

南京钢铁股份有限公司 尾矿管理声明

Nanjing Iron & Steel Co., Ltd. Tailings Management Statement

第一条 总则

本声明旨在阐述南京钢铁股份有限公司（以下简称“公司”）采取可持续发展的方式，在尾矿设施生命周期的所有阶段（包括闭库和闭库后）承担责任，并将确保尾矿设施安全作为头等要务采取，致力于实现对人员和环境零伤害。

I General Rules

The purpose of this Statement is to explain that Nanjing Iron & Steel Co., Ltd. (hereinafter referred to as the "Company") takes a sustainable approach, assumes responsibility for all phases of the life cycle of the tailings facility, including closure and post-closure, and is committed to achieving zero harm to people and the environment by making the safety of the tailings facilities a top priority.

第二条 适用范围

本声明适用于公司与矿业相关的子公司安徽金安矿业有限公司（以下简称“金安矿业”）以及相关业务合作伙伴。

II Coverage

This Statement applies to the Company's mining-related subsidiary Anhui Jinan Mining Co., Ltd (hereinafter referred to as "Jinan Mining") and related business partners.

第三条 整体声明

公司重视尾矿管理安全，承担应有的责任，努力在尾矿设施的全生命周期管理实施最优的管理策略。我们承诺：

III Overall Statement

The Company emphasizes tailings management safety, assumes due responsibility and strives to implement optimal management strategies in the full life cycle management of tailings facilities. We are committed to:

（一）管理政策

公司遵循《中华人民共和国安全生产法》《中华人民共和国矿山安全法》《尾矿库安全规程》《尾矿设施施工及验收规范》《尾矿库安全监督管理规定》以及运营点所在地区的法规和标准，承诺实施《全球尾矿管理行业标准》（GISTM），遵循领先的国际和国内标准和尾矿管理的最佳实践，对标最高要求强化尾矿设施管理，持续健全尾矿设施全生命周期管理流程。公司固化并持续改进既有的标准化、系统化管理要求，注重对尾矿坝体、排水系统的风险评估、预防性维护和周期性的评价复核，确保尾矿设施可靠安全。

公司健全并落实尾矿设施全员安全生产责任，配备专业管理队伍，健全尾矿设施安全管理制度，不断推进和完善尾矿设

施安全生产标准化建设，强化风险分级管控和隐患排查治理双重预防机制，健全工程、技术、管理、培训和应急等防御措施，尽最大可能在尾矿设施的全生命周期管理中预防和降低事件事故的发生，确保尾矿设施风险可控在控。公司还邀请第三方对尾矿设施的安全性进行评估。

公司关注并积极维护尾矿设施周边的生态环境，在遵守当地法律法规的前提下，原则上不直接向河流、海域等自然流域排放尾矿。

1. Management Policy

The Company follows the Work Safety Law of the People's Republic of China, Mine Safety Law of the People's Republic of China, Tailings Storage Safety Regulations, Tailings Facility Construction and Acceptance Specification, Tailings Storage Safety Supervision and Management Provisions, as well as the regulations and standards of the regions where the operation sites are located. The Company commits to implementing the Global Industry Standard on Tailings Management (GISTM), adheres to leading international and domestic standards and industry best practices for tailings management, strengthens the management of tailings facilities against the highest requirements, and continuously improves the whole-life-cycle management process of tailings facilities. The Company solidifies and continuously improves the established standardized and systematic management requirements, and focuses on risk assessment, preventive maintenance and periodic evaluation and review of tailings dams and drainage systems to ensure reliable and safe tailings facilities.

The Company improves and implements the responsibility for work safety of all staff at tailings facilities, equips professional management teams, improves the safety management system of tailings facilities, continuously promotes and improves the standardization of safety production at tailings facilities, strengthens the dual preventive mechanism of risk classification and control and hidden trouble detection and management, and improves the defensive measures of engineering, technology, management, training and emergency response, so as to prevent and reduce the occurrence of incidents and accidents as much as possible in the management of tailings facilities during the whole lifecycle, and ensure that tailings facility risks are manageable. The Company also invites the third party to evaluate the safety of the tailings facilities.

The Company pays attention to and actively maintains the ecological environment around tailings facilities, and on the premise of complying with local laws and regulations, in principle, does not directly discharge tailings into natural watersheds such as rivers and seas.

（二）尾矿储存设计与建设

公司遵循尾矿设施建造“三同时”原则，即尾矿设施建设项目的安全设施、环境保护设施和职业健康防护设施与主体工程同时设计、同时施工、同时投入生产和使用。

公司注重尾矿设施设计与建造，对项目选址作充分论证并进行相应的岩土工程勘察，设计时严格执行强制性标准要求，建造时严格执行设计文本、安全设施设计及工程控制质量等要

求。公司在设计与建造的各阶段做充分的模拟和复核，包括尾矿坝稳定性、尾矿设施排水能力、安全监测设施的有效性等，力争将尾矿设施的影响和风险降至最低。

公司已制定尾矿设施规划。规划内容明确矿山运营全周期内尾矿的储存选址、堆放方式与分区布局，同步细化尾矿库建设的预算编制、工期排期及分阶段施工方案，确保各环节衔接有序、实施可控。同时，公司已编制尾矿操作手册，涵盖尾矿输送、堆存、坝体维护、排水系统运行、应急处置等全流程操作规范与技术参数，为尾矿规范化、标准化管理提供明确指引。

2. Tailings Storage Design and Construction

The Company follows the principle of "three simultaneous" construction of tailings facilities, i.e., the safety facilities, environmental protection facilities and occupational health protection facilities of tailings facility construction projects are designed, constructed and put into production and use at the same time as the main project.

The Company emphasizes on the design and construction of tailings facilities, fully justifies the site selection and conducts corresponding geotechnical investigation, strictly implements the requirements of mandatory standards in design, and strictly implements the requirements of design text, safety facility design and quality control of works in construction. The Company does sufficient simulations and reviews at all stages of design and construction, including the stability of tailings dams, the drainage capacity of tailings facilities, the effectiveness of safety monitoring

facilities, etc., in order to minimize the impacts and risks of the tailings facilities.

The Company has formulated a tailings facility plan. This plan clearly defines the storage site selection, stacking methods and zonal layout of tailings throughout the entire lifecycle of mine operations, and simultaneously specifies the budget formulation, construction schedule arrangement and phased construction plan for tailings pond construction, so as to ensure the orderly connection and controllable implementation of all links. In addition, the Company has compiled a tailings operation manual, which covers the full-process operational specifications and technical parameters for tailings transportation, stacking, dam maintenance, drainage system operation and emergency response, providing clear guidelines for the standardized and normalized management of tailings.

（三）尾矿设施检查与监测

尾矿设施运行期间，公司制定作业计划和运行图表，严格按作业计划生产运行。公司重点做好入库尾矿指标检测、尾矿筑坝与排放、库水位控制与防洪、渗流控制与防震抗震以及定期进行安全评价、安全性复核。公司及时发现并纠正尾矿设施运行期间人的不安全行为、物的不安全状态以及管理缺陷，特别注重对于重大险情的识别与重大事故隐患的排查并及时进行控制或消除。

公司定期对尾矿设施的污染隐患进行排查，重点对环境管理制度、污染隐患排查治理制度等制度落实情况，排尾管道、回水管道、废水处理设施和地下水监测与防渗设施等设施建设

和运行情况，以及尾矿设施周边土壤污染情况等进行全面检查与监测。针对排查出的污染隐患点，公司将及时进行改进和治理，严防尾矿设施污染事件发生。

3. Inspection and Monitoring of Tailings Facilities

During the operation of tailings facilities, the Company formulates operation plans and operation charts, and produces and operates strictly according to the operation plans. The Company focuses on the detection of incoming tailings indicators, tailings damming and discharge, reservoir water level control and flood control, seepage control and seismic resistance, as well as regular safety evaluation and safety review. The Company promptly identifies and corrects unsafe human behaviors, unsafe physical conditions and management deficiencies during the operation of tailings facilities, and pays special attention to the identification of major hazards and the investigation of major potential accidents, and controls or eliminates them in a timely manner.

The Company conducts regular inspections of the pollution hazards of the tailings facilities, focusing on the implementation of the environmental management system, the system for the investigation and management of pollution hazards, the construction and operation of facilities such as the tailings discharge pipeline, the water return pipeline, the wastewater treatment facilities and the groundwater monitoring and seepage control facilities, as well as the comprehensive inspection and monitoring of the soil contamination in the vicinity of the tailings facilities. In response to the identified pollution hazard points, the Company will make timely

improvements and governance to prevent the occurrence of tailings facility pollution incidents.

（四）尾矿设施应急准备和响应计划

公司制定和实施针对特定地点的尾矿设施应急准备和响应计划，在发生灾难性尾矿设施破坏时，立即做出响应，拯救生命，提供人道主义援助，并将危害降至最低。

4. Emergency Preparedness and Response Plan of Tailings Facilities

The Company develops and implements site-specific emergency preparedness and response plans of tailings facilities to respond immediately in the event of catastrophic tailings facility damage to save lives, provide humanitarian assistance and minimize hazards.

（五）尾矿设施闭库管理

为安全关闭尾矿设施，公司开展闭库前的安全评价、闭库设计与施工和闭库安全验收。尾矿设施运行到设计最终标高的前 12 个月内，进行闭库前的安全现状评价和闭库设计，闭库设计应当包括安全设施设计。闭库安全设施设计应当经有关安全生产监督管理部门审查批准。

5. Closure Management of Tailings Facilities

For the safe closure of tailings facilities, the Company carries out pre-closure safety evaluation, closure design and construction and closure safety acceptance. Within 12 months prior to the operation of the tailings facilities to the final elevation of the design, the evaluation of the safety status before the closure and the design

of the closure shall be carried out, and the design of the closure shall include the design of the safety facilities. The design of safety facilities for the closure shall be reviewed and approved by the relevant work safety supervision and management authorities.

第四条 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。

IV 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.