Zhejiang Huayou Cobalt Co., Ltd. ("Huayou Cobalt", "the Company" or "us") is committed to building a high standard anti-corruption system

Huayou Cobalt not only requires its own operation to comply with this policy, but also requires relevant parties to meet Huayou's policies and expectations in the value chain. For specific requirements for suppliers, please refer to the Supplier Code of Conduct.
The underlying principles for our own operations and doing business with related parties (including but not limited to business partners, suppliers, contractors) are as follows:

4.1 Compliance Employment

4.1.1 Prohibition of child labor

The Company strictly complies with international labor standards and prohibits the employment of anyone below 16 years of age or below the country's minimum age for employment, whichever is the highest, to prevent child labor by implementing strict identity verification mechanisms.

4.1.2 Prohibition of forced labor

The Company prohibits any form of forced or coerced labor, imprisonment or contract labor, or any form of physical or psychological coercion and exploitation, and ensures that employees voluntarily sign labor contracts and enjoy the right to leave freely. We promise that any employee shall not seize the applicant's documents or collect a deposit. The workplace shall not restrict employees' freedom of movement (e.g., restroom access, drinking water, etc.). Employees have the freedom to choose to leave their jobs by giving written notice in advance as required.

4.1.3 Combating human trafficking

The Company prohibits all forms of human trafficking and ensures that its operations are not directly or indirectly involved in human trafficking by establishing an early warning mechanism and strengthening supply chain monitoring.

4.2 Equality and inclusion

4.2.1 Prohibition of discrimination

The company advocates diversity and inclusiveness, provides equal opportunities for everyone, and ensures that recruitment, promotion, remuneration and other aspects are not affected by any gender, race, age, sexual orientation, skin color, religious belief, physical disability, marital status or other characteristics.

4.2.2 Equal pay for equal work

The Company provides employees with job remuneration in line with their work ability. The remuneration of the same position and rank is not affected by gender, age and other factors.

4.2.3 Anti-discrimination and anti-harassment

The Company has zero tolerance for harassment (including sexual harassment and non-sexual harassment), bullying, discrimination and other behaviors in the workplace and other work-related environments, and explicitly prohibits harassment and insult of

employees, including any form of physical, sexual, psychological or verbal harassment and insult. Conduct regular workplace anti-discrimination and anti-harassment awareness and training for all employees. Once prohibited behaviors such as workplace discrimination or harassment are found, report and take punishment and corrective measures as soon as possible, and protect the privacy information of the whistle-blower to avoid unfair treatment and retaliation.

4.3 Freedom of association and collective bargaining

4.3.1 The Company respects the freedom of association of employees, and supports and encourages employees to have the right to freely choose whether to join, form or reject associations and associations on the premise of complying with relevant laws and regulations.

4.3.2 The Company supports and actively promotes cooperation and dialogue with trade unions and associations on matters such as collective labor contracts and employee benefits, and guarantees employees' right to participate in collective bargaining.

4.4 Basic rights of employees

4.4.1 Reasonable hours

The Company strictly complies with laws and reasonably arranges working hours that can

5.1 Evaluate human rights impact and risk areas and incorporate human rights due diligence into our decisions and operations, such as hiring new suppliers and third-party audits prior to major acquisitions. When performing due diligence, we follow international standards, including the OECD Guidelines for Responsible Supply Chain Due Diligence of Minerals in Conflict Affected and High Risk Areas.

5.2 The Company has established a systematic human rights risk assessment framework to comprehensively identify possible human rights issues and their influencing factors by collecting and analyzing internal and external information, combining the actual operation of the Company and local laws and regulations. The assessment process includes five key steps of risk identification, analysis, evaluation, control and supervision, aiming at preventing, reducing and controlling the occurrence of human rights risks and their potential impact on the company's operation and reputation.

5.3 In order to ensure the effective implementation of the human rights risk assessment framework, the Company conducts human rights risk audits on a regular basis. The audit is carried out by an internal expert team or an independent third party, focusing on whether the Company and its stakeholders comply with national laws and regulations and international human rights standards, whether the rights and interests of employees are effectively protected, whether the social and environmental impacts of products and services are fully assessed and managed, and whether a sound human rights risk assessment and response mechanism is established.

5.4 In order to effectively respond to different levels of human rights issues, the company divides human rights risks into three levels: minor, serious and emergency. Minor problems have no significant or lasting impact, but still need to be improved; Serious problems pose a significant threat to the fundamental human rights of employees or suppliers and require immediate action; Urgent problems directly threaten life, health or safety and require urgent intervention. For different levels of problems, the company has set up different processing procedures and time limits to ensure timely response and effective rectification.

5.5 In order to encourage employees and stakeholders to actively participate in human rights protection, the Company has established convenient channels for reporting human rights issues. Through hotlines, emails, websites and other ways, employees and stakeholders can easily report human rights-related issues or make complaints to the company. The company promises to seriously investigate and deal with each report, ensure that the problem is solved in a timely manner, and continuously improve human rights management.

We provide employees w