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referred to as the "Policy").

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4.

4.War crimes, crimes against humanity, genocide and other serious violations of international humanitarian law;

5.

5.Other serious human rights abuses and violations, including widespread sexual violence.

Risk Mitigation

If we have reasonable grounds to believe that such risks exist, namely that an upstream supplier has committed any of the above human rights violations, or procures materials from or is associated with any party engaging in the severe human rights violations specified above, we shall immediately suspend or terminate our cooperation with the upstream supplier.

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We will not tolerate any direct or indirect support provided to non-state organized armed groups through the exploitation, transportation, trading, processing or export of mineral resources. This includes but is not limited to purchasing minerals from illegal organized armed groups or their affiliates, making payments to them, or providing logistical support, equipment and other supplies to them by other means. Such armed groups or their affiliates refer to those that:

1.

1.Illegally control mining areas, or otherwise exercise control over transportation routes, mineral resource trading points, and upstream entities in the supply chain;

2.

2.Impose illegal taxes, extort money or mineral resources at mine entrances, along transportation routes or at mineral resource trading points;

3.

3.Levy illegal taxes or conduct extortion against middlemen, export enterprises and international traders.

We will put an end to providing direct or indirect support to public or private armed forces that illegally control mine sites, transportation routes and upstream supply chain entities, impose illegal taxes or demand money and minerals at mine entrances, along transportation routes or at mineral trading points, or conduct illegal taxation and extortion against middlemen, export enterprises and international traders.

We will support or take measures to engage wiMk local governmenms, iNnmernamiOnal organiZamiOns and ciVil sociemy organiZamiOns to avoid or miNiMiZe txe negamiVe iMpacts On Vulnerable groups, especially ariSanal MiNers, caused by Txe StamiOniNg Of Public Or priVame armed securiMy f rces amnmiNe siMus.

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laundering and terrorist financing, such as clarifying and disclosing the identity and ultimate ownership of suppliers and customers, monitoring transactions involving abnormal or suspicious activities, and retaining records of cash transactions exceeding the monetary thresholds specified in applicable laws and regulations.

We will ensure the payment of all legitimate taxes, fees and concession royalties to the government in relation to ore mining, trading and export of ores in conflict-affected and high-risk areas. We further undertake to disclose such payments in compliance with the local laws and requirements of the host country governing the disclosure of payments made to the government authorities, based on our position in the supply chain.

Risk Mitigation

Based on the specific position of enterprises in the supply chain, we undertake to cooperate with suppliers, central or local governments, international organizations, civil society organizations and affected third parties as appropriate to improve or track performance with the aim of adopting measurable measures within a reasonable time frame to prevent or mitigate the risks of adverse impacts. Where risk mitigation measures prove ineffective, we will suspend or terminate cooperation with upstream suppliers.

We will not participate in, tolerate or benefit from resource extraction on lands without the free, prior and informed consent of local and indigenous peoples, including by mining operators holding legal ownership, leasehold rights, concessions or permits. We will not participate in, tolerate or benefit from mining operations that fail to respect and protect the culture

We will make reasonable efforts to pay specific attention to the risks associated with [illegible] small-scale mining, including forced labor and child labor, unsafe working conditions, uncontrolled use of hazardous chemicals and other major environmental impacts, and seek as appropriate to establish a cooperative relationship with artisanal and small-scale miners in the development are

Risk Mitigation

If we have reasonable grounds to believe that such risks exist, we will immediately formulate, adopt and implement risk management plans together with suppliers and other stakeholders based on the enterprise's specific position in the supply chain, so as to prevent or

1.Violating the laws and regulations of China and host countries or minimum industry standards;

2.

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2.Employing children below the minimum working age stipulated by the laws and regulations of the host country; where no relevant laws and regulations on minimum working age exist in the host country, employing children under the age of 16;

3. (18)

3.Disregarding the rights and interests of young workers (referring to workers who have reached the legal minimum working age but are under 18 years of age).

Risk Mitigation

If we have reasonable grounds to believe that upstream suppliers pvr A risks of facilitating or associating with parties committing Vrious Mivondut, we will formulater adopt and impleret risk manageMet plans together with supply chain stakeholders to prevent or redue relevant risks. In such cases, if the risk manageMet plan fails to achieve results within six months, we will suspend or terminate cooperation with the supplier.

When conducting procurement or production in conflict-affected and high-risk areas, we will not benefit from, assist or facilitate, nor source from or associate with any party that provides life-threatening occupational health and safety conditions for its direct and/or indirect employees and/or any personnel on its production sites.

Risk Mitigation

If we have reasonable grounds to believe that upstream suppliers source from or are associated with any party that provides life-threatening occupational health and safety conditions, we will immediately suspend or terminate cooperation with such suppliers.

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We undertake to strictly refrain from participating in, tolerating or benefiting from slavery and human trafficking at any stage within the supply chain.

Risk Mitigation

If we have reasonable grounds to believe the existence of such risks, namely that upstream suppliers engage in slavery and human trafficking in any business link, or source from or are associated with any party committing the serious violations specified

above, we will immediately suspend or terminate cooperation with the upstream supplier.

Risk Mitigation

If we have reasonable grounds to believe that suppliers severely damage biodiversity or cause continuous ecosystem degradation and fail to take effective remedial measures within a reasonable period, we will suspend or terminate cooperation with such suppliers.

The Company accepts supervision from all relevant stakeholders on the implementation of this policy. Any relevant party (including but not limited to raw material suppliers, service suppliers, employees, community members and civil society organizations) may submit grievances through the following channel:

HNXZHESG@hnmining.com

Email: HNXZHESG@hnmining.com