

南京钢铁股份有限公司 冲突矿产尽职调查政策

Nanjing Iron & Steel Co., Ltd. Conflict Minerals Due Diligence Policy

南京钢铁股份有限公司（以下简称“公司”）作为负责任的企业，认识到在受冲突影响和高风险区域从事矿产资源开采、贸易、处理和出口存在可能造成重大负面影响的风险，并认识到有尊重人权、不助长冲突和不对环境和社会产生负面影响的义务。公司严格遵守《经合组织关于来自受冲突影响和高风险地区矿产的负责任供应链尽责调查指南》《中国负责任矿产供应链尽责管理指南》等国际公约和行业倡议，关注公司经营所在地与冲突矿产相关的法规和监管要求，坚决反对采购任何违反国际法规和侵犯人权的非法矿产，承诺不使用冲突矿产，不与涉及受冲突影响地区采购活动或与之相关联的供应商开展合作。

Nanjing Iron & Steel Co., Ltd. (hereinafter referred to as the "Company"), as a responsible enterprise, recognizes the risks associated with the mining, trading, processing, and export of mineral resources in conflict-affected and high-risk areas, which may lead to significant negative impacts. The Company acknowledges its obligation to respect human rights, not to contribute to conflicts, and to avoid negative impacts on the environment and society. The Company strictly adheres to international conventions and industry

initiatives such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, pays close attention to the laws and regulatory requirements related to conflict minerals in the areas where it operates, firmly opposes the procurement of any illegal minerals that violate international regulations and infringe on human rights, and commits to not using conflict minerals and not cooperating with suppliers involved in procurement activities related to conflict-affected areas or are associated with such activities.

公司对矿产供应链负责任管理提出明确的要求，并要求所有供应商严格遵守且积极践行。公司承诺每年按照《关于来自受冲突影响和高风险区域的矿产的负责任供应链尽职调查指南》对涉及冲突矿产的供应商开展尽职调查，并对供应商提供资料进行严格审核，用于识别上游冶炼厂/精炼厂及其资质认证状态，确保不涉及冲突矿产，保障供应链的责任性与可持续性。

The Company sets clear requirements for the responsible management of the mineral supply chain and requires all suppliers to strictly comply and actively implement these requirements. The Company commits to conducting due diligence on suppliers involved with conflict minerals annually in accordance with the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and to rigorously reviewing the information provided by suppliers to identify upstream smelters/refiners and their qualification status, ensuring that no

conflict minerals are involved, and safeguarding the responsibility and sustainability of the supply chain.

我们参考国内外冲突矿产要求，制定冲突矿物报告模板对供应商冲突矿产情况开展调查，并通过采访、实地观察、文件审查等方式核实信息，以评估供应链中与冲突矿产相关的风险。

We refer to domestic and international conflict minerals regulatory requirements, develop the Conflict Minerals Reporting Template (CMRT) to conduct due diligence on the conflict minerals status of our suppliers, and verify information through interviews, on-site investigation, and document reviews to assess the risks related to conflict minerals in the supply chain.

公司提供畅通的沟通和申诉机制，以保障本政策的有效实施。对于任何实际发生或涉嫌违反本政策或任何适用法律法规的情况，公司所有董事、高级管理层及员工，以及所有合作伙伴均有义务上报。若希望举报，可将有关违规实情或嫌疑情况，或其他投诉，或涉及的问题，拨打电话 025-57072073。公司承诺严格保密举报人身份信息及举报内容。

The Company provides accessible communication and complaint channels to ensure the effective implementation of the policy. All directors, senior management, employees, and all partners of the Company are obligated to report any facts or suspicions of violations of this policy or any applicable laws and regulations. If you wish to report, please call 025-57072073 regarding any violations or suspicions, or other complaints or issues. The Company

commits to strictly keeping the identity of the whistleblower and the content of the report confidential.