

Mineral Supply Chain Due Diligence Assessment Summary Report

Assessed Party	Serbia Zijin Copper Doo Bor				
Assessment Date	02/19/2025-02/21/2025	02/19/2025-02/21/2025			
Assessed Material	Copper	Copper			
LME-listed Brand	ZIJIN BOR				
Assessment Type	☑ Main Assessment ☐ Tracking Assessment				
Assessment Result	\Box AAA	□ АА	☑ A	□В	□С
Assessment Firm	China Standard Conformity Assessment CO., LTD (CSCA)				
Assessor	Hou Chao, Yang Dong				



Instruction

Objective

This assessment program is an independent third-party assessment conducted by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) based on *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*, aiming to assess the performance of the Company's due diligence management system and process, and support the Company to identify the gaps that need further improvements and develop corresponding improvement measures.

Basis of the Assessment

The assessment is based on Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition), hereinafter referred to as the Guidelines. The companies shall meet the content of "Companies should" in the Guidelines. "Companies should" refers to specific requirements of the Guidelines for companies' due diligence management, as well as the specific refinement of the requirements, which is consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition).

Explanation of Conformity Degree

Conformity: Indicates that the Company's management system, policies, procedures or processes meet the requirements of corresponding provisions of *the Guidelines*.

Need improvement: Indicates that the Company's management system, policies, procedures or processes partially meet the requirements of corresponding provisions of *the Guidelines*, but lack some necessary elements or content, or can not prove or lack evidence to prove that they are substantively functional, and further measures are needed to improve its performance.

Non-conformity: Indicates that the Company's management system, policies, procedures, or processes cannot meet the requirements of corresponding provisions of *the Guidelines*, resulting in systematic and repetitive non-conformities.

Not applicable: Indicates that corresponding provisions of *the Guidelines* do not apply to the Company.



Zero tolerance: If any of the following situations occurs, it is a "zero tolerance" situation.

- 1. Misrepresentation, deliberately forging false evidence or vouchers;
- 2. Any form of support for illegal control, or illegal taxation and extortion by non-state armed groups;
- 3. Any form of torture, cruel, inhuman and degrading treatment;
- 4. Directly cause or contribute to forced or compulsory labor;
- 5. Cause or contribute to widespread sexual violence;
- 6. The worst forms of child labor;
- 7. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
- 8. Other situations generally considered unacceptable.

Explanation of Assessment Results

The overall assessment result is based on the percentages of "non-conformity" items and "need improvement" items. The China Chamber of Commerce of Metals, Minerals & Chemical Importers & Exporters (CCCMC) provides the following suggestions on the assessment results:

Level AAA: There is no "non-conformity" items, indicating that the Company has excellent supply chain due diligence management performance.

Level AA: the percentage of "Need improvement" items does not exceed 15% of all applicable items, and the percentage of "non-conformity" items does not exceed 5% of all applicable items.

Level A: the percentage of "Need improvement" items does not exceed 25% of all applicable items, and the percentage of "non-conformity" items does not exceed 10% of all applicable items.

Level B: the percentage of "Need improvement" items does not exceed 35% of all applicable items, and the percentage of "non-



conformity" items does not exceed 20% of all applicable items.

Level C: The above level cannot be reached or there is any "zero tolerance" situation.

Description of Assessment Type

The assessment is divided into main assessment and tracking assessment. The main assessment needs to be carried out once a year. The tracking assessment is conducted every six months or during the re-assessment (main assessment) based on the conformity degree and assessment results.



1. Assessed Party

Company Name	Serbia Zijin Copper Doo Bor	
Refinery Name	Serbia Zijin Copper Doo Bor	
Location	Đorđa Vajferta 29, 19210 Bor, Serbia	
Profile Number	DDMSC-CNCu0108	

2. Assessment Results

Туре	☑ Main Assessment		☐ Tracking Assessment			
Result	☐ Level AAA	☐ Level AA	☑ Level A	☐ Level B	☐ Level C	

3. Assessment Scope

Materials	Copper		
LME-listed Brand	ZIJIN BOR		
Types of Materials	☐ Mine materials	☐ Recycled materials	☑ Both
Assessment Period	☑ 12 months: 01/01/2024-12/31/2024	☐ Less than 12 months:	



4. Summary of Assessment Results

Assessment Result A

Step 1: Establishing A Corporate Due Diligence System				
Develop and adopt due diligence policy	The company has formulated and approved the <i>Copper Supply Chain Responsibility Management Policy</i> , which includes requirements for both the company and its suppliers, as well as risk management for identified risks. This policy has been made public on the company's official website.			
Structure appropriate internal management systems	A Copper Supply Chain Responsibility Management Committee and a Responsibility Management Joint Office have been established within the company. The <i>Copper Supply Chain Responsibility Management Committee Management Measures</i> have been formulated, with the company's general manager appointed as the committee chair and department heads as members of the Responsibility Management Office. Internal training on mineral supply chain responsibility management has also been conducted.			



Establish a system of controls and transparency over the supply chain	The company has developed a <i>Supplier Classification Management Procedure</i> and a <i>Supply Chain Control and Transparency System</i> . The company regularly conducts warning signal reviews, and if warning signals are triggered, the supply chain control and transparency system is further improved, and supply chain traceability information is supplemented.
Strengthen engagement with suppliers	The company has formulated a Supplier Code of Conduct and a Supply Chain Responsibility Management Questionnaire (KYS Questionnaire), which suppliers are required to sign. The content includes compliance with responsibility management policy requirements to ensure that suppliers meet the responsibility management standards for the mineral supply chain.
Establish a Company level grievance mechanism and/or participate an industrial level grievance mechanism	A Supply Chain Responsibility Management Grievance Mechanism has been established and published on the company's official website. The grievance mechanism includes information on the company's participation in the grievance mechanism at the industry level. On-site assessments have confirmed no complaints occurred during the assessment period.
Step 2: Risk Identification ar	nd Assessment
Conduct warning signs review, and	
identify the scope of the risk	The company has formulated the Serbia Zijin Copper Co., Ltd. Conflict-Affected and High-Risk Areas

assessment of the mineral supply chain based on the results of warning signs review

identify the scope of the risk The company has formulated the Serbia Zijin Copper Co., Ltd. Conflict-Affected and High-Risk Areas (CAHRAs) Identification Procedure and the Serbia Zijin Copper Co., Ltd. Alert Signal Identification List. Warning signal reviews have been conducted based on these documents.



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When warning signs are identified, companies shall conduct an on-the-ground assessment of the corresponding supply chain	The company has conducted warning signal reviews according to the <i>Conflict Affected and High Risk Areas</i> (CAHRAs) Identification Procedure, and the results showed that warning signals were triggered during the assessment period. The company's parent group engaged a third-party organization to conduct an on-site assessment and developed a <i>Mineral Supply Chain Responsibility Management On-Site Assessment Report</i> .
Assess risks in the supply chain	The company has carried out mineral supply chain risk identification and assessment and has formulated the <i>Serbia Zijin Copper Co., Ltd. Risk Identification and Assessment Report</i> . The company has identified and assessed risks related to supply chain responsibility management through desktop research, on-site assessments, and questionnaire analysis.
Step 3: Risk Prevention and 	Mitigation
Report risk assessment results internally	The company has conducted supply chain risk identification and assessment and has formulated the Serbia Zijin Copper Co., Ltd. Risk Identification and Assessment Report and the Serbia Zijin Copper Co., Ltd. Risk Assessment Results Reporting Form. The company reported the risk assessment results to the Supply Chain Responsibility Management Committee.
Develop and adopt risk management plan	The company has formulated and approved the <i>Serbia Zijin Copper Co., Ltd. Risk Management Plan Procedure and Risk Management Plan.</i> The plan covers mitigation strategies and response measures for different risks.
Implement risk management plan, monitor and track performance of risk mitigation strategies	The company has formulated and approved the <i>Serbia Zijin Copper Co., Ltd. Risk Management Plan Procedure and Risk Management Plan.</i> During the assessment period, there were no significant changes to the company's risk management plan, which could be adapted to environmental changes.



Supplementary assessment of risks						
that	nee	ed	to	be	e mi	tigated.
Supplementary assessment can						
also	be	coı	nduc	ted	after	actual
circumstances have changed						

The company has formulated the *Serbia Zijin Copper Co., Ltd. Additional Risk Assessment Requirements Form* to ensure that additional risk assessments could be conducted when changes occur in the supply chain. And it has confirmed that no additional assessments are needed during the assessment period.

Step 4: Internal and External Assessment

Companies should establish internal assessment system, to continuously monitor and manage due diligence performance	The company has established an internal assessment team, appointed an internal assessment team leader and members, formulated an internal assessment work plan, and conducted internal assessments to form internal assessment reports. The company stipulates that the internal assessment should be conducted at least once a year.
Companies should designate the second or third party to conduct assessment when applicable	This is an independent third-party assessment of the copper supply chain due diligence management participated by the company.
When necessary, the company at the key points (smelters/refiners) makes necessary disclosures on the	The company has committed to releasing the Assessment Summary Report of Supply Chain Due Diligence

Step 5: Reporting and Communication

assessment results



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Develop due diligence progress report	The company has prepared and publicly released the Serbia Zijin Copper Co., Ltd. Supply Chain Responsibility Management Progress Report on its official website, which includes due diligence management information of the company.
With due regard to business confidentiality and other competitive concerns, companies should publish due diligence progress reports or summary	The company has prepared and published the Serbia Zijin Copper Co., Ltd. Supply Chain Responsibility Management Progress Report on its official website. Link: https://zijinbor.com/#/PerformanceReport
Step 6: Provide for or Cooper	rate in Remediation When Appropriate
When the Company recognize that it has caused or contributed to actual adverse impacts, they should mitigate these impacts by providing for or cooperating in remediation when appropriate	N/A
Companies provide conditions or cooperate with existing remedial mechanisms in a timely manner	N/A