

南京钢铁股份有限公司 人权声明

Nanjing Iron & Steel Co., Ltd. Human Rights Statement

第一条 总则

南京钢铁股份有限公司（以下简称“公司”）认识到个人在企业活动各方面的不同价值，并根据国际准则尊重和捍卫所有人权。公司已经通过企业社会责任标准 SA 8000 认证。

公司承诺尊重国际公约及相关法律法规规定的人权，包括但不限于联合国《全球契约》、国际劳工组织《关于工作中基本原则和权利宣言》《联合国工商企业与人权指导原则》《世界人权宣言》《国际人权法案》《经合组织跨国企业准则》《联合国关于土著人民权利的宣言》等国际公认的人权框架与标准，以及其他规定移民工人、妇女和残疾人权利的国际规范。公司《人权声明》的制定与修订均遵循并符合这些已确立的国际标准。

I General Rules

Nanjing Iron & Steel Co., Ltd. (hereinafter referred to as the "Company") recognizes the diverse values of individuals in all aspects of corporate activities and respects and defends all human rights in accordance with international standards. The Company has passed the Corporate Social Responsibility Standard SA 8000 certification.

The Company commits to respecting all human rights as set

forth in international conventions and applicable laws and regulations, including but not limited to internationally recognized human rights frameworks and standards such as the United Nations Global Compact (UNGC), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Universal Declaration of Human Rights, the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises, and the United Nations Declaration on the Rights of Indigenous Peoples. This commitment also extends to international norms protecting the rights of migrant workers, women, and persons with disabilities. The development and revision of the Company's Human Rights Statement have been informed by and aligned with these established international standards.

第二条 适用范围

本声明适用于公司及下属企业，以及供应商、承包商，以及其他业务伙伴。

II Coverage

This Statement applies to the Company and its subsidiaries, as well as suppliers, contractors, and other business partners.

第三条 整体声明

公司致力于在业务运营的各个环节尊重和保障人权，不断改善作业环境、劳动条件，加强劳动保护、维护员工权益，勇于承担社会责任并付诸实践。我们承诺：

III Overall Statement

The Company is committed to respecting and protecting human rights in all aspects of its business operations, continuously improving the working environment and labor conditions, strengthening labor protection, safeguarding the rights and interests of employees, and courageously assuming social responsibility and putting it into practice. We are committed to:

（一）禁止歧视

公司禁止一切形式的歧视行为，不干扰员工行使遵奉信仰和风俗的权利，公司严禁任何形式歧视女工，特别是歧视孕妇。

人力资源部确保在聘用、培训机会、工资报酬、工作分配、升迁、解聘退休等事务上，不涉及任何基于种族、民族、地域或社会出身、社会阶层、国籍、血统、宗教、身体残疾、性别、性别取向、年龄、使用语言、婚姻状况、员工代表、政见等各种身份或政治关系的歧视行为。

1. Prohibition of Discrimination

The Company prohibits all forms of discriminatory behavior and does not interfere with the exercise of the right of employees to practice their beliefs and customs, and it strictly prohibits any form of discrimination against women workers, especially pregnant women.

The Human Resources Department ensures that matters such as hiring, training opportunities, salary and compensation, job assignment, promotion, termination of employment and retirement do not involve any discriminatory behavior on the basis of various identities or political affiliations, such as racial, ethnic, geographic, or social origin, social class, national origin, ancestry, religion, physical disability, gender, sexual orientation, age, use of language,

marital status, employee representation, and political opinion.

（二）惩戒性行为

公司禁止任何形式的惩罚行为，包括体罚、恐吓、辱骂、罚款及其他任何形式的精神或肉体上的胁迫，语言上的侮辱。员工发现有不当的处罚行为，可以向公司任何级别的管理人员投诉。针对员工关于社会责任方面的投诉，公司及时进行必要的纠正行动。

公司所有员工均有权在一个安全、尊重和有尊严的环境中工作。公司对骚扰，特别是性骚扰行为持零容忍态度，严禁在工作场所或与工作相关的任何情境中发生基于性别、种族、宗教、年龄、残疾或其他受保护特征的骚扰、性暗示言论、不当肢体接触或任何其他形式的不受欢迎行为。

2. Disciplinary Behavior

The Company prohibits any form of punitive behavior, including corporal punishment, intimidation, verbal abuse, fines and any other form of mental or physical coercion, verbal abuse. Employees can complain to any level of management in the Company if they find that there is an inappropriate sanction. In response to employee complaints regarding social responsibility, the Company promptly takes the necessary corrective action.

All employees of the Company have the right to work in an environment that is safe, respectful, and dignified. The Company maintains a zero-tolerance policy towards harassment, particularly sexual harassment, and strictly prohibits any form of harassment—whether verbal, physical, or behavioral—based on gender, race, religion, age, disability, or other protected

characteristics. This includes unwelcome conduct such as sexually suggestive remarks, inappropriate physical contact, or any other offensive behavior, whether occurring in the workplace or in work-related contexts.

（三）童工与未成年工

公司绝对禁止使用童工，坚决反对任何变相使用的行为，不与任何故意使用童工的供应商或分包商合作。

3. Child Labor and Underage Workers

The Company absolutely prohibits the use of child labor, firmly opposes any disguised use, and will not cooperate with any supplier or subcontractor who intentionally uses child labor.

（四）人口贩运

公司禁止人口贩运、奴役或剥削任何人，不与任何参与人口贩运活动或使用奴役劳动力的产品与服务提供商合作。

4. Human Trafficking

The Company prohibits human trafficking, enslaving or exploiting any person and does not work with any product and service provider who is involved in human trafficking activities or uses enslaved labor.

（五）强迫和强制劳动

公司尊重员工自由权利，包括雇佣自由、辞工自由，加班自由及行动自由，禁止使用任何形式的强迫劳工，包括囚工、契约劳工、抵债劳工。

5. Forced and Compulsory Labor

The Company respects the freedom of employees, including the freedom of employment, the freedom to resign, the freedom to work overtime and the freedom of movement and prohibits the use of any form of forced labor, including imprisonment, indentured labor, and bonded labor.

（六）工作时间

公司根据国家相关法律法规安排工作时间，禁止强迫员工加班。保证达到当地法规要求和企业社会责任标准 SA 8000 要求，以及行业标准和各相关客户的社会责任准则要求。

6. Working Time

The Company arranges working hours in accordance with relevant national laws and regulations and prohibits forcing employees to work overtime. We guarantee to meet the requirements of local laws and regulations and Corporate Social Responsibility Standard SA 8000, as well as industry standards and the requirements of the social responsibility guidelines of each relevant client.

（七）工资报酬

公司保证公司员工工资福利达到当地法规和企业社会责任管理体系（SA 8000）的标准要求，以及行业标准和各相关方客户的社会责任标准要求，以满足员工符合当地基本生活需求的工资。对从事相同工作、付出等量劳动、取得相同劳绩的劳动者，公司支付同等劳动报酬。

人力资源部根据劳动法的要求制定工资报酬和福利标准并实施。

7. Salary and Remuneration

The Company guarantees that the wages and benefits of its employees meet the requirements of local laws and regulations and Corporate Social Responsibility Standard SA 8000, as well as the industry standards and social responsibility standards of various relevant customers, so as to meet the wages of employees in line with local basic living needs. The Company shall pay the same labor remuneration to the workers who engage in the same work, pay the same amount of labor and achieve the same performance.

The Human Resources Department sets and implements salary, remuneration and welfare standards according to the requirements of the labor law.

（八）自由结社与集体谈判权利

公司尊重员工自由结社、参加工会和集体谈判的权利，建立并保持有效的申诉和投诉程序，确保公司活动符合法律法规及相关社会责任体系的标准要求。

工会建立并维持公司自由结社与集体谈判的政策或程序，组建工人代表大会支持员工选举工人代表和集体谈判的建立、运行或管理并为工人代表的活动提供场所与相关便利条件。

8. Freedom of Association and Collective Bargaining

The Company respects the rights of employees to freely associate, join labor unions and engage in collective bargaining, establishes and maintains effective grievance and complaint procedures, and ensures that the Company's activities are in compliance with laws and regulations and the standard requirements of relevant social responsibility systems.

The union establishes and maintains the Company's policies

or procedures for free association and collective bargaining, and organizes workers' congresses to support the establishment, operation or management of employee elections for workers' representatives and collective bargaining and provides space and related facilities for workers' representatives' activities.

（九）裁员前的协商与通知

若公司因经营调整或其他正当原因需实施大规模裁员，将严格遵守《中华人民共和国劳动合同法》及相关法律法规的规定，提前至少 30 天向全体员工或工会说明情况，并将裁员方案向当地劳动行政部门报告。在此期间，公司将积极与员工及其代表进行充分协商，听取意见和建议，尽可能通过优化岗位配置、内部转岗、培训再就业等方式减少裁员影响。

对于依法需解除劳动合同的情形，公司将依法支付经济补偿金，并提供必要的离职支持与职业过渡协助，切实保障员工的知情权、参与权和合法权益。公司坚持公平、透明、负责任的原则处理人员调整事项，努力维护劳动关系的和谐稳定。

9. Consultation and Notification Prior to Workforce Reduction

In the event that the Company needs to implement a large-scale workforce reduction due to operational adjustments or other legitimate business reasons, it will strictly comply with the provisions of the Labor Contract Law of the People's Republic of China and other applicable laws and regulations. The Company will provide notice to all affected employees or their representatives (including trade unions) at least 30 days in advance and submit the redundancy plan to the local labor administrative authority for record. During this period, the

Company will engage in full consultation with employees and their representatives, actively seeking their input and feedback. Wherever possible, the Company will seek to minimize the impact on employees through measures such as job reconfiguration, internal transfers, retraining, and support for alternative employment opportunities.

For cases where employment contracts are lawfully terminated, the Company will provide statutory severance compensation and offer necessary outplacement support and career transition assistance. The Company is committed to safeguarding employees' rights to information, participation, and legitimate rights and interests throughout the process. The Company handles all personnel adjustments in accordance with the principles of fairness, transparency, and accountability, striving to maintain harmonious and stable labor relations.

第四条 沟通、投诉与培训

公司确保每个人都有权提出正式投诉，不得因提出投诉而受到歧视或遭受报复。公司保证对提交投诉的人员进行匿名保护。公司努力确保规程透明，让各牵涉方的权利在所有规程步骤中均得到尊重。

此外，公司定期组织、举办相关培训，强化各利益相关方的人权保障意识。

IV Communication, Complaints and Training

The Company ensures that everyone has the right to file a formal complaint and may not be discriminated against or subjected to retaliation for filing a complaint. The Company guarantees the anonymity of the person submitting the complaint.

The Company strives to ensure that its procedures are transparent and that the rights of all parties involved are respected at all procedural steps.

In addition, the Company organizes and conducts regular training sessions to strengthen stakeholders' awareness of human rights protection.

第五条 关键承诺和目标

为系统推进人权保护在运营中的落地，公司围绕反歧视、禁止强迫劳动与童工、员工发展等关键议题，设定以下承诺及目标：

维度	承诺内容	目标
反歧视与平等机会	公司坚持尊重多样性，反对基于性别、民族、宗教、年龄、残疾状况、户籍的任何歧视行为，推动包容性企业文化建设。	- 到 2030 年，实现管理层中女性占比提升至不低于 5.1%，并在人才梯队中加强女性后备力量培养； - 每年至少开展 1 次反歧视与多元化培训，到 2030 年实现全员反歧视与多元化培训覆盖率达 100%。
杜绝童工、强迫劳动与人口贩卖	公司坚决反对任何形式的剥削性用工行为，致力于在全价值链中	设立独立、保密的人权投诉渠道（包括热线、邮箱和线下信箱等），确保所有申诉在收到

	消除童工、强迫劳动与人口贩运风险。	后 5 个工作日内响应，并在 30 天内完成初步调查与反馈； • 确保公司所有生产基地达到 100% 零童工、零强迫劳动记录，并纳入年度社会责任审核结果。
员工发展与培训	公司通过系统性培训提升员工技能水平与职业发展机会，增强其在工作中的成就感与归属感。	• 到 2030 年，实现员工年度人均培训时长较 2025 年提升 5%； • 到 2030 年，实现关键岗位技能培训参与率较 2025 年提高 5%，重点覆盖青年员工、女性员工及一线操作人员； • 每年组织不少于 1 次跨部门职业发展交流活动，促进内部流动性与成长通道建设。

V Key Commitments and Targets

To systematically advance the implementation of human rights protection in its operations, the Company has established

the following commitments and targets regarding key issues, including anti-discrimination, the prohibition of forced labor and child labor, and employee development:

Dimension	Commitment	Target
Anti-Discrimination and Equal Opportunity	The Company upholds respect for diversity and opposes any form of discrimination based on gender, ethnicity, religion, age, disability status, household registration, promoting the development of an inclusive corporate culture.	• By 2030, increase the proportion of women in management positions to no less than 5.1%, and strengthen the cultivation of female talent in the talent pipeline. • Conduct at least one anti-discrimination and diversity training session per year, achieving 100% coverage of anti-discrimination and diversity training for all employees by 2030.

Elimination of Child Labor, Forced Labor, and Human Trafficking	The Company firmly opposes any form of exploitative employment practices and is committed to eliminating the risks of child labor, forced labor, and human trafficking across the entire value chain.	• Establish independent and confidential human rights complaint channels (including hotlines, email, and physical mailboxes), ensuring that all complaints receive a response within 5 working days and that a preliminary investigation and feedback are completed within 30 days. • Ensure that all of the Company's production sites maintain a 100% record of zero child labor and zero forced labor, and incorporate this into the annual social responsibility audit results.
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Employee Development and Training	The Company enhances employee skill levels and career development opportunities through systematic training, strengthening their sense of achievement and belonging at work.	• By 2030, increase the average annual training hours per employee by 5% compared to 2025. • By 2030, increase the participation rate of skills training for key positions by 5% compared to 2025, with a focus on covering young employees, female employees, and frontline operators. • Organize no less than one cross-departmental career development exchange activity per year to promote internal mobility and career growth pathways.
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第六条 附则

本声明经公司董事会战略与 ESG 委员会审议批准，自发

布之日起生效。

VI Annex

This Statement has been reviewed and approved by the Strategy and ESG Committee of the Board of Directors of the Company, which is effective as of the date of promulgation.