

負責任礦產供應鏈管理政策

Responsible Minerals Supply Chain Policy

8 May 2023

美琪瑪認知到受衝突影響和高風險區域從事礦產開採、貿易、處理、出口，存在著可能形成重大負面影響的風險，並意識到美琪瑪有尊重人權、不助長衝突的社會義務，因此美琪瑪承諾採納並遵循經濟合作與發展組織(OECD)發佈的《經濟合作與發展組織關於來自受衝突影響和高風險區域的礦石的負責任供應鏈盡責管理指南 第三版》(簡稱 OECD 指南)，並將其併入與供應商簽訂的合同和/或協定之中。美琪瑪承諾不從事任何會為衝突提供資助的活動，承諾遵守聯合國相關制裁決議，或者在適用情況下，遵守執行此類決議的國內法律。

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to adverse impacts to society, MECHEMA commits to adopt the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Edition 3 published by the OECD (OECD Guidance). We will widely disseminate and incorporate the following policy into contracts and/or agreements with suppliers on responsible sourcing of minerals from high-risk areas. Mechema undertakes not to engage in any activities that would support conflict, and comply with relevant United Nations sanctioned resolutions, or, where applicable, to comply with domestic laws that enforce such resolutions.

與礦產開採、運輸、或貿易有關的嚴重侵權行為：

Regarding serious abuses associated with the extraction, transport or trade on minerals:

1. 在受衝突影響和高風險區域開展採購或經營活動時，美琪瑪既不會容忍也不會以任何方式獲利於、說明、協助或便利任何一方實施：

While sourcing from, or operating in high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of

- i) 任何形式的酷刑，殘忍、不人道和有辱人格的待遇。
any forms of torture, cruel, inhuman and degrading treatment
- ii) 任何形式的強迫或強制勞動。強迫或強制勞動是指以懲罰作為威脅 榨取的任何個人的、並非該人自願提供的勞動或服務；
any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily
- iii) 最惡劣形式的童工。
the worst forms of child labor
- iv) 其他嚴重侵犯和踐踏人權的行為，如普遍的性暴力行為。
Other serious human rights violations and abuses, such as general sexual violence.
- v) 戰爭罪或其他嚴重違反國際人道主義法的行為，以及反人類罪或種族滅絕罪。
war crimes or other serious violations of international humanitarian law, and crimes against humanity or genocide.

對嚴重侵權行為的風險管理：

Regarding risk management of serious abuses:

2. 如果美琪瑪有合理理由認為該風險存在，即上游供應商正從實施第 1 條所規定的嚴重侵權行為的任何一方進行採購或與該方有關聯，美琪瑪將立即中止或中斷與該供應商的合作。
We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

關於直接或間接支持非國家武裝團體：

Regarding direct or indirect support to non-state armed groups:

3. 美琪瑪不會容忍任何通過礦產開採、運輸、貿易、處理或出口為非國家武裝團體提供直接或間接的支援。通過礦產開採、運輸、貿易、處理或出口為非國家武裝團體提供“直接或間接的支持”包括且不限於從非國家武裝團體或其關聯方 4 購買礦產，向其進行付款，或以其他方式為其提供 後勤支援或設備等。這些武裝團體或關聯方：
We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
 - i) 非法控制礦址，或以其他方式對運輸路線、礦產交易點以及供應鏈的上游行為主體進行

非法控制；

illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

ii) 在礦址入口、運輸路線沿線或礦產交易點非法徵稅或者勒索 6 錢財或 礦產；並/或 illegally tax or extort money or minerals resources at points of access to mine sites, along transportation routes or at points where minerals are traded;

iii) 對中間商、出口企業、或國際貿易者非法徵稅或勒索。

illegally tax or extort intermediaries, export companies or international traders.

對向非國家武裝團體提供直接或間接支援的風險管理：

Regarding risk management of direct or indirect support to non-state armed groups

4. 如果美琪瑪有理由認為，上游供應商從向非國家武裝團體（見第三段中定義）提供直接或間接支援的任何一方進行採購或與之存在關係，美琪瑪將立即中止或中斷與該供應商的合作。

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

關於公共或私人安全武裝：

Regarding public or private security forces:

5. 美琪瑪同意根據第十段之規定，杜絕向非法控制礦址、運輸路線以及供應 鏈上游行為主體，在礦址入口、運輸路線沿線或礦產交易點非法徵稅或 索要錢財或礦產，或者向中間商、出口企業或國際貿易者非法徵稅或進 行勒索的公共或私人安全武裝提供直接或間接支援。

We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. 美琪瑪認可礦址及/或其周邊地區以及/或運輸道路沿線的公共或私人安全武裝的作用僅是維護法治，包括保障人權、保護礦工、設備和設施安全、保護礦址或運輸路線以使合法的開採和貿易不受干擾。

We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. 在美琪瑪或其供應鏈上的任何企業與公共或私人安全武裝簽訂了合約的情況下，美琪瑪承諾或者將規定，在與這類安全武裝進行合作的過程中將遵守《安全與人權自願原則》的規定。尤其是，美琪瑪將會支持或採取措施運用篩查政策，確保已知的實施過嚴重侵犯人權行為的個人或安全武裝單位不被錄用。

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with internationally recognized standards. In particular, we will support or take steps, to adopt

screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. 美琪瑪將支持或採取措施與中央或地方政府、國際組織和民間社會組織開展合作，共同為如何提高公共安全武裝安保費用的透明度、相稱性和問責性找到可行的解決方案。

We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. 美琪瑪將支持或採取措施與當地政府、國際組織和民間社會組織開展互動，避免或最大限度地降低公共或私人安全武裝駐紮在礦址給弱勢群體帶來的負面影響，尤其是對小作坊礦工的負面影響，這種情況下，供應鏈上的礦產是通過小作坊或小規模採礦的方式開採出來的小作坊。

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

對公共或私人安全武裝的風險管理：

Regarding risk management of public or private security forces:

10. 如果美琪瑪發現在一定程度上存在此類風險，將根據企業在供應鏈上所處的具體位置，立即制定、採用和實施上游供應商及其他利益相關方風險管理計畫，從而使第五段中所述的為公共或私人安全武裝提供直接或間接支援的風險得到遏制或降低。如果風險管理計畫實施六個月未起作用，美琪瑪將暫時停止或中斷與上游供應商的合作。美琪瑪發現在一定程度上有可能存在有違第8段和第9段內容的行為的情況下，將採取同樣的應對措施。

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or

private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

關於行賄受賄及礦產原產地的欺詐性失實陳述：

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. 美琪瑪不會提出、承諾、進行或索要任何賄賂，並且抵制誘惑，不會為了掩蓋或偽造礦產原產地，虛報礦產開採、貿易、處理、運輸、出口等活動應向政府繳納的稅收、費用和特許開採費而行賄。

We will not offer *directly or indirectly*, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export, or failing to follow relevant international standards and conventions for anticorruption.

關於洗錢：

Regarding money laundering:

12. 如果美琪瑪有理由認為，存在因開採、貿易、處理、運輸或出口在礦址入口、運輸路線沿線、或上游供應商礦產交易地進行非法徵稅或勒索而得的礦產所引起或與之相關的洗錢風險，美琪瑪將支援或採取措施，為有效消除洗錢行為做出貢獻。

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

關於向政府支付的稅收、費用及特許費：

Regarding the payment of taxes, fees and royalties due to governments:

13. 美琪瑪將確保向政府支付所有與受衝突影響和高風險區域礦石開採、貿易、出口相關的合法稅收、費用和特許費，並且承諾根據企業在供應鏈上所處位置依照《採掘行業透明度行動計畫》(EITI) 中的各項原則對此類支付進行披露。

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with internationally recognized transparency standards.

**對行賄受賄及礦產原產地的欺詐性失實陳述、洗錢及向政府支付稅收、費用、特許費的風險管理：
Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals,
money-laundering and payment of taxes, fees and royalties to governments:**

14. 根據企業在供應鏈上所處的具體位置，美琪瑪承諾與供應商、中央或地方 政府機關、國際組織、民間社會以及受影響的協力廠商酌情進行合作，本著在合理的時間跨度內採取顯著措施防範或降低有負面影響的風險之目的，對績效進行改善或跟蹤。風險降低措施未起作用的，美琪瑪將暫時停止或中斷與上游供應商的合作。

In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

關於職業健康與安全：

Regarding occupational health and safety:

15. 在高風險地區進行採購或生產時，美琪瑪不會獲利於、協助於任何為直接或間接在其生產現場的任何人員提供威脅生命的職業健康與安全環境的一方，或從該方採購或與之存在關聯。

While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and / or indirect employees and / or any person present on the party's operations.

關於職業健康與安全的風險管理：

Regarding risk management of occupational health and safety:

16. 如果美琪瑪有合理理由為上游供應商提供第 15 條中所定義的威脅到生命的職業健康和環境的任一方採購或與其存在關聯，我們將立即中止或中斷與其供應商的合作。

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing life threatening occupational health and safety conditions as defined in paragraph 1

關於童工：

Regarding child labor:

17. 美琪瑪將不會僱傭、獲利於、協助或為低於該國法律規定之最低工作年齡或不滿完成義務教育年齡的兒童就業而提供便利或跟其採購或與其有關連。如該國沒有相關規定，則最低工作年齡為 15 歲。

While sourcing from, or operating in high-risk areas, we will not employ, profit from, assist

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with, or facilitate, or source from, or be linked to, any party employing, profiting from, assisting with, or facilitating the employment of children under the minimum working age which is legally prescribed by the host country laws and regulations. If there is no relevant host country law or regulation, the minimum working age shall be 15 years.

關於童工的風險管理

Regarding risk management of child labor:

18. 如果美琪瑪有合理理由認為該風險存在，即上游供應商正從 17 條所規定的任一方僱傭同工進行採購或與該方有關連，我們將立即中止或中斷與其供應商的合作。

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party employing children as defined in paragraph 17.

美琪瑪國際股份有限公司

董事長 嚴隆財