	等级 Class	分值范围 Range
1	严重 Critical	0.00 ~ 2.50
2	高 High	2.51 ~ 5.00
3	中等 Mid	5.01 ~ 7.50
4	低 Low	7.51 ~ 10.00

- 不管Risk Score Countries Details工具的评估结果是何种级别，国际绿色供应链管

理办公室都会收集可用信息以了解相关特定地区确实受到了资源所引发问题的影响 和/或 特定供应链（如负责任矿产供应链）受到了资源所引发问题的影响。收集可用信息的来源包括但不限于：

Regardless of the level of assessment from the Risk Score Countries Details tool, OGMA collects available information to understand that specific regions are indeed affected by resource-related issues and/or that specific supply chains (such as the responsible mineral supply chain) are affected by resource-related issues. The sources of available information include, but are not limited to:

- RMI官网公开的Risk Score Countries Details工具所包含 和/或 关联的信息；  
Information contained and/or associated with the Risk Score Countries Details tool disclosed on RMI's official website;
- 由第三方或联合第三方进行的现场考察报告；  
Site inspection reports conducted by third parties or joint third parties;
- 新闻报道；  
News coverage;
- NGO 报告；  
NGOs report;
- 按照《申诉管理程序》收集和确认的反馈信息。  
The feedback information collected and confirmed in accordance with the Grievance Management Procedure.

### 2.2.3 识别供应链风险

#### Identify Supply Chain Risks

识别原料来源为低风险时，进行基本的尽职调查即可，并按要求向供应商传递《GEM负责任全球供应链的尽责管理政策》、《供应商行为准则》，并签署《回执函》后，回传我司存档。

When the source of raw materials is identified as low risk, basic due diligence should be done, and the "Responsible Management Policy for Responsible Global Supply Chain" and "Supplier Code of Conduct" should be delivered to the supplier as required, and the "Letter of Acknowledgement" should be signed and sent back to our company for archiving.

识别原料来源存在高风险时，必须完成高风险来源审计工作。针对现有的和计划中的供应链的实际情况进行分析。包括：

When identifying the source of raw materials with high risk, the audit of high-risk source must be completed. Analyze the actual situation of existing and planned supply chains. Include:

- 评估CAHRA的背景。  
Assess the background of CAHRA.
- 阐明监管链。  
Clarify the chain of custody.
- 评估上游供应商的活动和关系。  
Assess upstream vendor activities and relationships.
- 识别矿石的开采、贸易、处理和出口的地点和定量条件；以及

Identification of the location and quantitative conditions for the mining, trading, processing and export of ores; As well as

- 适用时，进行实地风险评估。  
Where applicable, on-site risk assessment is conducted.

#### 2.2.4 评估供应链风险

##### Assessment of supply chain risks

公司通过将实际情况与《GEM负责任全球供应链的尽责管理政策》中涵盖的风险进行对比，评估供应链中是否存在风险以及严重性。以确定相关特定地区确实受到了资源所引发问题的影响 和/或 特定供应链（如负责任矿产供应链）受到了资源所引发问题的影响。

The company evaluates the existence and severity of risks in the supply chain by comparing the actual situation with the risks covered in the "Responsible Management Policy for Responsible Global Supply Chain". To determine that a particular area is indeed affected by a resource-induced problem and/or that a particular supply chain (such as the responsible mineral supply chain) is affected by a resource-induced problem.

此报告期间内，GEM钴供应链识别的风险包括：矿山和粗炼厂所在地，刚果民主共和国，为高风险区域。触发的警示信号或警告标志包括：

During this reporting period, risks identified by the Cobalt supply chain include: the Democratic Republic of Congo, where mines and refineries are located, as a high-risk area. Triggered warning signals or warning signs include:

- 与矿产开采、运输、或交易有关的严重侵权行为（不包括童工，童工单独列出）；  
Serious infringements relating to the mining, transport or trading of minerals (excluding child Labor, listed separately);
- 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;
- 关于洗钱；  
On money laundering;
- 关于童工。  
About child labor.

针对上述风险，GEM与供应商正在展开积极沟通，推动供应商以《OECD指南》为基本框架，并在RMI的指导下完善其尽责管理体系。在RMI、GEM和相关方的推动下，供应商已加入RMAP审核计划。供应商已确认其钴粗炼厂原定于2020年4月进行，但由于COVID旅行限制不得不推迟。目前计划在2021年4月底进行(除非COVID进一步推迟)。

In response to the above risks, GEM and its suppliers are actively communicating to encourage them to improve their accountability management systems under the guidance of RMI and the OECD Guidelines as a basic framework. Suppliers have joined the RMAP audit program at the urging of RMI, GEM and interested parties. The supplier has confirmed that its cobalt refinery was originally scheduled for April 2020 but had to be delayed due to COVID-19 travel

restrictions. It is currently scheduled for late April 2021 (unless COVID-19 is further delayed).

### 2.2.5 负责任矿产采购的供应商标准

#### **Supplier standards for responsible mineral procurement**

公司依据《负责任矿产采购的供应商标准》，确定矿产供应商的选择标准，包括：  
The company determines the selection criteria of mineral suppliers according to the Supplier Standards for Responsible Mineral Procurement, including:

- 优先使用回收原料，立足于循环再造产业，履行社会责任。  
Give priority to the use of recycled raw materials, based on the recycling industry, fulfill social responsibility.
- 优先选择来源于符合RMI标准或交叉认可计划的矿产供应商，例如列入RMI白名单的矿产原料供应商。  
Preference is given to mineral suppliers that meet RMI standards or cross-validation schemes, such as mineral raw material suppliers listed in THE RMI Whitelist.
- 优先采购从大型机械矿山开采的矿石原料；  
Give priority to the purchase of ore raw materials extracted from large mechanical mines;
- 积极配合我司 和/或 MRI 和/或 参与交叉认可计划的矿产供应商。利用《OECD 指南》和《GEM负责任全球供应链的尽责管理政策》中定义的风险管理策略，逐步减缓高风险采购的供应链风险。  
Actively cooperate with our company and/or mineral suppliers that MRI and/or participate in the Cross Audit Program. Use the risk management strategies defined in the OECD Guidelines and the GEM Responsible Management Policy for Responsible Global Supply Chain to progressively mitigate supply chain risks associated with high-risk purchases.

### 2.2.6 供应链政策传达

#### **Supply Chain Policy Communication**

GEM《关于负责任全球供应链的尽责管理政策》、《供应商行为准则》和申诉机制的内容和政策，已公布在官方网站：<http://www.gem.com.cn/ResponsibleMineralManagement/index.html>，便于相关方查阅。

The contents and policies of GEM Due Diligence Policy for a Responsible Global Supply Chain, Code of Conduct for Suppliers and Grievance mechanism have been published on the official website [www.gem.com.cn](http://www.gem.com.cn) for relevant parties to check.

### 2.3 制定和实施策略以应对已识别的风险

#### **Develop and Implement Strategies to Address Identified Risks**

公司根据《矿产供应链风险减缓控制程序》对负责任矿产供应链识别的风险进行减缓，风险减缓管理程序包括：

The Company mitigates the risks identified by the responsible mineral supply chain according to the Risk Mitigation Control Procedures for Mineral Supply Chain. The risk

mitigation management procedures include:

### 2.3.1 风险减缓策略

#### **Risk Mitigation Strategy**

GEM通过以下方式管理风险:

GEM Manages risk by:

- 在整个降低可衡量风险的过程中继续开展贸易;  
Continuing to trade throughout the process of reducing measurable risks;
- 在不断降低可衡量风险的同时暂时中止贸易;  
Suspending trade while reducing measurable risks;
- 在风险减缓失败, 或公司有理由认为风险减缓措施不可行或无法接受的情况下, 终止与供货商的合作。  
Termination of cooperation with the supplier if risk mitigation fails or if the company has reason to believe that risk mitigation measures are not feasible or acceptable.

### 2.3.2 风险减缓计划

#### **Risk Mitigation Plan**

通过RMI / GEM的推动和供应商的配合, 相关供应商已经加入 RMI 和 RMAP 审核计划。风险减缓计划的内容包括:

Through the promotion of RMI / GEM and the cooperation of suppliers, relevant suppliers have joined the RMI and RMAP audit plan. The risk mitigation plan includes:

- 需要管控的风险;  
Risks that need to be managed;
- 风险管理预期目标和影响;  
Expected objectives and impacts of risk management;
- 可衡量的风险减缓措施及行动情况;  
Measurable risk mitigation measures and actions;
- 路线图、时间表及必要的资源配置。  
Road maps, timetables and necessary resource allocation.

### 2.3.3 监测和跟踪风险管理计划

#### **Monitor and Follow Up the Risk Management Plan**

国际绿色供应链管理办公室负责监测和跟踪风险管理计划的完成情况。进一步保持持续的风险监测工作, 至少6个月评估一次风险管控措施的有效性, 并根据需要开展额外风险评估, 例如, 万一风险减缓计划出现偏离(商业关系的继续、暂停或终止), 确保有附加活动。

The International Green Supply Chain Management Office is responsible for monitoring and tracking the completion of risk management plans. Further maintain ongoing risk monitoring, assess the effectiveness of risk controls at least once every 6 months, and conduct additional risk assessments as needed, for example, to ensure additional activities in case of



deviations from the risk mitigation plan (continuation, suspension or termination of business relationships).

## 2.4 独立第三方评估与审核

### **Independent Third-Party Assessment and Audit**

荆门市格林美新材料有限公司积极响应负责任矿产尽责管理要求，参与第三方审核，满足利益相关方对负责任矿产供应链合规、透明的期望。

Jingmen GEM actively responds to due responsible mineral management requirements, participates in third-party audit, and meets stakeholders' expectations of responsible mineral supply chain compliance and transparency.

2020年我司一直在RMI的指导下完善负责任矿产尽责管理体系。已接受客户委托RCS的第三方审计四次。

In 2020, our company has been improving the responsible mineral management system under the guidance of RMI. RCS has been audited four times by the third party entrusted by the client.

## 2.5对供应链风险管理过程和结果进行报告

### **Report the Supply Chain Risk Management Process and Results**

荆门市格林美新材料有限公司尽责管理报告的发布周期为至少每年一次，可在官网：<http://www.gem.com.cn/ResponsibleMineralManagement/index.html> 查阅。我们诚挚欢迎利益相关方对我司负责任矿产尽责管理工作提出建议。

The release cycle of GEM's due responsible management report is at least once a year, which can be found on its official website: <http://www.gem.com.cn/ResponsibleMineralManagement/index.html>. We sincerely welcome stakeholders' suggestions on responsible management of our mines.

荆门市格林美新材料有限公司

Jingmen GEM Co., Ltd

国际绿色供应链管理办公室

International Green Supply Chain Management Office

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2021年1月18日

January 18, 2021