

江钨世泰科钨品有限公司
Jiangwu H.C. Starck Tungsten Products Co.,Ltd.
负责任矿物审验流程公开尽职调查报告
Responsible Minerals Assurance Process (RMAP) public due diligence report

1. 公司信息（所有来源）

1. Company Information (ALL SOURCES)

本公司名为江钨世泰科钨品有限公司，公司 CID 号码是 CID002551。公司所在地为中国江西省赣州市水西有色冶金基地，本公司冶炼加工钨产品。本报告涵盖的时间段从 2016 年 4 月 23 日起，至 2019 年 5 月 9 日止。
The company is called Jiangwu H.C. Starck Tungsten Products Co.,Ltd. The company's CID number is CID002551. The company locates at Water West Nonferrous Metallurgical Base, Ganzhou City, Jiangxi Province, China. Our smelting facility is processing tungsten products. This report covers the time period from 23rd Apr., 2016 to 9th May, 2019.

2. RMAP 评估总结（所有来源）

2. RMAP Assessment Summary (ALL SOURCES)

江钨世泰科钨品有限公司于 2016 年 4 月 22 日进行了 RMAP 评估。评估有效期为三年。评估期自 2015 年 4 月 21 日起，至 2016 年 4 月 22 日止。评估由 UL 公司执行。评估总结报告载于以下网址，可供公众查阅：
Jiangwu H.C. Starck Tungsten Products Co.,Ltd. has undergone a RMAP assessment on 22th Apr., 2016. The assessment is valid for three years. The assessment period was from 21st Apr., 2015 to 22nd Apr., 2016. The assessment was conducted by UL LLC. The assessment summary report is public and available at:

<http://www.responsiblemineralsinitiative.org/tungsten-conformant-smelters/>

3. 公司供应链政策（所有来源）

3. Company Supply Chain Policy (ALL SOURCES)

为避免使用直接或间接为武装团体提供资金或使他们得益的冲突矿物及/或涉及在高风险和受冲突影响地区进行其他严重侵犯人权行为的冲突矿物，公司制定了供应链政策。本供应链政策完全符合第三版经合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（经合组织指南）。它涵盖了经合组织指南附录二中确定的所有风险，适用全球范围。公司承诺一经发现任何附录二风险，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，可于以下网址查阅：

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, the company has developed a supply chain policy. The supply chain policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is committed to addressing any Annex II risks if identified. The policy was reviewed and approved by senior management, which



committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is public and available at:

<http://www.jwstk.cn/nd.jsp?id=19>

4. 公司管理体系（所有来源）

4. Company Management Systems (ALL SOURCES)

管理结构

Management Structure

公司恪守在供应链政策方面的承诺，并制定了以下方面的尽职调查内部流程：

The company follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:

- 钨原料采购尽责管理委员会负责审核对于钨矿产供应链尽职管理体系的评估、批准对尽职管理体系的修订、正式的预防和纠正行动计划并批准更新后的受冲突影响和高风险地区名单。
Tungsten raw material purchasing due diligence committee is responsible for reviewing the evaluation to the due diligence management system of tungsten mineral supply chain, approving the revision of the due diligence management system, formal preventive and corrective action plan, and approving the updated list of Conflict-Affected and High-Risk Areas (CAHRA).
- 尽责管理工作办公室负责监督尽职调查计划和风险管理的设计和和实施。
Due diligence office is responsible to oversee the due diligence program and risk management design and implementation.
- 公司已任命尽职调查计划经理协调相关部门（包括采购部、质量部、生产部和仓库管理部）的工作，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。
The company has assigned a due diligence program manager to coordinate the work of the relevant departments (including the Purchasing Department, Quality Department, Production Department, and Warehouse Management Department) to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report any red flags and potential risks identified.
- 公司按照尽职调查计划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。如计划有更新，公司会根据需要开展额外培训。
The company conducts due diligence management system training once a year for key staff from all relevant departments required in due diligence program. If there is an update of the program, the company conducts additional training as necessary.

内部控制系统

Internal Systems of Control

公司已于 2019 年 3 月更新了尽职调查管理系统，使其与经合组织指南及 RMAP 保持一致。目前公司的钨矿产供应链尽职管理制度规定只能从低风险国家采购。公司已于 2019 年 4 月向所有已确定上游供应商传达了最新的供应链政策和采购要求。公司已将尽职调查要求纳入与直接供应商达成的具有法律约束力的协议中。公司每年考察采购量 70% 的直接供应商至少一次，并将尽职调查要求作为谈话的一部分。公司参考 RMI 的申诉机制，收集有关方面的申诉信息。

The company has updated its due diligence management system to be aligned with the OECD Guidance and RMAP

in Mar., 2019. At present, the tungsten mineral supply chain due diligence management system of the company stipulates the company can only purchase from low-risk countries. The company communicated the updated supply chain policy and sourcing requirements to all identified upstream suppliers in Apr. 2019. The company has incorporated due diligence requirements into legally binding agreements with direct suppliers. The company visits its direct suppliers which supply 70 percent of annual volume at least once a year, and includes due diligence requirements as part of the conversation. The company refers to RMI's grievance mechanism to collect information on grievances from interested parties.

记录保留系统

Record Keeping System

公司要求与尽职调查计划相关的所有记录至少保存五年，要求正确使用并安全存储在我们的电脑数据库中。The company requires that all records relating to the due diligence program are maintained at least for five years and that they be properly used and safely stored in our computer database.

5. 风险识别（所有来源）

5. Risk Identification (ALL SOURCES)

公司设有一套健全的流程来识别供应链中的风险。

The company has a robust process to identify risks in the supply chain.

首先，参考公司供应链政策中的风险，公司制定了识别“受冲突影响和高风险”地区（CAHRA）的程序。程序包括使用的资源、确定 CAHRA 的标准以及我们检讨决定的频率。公司使用以下资源来确定。

Firstly, referring to the risks in the company's supply chain policy, the company established a procedure to identify CAHRAs. The procedure includes the resources used, the criteria to define a "conflict-affected and high-risk" area as well as the frequency with which our determination is reviewed. The company uses the following resources to determine CAHRAs:

CAHRA:

公司选取《海德堡冲突晴雨表》代表武装冲突；世界银行全球治理指数—腐败控制数据代表治理情况；联合国开发计划署国际人类发展指数代表人权情况。参考上述三种参考资料，公司已制定确定 CAHRA 的标准和基准指标。

The company selects the Heidelberg Conflict Barometer representing Armed Conflict; the Worldwide Governance Indicators-Control of Corruption representing governance; UNDP International Human Development Indicators representing Human Rights. Referring to above three external resources, the company has defined criteria and benchmark indicators to determine CAHRAs.

其次，公司设计了一套了解供应商（KYS）流程，纳入关于供应商法律地位和身份信息、供应商分析和潜在风险。我们的所有供应商已完成并交回 KYS 表格。公司的尽职调查计划经理与采购团队一起审查了获提供的信息和联合国制裁名单。只要在 KYS 表格中发现不一致、错误或不完整信息，公司将告诉供应商需改进之处并索要更新后的表格。一旦发现示警信号，公司将与供应商进一步合作，在需要时明确和改进文件。在本报告期间，没有发现与所提交的 KYS 表格相关的示警信号。

Secondly, the company designed a Know Your Supplier (KYS) to include information concerning supplier legal status and identity, supplier mapping and potential risks. All of our suppliers have completed and returned the KYS form. The company's due diligence program manager reviewed the provided information and the UN Sanction List

with the Purchasing Team. Whenever inconsistencies, errors or incomplete information were identified in the KYS form, the company communicated the improvement areas to suppliers and requested an updated form. If red flags were identified, the company would further engage with its suppliers to clarify and improve the documents as needed. During this reporting period, no red flags were identified related to submitted KYS forms.

第三，公司要求提供每起重大交易的原产地信息，并确保能够了解交易来源、运输路线以及直接供应商的名称和地点。

Thirdly, the company requested origin information for each material transaction and ensured that it was able to understand the transaction origin, transportation route, as well as direct suppliers' names and locations.

第四，公司对照 CAHRA、制裁清单、当地法律和内部采购要求审查所收集的所有信息。

Fourthly, all information collected was reviewed by the company against CAHRAs, sanction lists, local laws and internal sourcing requirements.

风险评估（仅高风险采购）

Risk Assessment (HIGH RISK SOURCING ONLY)

目前公司的钨矿产供应链尽职管理制度规定只能从低风险国家采购。

At present, the tungsten mineral supply chain due diligence management system of the company stipulates the company can only purchase from low-risk countries.

发现有“高风险”原料进入了公司供应链的情况时，公司会开展增强型尽职调查。这包括：

When we find “high-risk” material has entered our supply chains, the company conducts enhanced due diligence. This includes:

- 评估 CAHRA 的背景；
- Assessing the context of CAHRAs;
- 阐明监管链；
- Clarifying the chain of custody;
- 评估上游供应商的活动和关系；
- Assessing the activities and relationships of upstream suppliers;
- 识别矿石的开采、贸易、处理和出口的地点和定性条件；
- Identifying locations and qualitative conditions of the extraction, trade, handling, and export of minerals;
- 以及进行实地风险评估。
- and conducting on-the-ground assessments.

为了对实际情况进行分析、开展实地评估并评估高风险供应链中的风险，我们依靠以下几点：

In order to map the factual circumstances, conduct on-the ground assessments and assess risks in the high risk supply chains, we rely on the following:

情景 1：要求供应商参与 RMI 认可的上游审验机制：

Scenario 1: Requesting the supplier to participate in RMI recognized upstream assurance mechanisms:

更佳采购计划 (BSP)：

Better Sourcing Program (BSP):

供应商使用更佳采购计划 (BSP) 来评估各起高风险采购交易的风险时，该计划分析供应商的上游供应链并提供下列信息/文件。这些信息涉及每批原料，并可在 BSP 软件平台上直接访问：

When the supplier has been using the Better Sourcing Program (BSP) to assess risks for each high-risk sourcing transaction, the program maps the supplier's upstream supply chain and provides the information/documents listed below. The information relates to each shipment of material, and is accessed directly on the BSP software platform:

- 1) 采矿公司供应商尽职调查计划 (例如 KYS 问卷调查、公司注册、采矿许可证、缴税证明)
- 1) Mining company supplier due diligence program (e.g. KYS questionnaire, company registration, mining license, certificate of payment of taxes)
- 2) 与采矿公司供应商的运营/国家背景有关的治理信息 (例如政治、经济和安全形势；尽职调查标准)
- 2) Governance information relating to operating/ country context of mining company supplier (e.g. political, economic and security situation, due diligence standards)
- 3) 采矿公司供应商基准评估报告 (BSP 现场代理对每个矿场开展经合组织指南附录二风险的初始基线评估)
- 3) Mining company supplier baseline assessment report (BSP field agents conduct an initial baseline assessment of the OECD Guidance Annex II risks at each mine site)
- 4) 采矿公司供应商动态评估报告 (对于每个矿场而言，BSP 现场代理使用移动应用程序持续监测现场风险和事故)
- 4) Mining company supplier dynamic evaluation report (for each mine site, BSP field agents continuously monitor risks and incidents on the ground using a mobile application)

或

OR

iTSCi:

当供应商是 iTSCi 的有效成员时，对于每个高风险采购交易，iTSCi 提供以下文件：

When the supplier has been an active member of iTSCi, for each high-risk sourcing transaction, iTSCi provides the following documents:

- 1) 事件总结报告 (在获得后)
- 1) Incident summary reports as they become available
- 2) 矿场考察建议，包括具有潜在风险的矿场名单 (建议向这些矿场采购的公司开展增强型尽职调查和风险评估)
- 2) Mine Visit Recommendations including a list of mine sites with potential risks (it is advised that companies sourcing from these mine sites conduct enhanced due diligence and risk assessment)
- 3) 国家和地区月度报告，审查实地的一般情况
- 3) Monthly country and region reports, which review the general situation on the ground
- 4) 数据总结和其他报告
- 4) Data summary and other reports

公司会开展进一步尽职调查，对照公共领域的信息和实际交易信息审查来自上游计划的相关文件，以评估

风险水平。

The company conducts further due diligence to review these documents from upstream program against information in the public domain and the actual transaction information to assess the level of risk.

情景 2: 在没有上游计划的情况下评估风险:

Scenario 2: Assessing risks without an upstream program:

公司会对我们供应链中确定的 CAHRA 进行基础研究。这包括有关各国治理、安全和人权情况的公开报告以及具体提及与钨采矿实务有关的侵犯人权行为的公开报告。

The company conducts basic research on the CAHRAs identified in our supply chain. This includes publicly available reports regarding the governance, security and human rights context of the countries as well as reports specifically mentioning human rights abuses related to tungsten mining practices.

其次, 公司会完成利益相关者分析, 为我们的利益相关者参与战略提供信息。作为分析的补充, 公司要求我们的直接供应商提供从矿场到国内出口商之间每个供应链参与者的名称、地点和业务运营类型。公司已就从贸易商到矿场的所有上游参与者实施了增强型 KYS 流程。我们与供应链合作伙伴一起, 收集每起重大交易的监管链文件, 并确保能够了解交易来源和运输路线。在必要时前往矿场进行实地评估。通过矿场考察、文件检查和与矿工面谈、咨询当地社区和其他利益相关者, 公司评估经合组织指南附录二下的所有风险并生成矿场现场考察报告。

Secondly, the company completes a stakeholder mapping to inform our stakeholder engagement strategy. To complement the mapping, the company requires our direct suppliers to provide the names, locations and types of business operations for each supply chain actor between the mine sites and the in-country exporter. The company conducts an enhanced KYS process for all upstream actors from the trader to the mine. Working with our supply chain partners, we collect chain of custody documentation for each material transaction and ensure that it is able to understand the transaction origin and transportation route. When necessary, the company conducts an on-the-ground mine site assessment. Through a mine tour, a document check and interviews with mine workers, consultation with local communities and other stakeholders, the company assesses all the risks under Annex II of OECD Guidance and generated a mine site visit report.

6. 风险降低 (仅高风险采购)

6. Risk Mitigation (HIGH RISK SOURCING ONLY)

公司的供应链政策根据经合组织指南附录二示范政策确定了三种可行的风险降低策略。按以下方式降低高风险供应链中发现的风险:

The company's Supply Chain Policy defines three possible risk mitigation strategies in accordance with the OECD Guidance Annex II Model Policy. Risks identified in high-risk supply chains are mitigated as follows:

情景 1: 参与 RMI 认可的上游审验机制:

Scenario 1: Participation in RMI recognized upstream assurance mechanisms:

更佳采购计划 (BSP):

Better Sourcing Program (BSP):

基于初步基准报告和动态评估报告的结果, BSP 提供技术意见并帮助参与的采矿公司填补尽职调查管理体

系中的缺口（例如制定供应链政策、设立管理结构）、实现可追溯性（例如开发电子标记系统）并对已识别风险做出响应。基于其严重程度（轻度、中度和重度）对每项已识别风险进行审查和评分，而 BSP 为采矿公司如何在短期和长期内降低风险提供标准化协议。BSP 现场代理定期追踪及报告风险降低措施的有效性，BSP 现场代理也参与与受影响利益相关者（如当地社区）的相关互动。公司会根据需要与 BSP 和供应链参与者协商评估该数据，以推断是否需要采取额外的风险降低措施。

Based on the findings of the initial baseline report and the dynamic evaluation report, BSP provides technical advice and helps the participating mining companies close any gaps in due diligence management systems (e.g. develop a supply chain policy, establish a management structure), achieve traceability (e.g. develop an electronic tagging system) and respond to identified risks. Each identified risk is reviewed and scored on the basis of its severity (minor, moderate and major) while BSP provides a standardized protocol for how the risk can be mitigated in the short term and long term by the mining company. The effectiveness of mitigation is tracked and reported on periodically by BSP field agents who are also involved in related engagement with affected stakeholders (e.g. local communities). The company assesses this data in consultation with BSP and supply chain participants as needed to infer whether additional risk mitigation action is required.

iTSCi:

公司询问 ITSCi 秘书处，获取风险降低流程的详细信息。公司力求：

The company checks with the ITSCi secretariat to obtain details of the risk mitigation process. The company seeks to:

明确原料的具体来源，包括生产商和出口商的名称

- Identify the specific source of the material including the name of the producer and exporter
明确已报告风险是否已在后续报告期间得到解决及/或重新报告。

- Identify whether the reported risks have been addressed and/or are re-reported in the subsequent reporting period.

查询解决风险的方法，包括由谁执行风险降低活动

- Query the methodology for addressing the risks including who performed risk mitigation activities
要求定期更新相关供应链的风险降低活动
- Request regular updates of the risk mitigation activities for relevant supply chains

情景 2：在没有上游计划的情况下降低风险：

Scenario 2: Mitigating risks without an upstream program:

公司在发现有“高风险”的原料进入了公司的供应链时会向高级经理报告，并决定在实施风险降低计划的同时继续与供应商进行业务往来。

The company reports to the senior manager when we find “high-risk” material has entered our supply chains, and decides to continue business with the supplier while implementing a risk mitigation plan.

公司就风险降低策略咨询供应商、客户和当地利益相关者，以确保其可行性和有效性。经各方同意，公司会制定风险降低计划。交易商和选矿厂必须支持风险降低计划在矿场的实施。作为一项为期 3 个月的改进计划的一部分，矿场须采取补救措施并设立尽职调查程序，以确保不存在经合组织指南附录二下的任何风险。公司可以聘请一家第三方评估机构，该机构是经合组织五步框架方面的专家，在接下来的 6 个月中考察该矿场，并确认风险降低行之有效。公司通过与供应商和参与矿场持续风险监测的其他利益相关者（如

当地社区、非政府组织、客户、行业组织、咨询公司)合作,确保持续评估相关风险。

The company consults its suppliers, customers and local stakeholders on the risk mitigation strategy to ensure its feasibility and effective. With all parties' agreement, the company develops a risk mitigation plan. The trader and the concentrator are required to support the implementation of the risk mitigation plan at the mine site. As part of a 3-month improvement plan, the mine site takes remediation actions and sets up a due diligence procedure to ensure no risks under Annex II of OECD Guidance is present. The company hires a third-party assessment firm, which is an expert in OECD five steps framework, to visit the mine site in the following 6 months and confirm that the risk mitigation is effective. The company ensures that it assesses risks on an ongoing basis by working in partnership with suppliers and other stakeholders (e.g. local community, NGO, customers, industry organization, consulting company) engaged in continuous risk monitoring at the mine site.

在执行风险缓解计划的同时,本公司指导供应商加强对于钨供应链的风险管理。

While implementing the Risk Mitigation Plan, the company directs its supplier to strengthen risk management for the tungsten supply chain.

江钨世泰科钨品有限公司
Jiangwu H.C. Starck Tungsten Products Co., Ltd.
2019年5月9日
9th May, 2019

