NORINMINING
北方矿业

企业行为准则
CODE OF CONDUCT

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介 绍
Introduction

寄语
A Message from our President

各位同事：

Dear Colleagues,

北方矿业有限责任公司（以下简称北方矿业）的发展目标是“建设技术领先、绿色高效、具有国际竞争力的世界一流矿业公司”，为实现这一目标，我们不仅要在专业、创新、资源、人才等方面成为世界领先企业，更要在企业文化、商业道德、社会责任、环境管理等方面成为标杆企业。这是一个宏伟的战略目标，需要公司每一位同事齐心协力、勇于担当，无论你位于哪个国家，处于什么职位。

At Norin Mining, our strategic target is to build a world-class mining company with advanced technology, green efficiency and international competitiveness. To achieve the target, we should not only become a leading enterprise in terms of professional excellence, innovation, resources, and talents, but also – if not more - in terms of corporate culture, business ethics, social responsibility, and environmental stewardship, etc. This is a strategic target, and it requires the concerted efforts of every one of you, no matter which country you are working in and what position you are currently being.

在当今世界，赢得利益相关方的信任、塑造公司良好的国际声誉可能需要我们一生为之奋斗，但失去信任、摧毁声誉只需片刻时间，一个错误的决定可能会导致我们多年的努力付诸东流。我们致力于通过负责任的、可持续的矿业投资和经营创造价值，改善人们生活，这意味着我们需要从点点滴滴做起，切实做好本职工作，严格遵守公司《企业行为准则》（以下简称《行为准则》）。

In the world today, while it can take a lifetime to build stakeholder trust and a good reputation, it takes only a moment to destroy it. One bad decision can undo years of work and effort. We are committed to create long-term value and improve lives through responsible and sustainable mining. This starts with following our Code of Conduct in daily work.

这份新发布的《行为准则》阐释了公司在负责任矿山建设开发方面所奉行的经营理念，彰显了公司多年来在可持续发展实践方面所取得的显著进展。在 ESG 体系建设过程中，希望每一位员工继续恪守公司核心价值观，开展切实行动，赢得各利益相关方的信任，提升我们作为一家负责任矿业公司的国际声誉。

This new Code of Conduct reflects our philosophy on sustainable mining and the continuation of the remarkable progress we have achieved on responsible business practices over the past several years. As we are going through the journey of ESG institutionalization, I count on all of you to act on our core values, build trust with our stakeholders, and enhance our global reputation as a responsible mining company.

该《行为准则》对公司的核心价值观及相关指导原则进行了梳理，对期望各位同事做到的行为以及禁止的行为给出了实例参考，从而方便各位同事理解，并更有效地将它运用到日常工作中。该《行为准则》还列举了大家在工作中可能会碰到的一些情况，并以问答形式阐释了该如何处理。如果在碰到实际问题时仍存有疑虑，希望大家能积极提出意见和建议。

Throughout this Code, you will see principles guided by our Values and practical examples of expected and prohibited behaviours, so you can easily see how they apply in your day-to-day work. Although this document provides practical examples of issues that may arise, it is impossible to anticipate every situation. I encourage you to ask questions and speak up if you have doubts about the proper course of action.

在公司高质量发展的道路上，让我们不忘初心、勇毅前行，共同为公司、社区 、东道国带来积极的影响和变化。

On the way of high-quality development, let's remain true to our original aspiration and continue our endeavour to make a positive change to the company, the host communities, and the countries where we operate.

马卫国

北方矿业有限责任公司总经理
President of Norin Mining

我们的价值观
Our Values

健康、安全
Health and Safety

我们坚持生命至上，以零隐患、零违章、零伤害、零事故为工作目标，采取切实措施预防事故发生和疾病传播，充分保障员工安全福祉。

We are committed to putting safety first and achieving our goal of zero hazards, zero violations, zero injuries and zero accidents. We take a hands-on approach to health and safety with the aim of continuous improvement in the prevention of injuries and diseases.

平等、人本
Equal and People Oriented

我们坚持机会平等，以员工在职业发展中取得进步为己任，与各方优秀合作伙伴携手创造价值，绝不因国籍、种族、宗教、性别、残疾、年龄或任何其他原因而歧视他人。

As a merit-based company, we are an equal opportunity employer. We believe in supporting our workers as they advance in their careers at Norin Mining. We do not discriminate based on national origin, race, religion, sex, disability or age, or any other attribute protected by local laws. We apply the same standards in how we operate with our suppliers.

共商、开放
Consultation and Openness

我们以能与各利益相关方开展坦诚沟通而自豪，我们关心所有员工、社区、东道国政府、投资者、客户和供应商等利益相关方，通过公开协商、利益相关方参与、申诉机制有效回应关切，实现互利共赢。

We are a merit-based company that prides itself on open communication between all our people and stakeholders. This allows us to build a strong relationship within our company and with our customers, suppliers, government, and societies at large. This enables us to coordinate our efforts for the mutual benefit of all our stakeholders and the common good. We care about our stakeholders and respond effectively to their concerns through our open consultations, stakeholder engagement, and grievance mechanism.

可持续、共成长
Sustainable and Shared Growth

我们承诺遵循《联合国工商业与人权指导原则》，始终秉持社会、环境、经济“三位一体”以及绿色低碳的可持续发展观，坚持对社区及环境负责，致力于与社区人民共享发展成果。

We adhere to the *United National Guiding Principles on Human Rights* and are committed to sustainable development, incorporating social, environmental, and economic principles into our operations. We take responsibility for our impact on local communities and strive to share the benefits of development with them.

合规、守信
Compliance and Integrity

我们坚持高标准与利益相关方互动，承诺依法合规经营，坚守公平诚信原则，反对任何形式的腐败行为。

Integrity and accountability are the cornerstones of Norin Mining. We hold ourselves to the highest standards in terms of fairness, lawfulness, and honesty. This extends to all interactions with our stakeholders such as our community, host governments, customers, suppliers, and investors. Wherever we work, we commit to operating to the same high standard of integrity and accountability by complying with all laws and regulations.

执着、奉献
Determination and Dedication

我们相信天道酬勤，相信在充满挑战的环境中工作需要坚定的决心和奉献精神，这样的责任感是我们企业文化的核心支柱。

We value and reward diligence and hard work as they are essential for achieving success. We understand that working in a challenging environment requires strong determination and dedication. This sense of responsibility is the foundation of our corporate culture.

创新、卓越
Innovation and Excellence

我们坚持以企业家精神实现自我提升，鼓励并积极培养员工做到敬业勤勉、勇于负责、追求卓越、不断超越。

Our approach is to instill a pioneering entrepreneurial spirit in our people based on self-betterment through innovation, professionalism, excellence, and responsibility for others. We do not compromise on our values, ethics, or standards to achieve superior returns.

准则适用范围
To whom does the Code apply?

本《行为准则》适用于北方矿业及旗下所有子公司、职能及业务部门，所有员工、经理、董事，无论其职位、职责或资历。我们积极促进公司利益相关方，包括承包商、供应商、合作伙伴和客户，采用严格的商业行为准则及道德规范标准，积极影响非控股合资公司以及相关的合作伙伴，确保合资公司采用类似标准。

This Code applies to Norin Mining, all subsidiaries, divisions, and respective employees, managers, and directors, regardless of their job title, responsibilities, or seniority. Additionally, we promote the adoption of strong business and ethical standards by our other stakeholders, including contractors, suppliers, partners, and customers. We seek to influence our non-controlled joint ventures and our partners in those joint ventures, to ensure they adopt standards similar to those in this Code and our policies.

准则使用简介
How to use this Code?

请仔细阅读并熟知本《行为准则》，如果对某一特定行为的适当性有任何疑虑，请查看目录，参照最适用于相关行为的章节开展工作。每个章节包含公司政策原则、与政策相关的要求和禁止行为、以及基于问答形式的实际案例。

Please familiarise yourself with this Code of Conduct. If you have any doubt about the appropriateness of a particular act, look through the Table of Contents to find the section that most likely applies to your issue. Each section contains a summary of our policy, examples of expected and prohibited actions related to that policy, and practical examples in Q&A format.

例如：

- 如果对公司环保相关实践或规范有疑虑，你应该怎么做？
  请查阅“环境管理”章节。
- 如果项目所在社区成员向你提出问题或诉求，你应该怎么做？
  请查阅“社区影响”章节。
- 如果有记者在发布一篇关于公司的报道时想征求你的意见，你应该怎么做？
  请查阅“对外沟通”章节。

For example:

- If you have a concern about environmental incompliance, what you should do?
  Go to "Environmental Stewardship" section.
- If a community member brings an issue to you, what you should do?
  Go to "Community Impact" section.
- If you are asked to give comments on a potential report about our company, what you should do?
  Go to "External Communication" section.

第二章
Chapter 2

我们的责任
Our Responsibilities

对员工及经理的要求
Requirements of Employees and Managers

对员工的要求：

- 了解并严格遵守与公司业务相关的法律法规，尤其是涉及社会、环境和人权的法律法规。
- 仔细阅读、理解并遵循公司《行为准则》，包括相应的政策、制度及实践规范。
- 对任何涉嫌违反本准则的行为，按照“提出关切”章节所列步骤提出意见或进行报告。

As an employee, you are required to:

- Understand and follow the laws and regulations related to our business, in particular those concerning social, environmental, and human rights.
- Read, understand, and follow our Code, policies and practices applicable to you.
- Report any suspected violations of the Code using the steps outlined in the "Raise a Concern" section.

作为一名经理或管理人员，除满足上述要求外，需以身作则，促进建立一个尊重他人、友善待人、和谐相处、积极向上的工作环境。

As a manager, you have additional responsibilities, you are responsible for promoting a positive working environment in which people are treated with dignity, kindness and respect.

对经理或管理人员的要求：

- 以身作则，始终牢记并带头遵守和维护《行为准则》。
- 协助同事理解并遵守《行为准则》，包括相应的政策、制度及实践规范。
- 支持诚心提出意见、建议或报告不当行为的人。
- 及时跟进对不当行为提出的意见、建议或报告，绝不姑息容忍不当行为或对其视而不见。

As a manager, you are required to:

- Lead by example by living up to the standards of our Code at all times.
- Help your colleagues understand and follow the standards outlined in our Code, policies, and practices.
- Support those who raise a concern or report suspected misconduct in good faith.
- Follow up when you hear about or suspect potential misconduct, and never look the other way to ignore misconduct.

提出关切
Raise a Concern

在北方矿业，我们提倡基于“开放互信”原则与所有员工开展对话，鼓励员工表达和捍卫自己的观点，指出不可接受的行为，尤其是违反本《行为准则》的举动。

At Norin Mining, we promote an open and trusting dialogue with employees at all levels. All employees are encouraged to express their views, defend their opinions, and point out unacceptable behaviour, especially behaviour that violates this Code of Conduct.

提出关切表明了你对公司和同事的关心，公司希望也需要听到员工意见，这样才能促进公司高质量发展，成长为一家优秀的跨国企业。

Speaking up or raising a concern demonstrates your care for the company and your colleagues. We want to and need to hear from you, so that we can be a better company as a whole.

如果在以下方面发现问题，请积极提出关切或进行报告：

- 职业健康与安全
- 社区健康与安全
- 环境违规
- 侵犯人权
- 歧视、骚扰或欺凌行为
- 盗窃、欺诈或任何其他形式的不实行为
- 贿赂或腐败
- 会计或财务违规行为
- 吸毒或酗酒
- 其他不遵守公司准则或政策的行为

Please speak up if you have a concern about:

- Occupational Health and Safety
- Community health and safety
- Environmental incompliance
- Violation of human rights
- Discrimination, harassment, or bullying
- Theft, fraud, or any form of dishonesty
- Bribery or corruption
- Accounting or financial irregularities
- Drug or alcohol abuse
- Other forms of incompliance with our Code or policies

对于诚心提出关切或报告不当行为的人，公司是你的坚强后盾。我们承诺将遵循“安全”、“尊重”、“公平”的原则对待检举人，充分履行保密规定，及时对检举问题展开调查处理，对任何报复行为采取零容忍态度。

Norin Mining protects those who speak up and raise concerns appropriately and in good faith. We are committed that any reports and concerns raised will be treated confidentially and handled promptly in a way that is safe, respectful, and fair. We have zero tolerance for retaliation.

在报告渠道方面，你可以选择直接向主管经理、人力资源部门或公司高层提出意见或建议，也可以通过工会提出诉求或关切。

You can raise your concern to the frontline managers as well as the human resource department and the senior leadership, you can also raise it to the union representatives.

如果因为提出意见或报告问题而遭到打击报复，你可直接与公司 ESG 管理办公室联系。

If you believe you have been retaliated against for reporting an issue, please contact ESG Management Office.

北方矿业 ESG 管理办公室	
办公室负责人	刘云峰
电话	010-63209313
邮箱	liuyf@norinmining.com
地址	北京市广安门南街甲 12 号

Norin Mining ESG Management Office	
Director of ESG Management Office	Mr. Liu Yunfeng
Telephone	010-63209313
Email	liuyf@norinmining.com
Address	No.12 Guang'anmen South St, Beijing

如果所提问题涉及腐败、贿赂、作风问题，你可通过电子邮件、电话、信件、来访等方式向公司监督部门举报。公司倡导负责任、实事求是的实名举报，监督办公室将组织开展调查，并根据调查结果进一步采取相应处理。

If your concern is related to bribery or corruption, you can also choose to report to our Inspection Commission through email, telephone calls, or letters. We encourage responsible and truthful report. The Inspection Office will conduct investigation and take actions based on the findings.

北方矿业监督部门	
监督部门公司级负责人	衣丰娟
电话	010-63209355
邮箱	Yifj@norinmining.com
地址	北京市广安门南街甲 12 号

北方矿业监督办公室	
办公室主任	邱然
电话	010-63209318
邮箱	qran@norinmining.com
地址	北京市广安门南街甲 12 号

Norin Mining Inspection Commission	
Director of Inspection Commission	Mme. Yi Fengjuan
Telephone	010-63209355
Email	Yifj@norinmining.com
Address	No.12 Guang'anmen South St, Beijing

Norin Mining Inspection Office	
Manager of Inspection Office	Mme. Qiu Ran
Telephone	010-63209318
Email	qran@norinmining.com
Address	No.12 Guang'anmen South St, Beijing

第三章
Chapter 3

我们的企业文化和管理
Our Culture and Management

职业健康安全
Occupational Health & Safety

北方矿业每一个人，包括承包商和供应商，需严格遵守公司安全相关政策及规章制度，坚持生命至上，以零隐患、零违章、零伤害、零事故为工作目标。公司旗下每一个项目需参照行业领先标准建立并实施安全管理体系、定期开展安全培训、提升安全意识、加强安全文化建设，将安全措施贯穿到每个工作环节，覆盖项目全生命周期。结合项目实际情况，我们需以同样的标准选择承包商，做好承包商的安全监督管理工作。

At Norin Mining, we are committed to ensuring that every person at our projects, including the employees of our contractors, follows our safety procedures and policies. We are committed to putting safety first and achieving our goal of zero hazards, zero violations, zero injuries and zero accidents. We are getting there through the implementation of safety management system, regular staff training, safety awareness and culture building, as well as observance of industry-leading safety standards. Safety procedures extend across all areas of our work. We strictly follow safety standards throughout the project lifecycle, as much as when we are selecting and overseeing our subcontractors.

公司倡导“人人都是安全员”，鼓励员工在对工作场所或社区健康安全有疑虑或担心时畅所欲言。每一位员工需牢记安全责任义不容辞，责无旁贷。

We promote a company-wide safety culture, which means health and safety are not only on the shoulders of managers & safety personnel but everyone’s responsibility. We encourage every employee to speak up when there is a concern related to health and safety in the workplace or communities.

期望行为
Expected Actions

- 遵守与项目相关的法律、标准和程序。
- 在项目全生命周期内识别、评估、缓解、监测健康与安全风险。
- 对自己及他人的安全负责。
- 严格遵守公司安全生产相关政策及规章制度，按规范配备个人防护装备 (PPE)。
- 以坦诚布公的态度处理职业健康和安全问题 , 鼓励员工就相关问题提出意见或建议。
- 若发现或怀疑有任何不安全的工作环境或作业条件，第一时间报告上级管理人员或安全管理人员。
- 对每一起安全事故进行充分调查，分享从中汲取的经验教训，提升风险防范意识，尽可能降低事故再次发生的风险。
- 查漏洞、补短板，不断提升健康和安全绩效表现。

- Comply with all law, standards and procedures related with our project.
- Identify, assess, mitigate, and monitor health and safety risks throughout the project lifecycle.
- Take responsibility for your health and safety and that of others.
- Strictly abide by the safety requirements and emergency procedures that apply to your work, including the Personal Protective Equipment (PPE) you must wear.
- Deal with occupational health and safety issues frankly and openly, encourage people to speak up.
- Alert your supervisor or safety personnel right away if you know of or suspect any unsafe situations or conditions.

禁止行为
Prohibited Actions

- 在没有接受必要安全培训的情况下作业。
- 在无审批的情况下从事高危作业。
- 无视健康和安全相关政策及规章制度。
- 在明知工作无法安全执行（包括安全设备设施不到位）的情况下开展工作。
- 在酒精或药物的影响下工作。
- 打架斗殴或赌博。
- 明知他人在不安全的情况下工作，选择沉默。
- 在职业健康和安全方面选择妥协。

- Working without necessary safety training.
- Perform High-risk task without PTW(permit to work).
- Ignore health and safety rules and procedures.
- Start a task knowing the work cannot be performed safely, including not properly equipped.
- Work under the influence of alcohol or drugs.
- Fighting & Gambling.
- Ignore when others work unsafely.
- Compromise on occupational health and safety issues.

Q&A

如果作业人员对安全有疑虑，应该怎么做？

※ 停止作业，确保自身和他人的人身安全后再恢复工作；将对安全的疑虑或关切向上级管理人员或安全管理人员报告。

如果因安全事故受伤了，应该怎么做？

※ 立即采取急救措施，防止伤情进一步恶化；如有需要，立即呼叫援助；

※ 向上级管理人员或安全管理人员报告安全事故；

※ 按照公司要求记录安全事故；从事故中汲取经验教训，防止将来再次发生类似事故。

如果没有配备个人防护装备，应该怎么做？

※ 在没有配备必要的个人防护装备的情况下绝不开展相关作业；

※ 询问上级管理人员或安全管理人员，如何获取适当的个人防护装备。

What should I do if I have a safety concern during work?

※ Stop the work and ensure your safety and the safety of others before resuming to work. Report your concern to your supervisor or safety personnel.

What should I do if I had an accident and got injured?

※ Take immediate action to protect against further damage. Call for help if needed.

※ Report the accident to your supervisor or safety personnel.

※ Ensure that the accident is recorded in accordance with company requirements. The lesson learned from your accident could help prevent someone else from being injured in the future.

What should I do if I do not have my personal protective equipment (PPE)?

※ Never work without required PPE.

※ Ask your supervisor or safety personnel how to get the appropriate PPE.

环境管理
Environmental Stewardship

我们相信矿业的高质量发展必须做到人与自然和谐共生，尽可能降低环境影响对公司经营发展、赢得项目“环境许可”至关重要。在项目全生命周期内，每一位员工必须以积极负责的态度管理环境影响，包括在影响发生前对环境风险开展识别和管控工作，以身作则，确保为东道国社区及子孙后代留下可持续的生态环境。

At Norin Mining, we believe that the development of mining must be in harmony with people and nature. Minimising our environmental footprint is essential to our business development and to maintain our environmental approval to operate. Our staff and managers at all levels are expected to take a proactive and responsible manner towards environmental impact management throughout the project lifecycle, which includes anticipating and addressing potential impacts before they occur and taking personal accountability to ensure that our operation preserves the ecological environment for the future generation.

所有境外项目遵守项目驻在国环境保护相关法律法规和标准规范，积极引入适用的国际标准与良好实践。

Comply with environmental laws, regulations, and standards in host countries, actively refer to applicable international standards and good practices.

作为一家负责任的矿业公司，我们鼓励员工在对工作场所或社区环境影响有疑虑或担心时畅所欲言。

We encourage every employee to speak up when there is a concern related to the environmental impact in the workplace or communities.

期望行为
Expected Actions

- 遵守所有适用的环境法律法规、运营许可制度、公司环保相关政策规范。
- 在项目全生命周期内，积极识别、评估、缓解、监测环境风险。
- 了解自身工作对环境的影响，如废弃物、噪音、粉尘、水资源、生物多样性等，尤其要重视因环境问题而引起的对当地社区的影响，包括实际和潜在影响。
- 查漏洞、补短板，尽最大可能降低环境影响。
- 一旦发生环境事件，立即向主管经理或环境管理人员报告，同时采取控制措施。
- 若发现或怀疑有任何环境危害，立即向主管经理或环境管理人员报告。
- 对每一起环境事故进行充分调查，分享从中汲取的经验教训，提升风险防范意识，尽可能降低事故再次发生的风险。
- 遵循环境报告要求，如实记录环境管理相关信息，提升公司透明度，在与东道国环境监管机构接触时遵循诚信原则。

- Comply with all applicable environmental laws, regulations, operating permits, and our environmental policies.
- Identify, assess, mitigate, and monitor environmental risks throughout the project lifecycle.
- Understand the impact of your work on the environment, such as waste, noise, dust, water, biodiversity, etc. with particular care on the environmental impact on the host community, including actual and potential impact.
- Identify ways to minimise environmental impact as much as possible.
- Immediately report any environmental incidents to your supervisor or the environmental personnel.
- Alert your supervisor or the environmental personnel in the project right away if you identify any potential environmental incidents.
- Investigate and share lessons learned from environmental incidents to increase awareness and minimise the risk of recurrence.
- Comply with environmental reporting requirements with transparency and accuracy and engage environmental regulators with integrity.

禁止行为
Prohibited Actions

- 对潜在或正在发生的环境事件视而不见。
- 允许承包商在没有获得相应环境许可的情况下开工。
- 忽视或低估与当地社区就环境影响进行沟通磋商的必要性。
- 漠视供应商或承包商破坏环境的做法。
- 未将生态环境保护纳入项目开发计划。

- Ignore potential or actual environmental incident.
- Allow contractors work without proper environmental permits.
- Ignore the importance of consultation with the host communities on environmental impact management.
- Accept environmental practices in our supply chain that would not be accepted in our own operations.
- Undertake a project that could compromise the well-being of communities that depend on the environmental ecosystem, such as water, land, forest, and biodiversity.

Q&A

如何了解更多关于公司环境管理的信息？

※ 北方矿业旗下所有境外项目遵守普遍接受的国际标准开展作业。相关国际标准为公开信息，可在网上查阅。

※ 2022 年 11 月，公司更新发布了《质量、环境和职业健康安全管理手册》、《质量、环境和职业健康安全程序文件》，所有项目需遵循这一政策性文件，你可向上级主管或项目环境工程师查询相关信息。

如果对公司相关作业是否符合环境政策法规有疑虑或担心，应该怎么做？

※ 停止作业，将你的疑虑或担心告诉主管经理或环境管理人员。如果判断可能造成环境影响事件，则应立即采取控制措施。

※ 可根据准则中“提出关切”章节内容提出你的关切。

How can I learn more about environmental requirements?

※ At Norin Mining, all sites are required to follow the universally accepted international standards on environmental management, all standards are publicly available.

※ In November 2022, we updated our environmental requirements on *Management Manual and Procedure Document for Quality, Environment,* and *Occupational Health & Safety*. All projects are required to follow the standards. You can seek relevant information from your supervisor, or the environmental personnel.

What should I do if I have a concern about environmental incompliance?

※ Stop the work and share your concern with your supervisor or the environmental personnel stationed on the project.

※ Use the steps outlined in the Raise a Concern section of our Code.

社区影响
Community Impact

我们承诺以对社会和环境负责任的方式开展业务，确保所有相关方共享可持续发展未来。为实现这一承诺，在项目全生命周期内，我们需持续与相关方磋商，征求反馈意见，积极管理项目运营对其产生的影响。

We are committed to conducting business in a socially, economically, and environmentally responsible manner so as to ensure a sustainable future for all our stakeholders. To realize our commitment, we must constantly seek their feedback throughout the project lifecycle on matters that impact them either positively or negatively.

开展社区工作，与社区内的团体组织或个人（尤其是弱势人群或边缘化人群）进行有意义的沟通，是我们取得成功的基础。我们必须尽最大可能避免或减少对相关方造成的不利影响，尽最大努力为他们带去发展机会。

Engaging with local communities and having meaningful communication with community groups and individuals, especially the vulnerable or marginalised people, is fundamental for us to achieve success. We must always aim to avoid or minimise adverse impacts on affected stakeholders and maximise development opportunities.

为系统管理社区影响，对社区做出积极贡献，妥善解决源自当地社会环境的根本性问题，我们必须采取科学方法，将社区参与、社区投资、社区赋能纳入体系化管理，加强公司责任制度建设，并将这一做法贯穿于项目全生命周期。

In order to systematically manage our impacts on the community, maximise our contributions, and properly address the resilient issues and the root-causes of the risks under local context, we must take a scientific approach and institutionalise community engagement, community investment, and accountability throughout the project lifecycle.

期望行为
Expected Actions

- 了解并尊重东道国的文化、习俗、宗教信仰，以及当地社会文化实践规范。
- 做当地社区的好邻居，赢得当地社区的信任和支持。
- 识别并充分考虑受影响社区民众的关切和期望。
- 评估并充分考虑矿山建设开发对当地社区社会、文化、环境和经济方面产生的影响。
- 坚持“诚信透明”原则与东道国社区沟通分享信息，严禁暗箱操作或以其他不道德的方式与社区开展接触，造成不当影响。
- 避免或尽可能减少对当地社区的不利影响。
- 及时回应社区投诉，以适应当地文化的方式与社区民众沟通，采取切实行动，解决社区所关心的问题。
- 促进当地社区发展，提升社区民众生活质量，尤其是当地弱势群体，如妇女、儿童、老人和原住民。
- 尊重社区的传统权利，充分认识原住民与环境的独特关系。

- Respect the culture, customs, beliefs, and socio-cultural practices of the host communities, so long as they comply with the law and the Code.
- Be a good neighbour and build trust with the host communities.
- Identify and consider the concerns and expectations of communities affected by our operations.
- Assess and consider the social, cultural, environmental, and economic impact of our operations on the host communities.
- Share, plan, and communicate with the host communities honestly and transparently, engage with them in a manner that avoids unethical behaviour and improper influence.
- Always aim to avoid or minimise adverse impacts on host communities.
- Always respond to community complaints promptly and take action to address their concerns in a culturally appropriate manner.
- Contribute to the development and quality of life of our host communities, particularly vulnerable groups, such as women, children, elders, and indigenous people.
- Value the traditional rights of indigenous communities and recognise the unique relationship of indigenous communities with their environment.

禁止行为
Prohibited Actions

- 忽视社区关切或投诉。
- 低估社区参与、社区沟通的重要性，尤其是在抢工期、赶进度的情况下。
- 认为社会风险管理相关工作只是社区联络小组的责任。
- 通过提供物品、金钱等不正当手段影响社区代表来推动业务发展或获得竞争优势。
- 未经授权向社区做出承诺。
- 开展可能会对公司声誉造成负面影响的活动。
- 以公司慈善捐赠的名义，为自己或配偶、伴侣、亲戚、朋友、同事谋私利。
- 对提出社区关切或报告社区相关问题的员工或社区成员打击报复。

- Ignore community concerns or complaints.
- Underestimate the importance of engagement with the host communities, particularly when you are under a tight construction or production schedule.
- Assume that responsibility for managing social issues rests only with the Community Liaison Team.
- Offer anything of value with the intent to improperly influence community representatives to gain business or improper advantage.
- Make commitments to communities without proper authorization.
- Conduct activities that may present a reputational risk to the company.
- Make charitable donations to benefit yourselves or your spouse, partner, relatives, friends, or associates.
- Retaliate against any employee or member of our host communities for making a community-related complaint.

Q&A

如果某社区成员提出关切或问题，应该怎么做?

※ 赢得当地社区的信任和支持是公司每一个人的责任，时刻牢记尊重他人、友善待人原则。

※ 倾听对方所说的话，尽可能把所提出的关切或问题记录清楚，包括对方的联系方式，及时将信息转达至社区联络小组。

※ 如果所提出的问题比较紧急，需要公司立即干预，应立即联系主管经理或社区联络小组负责人。

What should I do if a community member brings an issue to me?

※ Be mindful that building trust with the host communities is everyone's responsibility. You should treat him/her with dignity, kindness, and respect.

※ Listen to what he/she said, make notes of the issue as clear as possible, including his/her contact information, then promptly pass on the information to the Community Liaison Office.

※ If the issue is of urgent nature that requires immediate intervention, you should call your supervisor or the Community Liaison Office right away.

人权保护
Human Rights

在国际化经营过程中，北方矿业包括旗下子公司始终致力于负责任的矿业开发与可持续发展，坚信实施人权“保护、尊重和补救”框架是作为一家负责任的国际矿业公司不可或缺的一部分，只有坚持以人为本、尊重并保护人权，才能有效推动企业、社区、环境的和谐发展，共同繁荣。

We are a pioneering company dedicated to responsible and sustainable mining globally. We believe that respecting human rights and providing remedy for human rights impact is an indispensable part to be a responsible mining company. Only with human rights and people at the heart of our operation, can we build a business where community, company, and environment thrive together harmoniously.

我们尊重并维护联合国《世界人权宣言》所界定的人权，促进实践《国际劳工组织关于工作中基本原则和权利宣言》的劳工标准，尊重工人在不受干涉、不担心报复的情况下组织或加入工会、参加集体谈判的权利。我们相信，工人了解和行使自己权利的能力对建立牢固的劳资关系至关重要。我们组织培训使工人了解劳动法和集体谈判协议中的条款。

We are committed to respecting human rights as defined in the *United Nations Universal Declaration of Human Rights* and operating in the spirit of the core labour standards set out in the *International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights and Work*. We respect the right of our workers to form and join a union and to participate in collective bargaining without interference or fear of retaliation. We believe that the ability of workers to know and exercise their rights is critical to building a strong labour relationship, and we organise and facilitate training for workers to understand the labour laws and terms in the collective bargaining agreements.

发展权是一项不可剥夺的人权，我们以人为本，把促进人的全面发展作为出发点和落脚点。我们在各国开展业务的宗旨是为我们的员工、社区、合作伙伴创造发展机会，参与并促进当地社会、经济和文化发展，共享发展成果。

We recognise that the right to development is an inalienable human right, and the human person is the central subject of development. The ultimate mission of our operations across countries is to create opportunities for our employees, communities, and partners to participate in, contribute to, and enjoy economic, social, and cultural development.

期望行为
Expected Actions

- 与同事和谐相处，高效合作，实现共同目标。
- 感激他人的付出和贡献。
- 营造积极向上的工作氛围，鼓励大家发表意见、相互尊重。
- 注重和员工的对话和沟通，公平公正地对待所有员工。
- 定期与工会就员工相关事宜开展有效沟通，如公司政策、福利待遇、薪资、健康、安全、环境等。
- 识别、评估、缓解、监测项目现场及供应链中的人权风险。
- 防止项目现场及供应链中出现童工或强迫劳动问题。
- 报告在项目现场及供应链中任何可疑或实际发生的侵犯人权行为。

- Work cooperatively with others across the company to achieve shared objectives.
- Appreciate others for their contributions and accomplishments.
- Create a work environment that encourages people to express their views and fosters mutual respect.
- Use dialogue as a means to support fair and equitable treatment of all our employees.
- Engage with unions regularly on different matters related to our worker force, such as company policy, benefits, wages, health and safety, environment, etc.
- Identify, assess, mitigate, and monitor labour and human rights risks in the workplace and supply chain.
- Eliminate and prevent child labour and forced labour in the workplace and supply chain.
- Report any potential or suspected human rights abuse in our operations or our value chains.

禁止行为
Prohibited Actions

- 忽视员工所提出的意见、建议或投诉。
- 忽视承包商、分包商、供应商或其他合作伙伴侵犯人权的行为。
- 干涉或影响员工自由成立或加入工会、参加集体谈判的权利。
- 在开展社区参与或社区发展项目时，忽视弱势群体的需求和权利。
- 对提出与劳工权利相关投诉的员工进行打击报复。

- Ignore concern or complaint from our workforce.
- Ignore human rights abuses in contractors, subcontractors, suppliers, and other partner organizations.
- Interfere with or influence the free choice of employees to form or join a union.
- Neglect the needs and rights of vulnerable groups when conducting community engagement or development programs.
- Retaliate against any employee for making a labour rights-related complaint.

Q&A

如果看到承包商不友善对待员工，比如大骂脏话，应该怎么做？

※ 根据公司《行为准则》，这属于不可接受的行为。项目上的每一个人，包括承包商和分包商，都应该尊重他人、友善待人，尤其是在意见出现分歧的时候。

※ 如果对所见到的情况感到担心，应直接向主管经理报告，或者通过工会代表提出关切，工会代表将把这一问题报告给行政人事部。最终，项目管理人员会决策如何开展调查并采取相应的纠正措施。

我想对一起涉及人权的问题提出意见，但担心自己将来的职业发展受到影响。

※ 不用担心。作为一项公司政策，我们对打击报复行为采取零容忍态度，这包括员工的培训机会、升职机会、绩效考核等。

※ 我们鼓励员工以实事求是、善意的方式提出意见、建议或关切，因为这表明员工关心公司和同事。我们反对员工以捕风捉影的方式、为谋求个人私利而提出问题。

※ 如果因为提出意见或报告问题而遭到打击报复，可以直接联系公司 ESG 管理办公室。

What should I do if I see a contractor mistreating it's employees, such as yelling with loads of swear words?

※ It's unacceptable according to our Code. Everyone at our projects, including contractors and subcontractors, should treat people with dignity, kindness, and respect, particularly when in disagreement.

※ If you are concerned, you should raise it to your supervisor or confidentially through the worker representative. The worker representative will report the issue to the human resource department. Senior managers at our project will decide how to investigate and take corrective actions.

I want to raise a human rights-related issue, but should I be concerned about my future promotion?

※ As a company policy, we have zero tolerance against retaliation, which includes your training opportunities, promotion, performance review, etc.

※ We encourage you to raise the issue appropriately and in good faith, as it shows that you care about the company and your colleagues. We object that employees raising issues for the purpose of their personal gains, and in the way that does not reflect the truth.

※ If you believe you have been retaliated against for reporting an issue, please contact our ESG Management Office.

机会平等
Equal Opportunities

无论我们在哪里开展业务，都应致力于减少社会和经济不平等现象，促进共享发展和人人享有体面的工作。

No matter where we operate, we are committed to reducing social and economic inequalities and promoting shared prosperity and decent work for all.

我们应与当地社区密切合作，改善他们获得公共服务和资源的机会，包括医疗、教育、清洁的水资源等 , 尤其是为弱势群体、边缘化群体创造发展机会，如妇女、儿童、老人和原住民等。

We work closely with the host communities to improve their access to health, clean water, education, and other development opportunities, particularly for the vulnerable or marginalised groups, such as women, children, elders, and indigenous people.

在人人享有体面工作方面，我们坚持机会平等，以员工在职业发展中取得进步为己任，绝不因国籍、种族、宗教、性别、残疾、年龄或任何其他原因而歧视他人。

We believe in supporting our workers as they advance in their careers at Norin Mining. We do not discriminate based on national origin, race, religion, sex, disability or age, or any other attribute protected by local laws.

期望行为
Expected Actions

- 遵循公平原则，基于候选人的工作能力、资质和工作表现开展人力资源管理，包括员工招聘、评估、晋升、薪资、解雇、培训等。
- 在设计和实施社区计划时（如利益相关方的识别分析和沟通参与、本地化招聘、本地化采购、社区发展项目等），确保社区计划具有包容性，重点关注弱势和边缘化群体。
- 在各项工作中促进性别平等，保障妇女权益。
- 面对歧视现象或其他错误行为时，积极表达意见、予以指正。

- When making employment decisions, such as hiring, evaluation, promotion, pay, termination, and training opportunities, base them solely on objective merit, qualifications, and performance.
- When developing social programs, such as stakeholder mapping, stakeholder engagement, local hiring, local procurement, and local development plan, make sure the programs are inclusive, with a focus on vulnerable and marginalised groups.
- Promote gender equality and women's rights in every aspect of our work.
- Speak up about any discrimination or behaviour you might see that you believe is wrong.

禁止行为
Prohibited Actions

- 任何歧视行为，如因国籍、种族、宗教、肤色、年龄、性别或任何其他原因歧视他人。
- 面对明显的歧视现象或行为时，选择保持沉默。
- 在社区计划中（包括开展利益相关方参与沟通时）排除弱势或边缘化群体。
- 在人权尽职调查过程中，忽视弱势或边缘化群体应享有的权利。

- Use influence to favour particular individuals in the workplace based on personal relationships.
- Discriminate on race, colour, national origin, age, gender, religion, political affiliation, or any other characteristic.
- Remain silent in the face of obvious discrimination.
- Exclude vulnerable or marginalised groups in the social programs, including stakeholder engagement.
- Neglect the rights of vulnerable or marginalised groups in the human rights due diligence process.

Q&A

我的主管经理拿员工的种族和肤色开玩笑，其他几位同事看起来好像并没有什么意见，我该怎么做？

※ 你应该报告这样的行为。

※ 你的同事在面对明显的歧视现象或行为时选择了沉默，这属于“禁止行为”，你的主管经理有明显的歧视他人问题，你可参照“提出关切”章节内容进行报告。

※ 作为一名经理或管理人员，需以身作则，促进建立一个尊重他人、友善待人、和谐相处、积极向上的工作环境，始终牢记并遵守《行为准则》规范。

What should I do if I see my supervisor making a joke on the race and national origin of some workers, and some other colleagues seem fine with it?

※ You should report this behaviour.

※ Your colleagues' behaviour violates our commitment to non-discrimination. Because your supervisor is part of the problem, you can go to the "Raise a Concern" section.

※ As a manager, your supervisor is responsible for promoting a positive working environment in which people are treated with dignity, kindness, and respect. He or she should lead by example by living up to the standards of our Code at all times.

对骚扰和欺凌行为零容忍
Zero tolerance to Harassment and Bullying

作为一家国际矿业公司，我们常常需要在跨文化环境下工作，必须学会相互尊重，取长补短，巧用彼此的差异，不断取得更好的发展成果。

As an international mining company, we always work in a cross-cultural environment. It is essential to respect and learn from each other so that we can leverage our differences to achieve better results.

无论是在工作时间内还是工作时间外，公司所有员工（包括管理人员）都要友善待人、彼此尊重，我们努力建立包容性的企业文化，从而增进员工之间的互信。

All staff and managers at Norin Mining are required to treat each other with kindness, dignity, and respect, during or outside of normal working hours. With this in mind, we strive to build an inclusive corporate culture and foster trust.

我们承诺对骚扰和欺凌行为采取零容忍态度。当看到他人被骚扰或欺凌时，我们应当予以制止。

We are committed to zero tolerance to harassment and bullying. We show care and courage by speaking up if we see others being harassed or bullied.

期望行为
Expected Actions

- 营造包容性工作环境，促进形成相互尊重、相互学习的工作氛围。
- 了解并尊重文化差异。在一种文化中可接受的行为，在另一种文化中可能被视为冒犯，对文化差异要具有一定的敏感性。
- 如果目睹或经历任何构成骚扰或欺凌的行为，应予以制止。

- Foster an inclusive work environment that promotes respect for each other and learning from each other.
- Be aware of cultural differences. What is acceptable in one culture may not be in another. It is important to be aware of and understand these cultural sensitives.
- Speak up if you witness or experience any behaviour that you believe constitutes harassment or bullying.

禁止行为
Prohibited Actions

- 任何形式的骚扰或欺凌行为，包括不妥当的肢体接触、手势、言语等。
- 对身边发生的骚扰或欺凌行为视而不见。

- Engage in any form of harassment, including unwelcome expressions, gestures, comments, or physical contact.
- Ignore evidence of harassment or bullying around you.

Q&A

我理解公司需要建立一个包容性的企业文化，培养信任，但是由于文化和语言上的差异，我需要花费更多的时间。如果建立一支拥有相同背景的团队不是更有效率吗？

※ 建立一支具有包容性的团队需要时间，请保持耐心，继续努力。研究表明，尽管拥有不同背景的团队需要更长时间磨合，但他们往往能取得更好的成果。

※ 如果你在某个项目工作，可向项目行政人事部咨询更多关于语言和跨文化沟通的培训项目，这些培训项目能帮助你和你的团队更有效地沟通。

I understand that we need to build an inclusive corporate culture and foster trust, but more time is lost due to cultural and language barriers, wouldn't it be more efficient to have a team from same background?

※ It takes time to build an inclusive team. Be patient and continue to try your best. Studies have shown that although diverse teams take longer to find a harmonised approach, they generally achieve better results.

※ If you are stationed in the project, you can also seek more information from the local human resource department about potential training programs related to language and cross-cultural communication. It will help you and your team to communicate more efficiently.

第四章
Chapter 4

诚信经营
Conduct Business with Integrity

防止利益冲突
Conflicts of Interest

我们尊重员工的隐私权以及个人利益。然而，当个人利益影响到为公司做出客观公平的决策时，就会产生利益冲突。

We respect our employees'privacy and their right to pursue interests outside of the company. However, a conflict of interest can arise when your personal or professional interests affect your ability to make fair and objective decisions for Norin Mining.

利益冲突对员工个人声誉和公司声誉都可能造成负面影响，北方矿业每一位员工，尤其是公司管理人员，必须有效防止涉及自身及其亲友的利益冲突。

Conflict of interest can jeopardise your personal reputation as well as Norin Mining's. Every employee of Norin Mining, including our directors and managers, must avoid actual or perceived conflicts of interest involving yourselves, relatives, or close friends.

期望行为
Expected Actions

- 不偏不倚，做出公正合理的决策。
- 避免因个人利益影响决策或工作表现。
- 主动报告任何潜在的利益冲突。

- Make business decisions without bias or favouritism.
- Avoid situations where your personal interests affect your decision-making or work performance.
- Proactively disclose any potential conflict of interest.

禁止行为
Prohibited Actions

- 对潜在的或实际发生的利益冲突隐瞒不报。
- 通过公司或旗下项目资源为员工个人或其亲属的业务提供便利。
- 与公司竞争对手或同类型产品企业存在利益往来关系。
- 在个人或亲属相关联企业参与公司招标时，对比选流程进行干涉或施加影响。
- 在亲属或私人朋友参与公司招聘时，对招聘流程进行干涉或施加影响。

- Hide information on potential or actual conflicts of interest.
- Use company assets to support the business of yourself, your families, or relatives.
- Engage in external interests that compete with Norin Mining.
- To interfere or exert influence in the business selection process of a potential contractor or supplier that is linked to yourselves, families, or relatives.
- To interfere or exert influence in the hiring process of a candidate who is your family member or friend.

Q&A

我最好的朋友想成为公司的供应商，是否可以推荐给公司？

※ 如果你对供应商的评选决策会产生影响，将造成利益冲突，应该回避。

※ 你的朋友可通过公开渠道申请成为公司的供应商，你应该回避相关的供应商评选流程。

My best friend is seeking to become a supplier to Norin Mining, is it okay to recommend him/her to the company?

※ If you are part of the decision-making body regard to selecting suppliers, it will be a conflict of interest, which you must avoid.

※ Your friend can apply to be a supplier of Norin Mining through the public channel, you should withdraw yourself from the supplier selecting process.

反腐败、反贿赂
Anti-corruption and Bribery

诚信和责任是公司的发展基石。我们坚持高标准与社区、东道国政府、投资者、客户和供应商等相关方互动，承诺依法合规经营，坚守公平诚信原则，反对任何形式的腐败和贿赂行为。

Integrity and accountability are the cornerstones of Norin Mining. We hold ourselves to the highest standards in terms of fairness, lawfulness, and honesty. This extends to all interactions with our stakeholders such as our community, host governments, customers, suppliers, and investors. Wherever we work, we commit to operating to the same high standard of integrity and accountability by complying with all laws and regulations.

公司每一位员工需熟知并恪守公司廉洁从业相关规范，严禁以任何形式索取或收受不正当利益、牟取私利，包括礼品、礼金、回扣和服务等。

Everyone in the company must familiarise yourself with and follow the code of ethics and discipline. Soliciting or receiving benefits, including gifts, loans, remuneration, job offerings, contracts, services, and concessions in any form are strictly prohibited.

若发现任何不合规情况，每一位员工、供应商、承包商都可通过电子邮件、电话、信件、来访等方式向公司监督办公室举报。公司倡导负责任、实事求是的实名举报，监督办公室将组织开展调查，并根据调查结果进一步采取相应处理。

Any employees, suppliers, or contractors who witness any non-compliance can report to our Inspection Office through email, telephone calls, letters, or visits. We encourage responsible and truthful report. The Inspection Office will conduct investigation and take actions based on the findings.

期望行为
Expected Actions

- 合规经营，严格遵守反腐败、反贿赂相关法律以及公司相关政策规章制度。
- 熟知并恪守公司廉洁从业相关规范。
- 积极参加诚信经营、廉洁从业相关培训或座谈会。
- 如果对反腐败、反贿赂有任何疑虑，积极向公司监督部门咨询。
- 对腐败或贿赂行为进行举报。

- Conduct business with compliance, always consistent with anti-corruption and bribery laws and our internal policies and standards.
- Familiarise yourself with, and follow the code of ethics and discipline.
- Know who you are doing business with by conducting the appropriate due diligence.
- Attend required training programs on business integrity and self-discipline.
- Consult Inspection Commission if you have any questions or concerns related to corruption or bribery.
- Report corruption or bribery behaviour.

禁止行为
Prohibited Actions

- 通过承诺或给予回扣等不同行贿方式，谋取不正当特殊待遇或商业优势。
- 以任何形式索取或收受不正当利益，牟取私利，包括礼品、礼金、回扣和服务等。
- 对腐败或贿赂行为视而不见。

- Offer, accept, or promise a bribe, kickback, or facilitation payment for favourable treatment or to gain a business advantage.
- Solicit or accept gifts, hospitality, entertainment, or anything else of value in exchange for a decision favouring the provider.
- Turn a blind eye to bribery and corruption.

Q&A

某次商务会议后，某供应商想邀请你去他的家乡度假，他说他会提供机票、酒店和度假区门票。你应该怎么做？

※ 拒绝邀请，因为这违反公司《行为准则》。

After a business conference, a supplier approaches you and invites you to a resort in his hometown. He says he will take care of the plane tickets, hotel, and resort entrance tickets. What should you do?

※ Decline the invitation because it is contrary to our Code of Conduct.

反洗钱
Anti-Money Laundering

北方矿业严格遵守所有适用的反洗钱 (AML) 和反恐怖融资法律法规，只与从事合法商业活动且信誉良好的合作伙伴开展业务。

Norin Mining is committed to fully complying with all applicable anti-money laundering (AML) and counterterrorism financing laws. We conduct business only with reputable partners involved in legitimate business activities.

我们严格遵循上级单位发布的《中国北方工业有限公司商业伙伴合规管理指引》，建设并完善商业伙伴合规管理体系，对商业伙伴进行全过程管理，覆盖选聘、签约、履约、评价等不同阶段。我们通过基于风险的管理模式，避免与任何可能涉及洗钱的公司或个人建立业务关系，对潜在新客户开展尽职调查，筛选涉及非法武装组织、侵犯人权或金融不法行为等相关信息。

We strictly follow the *Guidelines for Compliance Management of Business Partners* issued by our parent company, build and improve the compliance management system of business partners, and carry out whole-process management of business partners, covering different stages such as selection, signing, performance and evaluation. We take a risk-based approach to avoid business relationships with any counterparties that may be engaged in money laundering, including Know Your Customer (KYC) due diligence on potential new clients, and screening for trade sanctions and information on potential activities involving illegal armed groups, human rights violations, or financial wrongdoings.

每一位员工，如果怀疑或发现公司与任何可能从事洗钱活动的公司或个人有业务往来，必须在第一时间向主管经理及合规管理部门报告。

Should any employee have cause to suspect that Norin Mining might be or has been engaged with any counterparties that may be engaged in money laundering, the circumstances must be reported to your supervisor and compliance department in the first instance.

期望行为
Expected Actions

- 对新业务合作伙伴开展尽职调查，了解并掌握合作伙伴相关信息。
- 与合作伙伴加强沟通，确保公司供应链不涉及非法武装团体、人权侵犯、财务违规等问题。
- 必要时，针对供应商开展现场尽调调查。（例如：如果供应商位于高风险地区，或可能涉及任何形式的侵犯人权行为或助长冲突，或其他违反公司《行为准则》的不道德行为）
- 如果注意到公司与任何可能从事助长非法武装团体的公司或个人有业务往来，第一时间向主管经理及 ESG 管理办公室报告。

- Perform due diligence on new business partners to know exactly who you are doing business with.
- Be vigilant in identifying irregular payments.
- Strengthen engagement with business partners to ensure that we are not involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings.
- Carry out site assessment if deemed necessary. (For example, if the supplier is in high-risk areas, or potentially involved in any form of human rights violations or contributing to conflicts or other unethical behaviour that is against our Code.)
- Raise concerns if you notice something which may look like money laundering and financing of terrorism.

禁止行为
Prohibited Actions

- 在不开展尽职调查的情况下，与新合作伙伴建立业务关系。
- 与最终控制人不清晰的公司开展合作。
- 参与洗钱或助长非法武装团体的活动。

- Establish a business relationship without prior due diligence.
- Work with a client whose ownership is opaque.
- Get involved with money laundering or financing of terrorism.

Q&A

某潜在客户计划从公司购买矿产品，他告知说款项将由在开曼群岛注册的第三方支付，我应该怎么做？

※ 首先，需要对该潜在客户开展 KYC 尽职调查。

※ 如果已开展过尽职调查，还需要针对该第三方开展 KYC 尽职调查，调查该第三方公司是否为合法的实体单位，或只是空壳公司。

※ 第三方公司所在的司法管辖区是众所周知的避税天堂，而且我们对第三方公司并不了解，所以一定要保持警惕，并与法律合规部门探讨相关细节。

A potential client wants to buy goods from us, he informed us that the payment will be made by a third party located in the Cayman Islands. What should I do?

※ First, you need to conduct KYC due diligence on this client.

※ If you have done so, you need to conduct KYC due diligence on this third party as well, see if the third party is a legitimate entity or just a shell company that exists only on paper.

※ The bank account is located in a jurisdiction that is known to be a tax haven, and particularly from a third party that you don't know, so you should definitely be alerted and discuss details with the legal department.

NORINMINING

CODE OF CONDUCT

第五章
Chapter 5

维护公司资产
Protect Our Assets

维护公司资产及数据安全
Protect Assets and Data

公司的实物资产如矿山设备设施，以及非实物资产如软件、信息和知识产权等对公司的成功都至关重要，每一位员工都有责任保护公司资产免遭盗窃、丢失、损坏或未经授权的使用。

Physical assets such as mining facilities and equipment, as well as non-physical assets like software, information, and intellectual property are essential to our success. Every employee of Norin Mining has a responsibility to protect these assets against theft, loss, damage, misuse, or unauthorized access.

我们尊重员工、客户、供应商、社区民众以及业务合作伙伴的数据隐私权，严格遵守数据信息保护相关法规，以专业且合乎道德的方式管理数据。

At Norin Mining, we respect the privacy rights of our staff, clients, suppliers, communities, and business partners. We are committed to managing personal data in a professional, lawful, and ethical way. We only collect what is necessary for legitimate purposes and only store this data for as long as it is necessary. We handle data in accordance with applicable laws and regulations and ensure that it is secured properly to prevent unauthorized disclosure.

期望行为
Expected Actions

- 保护公司数据资产安全，做好设备设施保障工作。
- 严格遵守安全操作规范使用设备设施。
- 严格遵守业务信息保密制度。
- 主动防止未经授权人员访问公司设施、信息、数据或其他资产。
- 以实现合法且正当目的为前提收集、处理、存储、使用个人数据信息。
- 自觉保护外部利益相关方信息，如客户、供应商、当地社区以及其他第三方相关数据。
- 若发现数据安全隐患或漏洞，及时报告。

- Protect our information, as well as the technology devices and equipment in your care.
- Use company equipment and technology for their intended purpose.
- Maintain the confidentiality of our business information.
- Prevent non-authorised personnel from accessing our facilities, information, data, or other assets.
- Collect, process, store, use personal data only to the extent it is strictly necessary to fulfil a lawful or legitimate purpose.
- Protect the confidential information entrusted to us by others, such as clients, suppliers, host communities, and other third parties.
- Immediately report any personal data breach.

禁止行为
Prohibited Actions

- 利用公司资产或资源（包括实物资产及非实物资产）谋取私利。
- 利用公司数据或信息系统从事非法、不道德或不正当的活动。
- 将公司的保密信息泄露给公司以外的任何其他人。
- 违规获取或使用个人数据信息。

- Use Norin Mining assets (physical or non-physical) and resources for personal gain.
- Use Norin Mining communication or information system for unlawful, unethical, or improper activities.
- Leave company confidential information in public place.
- Use personal data of others for personal purposes or in any other inappropriate way.

Q&A

我的一个朋友正在建立客户群，让我把同事们的联系方式给他。我认为同事们会喜欢他卖的东西，我也愿意帮助他。我可以把同事的联系方式告诉他吗？

※ 不可以，同事们的联系方式属于个人数据信息，应该保护。

※ 劝你的朋友通过别的方法来建立客户群。

A friend of mine has asked me to give him the contact details of my colleagues. I think they would like what he is selling and I would like to help him out. Can I go ahead and give him their names and contact information?

※ No, the contact details of your colleagues are personal information we must protect.

※ Your friend will have to find another way of building his customer base.

对外沟通
Communicating Externally

北方矿业遵循“公开透明、互相尊重”的原则与外部利益相关方沟通。为确保沟通信息的准确性和一致性，体现公司的核心价值观，只有事先获得授权的人员才可以与媒体沟通或向外部机构提供公司信息。每一位员工需牢记，除非你的现有职责涵盖对外沟通，否则不应与外界分享信息或发表任何与公司相关的声明。如果收到来自外部的询问，请将询问信息转交至对外联络相关部门。

Norin Mining is committed to communicating with our stakeholders and the public in a transparent and respectful manner. Our external communications must be accurate, consistent, and embodies our values. For this reason, only those who have been authorised to do so in advance should communicate with the media or disclose company information to external organizations. Unless your designated responsibilities include external communications, you must refrain from making any statements or providing any responses to outside inquiries. Please direct any such inquiries or any questions to the relevant department on external communications.

在谈论北方矿业包括旗下子公司或分享公司信息时，你就是公司的形象大使，需彰显公司的核心价值观，秉持诚信、透明原则，通过清晰、准确的发言来保护公司声誉，提升公司形象。

When talking about Norin Mining or sharing company information we act as brand ambassadors of the company and our core values. We protect and enhance our reputation by speaking with clarity, accuracy, integrity, and transparency.

期望行为
Expected Actions

- 在代表公司发言时，要严谨、准确。
- 如有媒体记者或其他外部机构代表联系你，遵循友善待人原则行事，并将询问信息转交至对外联络相关部门。
- 确保对外沟通信息的准确性和一致性。
- 在获得相应审批之后再发表关于公司的公开声明。
- 在社交媒体上发布信息、图片或视频时，尊重公司的信息所有权以及其他同事的隐私权。

- Be strategic and thoughtful when identifying opportunities to speak on behalf of Norin Mining.
- If you are approached by a media reporter or other external organization representative, be polite but defer any questions or requests for information to the relevant department on external communications.
- Provide consistent and accurate information to the public regarding our business.
- Seek approval before making any public statement about Norin Mining, including its subsidiaries.
- Respect Norin Mining’s proprietary information, and the privacy of our colleagues and others when posting information, images, or video on social media.

禁止行为
Prohibited Actions

- 未与对外联络相关部门沟通并获得公司授权，擅自向媒体提供信息。
- 以虚假、误导或其他任何损害个人或公司声誉的方式对外沟通。
- 对外披露公司或公司相关方的任何机密信息，包括社区、供应商、客户等。
- 在对外沟通中，侵犯他人知识产权。
- 在社交媒体上发布员工或客户的个人资料。

- Provide information to the media without company authorizaiton and guidance from the relevant department on external communications.
- Publicly communicate in any way that is false, misleading, or would damage your personal or Norin Mining's reputation.
- Publicly disclose any confidential information of Norin Mining or our stakeholders, including our communities, suppliers, clients, etc.
- Use the intellectual property of others in our public communications.
- Post personal data of our employees or clients on social media.

Q&A

我收到一封媒体记者的邮件，对方正在写一篇关于公司的文章，要征求我的意见，我认为一些信息并不正确，我应该发表意见吗？

※ 不应该。你应该告知主管经理，并将记者的询问信息转交至对外联络相关部门，由对外联络部门决定如何更好地回应。

※ 向公众提供准确的信息对公司至关重要，但应该由对外联络相关部门统筹管理。

I received an email from a reporter asking me to comment on an article. I believe the reporter has some incorrect information about Norin Mining. Should I make the comments?

※ No, you should inform your supervisor and refer the reporter to the relevant department on external communications, which will determine how best to respond.

※ While it is important for us to provide accurate information to the public, our communications team should manage all contact with the media.

知识产权保护
Intellectual Property

知识产权包括各种创造发明成果，如公司名称、标志、设计、发明、专利、数据库和专有技术。在矿业领域，知识产权还涉及矿山机械、堆浸、萃取、电积、质量控制等生产技术领域的创新和发明。

Intellectual property refers to intellectual creations such as company names and logos, designs, inventions, patents, databases, and know-how. Examples in the mining context include the design of mining machinery, and technology of mineral production, such as heap leaching, extraction, electrodeposition, quality control, etc.

知识产权不仅是公司依法享有的专有权利，更是一项商业资产，是提升公司竞争力、加强公司品牌建设的核心要素和关键支撑。

Intellectual property is not only a legal asset but also a business asset that can be used to strengthen our brand and gain a competitive advantage over others.

我们致力于保护公司的知识产权，尊重其他关联企业的知识产权，如供应商、承包商、竞争对手和客户，仅在获得授权的情况下使用知识产权。

We protect our intellectual property and respect the intellectual property of third parties, such as suppliers, contractors, competitors, and clients, and we only use it where we are properly authorised to do so.

期望行为
Expected Actions

- 按规范使用公司品牌和商标。
- 加强科技合作，推动创新发展，采取适当措施做好知识产权保护。
- 按规范分类存储公司业务及技术信息，做好信息权限管理。
- 尊重他人的知识产权，仅在获得授权情况下并按照授权要求使用相应的知识产权。
- 若发现他人未经授权使用公司知识产权，向公司法律部门报告。

- Use Norin Mining's brands and trademarks appropriately.
- Collaborate with transparency to develop intellectual property for Norin Mining and take appropriate steps to protect it.
- Classify and store our business and technical information appropriately, and with appropriate access controls.
- Monitor for the unauthorized use of our intellectual property by others.
- Respect the intellectual property of others and only use it when authorized to do so and in accordance with such authorization.

禁止行为
Prohibited Actions

- 未经允许向外部机构或个人提供公司的保密信息。
- 违规使用公司信息系统管理权限，包括为没有相应权限的人员登入公司信息管理系统。
- 未经授权使用、修改或披露其他公司的专有信息。

- Disclose Norin Mining's confidential information outside of the company without permission.
- Grant access to IT systems to individuals who do not have the proper authorisation to access those systems.
- Use, modify, or disclose the proprietary information of third parties without authorisation.

Q&A

一位新同事没有账号登录公司信息管理系统，而我有该系统的管理权限，我可以和那位同事分享我的登录账号信息吗？

※ 不可以分享。

※ 你可以在收到相关授权文件后，再为同事创建一个新的登录账号。

A colleague does not have access to an IT system for which I have administrative rights. Can I share my login information with that colleague?

※ No, you should not share your login information.

※ You should create a new login for your colleague after receiving an authorised paper confirming the employee's need to access the system.

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SUSTAINABLE MINING RESPONSIBLE INVESTMENT

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