

中色卢安夏铜业有限公司

矿产供应链尽责管理进展报告

CNMC Luanshya Copper Mines Plc
Minerals Supply Chain Due Diligence Progress
Report

2025.07.01 - 2026.06.30



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01 报告导读 REPORT INTRODUCTION

编制主体与周期

REPORTING ENTITY & CYCLE

中色卢安夏铜业有限公司（CNMC Luanshya Copper Mines Plc）。本报告为年度报告，涵盖周期为2025年7月1日至2026年6月30日。

CNMC Luanshya Copper Mines Plc. This is an annual report covering the period from July 1, 2025 to June 30, 2026.

编制范围

REPORTING SCOPE

涵盖公司尽责管理体系、风险识别与评估、风险预防和缓解、内外部评估及沟通报告等环节。

Covers due diligence systems, risk identification, mitigation, internal/external audits, and communication reporting.

编制依据

REPORTING BASIS

根据五矿商会（CCCCMC）《中国矿产供应链尽责管理指南》及OECD《尽职调查指南》进行编制。

Compiled in accordance with CCCCC "Chinese Due Diligence Guidelines for Mineral Supply Chains" and OECD "Due Diligence Guidance".

发布形式

PUBLICATION FORM

报告定期在公司官网发布，诚挚欢迎各利益相关方提出建议和意见。

The report is regularly published on the official website. We welcome suggestions and feedback from all stakeholders.

02 关于我们 ABOUT US

公司概况

COMPANY OVERVIEW

中色卢安夏成立于2009年，隶属于中国有色集团（持股80%），赞比亚联合铜业控股有限公司（ZCCM-IH）持股20%。

Established in 2009, CNMC Luanshya is a subsidiary of CNMC (80% stake) and ZCCM-IH (20% stake).

经营现状

OPERATIONS

目前经营着赞比亚历史最悠久的百年老矿——卢安夏铜矿，年产铜金属近5万吨。

Operates the historic Luanshya Copper Mine, with an annual production almost 50,000 tonnes of copper.

重点项目：Shaft 28 新矿项目

KEY PROJECT: SHAFT 28 NEW MINE

2025 年 5 月，赞比亚总统希奇莱马莅临项目视察。项目全域抽排水作业已完工，现阶段开展基建排水。浅部项目 2026 年 8 月完成联动试车，2027 年 6 月投产；深部项目 2029 年 6 月建成投产。

In May 2025, Zambian President Hichilema paid an inspection visit to the project. Full-site water pumping and drainage has been finished, and infrastructure drainage is underway. The Shallow Project will finish linkage commissioning on in August 2026 and start production in June 2027; the Deep Project is set for completion and commissioning in June 2029.

项目目标 / Project Goals:

- 年产铜金属约 6 万吨 (Annual output ~6k tonnes)
- 服务年限约 20 年 (Service life ~20 years)
- 总投资约 7.04亿美元 (Total investment ~\$704M)

03 供应链尽责管理实践 SUPPLY CHAIN DUE DILIGENCE PRACTICE

STEP 01

建立尽责管理体系

Establish Strong Company Management Systems

STEP 02

风险识别和评估

Identify and Assess Risks in the Supply Chain

STEP 03

风险预防和缓解

Design and Implement a Strategy to Respond to Identified Risks

STEP 04

开展内外部评估

Carry out Independent Third-Party Audit

STEP 05

沟通和报告

Report on Supply Chain Due Diligence

STEP 06

补救与社区参与

Remediation and Community Engagement

步骤一：建立尽责管理体系 STEP 1: STRONG MANAGEMENT SYSTEMS

制度建设

SYSTEM CONSTRUCTION

完善政策体系

Implementing "Minerals Supply Chain Due Diligence Policy" and "Supplier Code of Conduct".

申诉机制

Established a robust Grievance Mechanism to identify and address supply chain risks promptly.

管理架构

MANAGEMENT STRUCTURE

尽责管理委员会

A cross-departmental committee comprising Sales, Technical, Finance, and HR departments.

职责明确

Defined roles for internal material control and traceability systems to ensure supply chain integrity.

透明度建设

TRANSPARENCY & EITI

EITI 成员国身份

Continued active participation in the Extractive Industries Transparency Initiative (EITI) in Zambia.

信息披露

Regularly disclosing tax payments and royalties to the government to foster stakeholder trust.

步骤一：建立尽责管理体系

Step 1: Establishing the Due Diligence Management System

制定供应链尽责政策

Formulating Supply Chain Due Diligence Policy

结合供应链尽责管理的实际需要，卢安夏建立了供应链尽责管理的政策，并制定并实施包括《矿产供应链尽责管理政策》、《供应商行为守则》、《供应链尽责管理申诉机制》等尽责管理文件。

Policies and guidelines, including the Mineral Supply Chain Due Diligence Policy, Supplier Code of Conduct, and Appeal Mechanism, have been established and implemented.

建立供应链尽责管理委员会

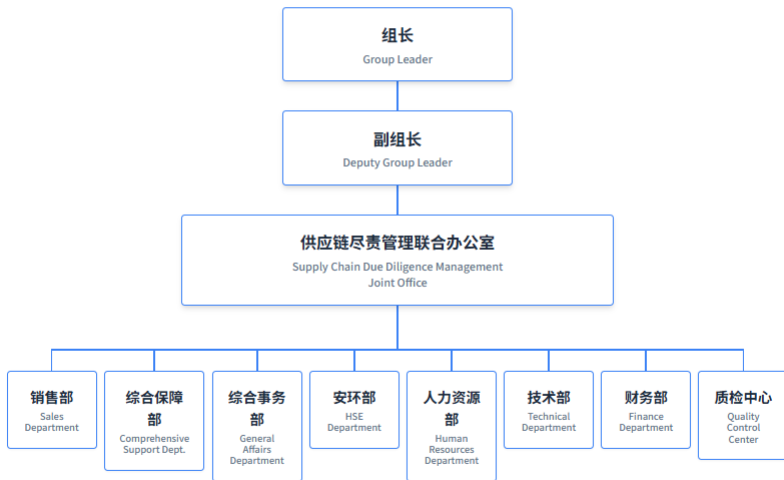
Establishing the Supply Chain Due Diligence Committee

卢安夏建立了内部的供应链尽责管理委员会，由组长、副组长及综合保障部、综合事务部、安环部、人力资源部、技术部、财务部、质检中心等相关部门人员组成，共同推进供应链尽责管理工作。

We have established an internal Supply Chain Due Diligence Management Committee, which consists of a group leader, a deputy group leader, and staff from relevant departments including the General Support Department, General Affairs Department, HSE Department, HR Department, Technology Department, Finance Department and Quality Inspection Center, to jointly advance the work of supply chain due diligence management.

组织架构图

Organizational Chart



组织架构：从“部门负责”到“全员合规”

Organizational Structure: From "Departmental Accountability" to "Full-Employee Compliance"

决策层：尽责管理委员会

Decision-Making Layer: Due Diligence Management Committee

【组成|Composition】

由高级管理层任委员会组长，主管供应链部门的负责人任副组长，销售、综合保障部、综合事务部、安环部、人力、财务、技术、质检等各部门负责人为成员。

The committee shall be chaired by senior management, with the person in charge of the Supply Chain Department serving as the deputy chair. Members shall include the heads of various departments such as Sales, General Support Department, General Affairs Department, HSE Department, Human Resources, Finance, Technology and Quality Inspection.

【核心职责|Core Responsibilities】

审批企业尽责管理的整体政策与战略方向；审议重大合规风险事项；监督管理体系的有效运行；定期向高级管理层汇报工作进展。

Approve the overall policies and strategic directions of the enterprise's due diligence management. Review major compliance risk matters. Supervise the effective operation of the management system. Regularly report work progress to senior management.

■ 执行层：尽责管理联合办公室（对外/商务/行政）

Execution Layer: Due Diligence Management Joint Office (External Affairs / Business / Administration)

■ 执行层：尽责管理联合办公室（人力资源/财务/技术）

Execution Layer: Due Diligence Management Joint Office (Human Resources / Finance / Technology)

■ 执行层：尽责管理联合办公室（供应链管控）

Execution Layer: Due Diligence Management Joint Office (Supply Chain Control)

★ 供应链尽责管理办公室运作机制：依托卢安夏的IMS集成管理体系，建立供应链尽责管理委员会，将责任分解至人力、生产、安保、财务及销售各部门，实现跨部门矩阵式管理。

Operation Mechanism of the Supply Chain Due Diligence Management Office: Rely on Luanshya's IMS integrated management system, establish a supply chain due diligence management committee, decompose responsibilities to various departments including human resources, production, security, finance, and sales, and realize cross-departmental matrix management.

供应链尽责管理实践：系统建设与供应商合作

System Construction and Supplier Cooperation



建立供应链控制和透明度系统

Establish a Supply Chain Control and Transparency System

原料来源保障：所有铜原料均来自自有矿山，产权清晰，源头确保合规与可追溯。

Raw Material Source Assurance: All copper raw materials are sourced from owned mines with clear property rights, ensuring compliance and traceability from the origin.

内部追溯系统：建立完善的物料控制体系，对投入、产出、损耗、回收全流程追踪。

Internal Traceability System: Establish a comprehensive material control system to track the entire process of input, output, loss, and recycling.



加强与供应商的合作

Strengthen Cooperation with Suppliers

合作体系建设：积极建立长期稳定的合作关系，共同完善供应链尽责管理体系。

Cooperation System Development: Proactively build long-term and stable cooperative relationships to jointly improve the supply chain due diligence management system.

供应商管理程序：制定严格的准入、评估及考核程序，规范供应商全生命周期管理。

Supplier Management Procedures: Formulate strict onboarding, assessment, and assessment procedures to standardize the full lifecycle management of suppliers.

行为守则签署：要求签署《供应商行为守则》，组织开展尽责管理培训，确保经营符合国际标准与公司尽责政策。

Code of Conduct Signing: Require suppliers to sign the Supplier Code of Conduct and organize due diligence management training to ensure operations comply with international standards and the company's due diligence policies.

公开申诉渠道_Public Grievance Mechanism

**中国有色矿业集团有限公司**
China Nonferrous Mining Corporation Limited

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Q 搜索 EN



中色卢安夏铜业有限公司

中色卢安夏铜业有限公司位于赞比亚铜带省卢安夏市，其主要资产包括巴鲁巴中矿、巴鲁巴东矿、穆利亚希北矿及其配套的湿法项目等，保有地质资源量含铜238万吨，钴9.9万吨，资源前景丰富。

- ▶ [卢安夏尽责管理报告（2024年7月-2025年6月）](#)
- ▶ [风险管理计划](#)
- ▶ [卢安夏尽责管理报告\(2022年全年\)](#)
- ▶ [卢安夏尽责管理报告\(2023年1月至6月\)](#)
- ▶ [卢安夏尽责管理报告\(2023年7月至2024年6月\)](#)
- ▶ [供应链尽责管理申诉机制](#)
- ▶ [矿产供应链尽责管理政策](#)

公司长期对外公开标准化供应链尽责管理申诉机制与全流程规范，面向全体内外部利益相关方开放申诉渠道，同步接入中国五矿化工进出口商会采矿业和矿产价值链调解磋商机制，严格落实信息保密与反打击报复要求。本报告周期内，公司未收到申诉事项，申诉机制平稳有序运行。

The Company has long publicly disclosed its standardized supply chain due diligence grievance mechanism and full-process procedures, opening grievance channels to all internal and external stakeholders. It has also integrated the Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), and strictly implements information confidentiality and anti-retaliation requirements. During this reporting period, the Company received no grievances, and the grievance mechanism operated smoothly and in an orderly manner.

《采掘业透明度倡议》 / Extractive Industries Transparency Initiative (EITI)

13. Tracking table of certified reporting templates 2023

Extractive Companies	Reporting Templates signed by the management	Reporting Templates certified by an external auditor	2023 Audited	2023 Financial Statement Auditor
KANSANSHI MINING PLC	Yes	No	Yes	PWC
KONKOLA COPPER MINES PLC	Yes	No	Yes	Extracted from ZCCM-IH
LUMWANA MINING COMPANY LIMITED	Yes	No	Yes	PWC
MOPANI COPPER MINES PLC	Yes	No	Yes	KPMG
FQM TRIDENT	Yes	No	Yes	PWC
FIRST QUANTUM MINING AND OPERATIONS LTD BM M 5	Yes	No	Yes	PWC
CHAMBISHI COPPER SMELTER LIMITED	Yes	No	Yes	Extracted from ZCCM-IH
NFC AFRICA MINING	Yes	No	Yes	Deloitte
CHILANGA CEMENT PLC	Yes	No	Yes	EY
CHMC CHILANGA COPPER MINE	Yes	No	Yes	Extracted from ZCCM-IH
LUSAMBE COPPER MINE	Yes	No	Yes	Extracted from ZCCM-IH
MAAMBA COLLIERIES LTD	Yes	No	Yes	Grant Thornton
KAGEM MINING	Yes	No	Yes	EY
ZCCM INVESTMENTS HOLDINGS PLC	Yes	No	Yes	KPMG

EITI详细披露信息/Detailed EITI Disclosure Information

<https://eiti.org/sites/default/files/Zambia%20EITI%202023%20and%202024%20report.pdf?hash=1776938400>

背景与合作 / Background and Cooperation

我们深知透明度是建立合作的基础。卢安夏所在的赞比亚是EITI成员国，公司严格遵循当地法律及EITI标准，定期向政府完整披露税费支付等关键信息，以公开透明的行动回应利益相关方的期待。We deeply understand that transparency is the foundation of cooperation. Zambia, where Luanshya is located, is an EITI member country. The company strictly complies with local laws and EITI standards, regularly fully discloses key information such as tax payments to the government, and responds to the expectations of stakeholders with open and transparent actions.

承诺与展望 / Commitment and Outlook

公司致力于与各方深化合作，推动供应链、产业链及价值链的协同优化。我们希望通过负责任的矿业开发，不仅创造经济价值，更切实惠及当地民生，实现社会共享发展。The company is committed to deepening cooperation with all parties to promote the collaborative optimization of the supply chain, industrial chain, and value chain. We hope that through responsible mining development, we will not only create economic value but also effectively benefit local people's livelihood and achieve shared social development.

步骤二：风险识别与评估 STEP 2: RISK IDENTIFICATION & ASSESSMENT

识别程序与依据

IDENTIFICATION PROCEDURE & BASIS

公司制定了《受冲突影响和高风险区域（CAHRAs）识别程序》，通过收集信息识别异常情况，判断矿产活动是否助长冲突。

The company has established the "CAHRAs Identification Procedure" to identify anomalies and assess if mineral activities contribute to conflict.

参考权威清单（部分）

AUTHORITATIVE REFERENCE LISTS (Partial)

- 欧盟 CAHRAs 清单 (EU CAHRAs List)
- 联合国安理会制裁信息 (UN Security Council Sanctions)
- 世界银行“世界治理指数” (World Bank WGI)
- 海德堡冲突晴雨表 (Heidelberg Conflict Barometer)

2026年6月实地评估结果

JUNE 2026 FIELD ASSESSMENT RESULTS

实地评估团队参考《中国指南》及《OECD指南》要求，对公司运营情况进行了全面审查。

The field assessment team conducted a comprehensive review of operations based on CCCMC and OECD guidelines.

评估结论 (Conclusion):

中色卢安夏为运营规范的矿山企业。经过实地评估与风险矩阵分析，**未发现明确证据**证明供应链存在与矿产开采、运输或贸易有关的严重侵权、直接或间接支持非法武装等四类风险。

CNMC Luanshya is a well-regulated mining enterprise. Field assessment and risk matrix analysis found **no clear evidence** of the four types of risks related to mineral extraction, transport, or trade.

风险监测

RISK MONITORING

公司将持续将尽责管理要求融入日常管理，以预防潜在风险的发生。

The company will continue to integrate due diligence requirements into daily management to prevent potential risks.

卢安夏的行动 OUR ACTION

赞比亚 Zambia Context

地理位置：属于大湖区，触发最高级别（强化版）尽责管理。

Geographical Location: Classified as part of the Great Lakes Region, triggering the highest-level (Enhanced Version) due diligence management.

卢安夏实践路径 Luanshya Practical Path

识别程序：建立双语程序，年度更新，参考海德堡、WGI等源。

Identification Procedure: Establish bilingual procedures, update annually, and reference sources including the Heidelberg Conflict Barometer and World Bank WGI.

实地评估：覆盖矿山、安保、运输，形成年度《实地评估报告》。

On-Site Assessment: Cover mines, security, and transportation operations, and produce an annual On-Site Assessment Report.

2025-2026 年度：四类一类风险全部为**低风险**。 2025-2026 Status: All Category 1 risks across four types are classified as Low Risk

受冲突影响与高风险地区（CAHRA）并非局限于“战乱区”。我们通过系统化风险管理与供应链尽职调查，在高风险区域践行负责任运营，向全球市场展现供应链的合规价值与承诺。

Conflict-Affected and High-Risk Areas (CAHRA) are not limited to "war-torn regions". Through systematic risk management and supply chain due diligence, we conduct responsible operations in high-risk areas and demonstrate the compliance value and commitments of supply chains to global markets.

步骤二：风险识别与评估/ Step 2: Risk Identification and Assessment

我们的行动/ Our Actions



① 团队组建与能力建设

公司无外部矿产供应商，实地评估团队深入赞比亚现场开展工作。团队成员熟悉公司运营，且均接受过供应链尽责管理专业培训，具备扎实的评估知识与实操能力。

As CLM is a mining company with no external mineral suppliers, our on-site assessment team conducted field assessments in Zambia. The team is well-acquainted with company operations, trained in supply chain due diligence, and competent in practical assessment.

② 依据国际标准开展实地评估

2026年6月，评估团队严格参考《中国矿产供应链尽责管理指南》与OECD《受冲突影响和高风险区域矿石负责任供应链指南》的核心要求，完成了实地评估工作。

In June 2026, the on-site assessment was carried out in strict accordance with the core requirements of the "Guidelines for Due Diligence in Mineral Supply Chains of China" and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

③ 严谨方法论保障评估质量

采取“重证”原则，通过确保评估人员独立于被评估活动、无利益冲突，以及确认团队具备适宜的知识技能，全方位保障了供应链实际情况与风险评估结果的可靠性。

We adopted an evidence-based approach. The reliability and quality of the assessment were ensured by guaranteeing the independence of assessors (free from conflicts of interest) and verifying their professional knowledge and skills.

④ 风险识别与评估结论

依据指南评估了4类核心风险，编制了专项评估报告。虽地处高风险国家，但未发现供应链存在明确风险证据。未来将持续深化尽责管理，将其全面融入公司运营体系以预防潜在风险。

Four core risks were assessed based on the guidelines, and a special assessment report was compiled. No evidence of risks was found in the supply chain despite operating in a high-risk country. We will continue to integrate due diligence into our management system to prevent potential risks.

步骤三：风险预防和缓解 STEP 3: PREVENTION & MITIGATION

风险预防

RISK PREVENTION

“预防为主”原则

Adhering to the "Prevention First" principle through comprehensive internal control measures.

内控程序

Strict implementation of procedures to prohibit forced labor, child labor, and engagement with non-state armed groups.

缓解策略

MITIGATION STRATEGY

动态调整机制

1. Continue trading while mitigating risks.
2. Temporarily suspend trading during mitigation.
3. Terminate cooperation if mitigation fails.

利益相关方参与

Consulting with suppliers and affected stakeholders to reach consensus on risk management plans.

跟踪和监测

MONITORING & TRACKING

持续评估

Regularly verifying the effectiveness of mitigation strategies and adjusting plans based on risk changes.

透明报告

Reporting monitoring results to the Due Diligence Committee and senior management for effective oversight.

步骤三：风险预防和缓解/ Step 3: Risk Prevention and Mitigation

01 风险预防 (Risk Prevention)

原则与内控：卢安夏建立“风险预防为主”原则，通过《禁止使用强迫劳动》《禁止使用童工》《非国家武装力量识别》等一系列具体的内控管理程序，构建全面的风险防火墙。

We adhere to a "prevention first" principle, implemented through a comprehensive internal control system covering forced labor, child labor, and identification of non-state armed groups.

02 风险管理和缓解 (Risk Management & Mitigation)

计划与行动：基于风险评估结果制定《风险管理计划》。识别风险后立即调查，并向供应链管理委员会报告监测结果。在计划制定过程中，充分征询供应商及利益相关方意见，达成一致并确保风险缓解措施有效落地。

Based on assessments, we develop Risk Management Plans. We report identified risks to the committee and actively consult with suppliers and affected stakeholders to implement effective mitigation measures.

公开版风险管理计划_Public Version Risk Management Plan

公司面向公众发布中英双语公开版风险管理计划，系统阐述风险缓释策略与实施要求。

We releases a public Chinese-English bilingual risk management plan to systematically elaborate on risk mitigation strategies and implementation requirements.

2026

中色卢安夏 | 风险管理计划

CNMC LUANSHYA COPPER MINES PLC - RISK MANAGEMENT PLAN

管理目标

MANAGEMENT GOALS

防范或降低已识别的风险，定期核查、跟踪风险缓释策略的效果，充分征询供应商和受影响利益相关方意见，实现有效的风险闭环管理。

To prevent or reduce identified risks, regularly verify and monitor the effectiveness of risk mitigation measures, thoroughly solicit input from suppliers and affected stakeholders, and achieve effective closed-loop risk management.

四类重点防范风险

FOUR TYPES OF RISKS

01

与矿产开采、运输或贸易有关的严重侵权行为

Serious violations related to mineral extraction, transportation, or trade

02

关于直接或间接支持非国家武装团体

Direct or indirect support to non-state armed groups

03

关于公共或私人安全武装

Engagement with public or private security forces

04

关于行贿受贿及矿产原产地的欺诈性失实陈述、洗钱、向政府支付的税收、费用和特许费

Bribery, fraudulent misrepresentation of mineral origin, money laundering, and payments of taxes, fees, and royalties to governments

源于《中国矿产供应链尽责管理指南》/ Source: Chinese Due Diligence Guidelines for Mineral Supply Chain

风险缓释策略

METHODS OF RISK MITIGATION

在缓解重大风险的过程中继续交易

Continuing trade throughout the course of major risk mitigation efforts

在持续缓解重大风险的过程中暂时中止交易

Temporarily suspending trade while pursuing ongoing risk mitigation

如果缓解风险的努力失败，或企业认为无法缓解风险，或风险无法接受，则终止和供应商的合作关系

Disengaging with a supplier in cases where mitigation measures fail or mitigation appears not feasible or unacceptable

实施要求

ASKS OF IMPLEMENT

与利益相关方(供应商)共同推动风险管理计划的实施

Jointly implement the risk management plan, monitor and track performance of risk mitigation measures in cooperation with stakeholders.

如发现风险出现重大变化可随时相应调整风险管理计划

If major changes in risks are identified, the plan should be adjusted accordingly.

就计划的实施、监督和绩效跟踪与受影响的利益相关方开展合作/协商

Cooperate/consult with affected stakeholders, governments, upstream companies, etc., on implementation and monitoring.

考虑通过建立或支持当地社区监督力量

Done by establishing or supporting local community monitoring networks.

向制定的高级管理者汇报，并确认是否需要调整计划

Report to designated senior managers and confirm whether the plan needs adjustment.

利益相关方参与

STAKEHOLDER ENGAGEMENT

企业

开采承包商

潜在供应商

政府

安保服务商

社区

供应商

员工

客户

国际/民间组织

持股方

LME

意见反馈与联系

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卢安夏供应链尽责管理联合办公室

Luanshya Supply Chain Due Diligence Joint Office



风险缓解策略

RISK MITIGATION STRATEGIES

① 在持续缓解重大风险的过程中暂时中止交易

Temporarily suspend transactions while mitigating significant risks.

② 在缓解重大风险的过程中继续交易

Continue transactions while mitigating significant risks.

③ 如果缓解风险的努力失败，或企业认为无法缓解风险，或风险无法接受，则终止和供应商的合作关系

Terminate supplier relationships if mitigation efforts fail, risks are deemed unmanageable, or are unacceptable.

步骤三：风险预防和缓解 - 利益相关方参与



风险意识提升

Risk Awareness Enhancement

公司定期开展矿产供应链尽责管理培训，邀请外部专家授课，并举办专题培训提升整体水平。所有培训活动均填写记录模板留档，确保培训效果可追溯。

The company regularly conducts due diligence training for staff, inviting external experts to enhance overall understanding and capabilities in supply chain due diligence. All training activities are documented for traceability.



利益相关方合作

Stakeholder Cooperation

公司秉持开放合作态度，与各方利益相关方开展深度对话。在制定风险管理计划和缓解措施时充分征询意见，共同推动风险防控，共建可持续发展的矿产供应链。

CLM maintains an open and cooperative approach, engaging with stakeholders in dialogue and collaboration to develop risk management plans and mitigation measures, fostering a sustainable and responsible mineral supply chain.



加强国际参与

Strengthening International Participation

公司积极参与各类国际对话与高端论坛，树立负责任的企业形象。包括2023年可持续矿产供应链国际论坛及2024年OECD负责任矿产供应链论坛，与全球伙伴共建供应链。

The company actively participates in international dialogues, such as the 2023 Sustainable Minerals Supply Chain International Forum and the OECD Forum, collaborating with international organizations to build a responsible mineral supply chain.

步骤四：内外部评估 —— 构建内部审核能力

STEP 4: INDEPENDENT AUDIT - INTERNAL CAPACITY BUILDING

为确保供应链尽责管理体系的有效运行与持续改进，我们积极培养内部审核团队。通过系统化的专业培训与权威认证，我们的内审员已具备独立、专业的评估能力，为公司的合规运营与负责任供应链管理提供了坚实的内部保障。

To ensure the effective operation and continuous improvement of the supply chain due diligence management system, we actively cultivate an internal audit team. Through systematic professional training and authoritative certification, our internal auditors have acquired independent and professional assessment capabilities, providing solid internal safeguards for the company's compliant operation and responsible supply chain management.



权威认证展示：中国五矿化工进出口商会（CCCMC）颁发的内审员资格证书

Authority Certification: Internal Assessor Certificates issued by CCCMC, confirming professional assessment capabilities.

步骤四：内外部评估 —— 内部评估结论

STEP 4: INDEPENDENT AUDIT - INTERNAL ASSESSMENT CONCLUSION

评估结论摘要

内部评估结论：本周期内部评估为卢安夏的第三次内部评估，公司供应链尽责管理体系运行有效、符合标准要求，已按 OECD 指南、中国矿产供应链尽责管理指南及公司体系文件要求，完成全流程管理与核心风险管控；2025 年度外部评估发现问题已全部整改闭环，体系适宜性、充分性、有效性得到验证。

Internal Assessment Conclusion: This periodic internal assessment marks the third internal assessment of Luanshya. The company's supply chain due diligence management system operates effectively and complies with standard requirements. Full-process management and core risk control have been completed in accordance with the OECD Guidelines, China's Mineral Supply Chain Due Diligence Guidelines and the company's system documents. All issues identified in the 2025 external assessment have been rectified and closed-loop, and the suitability, adequacy and effectiveness of the system have been verified.

利益相关方参与：行业组织合作

Stakeholder Engagement: Industry Collaboration



制度化参与行业机制

Institutional Participation in Industry Mechanisms

CLM正式参与五矿商会设立的《采矿业和矿产价值链调解磋商机制》，从标准遵循者转变为行业争议解决平台的共建者，为供应链争议解决提供正式渠道。

深度融入行业高端对话

Deep Integration into High-end Industry Dialogues

积极参与第三届可持续矿产供应链国际论坛 (2025.09) 及第33届五矿化工高质量发展大会 (2026.03)，分享经验并推动价值链的可持续发展。

利益相关方参与：参与行业组织交流与培训

Stakeholder Participation: Engage in exchanges and training organized by industry associations

行业交流赋能实践-Industry Exchange Empowers Practice

中色卢安夏供应链尽责管理工作负责人骆春晖受邀参加由中国五矿化工进出口商会主办的2026年矿产供应链企业尽责管理能力专题培训班。会上，他系统分享了卢安夏在供应链尽责管理领域的优秀实践成果，深入解读了践行《中国指南》对推动行业合规发展的核心价值，并与参会企业代表围绕矿产供应链合规建设与可持续发展议题展开深度探讨，以经验交流促能力提升，持续深耕海外矿业合规发展之路。

Luo Chunhui, Head of Supply Chain Due Diligence at China Nonferrous Luanshya, was invited to attend the 2026 Special Training on Responsible Management Capacity for Mineral Supply Chain Enterprises hosted by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters. At the training, he shared Luanshya's outstanding practices in supply chain due diligence, elaborated on the positive significance of implementing the China Guidance, and conducted in-depth exchanges with industry peers to drive continuous improvement in mineral supply chain compliance and sustainable development



重点进展：利益相关方参与

KEY PROGRESS: STAKEHOLDER ENGAGEMENT

属地员工技能竞赛

LOCAL EMPLOYEE SKILLS COMPETITION

2025年9月10日，公司承办首届中国有色集团赞比亚区域属地员工技能竞赛。涵盖电工、焊工、钳工等5个组别，近百名属地员工参与角逐。

In Sept 2025, hosted the 1st CNMC Zambia Regional Employee Skills Competition, involving nearly 100 local employees in 5 categories including electrical and welding.



中赞职院共建与本土矿业人才培养

Co-construction of Sino-Zambia Vocational College & Local Mining Talent Cultivation

中色卢安夏董事长蒋雷出席中赞职院毕业典礼，主张以职业教育培育本土矿业技术人才，共建赞比亚产教融合示范院校。

Jiang Lei, Chairman of CNMC Luanshya Copper Mines Plc, attended the graduation ceremony of Sino-Zambia Vocational College of Science and Technology. He advocates nurturing local mining technical talents via vocational education to jointly build a benchmark institution for industry-education integration in Zambia.



【ESG实践】培育能工巧匠 让创新与技能点亮未来人生 中赞职业技术学院举办第五届毕业典礼暨双选会

重点进展：社区互动与社会责任

KEY PROGRESS: COMMUNITY INTERACTION & CSR

社区贡献：连续16年农业扶持

COMMUNITY CONTRIBUTION: 16 YEARS OF AGRICULTURAL SUPPORT

2025年11月，公司连续第16年向卢安夏社区捐赠种子、化肥等农业物资。2025年总捐赠价值超过**150万赞比亚克瓦查**，直接惠及250户低收入农户，有力支持了当地粮食安全。

In Nov 2025, CLM donated agricultural supplies for the 16th consecutive year. Total donations in 2025 exceeded **1.5 million ZMW**, benefiting 250 low-income households and supporting local food security.

工会沟通与集体谈判

UNION COMMUNICATION & COLLECTIVE BARGAINING

2026年初，公司积极响应社区与工会呼吁，启动年度集体谈判程序。公司坚持透明、公正的原则，确保员工权益得到充分保障，维护和谐的劳资关系。

In early 2026, the company initiated annual collective bargaining in response to union calls. Adhering to transparency and fairness, we ensure employee rights are protected and maintain harmonious labor relations.



捐赠仪式现场

步骤五：沟通和报告 STEP 5: REPORTING

报告发布机制

REPORT PUBLICATION MECHANISM

年度定期发布

每年编制并发布《矿产供应链尽责管理进展报告》，保障信息公开披露。

Compiling and publishing the "Minerals Supply Chain Due Diligence Progress Report" annually to ensure information disclosure.

多部门协作编制

由供应链尽责管理办公室办公室牵头，各业务部门共同参与，保障报告具备可信度与实质内容。

Led by the Due Diligence Office with participation from all business departments to ensure report credibility and substance.

卢安夏在2023年9月、2024年8月以及2025年8月接受了第三方评估，评估结果均为AA等级，已经公布在五矿商会的网站上。

Luanshya underwent third-party assessments in September 2023, August 2024 and August 2025, and all the assessment results were rated AA, which have been published on the website of the China Chamber of Commerce for Metals, Minerals & Chemicals Importers and Exporters..

详见：For details, see: <https://www.cccmc.org.cn/search.html?keyword=%E5%8D%A2%E5%AE%89%E5%A4%8F>

沟通与反馈渠道

COMMUNICATION & FEEDBACK

官网公开查阅

所有利益相关方均可在公司官方网站查阅完整报告，以此提升供应链透明度。

All stakeholders can access the full report on the company's official website to enhance supply chain transparency.

意见征集与申诉

热忱欢迎各界通过公开渠道建言献策，持续提升供应链尽责管理工作成效。

Sincere welcome for suggestions from all sectors through public channels to continuously improve due diligence performance.

卢安夏AA级认证实践

Luanshya AA Grade Certification Practice

认证结果：三年体系升级路径 Certification Outcome: Three-Year System Upgrade Path

2023年 启动同步LME新规审计 → **2024年** 体系升级 → **2025年 维持AA级评级证书**

2023: Initiated audit aligned with new LME regulations → 2024: System upgrade → 2025: Maintain AA grade certification

关键成就 Key Achievements

- **首家在海外采用《中国指南》进行评估的中资企业**（唯一被LME与OECD认可的中国标准）The first Chinese-funded enterprise overseas to adopt the China Guidance for assessment (the only Chinese standard recognized by the LME and OECD).
- **成功取得LME注册品牌证书——第一家在新规下成功注册的中资铜企** Successfully obtained the LME Registered Brand Certificate — the first Chinese copper producer to register under the new LME rules.

核心支撑 Core Enablers

- **自有矿山，原料100%可控** Owned mines with 100% controllable raw material supply.
- **EITI透明度披露完整** Complete transparency disclosures in line with EITI standards.
- **申诉机制、培训记录、实地评估报告等证据完整存档** Complete archiving of evidence including grievance mechanisms, training records, and on-site assessment reports.

文件支撑 Document Support:

2025年外部评估报告、LME注册品牌证书、尽责管理进展报告（双语公开版） 2025 External Assessment Report, LME Registered Brand Certificate, Due Diligence Management Progress Report (bilingual public version)

步骤五：沟通和报告 STEP 5: REPORTING

报告发布机制

REPORT PUBLICATION MECHANISM

年度定期发布

Compiling and publishing the "Minerals Supply Chain Due Diligence Progress Report" annually to ensure information disclosure.

多部门协作编制

Led by the Due Diligence Office with participation from all business departments to ensure report credibility and substance.

沟通与反馈渠道

COMMUNICATION & FEEDBACK

官网公开查阅

All stakeholders can access the full report on the company's official website to enhance supply chain transparency.

意见征集与申诉

Sincere welcome for suggestions from all sectors through public channels to continuously improve due diligence performance.

报告摘要 | Report Summary

本报告周期为【2025.7.1-2026.6.30】严格遵循OECD、CCCMC及联合国相关准则，全面展示中色卢安夏供应链尽责管理体系运行、风险管控、利益相关方协同与信息披露成果。报告期内，公司完善追溯与透明度体系，完成实地风险评估，未发现重大违规风险；强化内控与培训，深度参与行业尽责管理活动，常态化开展多方对话，畅通申诉渠道；合规履行EITI披露要求，持续推动负责任供应链建设。

This report covers July 1, 2025 – June 30, 2026, compliant with OECD, CCCMC and UN guidelines. It presents CNMC Luanshya's performance in supply chain due diligence, risk management, stakeholder engagement and transparency. During the period, we improved traceability, completed on-site risk assessments with no material violations found. We strengthened internal controls, participated in industry due diligence activities, maintained stakeholder dialogues and grievance channels, and fulfilled EITI disclosure requirements to build a responsible supply chain.

步骤六：补救措施 STEP 6: REMEDIATION

补救原则

REMEDATION PRINCIPLES

补救不是尽责管理过程的组成部分，而是尽责管理中需提供条件并支持的一个单独和关键的过程。公司致力于在识别到负面影响时，积极配合或启动补救程序。

Remediation is not a component of the due diligence process itself, but a separate and critical process that requires providing conditions and support. The company is committed to actively cooperating with or initiating remediation procedures when negative impacts are identified.

本报告期核查情况 (2025.07 - 2026.06)

VERIFICATION STATUS FOR THE REPORTING PERIOD

在本次报告期内，公司通过持续的风险监测与合规审查，**未发生**需要采取措施进行补救的严重侵权事件或供应链风险事件。

During this reporting period, through continuous risk monitoring and compliance reviews, **no severe infringement incidents** or supply chain risk events requiring remediation measures occurred.

《中国指南》报告要求Requirements of the China Guidelines report		答复位置 Response
a. 企业尽责管理政策	a. Enterprise Due Diligence Policy	第7页
b. 负责尽责管理工作的企业管理架构	b. Enterprise Management Structure for Due Diligence	第7、8页
c. 描述企业控制和透明度系统	c. Description of Enterprise Control and Transparency System	第9、10页
d. 供应商合作方式和内容	d. Supplier Cooperation Methods and Content	第9页
e. 申诉机制、流程和已发生的申诉处理情况	e. Grievance Mechanism, Process, and Handling	第10页
f. “受冲突影响和高风险区域” 的识别程序或方法	f. "Conflict-Affected and High-Risk Area" Identification	第12、13页
g. 企业评估报告或概要	g. Enterprise Assessment Report or Summary	第21、26页
h. 报告公开的途径或方法	h. Report Disclosure Method	第26页
i. 每年定期编制报告和公开	i. Regular Annual Report Compilation and Disclosure	第26页
j. 产销监管链或供应链追溯信息	j. Chain of Custody or Supply Chain Traceability	第9页
k. 原料的原产地信息	k. Raw Material Origin Information	第9页
l. 风险识别和评估的方法和结果	l. Risk Identification and Assessment Methods and Results	第12、13、14页
m. 实地评估的方法、过程和结果	m. On-site Assessment Methods, Processes, and Results	第14页
n. 风险管理计划中所采取的措施、策略及利益相关方参与情况	n. Risk Management Measures, Strategies, Participation	第17、18、19页
o. 风险监测和跟踪绩效结果	o. Risk Monitoring and Tracking Performance Results	第16页
p. 对采掘业透明度或信息公开提出的披露内容建议	p. Additional Disclosure for Extractive Industry Transparency	第11页

携手共建负责任矿产供应链

Jointly Building a Responsible Mineral Supply Chain



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