

# 云南锡业股份有限公司关于冲突矿物政策的声明

## CONFLICT MINERAL POLICY STATEMENT OF YUNNAN TIN COMPANY LIMITED

云南锡业股份有限公司是世界最大的锡生产企业。拥有锡矿地质勘探、采掘、选矿、熔炼和锡的深加工，例如锡化工产品及焊料，以及锡的二次物料回收的设施。锡矿主要来源于自有矿山和国内矿山采购，以及部分缅甸进口。同时，从中国国内回收锡的二次物料进行循环利用。公司拥有两家冶炼厂，分别为云南锡业股份有限公司冶炼分公司 CID002180（地址：中国云南省个旧市冶炼路 1 号）以及郴州云湘矿冶有限责任公司 CID000228（地址：中国湖南省郴州市苏仙区桥口镇下渡村舍谷田组）。

Yunnan Tin Company Limited is the world's largest tin producer with facilities to explore, mine, concentrate, smelt, and also to downstream process tin into products such as chemicals and solder, as well as facilities to recycle tin secondary materials. Our cassiterite is generally sourced from our own concessions and other mines within China with portion of imports from Myanmar, and we also source secondary materials inside China for recycling. Yunnan Tin Company Limited owned two tin smelters, they are: Smelting Branch of Yunnan Tin Company Limited with CFSP CID002180(Add: No. 1 Yelian Road, Gejiu, Yunnan, P.R.China) , and Chenzhou Yunxiang Mining and Metallurgy Co.,Ltd with CFSP CID000228 (Add: Shegutian Group,Xiaducun, Qiaokou Town,Suxianqiao District, Chenzhou, Hunan,P.R.China)

根据 2010 年 7 月 21 日生效的《多德—弗兰克华尔街改革和消费者保护法案》第 1502 节规定：“冲突矿物”包括锡石及其衍生物，同时还有其它两种矿物和黄金。公司支持这项法案所要达成的目标，也从未与刚果民主共和国东部省份有关冲突采矿行业联系，并将认可此项法律对于在美国证券交易所的上市公司所做的相关披露要求。

Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act effective on July 21st 2010 defines 'Conflict Minerals' as including 'cassiterite and its derivatives' along with two other minerals and gold. Yunnan Tin Company Limited generally supports the objectives of this law and has no link between mining and conflict in the eastern Provinces of the Democratic Republic of Congo (DRC), and recognize the disclosure requirements which this law imposes on SEC reporting companies in the US.

我们的锡经营业务涉及二次物料的购买和处理，这些二次物料是从中国国内供应商处获得的使用寿命已经完结的材料、副产品或者中间产品等。我们也认为我们的锡回收业务应该对促进自然资源的可持续管理和活动做出重要和积极的贡献。我们在采购过程中，要求供应商承诺其提供的物料应产自非冲突地区，否则不予采购。

Our tin business partly involves the purchase and treatment of secondary materials that we obtain from end-of-life materials, by-products or intermediate products from Chinese suppliers. We also consider our tin recycling business to be an important and positive contribution to the sustainable management of natural resources and an activity that should be promoted. In the process of sourcing, we require commitment by our suppliers that their materials shall originate in conflict-free minerals. Otherwise, we will terminate sourcing immediately.

经济合作与发展组织（OECD）和联合国（UN）已经发布了大体相似的指导方针，用于对采购来自冲突地区和高风险地区的矿物的公司进行尽职调查，联合国发布的指导方针明确

提到了刚果民主共和国。方针鼓励有关公司在建立其尽职调查规程时利用好 OECD 指导，并倡导在负责采购的同时，增加政策灵活性以便使贸易可以继续进行。

Both the Organisation for Economic Co-operation and Development (OECD) and the United Nations (UN) have released broadly similar guidelines for company due diligence on minerals from conflict affected and high risk areas, and in the case of the UN, specifically for the DRC. The OECD guidance encourages companies to draw upon it as they establish their due diligence practices, and the guidance aims to promote responsible sourcing by incorporating the flexibility to allow trade to continue.

我们已经依据经济合作与发展组织指导方针的“红旗”标准对我们的矿石来源和供应商进行了评估，并认为无需作进一步的评估。公司并不从刚果金或毗邻国家进口锡矿。

We have assessed our sources and suppliers of minerals according to the ‘red flag’ criteria contained in the OECD guidance and consider that the need for further due diligence is not required. Our company does not source cassiterite from the DRC or adjoining countries.

We are engaged in the Conflict Free Smelter Programme and participate in auditing processes to provide assurance for our customers that our tin ingot and products are from sources not linked to conflict.

我们正在推进无冲突冶炼厂计划和审计进程，保证锡锭和产品的来源与冲突地区没有任何联系。

### 相关公司和协会的行动

#### RELEVANT COMPANY AND ASSOCIATION ACTIONS

尽管我们并不从刚果金或毗邻国家进口锡石，但我们都可以确保公司内部人员，冶炼厂经理或矿石采购员等了解美国的“冲突矿物”法以及经济合作与发展组织指导方针的“红旗”标准。我们同样也让我们的供货商了解了相关标准，并且在供货合同中包含了相关文本。

Although not sourcing cassiterite from the DRC or adjoining countries, we have made relevant personnel within our company such as smelter managers and mineral purchasers aware of the ‘conflict minerals’ law of the US, as well as the ‘red flag’ criteria of the OECD guidance. We have also made our suppliers aware of these criteria and have included relevant text in our supply contracts.

我们也通过其他渠道（例如公司网站）将这种政策告知了我们的消费者。

We also communicate this policy to our customers and publicly through other channels such as our company website.

我们已经认识到了有关刚果民主共和国锡矿石供应的问题，并作为国际锡协会的成员之一，2009年10月，发布了国际锡业协会成员有关手工开采和小规模开采（ASM）的声明，声明中每个成员公司都不能购买已知或疑似产于刚果地区的锡石，除非（这些矿石的）情况符合国际锡业协会锡供应链追溯计划(iTSCi)的现行要求。

We recognized issues with tin supply from the DRC and committed, as a member of the global tin association ITRI, to a policy on artisanal and small scale mining. This was followed in October 2009 by the ITRI Member Declaration on Artisanal and Small Scale Mining that included a

commitment by each member company not to purchase cassiterite known or suspected to have originated in the DRC unless participating in, and complying with, the current requirements of the ITRI Tin Supply Chain Initiative (iTSCi).

公司从未购买，现在也没有购买从刚果（金）或毗邻国家产出的锡石，因为这不属于我们的业务模式。我们完全支持 iTSCi 计划，以区分矿物交易是否为冲突提供了资金，为了使手工和小规模采矿得以继续，同时在可能的时候避免对这一区域的完全禁运。我们认为，“冲突矿物”可以更有效的从源头进行控制，而不是在冶炼这一环节上。

Our company has not, and is not purchasing cassiterite from the DRC and/or adjoining countries, since that is not part of our business model. However, we fully support the aims of the iTSCi programme to differentiate between minerals trade that may be funding conflict, and the trade that is not, in order to allow artisanal mining to continue when possible, and to avoid a complete embargo on the region. We consider that ‘conflict minerals’ can most effectively be controlled at source, rather than at the point of smelting.

我们注意到，iTSCi 计划参照了经济合作与发展组织指导方针的会员资格部分，并且支持经济合作与发展组织的建议，特别是在附录 2，“负责任的全球供应链的模范供应链政策”。未来我们将通过 iTSCi 系统购买从刚果（金）或毗邻国家产出的锡石，同时遵守经济合作与发展组织指导方针附录 2。

We note that the iTSCi programme references the OECD guidance in membership documents and aims to support the recommendations of the OECD, in particular Annex II, the ‘model supply chain policy for a responsible global supply chain’. Should we source cassiterite from the DRC or adjoining countries in the future we will do so through the iTSCi system and therefore while recognising Annex II of the OECD guidance.

国际锡业协会自 2009 年 12 月作为会员公司代表，担任经合组织的多方利益相关者工作组的主要参与者并参与了指导方针文件的工作。

ITRI has worked as a key participant in the OECD multi-stakeholder working group to develop the guidance document since December 2009 on behalf of member companies.

国际锡业协会拥有谅解备忘录，与刚果共和国、卢旺达、布隆迪和 ICGLR（五大湖地区的国际会议）的政府紧密合作，这些国家和地区都对 iTSCi 尽职调查系统的适用性给予了认可。

ITRI holds Memoranda of Understanding, and works closely with the Governments of the DRC, Rwanda, and Burundi, as well as the ICGLR (International Conference of the Great Lakes Region) who all recognise the iTSCi due diligence system as appropriate for use in their countries.

国际锡业协会也与美国国会相关办公室进行了讨论，参与了由美国证券交易委员会主持的圆桌会议，同时正在就可能的欧盟“冲突矿物”战略进行磋商。

ITRI has also participated in discussions with relevant offices of US Congress and a roundtable hosted by the SEC, and is participating in consultations regarding a possible EU strategy on ‘conflict minerals’.

自 2009 年初以来，国际锡业协会也代表会员企业支持并参与了全球电子可持续发展倡

议组织 (GeSI) 和电子行业公民联盟 (EICC) 工作, 并提供建议, 以改进无冲突冶炼厂 (CFS) 计划。

ITRI has also supported and worked with the Global e-Sustainability Initiative (GeSI) and Electronic Industry Citizenship Coalition® (EICC) since early 2009 and has provided advice to improve the conflict-free smelter (CFS) programme, also on behalf of member companies.

通过这些努力以及与各国政府和非政府组织的密切合作, 尽管没有直接参与从刚果(金)购买锡石, 但作为锡生产行业的领导成员, 公司旨在促进实现以下两个目标:

Through a combination of these efforts, and in close co-operation with Governments and NGOs, despite having no direct involvement in purchasing from the DRC, but as a leading member of the tin production industry, our company therefore aims to contribute to the achievement of two goals:

- 1、 尽量避免直接或间接从刚果金或其他毗邻国家的武装组织提供资金收益的矿业交易;

Minimising the trade in cassiterite that directly or indirectly finances or benefits armed groups in the DRC and/or adjoining countries, and;

- 2、 促进合法矿物从该地区进入全球供应链, 从而为地区经济和依靠此项贸易的当地社区提供支持。

Promoting ways for legitimate minerals from the region to enter the global supply chain, thereby supporting the economy of the region and the local communities that depend on this trade.

我们认可严格审查框架的实施, 例如经济合作与发展组织指导方针的概述, 这会花费一些时间, 并且对许多机制提出了挑战, 以促进区域采购的透明度, 例如已发展的 iTSCi 计划。我们也承认, 严格审批框架很有可能继续演变和发展, 特别是在美国证券交易委员会规则制定完成以后。

We recognize that implementation of due diligence frameworks, such as those outlined in the OECD guidance, will take time, and will present challenges as many of the mechanisms needed to facilitate transparency for in-region sourcing, such as the iTSCi project, are developed. We also acknowledge that these due diligence frameworks will likely continue to evolve and develop, particularly following the publication of the SEC rules.

供应链的意图应该是在刚果民主共和国及毗邻国家促进和推动改善治理, 和平与稳定, 尊重人权, 发展经济, 改善民生。

The intention of the supply chain should be to facilitate and promote improved governance, peace and stability, respect for human rights, economic development, and improved livelihoods in the DRC and adjoining countries.

然而, 正如近日报道, 领先的可持续性和倡导团体声称“对刚果矿物质的国际需求目前很低。这种低迷源于一些行业参与者对多德-弗兰克法案的要求严格的解释。它对矿工和他们的家人有严重影响, 所有利益相关者都应该致力于结束冲突, 减轻痛苦和建立一个和平与繁荣的刚果。”

However, “international demand for Congolese minerals is currently low. This downturn stems from a restrictive interpretation of Dodd-Frank’s requirements by some industry players. It has serious implications for miners and their families, and is not an outcome that is in the interest of anyone with a stake in ending the conflict, easing the suffering and building a peaceful and prosperous Congo,” as recently reported by leading sustainability and advocacy groups.

只有在贸易继续进行的时候才可能使尽职调查的框架和机制得以发展。我们敦促供应链中的所有参与者意识到他们各自的购买行为可能潜在的负面影响，协助锡生产行业，在刚果民主共和国及毗邻国家携手共同创建一个可持续的锡矿生产的解决方案。

Due diligence frameworks and mechanisms can only be developed when trade is continuing. We urge all participants in the supply chain to recognize the potential for negative impacts of their own purchasing decisions and to assist the tin production industry as we work jointly towards a lasting solution for sustainable cassiterite production in the DRC and the adjoining countries.

日期：2016年5月27日

Date: May 27<sup>th</sup>, 2016

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