



# **China Molybdenum Co., Ltd.**

## **Human Rights Policy**

**(This policy was prepared in both Chinese and English versions. Where there is discrepancy between the Chinese and English versions, the Chinese version shall prevail)**

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## Chapter 1 Our Commitment

China Molybdenum Co., Ltd., (“Group”) together with its subsidiaries (collectively, “CMOC”), is committed to promoting and protecting human rights wherever we operate. We recognize our responsibility to create positive impacts in society, and we respect the rights of all individuals, including employees, suppliers, community members and others who may be potentially impacted by our business operations.

CMOC’s commitment to addressing the human rights related aspects of our operations and supply chains is based on our corporate values of “Lead Responsibly,” “Act with Integrity” and “Live Respectfully.” We are an active, engaged member of the communities in which we operate and use consultative processes to identify and understand actual and potential human rights impacts of our activities. We believe showing respect for human rights contributes towards maintaining our competitiveness and fostering a good relationship with stakeholders.

We recognize our responsibility to respect internationally recognised human rights standards and guidance, including:

1. the International Bill of Human Rights, which comprises the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
2. the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and the eight fundamental ILO Conventions;
3. the United Nations Human Rights Council Guiding Principles on Business and Human Rights;
4. the Voluntary Principles on Security and Human Rights; and
5. the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We accomplish this by:

1. Assessing our human rights impacts and risk areas, including through country assessments and incorporating human rights due diligence into our decisions and operations, such as before making any significant acquisition, when we engage new suppliers, and through third-party audits. In conducting due diligence, we are guided by international standards, including, where appropriate, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
2. Consulting with stakeholders such as local communities, employees, government entities, investors and others regarding human rights impacts and risk areas. We engage in this consultation both in the context of our human rights due diligence and as part of our broader efforts to maintain positive, respectful relationships with local communities. We have established and maintained regular communication and outreach with local stakeholder groups, as well as engaged with local government and civil society organizations where appropriate. We also have a Community Policy at the group level, which further sets out our commitments regarding the communities in which we operate, and is supported by community relations programs the central goal of which is impact mitigation;
3. Respecting the rights and cultural heritage of everyone, including vulnerable and indigenous communities, through actions and policies such as working to obtain the free, prior and informed consent of indigenous communities where significant adverse impacts are likely to occur as a result of relocation, disturbance of lands and territories or of critical cultural heritage, seeking to avoid involuntary displacement, and respecting the unique cultures, customs, and values of the communities where we operate;
4. Prohibiting modern slavery, including forced labor, child labor, slavery or servitude, and human trafficking in all forms;
5. Establishing fair employment practices and treating all individuals with dignity and respect, with zero tolerance to all forms of unlawful discrimination and harassment, such as on the basis of race, color, sex, religion, national origin, sexual orientation, gender identity or expression, disability, or age;
6. Establishing policies relating to procurement or to the selection and due diligence of business partners, which align with this Human

Rights Policy, such as our Supplier Code of Conduct. CMOC believes in doing business only with suppliers who demonstrate high standards of ethical business conduct, and expects suppliers to read, understand, and follow the Supplier Code of Conduct, which provides that this Human Rights Policy applies to all CMOC suppliers;

7. Establishing and maintaining grievance mechanisms at every site to address feedback, concerns or complaints from employees and stakeholders;
8. Working to reduce and minimize the adverse impacts, including resettlement, of our operations on individuals, employees, and communities;
9. Providing a workplace environment that ensures health and safety, fair treatment and working conditions, including fair compensation, reasonable hours and rest breaks, guided by the principles set out by the International Labour Organization. Please refer to our Code of Business Conduct to learn more on how we prioritize workplace safety;
10. Respecting workers' rights to freedom of association and collective bargaining;
11. Respecting the natural environment of the areas in which we operate, as further detailed in our Environmental Policy.
12. Embedding the responsibility to respect human rights through all our business functions and processes, such as by incorporating human rights due diligence into our contracting decisions, educating and training our employees in relation to this policy, and providing or ensuring training of security providers in line with the Voluntary Principles on Security and Human Rights in high risk regions;
13. Training all employees and contractors, including security personnel, on the potential human rights impacts associated with their day to day activities; and
14. Communicating the steps taken to address actual or potential human rights impacts, including translation into local languages where necessary. We publish an annual Environmental, Social, and Governance Report, available on our website, which includes a description of the actions we take to manage human rights risks.

## **Chapter 2 Applicability and Expectations of Relevant Parties**

This Policy applies to the operations of all CMOC companies as defined above. In line with our commitment to identify and mitigate the human rights risks associated with individual projects, specific CMOC companies may develop additional requirements or policies relevant to their unique circumstances. To the extent any CMOC company has site-specific human rights policies, such policies shall be aligned to this Policy.

CMOC expects its employees, its business partners and other parties relevant to CMOC's operations to respect human rights. To that end, this Human Rights Policy applies to all CMOC employees and suppliers.

## Chapter 3 Our Key Human Rights Priority

CMOC recognizes that risks of adverse impacts associated with extracting and handling minerals from conflict-affected and high-risk areas are likely to be the most salient for our operations. We will continue to develop processes to address these risks. We commit to uphold international standards of diligence and conduct, as described in Chapter 1 above, to mitigate these risks, and in particular, to adopt and incorporate the OECD Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas in our relevant supply contracts.

## **Chapter 4 In cases of conflicts between international human rights principles and local law requirements**

CMOC aims to conduct businesses according to local laws and regulations, as well as the international human rights standards above. Where CMOC faces conflicts between the two, we seek to respect the international human rights as our primary mandatory commitment.

## Chapter 5 Accountability

This Human Rights Policy is communicated internally and externally via CMOC's website and provided to each of our suppliers. We believe proactive communication helps us stay accountable for our actions to meet its responsibility to respect human rights.

Our Legal and Compliance Department annually monitors and reviews this Human Rights policy and works towards continuously improving our human rights performance, identifies progress measurement indicators and tracks the effectiveness of our actions to identify and address human rights risks.

If there is any grievance or suspected violation of this Human Rights Policy, please contact the CMOC Legal and Compliance Department or report via our whistle-blower channel at [www.cmoc.com](http://www.cmoc.com).

## **Chapter 6 Effectiveness and Interpretation**

This Policy shall be interpreted by the Legal and Compliance Department of the CMOC Group.

This Policy shall come into force after being approved by the Board of Directors of the Company. If any policy previously issued by CMOC conflicts with this Policy, this Policy shall prevail.