

南京钢铁股份有限公司 社区政策

Nanjing Iron & Steel Co., Ltd. Community Policy

第一条 总则

南京钢铁股份有限公司（以下简称“公司”）始终秉持“与城市共融、与社区共生”的发展理念，将社区视为重要的利益相关方。公司承诺尊重社区权益，促进协同发展，实现企业与社区的长期共赢。

本政策旨在建立透明、可问责、可持续的社区参与机制，确保公司能够主动识别并管理社区影响，积极履行社会责任，提升社会价值创造能力。

I General Rules

Nanjing Iron & Steel Co., Ltd. (hereinafter referred to as the "Company") has always adhered to the development concept of "integration with the city, symbiosis with the community", regarding the community as an important stakeholder. The Company is committed to respecting community rights and interests, promoting coordinated development, and achieving long-term win-win outcomes for the enterprise and the community.

This Policy aims to establish a transparent, accountable, and sustainable community engagement mechanism, ensuring that the Company can proactively identify and manage community impacts, actively fulfill social responsibilities, and enhance the

ability to create social value.

第二条 适用范围

本政策适用于公司及下属企业、供应商、承包商以及其他业务伙伴，要求它们在其运营中尊重本政策原则，共同维护良好的社区关系。

II Coverage

This Policy applies to the Company and its subsidiaries, as well as suppliers, contractors, and other business partners, requiring them to respect the principles of this Policy in their operations and jointly maintain good community relations.

第三条 管理政策

为系统化、规范化推进社区关系管理，公司建立了由董事长担任组长、总裁担任副组长的社会责任领导小组，各相关职能部门具体执行社会责任相关事务，确保社区管理工作责任清晰、机制健全、执行有力。

公司承诺遵循联合国《世界人权宣言》(UDHR)、《工商企业与人权指导原则》(UNGPs)、《联合国土著人民权利宣言》(UNDRIP)、联合国全球契约(UNGC)、OECD《跨国企业准则》等国际标准，并结合中国国情及企业实际情况，建立符合自身特点的社区关系管理标准体系。

公司制定并实施《社会责任工作管理暂行办法》《对外捐赠管理办法》等一系列内部管理制度，明确社区参与、利益相关方沟通、公益投入、搬迁安置、投诉处理等关键环节的操作流程与管理要求，实现社区事务的制度化、透明化和可追溯管

理。公司致力于识别、预防和缓解生产经营活动对社区可能产生的负面影响，保障受影响群体的合法权益，推动企业与所在地社区的协同发展、互信共赢。

III Management Policy

To systematically and normatively promote community relationship management, the Company has established a Social Responsibility Leading Group with the Chairman as the leader and the President as the deputy leader. Relevant functional departments are responsible for carrying out social responsibility-related affairs, ensuring clear responsibilities, sound mechanisms, and strong implementation in community management.

The Company is committed to following international standards such as the United Nations Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), the United Nations Global Compact (UNGC), and the OECD Guidelines for Multinational Enterprises, and integrating China's national conditions and the Company's actual situation to establish a community relationship management standard system that suits its own characteristics.

The Company has formulated and implemented a series of internal management systems such as the Interim Measures for the Management of Social Responsibility Work and the Measures for the Management of External Donations, clarifying the operational procedures and management requirements for key aspects such as community participation, stakeholder communication, public

welfare investment, relocation and resettlement, and complaint handling, achieving institutionalized, transparent, and traceable management of community affairs. The Company is committed to identifying, preventing, and mitigating the potential negative impacts of production and business activities on the community, safeguarding the legitimate rights and interests of affected groups, and promoting coordinated development, mutual trust, and win-win outcomes between the enterprise and the local community.

第四条 社区参与

公司通过系统性、结构化的参与机制，建立与社区之间的信任关系，推动企业运营与地方发展的协同共进。我们坚持以下核心原则开展社区参与工作：

- **知情权与参与权保障：**在项目规划、建设及运营各阶段，确保受影响社区充分知情并有机会表达意见；
- **尊重多样性：**尊重当地文化、传统、宗教信仰和社会结构，特别关注妇女、儿童、老年人、残障人士等弱势群体的需求；
- **透明沟通：**以公开、坦诚的方式传递信息，回应关切，避免信息不对称引发误解或冲突；
- **持续互动：**社区参与不是一次性程序，而是贯穿项目全生命周期的动态过程。

公司承诺在重大项目开始前开展社区影响评估工作，全面分析项目对于当地社区的社会影响及潜在风险，评估公司生产经营活动可能对当地社区造成的影响。公司系统识别可能受影

响的利益相关方，包括周边居民、村（居）委会、地方政府部门、学校、医疗机构、非政府组织及特殊群体代表等，建立完整的内外部利益相关方清单，确保关键群体无遗漏，并根据项目进展动态更新。公司根据与利益相关方的沟通结果，确定受影响群体的关注事项，结合运营实际与社会风险的严重性、紧迫性进行综合评估与优先级排序，并据此制定切实可行的风险缓释计划与管理措施，确保相关风险得到有效预防和管控。

IV Community Participation

Through systematic and structured participation mechanisms, the Company establishes a trust relationship with the community and promotes the synergy between business operations and local development. We adhere to the following core principles in our community engagement work:

- **Guarantee of the right to know and participate:** During all stages of project planning, construction, and operation, ensure that affected communities are fully informed and have the opportunity to express their opinions;
- **Respect for diversity:** Respect local culture, traditions, religious beliefs, and social structures, with special attention to the needs of vulnerable groups such as women, children, the elderly, and persons with disabilities;
- **Transparent communication:** Convey information in an open and honest manner, respond to concerns, and avoid misunderstandings or conflicts caused by information asymmetry;
- **Continuous interaction:** Community participation is not a one-time process but a dynamic process throughout the entire

project lifecycle.

The Company is committed to conducting community impact assessments before major projects, comprehensively analyzing and evaluating the social impacts and potential risks of the project and the Company's production and business activities may have on the local community. The Company systematically identifies potentially affected stakeholders, including nearby residents, village (neighborhood) committees, local government departments, schools, medical institutions, non-governmental organizations, and representatives of special groups, establishing a complete list of internal and external stakeholders to ensure that key groups are not missed, and dynamically updates it according to project progress. Based on the results of communication with stakeholders, the Company determines the concerns of affected groups, conducts a comprehensive evaluation and prioritizes the issues based on operational reality and the severity and urgency of social risks, and accordingly formulates feasible risk mitigation plans and management measures to ensure effective prevention and control of relevant risks.

第五条 社区发展计划

公司始终致力于成为社区可持续发展的积极贡献者，坚持将企业发展与地方经济社会进步深度融合。公司承诺结合项目所在地的实际需求，系统规划和实施具有长期价值的支持举措。公司通过本地化采购、优先招聘周边社区员工、扶持中小企业等方式，促进区域经济活力，增强社区自我发展能力；同时依法足额缴纳税费及相关资源使用费用，切实提升地方政府公共服务能力，助力民生改善。

在教育、医疗、交通、环境等公共领域，公司积极支持基础设施建设和公益项目实施，重点关注弱势群体的福祉，推动乡村振兴、支教帮扶与社会公平。我们尊重当地文化传统，积极参与和支持文化传承活动，倡导企业与社区之间的相互理解与融合，确保社区投入精准有效。公司建立多元沟通渠道与社区保持紧密沟通，接受社会监督，不断提升社区发展的质量与影响力。

V Community Development Plan

The Company is always committed to being an active contributor to the sustainable development of the community, insisting on deeply integrating enterprise development with local economic and social progress. The Company promises to systematically plan and implement support measures with long-term value based on the actual needs of the project location. Through localized procurement, priority recruitment of employees from surrounding communities, and support for small and medium-sized enterprises, the Company promotes regional economic vitality and enhances the community's self-development capability; at the same time, it pays taxes and related resource usage fees in full according to law, effectively improving the local government's public service capacity and contributing to the improvement of people's livelihoods.

In public sectors such as education, healthcare, transportation, and the environment, the Company actively supports infrastructure construction and public welfare projects, focusing on the well-being of vulnerable groups, promoting rural revitalization, educational assistance, and social equity. We respect local cultural traditions, actively participate in and support cultural heritage

activities, advocate mutual understanding and integration between the Company and the community, and ensure that community investments are precise and effective. The Company establishes diverse communication channels to maintain close contact with the community, accepts social supervision, and continuously improves the quality and impact of community development.

第六条 原住民权利与移民安置

公司尊重所有社区群体的基本人权，特别是对具有独特文化传统、集体生活方式和与土地存在深厚联系的原住民及少数民族群体的权利给予高度关注。我们承认其文化、信仰、社会结构及其与自然环境之间的紧密关联，是其身体、精神、经济与社会发展的重要组成部分。公司若在原住民、少数民族聚居区或文化敏感地区开展业务，将严格遵循联合国《世界人权宣言》（UDHR）、《联合国土著人民权利宣言》（UNDRIP）以及国际劳工组织（ILO）第 169 号《土著和部落人民公约》等国际准则，积极落实“自由、事先和知情同意”（FPIC）原则，在项目启动前充分沟通，确保相关群体的知情权、参与权和表达权得到切实保障。

如因项目开发需要涉及土地征用或居民搬迁，公司承诺积极履行社会责任，始终坚持依法合规、公平公正、协商一致的原则推进移民安置工作。在项目规划阶段，公司承诺优先避让人口密集区和生态文化敏感区，确需实施搬迁时，将严格按照《中华人民共和国土地管理法》《国有土地上房屋征收与补偿条例》及相关法规执行，制定全面的重新安置行动计划。

公司承诺采取下列步骤与举措，以确保践行负责任的移民安置过程：

- **优先避让居民区：**在项目选址和规划阶段，优先选择非人口密集区域，尽可能避免涉及居民搬迁的土地使用，最大限度减少对社区的干扰和影响。
- **早期告知与知情参与：**如确需实施搬迁，公司承诺在项目初期即向受影响社区全面披露移民安置的范围、时间表、政策依据及相关权利等，确保信息透明、沟通及时。
- **提供法律援助与平等协商支持：**公司承诺为受影响居民，特别是原住民和弱势群体，提供必要的法律咨询与援助服务。
- **制定公正合理的移民安置计划（RAP）：**公司承诺依据国家法律法规，制定全面、可操作的移民安置计划，明确安置方式、补偿标准、过渡安排等。
- **落实公平补偿机制：**公司承诺就土地征收及房屋、附属设施、生产资料等资产的占用或拆除，按照相关法律法规要求进行补偿。
- **实施民生恢复与发展支持计划：**公司优先考虑为受影响家庭制定生计恢复方案，如就业推荐、技能培训、公共设施重建等措施。
- **建立独立申诉与沟通渠道：**公司承诺设立专用热线及现场接待机制，确保受影响居民可随时提出意见或投诉。
- **开展定期监测与成效评估：**如涉及移民安置，公司承诺对移民安置计划的执行情况进行全过程跟踪，每年组织内部审查或委托第三方机构开展独立评估，公开主要结果，持续改进管理实践。

VI Indigenous Rights and Resettlement

The Company respects the basic human rights of all community groups, with particular attention to the rights of indigenous peoples and ethnic minorities who have unique cultural traditions, collective lifestyles, and deep ties to the land. We acknowledge that their culture, beliefs, social structures, and close relationship with the natural environment are important components of their physical, spiritual, economic, and social development. If the Company conducts business in areas inhabited by indigenous peoples, ethnic minorities, or culturally sensitive regions, it will strictly adhere to international guidelines such as the United Nations Universal Declaration of Human Rights (UDHR), the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and the International Labour Organization (ILO) Convention No. 169 concerning Indigenous and Tribal Peoples, actively implement the principle of "Free, Prior and Informed Consent" (FPIC), fully communicate before project initiation, and ensure that the affected groups' rights to be informed, to participate, and to express their views are effectively protected.

If project development involves land acquisition or resident relocation, the Company commits to actively fulfilling its social responsibilities, always adhering to the principles of legality, fairness, justice, and consensus in advancing resettlement work. During the project planning phase, the Company commits to prioritizing avoidance of densely populated areas and ecologically and culturally sensitive zones. If relocation is necessary, it will strictly comply with the Land Administration Law of the People's Republic of China, the Regulations on the Expropriation and

Compensation of Houses on State-owned Land, and other relevant laws, and develop a comprehensive resettlement action plan.

The Company commits to the following steps and measures to ensure a responsible resettlement process:

- **Priority to avoid residential areas:** During project site selection and planning, prioritize non-densely populated areas to avoid land use involving resident relocation as much as possible, minimizing disruption and impact on the community.
- **Early notification and informed participation:** If relocation is necessary, the Company commits to fully disclose the scope, timeline, policy basis, and related rights of resettlement to affected communities at an early stage of the project, ensuring transparency and timely communication.
- **Provide legal assistance and support for equal consultation:** The Company commits to provide necessary legal consultation and assistance services to affected residents, especially indigenous peoples and vulnerable groups.
- **Develop a fair and reasonable Resettlement Action Plan (RAP):** The Company commits to developing a comprehensive and actionable resettlement plan based on national laws and regulations, clearly defining resettlement methods, compensation standards, transitional arrangements, etc.
- **Implement a fair compensation mechanism:** The Company commits to providing compensation for land acquisition and the occupation or demolition of houses, ancillary facilities, production materials, and other assets in accordance with relevant laws and regulations.

- **Implement livelihood restoration and development support plans:** The Company prioritizes developing livelihood restoration plans for affected families, such as employment referrals, skills training, public facility reconstruction, and other measures.
- **Establish independent complaint and communication channels:** The Company commits to setting up a dedicated hotline and on-site reception mechanism to ensure that affected residents can raise concerns or complaints at any time.
- **Conduct regular monitoring and effectiveness evaluation:** If resettlement is involved, the Company commits to track the implementation of the resettlement plan throughout the process, conduct internal reviews annually or commission third-party institutions for independent evaluations, disclose main results, and continuously improve management practices.

第七条 沟通与投诉

为保障社区利益相关方的有效沟通及参与，公司致力于建立系统化、本地化的社区沟通与申诉机制，确保社区诉求能够被及时倾听、妥善回应并融入管理决策。公司根据项目所在地的文化传统、语言习惯和社会特点，设立社区关系管理团队，增强沟通的亲和力与有效性。公司通过社交媒体、公告栏、宣传册、企业网站及多种形式的面对面会议，向社区全面传递项目进展、环境影响缓解措施及相关支持计划，提升信息透明度与公众理解。

沟通与投诉方式：

- 举报热线：025-57074958

同时，公司要求各项目定期审查社区沟通的覆盖范围与实际成效，评估申诉机制的响应效率与处理质量，并将结果及时反馈给利益相关方。对于长期未决事项，须进行专项分析并调整应对策略，制定改进计划，推动形成开放、互信、可持续的社区伙伴关系。

VII Communication and Complaints

To ensure effective communication and participation of community stakeholders, the Company is committed to establishing systematic, localized community communication and grievance mechanisms to ensure that community concerns are heard in a timely manner, properly responded to, and integrated into management decisions. Based on the cultural traditions, language habits, and social characteristics of the project location, the Company sets up community relationship management teams to enhance the affinity and effectiveness of communication. The Company comprehensively communicates project progress, environmental impact mitigation measures, and related support plans to the community through social media, bulletin boards, brochures, corporate websites, and various forms of face-to-face meetings, improving information transparency and public understanding.

Communication and complaint channels:

- Reporting hotline: 025-57074958

At the same time, the Company requires each project to regularly review the coverage and actual effectiveness of community communication, evaluate the response efficiency and

handling quality of the grievance mechanism, and provide timely feedback to stakeholders. For long-standing unresolved matters, special analysis must be conducted and response strategies adjusted, improvement plans developed to promote the formation of open, trustworthy, and sustainable community partnerships.

第八条 附则

本政策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。

VIII Annex

This Policy 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.