



# CHINA EVADES SANCTIONS & THREATENS GLOBAL RESOURCES

**2430 GROUP**  
[2430Group.org](http://2430Group.org)  
[Info@2430Group.org](mailto:Info@2430Group.org)

2430 Group 0001 Investigation 0006

OCTOBER 2023

# CHINA HIDES SANCTIONED MINING COMPANY

2430 Group exposed an attempt by a People's Republic of China (PRC)-backed company, Norin Mining, to hide its connection to its sanctioned parent company while seeking to acquire an Australian private equity firm's shares of its copper mining operations in Zambia. Norin is entrenched in the Democratic Republic of the Congo (DRC), and is attempting to expand into neighboring Zambia, where it appears intent on acquiring copper assets along the strategic Lobito Corridor. This corridor is the planned route of a rail line backed by the U.S. and the E.U. Norin's acquisition would damage U.S. companies and mining interests, the U.S. sanctions' regime, and U.S. foreign policy.

Norin's parent company, Norinco Group, is a PRC state-owned enterprise (SOE), subject to the direction of the Communist Party of China (CCP). Norinco has multiple ties to the People's Liberation Army (PLA) and is on the Department of Treasury's OFAC list of sanctioned entities. Norin Mining's executives previously served as senior officials of Wanbao Mining, another Norinco Group subsidiary. Wanbao Mining is on the Department of Commerce's Entity List. Western governments have sanctioned Norinco Group and its various subsidiaries multiple times for arms transfers and human rights violations. Norin is Norinco in all but name, as Norin's official ownership structure demonstrates.

The PRC's efforts to obscure ownership, play shell games with sanctioned entities, and use predatory investments, condemn U.S. companies to involuntarily finding themselves in business partnerships with bad actors. Any company's association with any subsidiary, partner, or proxy of Norinco Group would implicate that company in a similar arrangement. More broadly, the ability of the PRC to acquire additional mining assets will restrict access to copper for Western mining companies, their downstream customers, and the U.S. and its allies.

## KEY POINTS

- ▶▶▶ The PRC uses a sanctions shell game to dominate critical mining and resources
- ▶▶▶ By changing the name of a sanctioned company, the PRC is hoping to control copper in Zambia
- ▶▶▶ This PRC company is responsible for human rights violations and illegal arms transfers
- ▶▶▶ These PRC efforts undermine the sanctions regime and undercut the U.S. companies playing fairly
- ▶▶▶ The U.S. Government is positioned to prevent this

## DANGER TO U.S. & GLOBAL RESOURCES

The PRC openly seeks to control the global supply of copper and other key metals and minerals. In 2006, the PRC announced plans to stockpile certain minerals, purportedly to guarantee supply and guard against price fluctuation, but the PRC's international mining presence grossly exceeds its current domestic needs. The CCP wants to become the gatekeeper in the global transition to electric vehicles and the attendant growth in electric transmission infrastructure, of which copper is a crucial element.

While the PRC is clear about its overall economic and strategic goals, it realizes them through deception, bribery, and other unsavory methods. These methods include exploiting a network of SOEs, putatively private and disconnected subsidiaries, and partnerships, as demonstrated by the founding of Norin to evade sanctions and acquire additional mining rights. Given U.S. interests in the mining of critical metals and minerals, Norin should not be allowed to use sanction evading measures to acquire mining rights.



## EXECUTIVES WHO WORKED AT WANBAO MINING, NORIN MINING, AND/OR NORINCO CORPORATION

### GENG YI (耿一)

- NORIN MINING (HONG KONG) - PRESIDENT
- NORIN MINING (BEIJING) - CCP COMMITTEE PARTY SECRETARY (党委书记); AND BOARD MEMBER
- WANBAO MINING LTD. - (FORMER) DEPUTY GM; AND SAFETY DIRECTOR
- MYANMAR WANBAO MINING COPPER LTD. - (FORMER) MANAGING DIRECTOR
- MYANMAR YANG TSE COPPER LTD. - (FORMER) CHAIRMAN

### CHEN DEFANG (陈德芳)

- NORINCO - PRESIDENT
- NORIN MINING (BEIJING) - (FORMER) DIRECTOR
- WANBAO MINING (BEIJING) - (FORMER) LEGAL REPRESENTATIVE

### LIU JINKUI (刘金奎)

- NORINCO - VICE-PRESIDENT
- NORIN MINING (BEIJING) - CHAIRMAN

### MA WEIGUO (马卫国)

- NORIN MINING (BEIJING) - GENERAL MANAGER
- WANBAO MINING (BEIJING) - (FORMER) DIRECTOR

### WANG WEI (王伟)

- NORIN MINING (BEIJING) - VICE CHAIRMAN
- WANBAO MINING (BEIJING) - (FORMER) DIRECTOR

### YIN QINGHUA (殷清华)

- NORIN MINING (BEIJING) - FINANCE OFFICER; CHIEF ACCOUNTANT
- WANBAO MINING (BEIJING) - (FORMER) FINANCE OFFICER

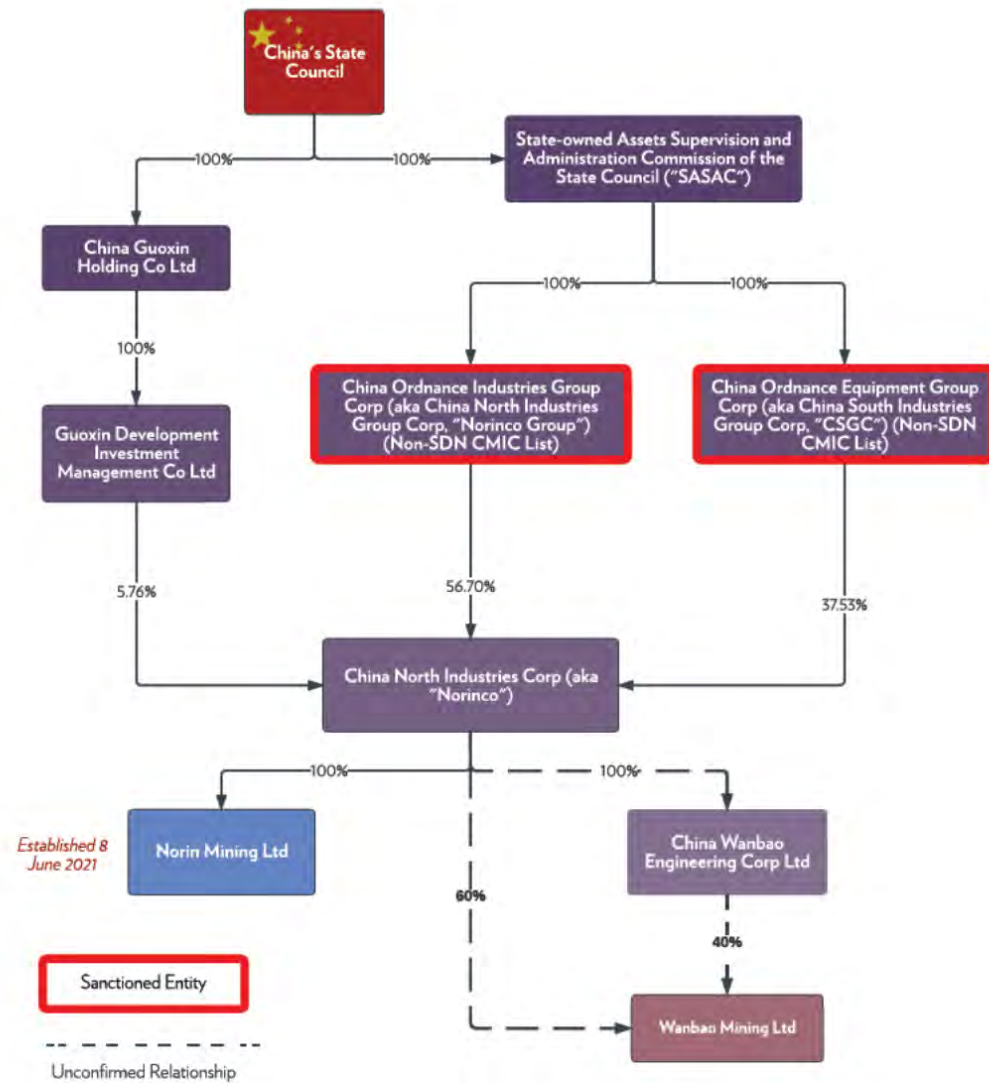
### WU CHENGYUN (吴程贇)

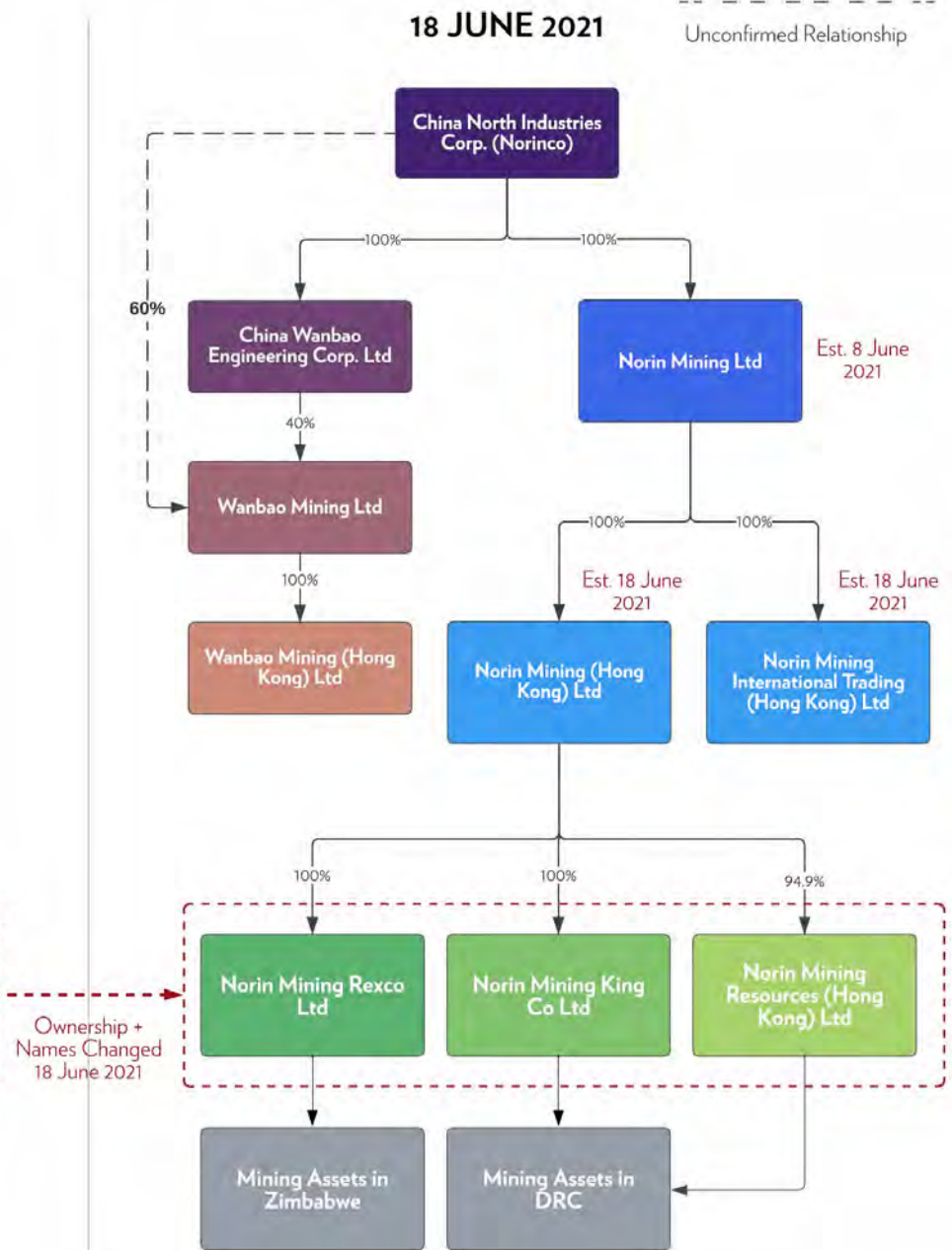
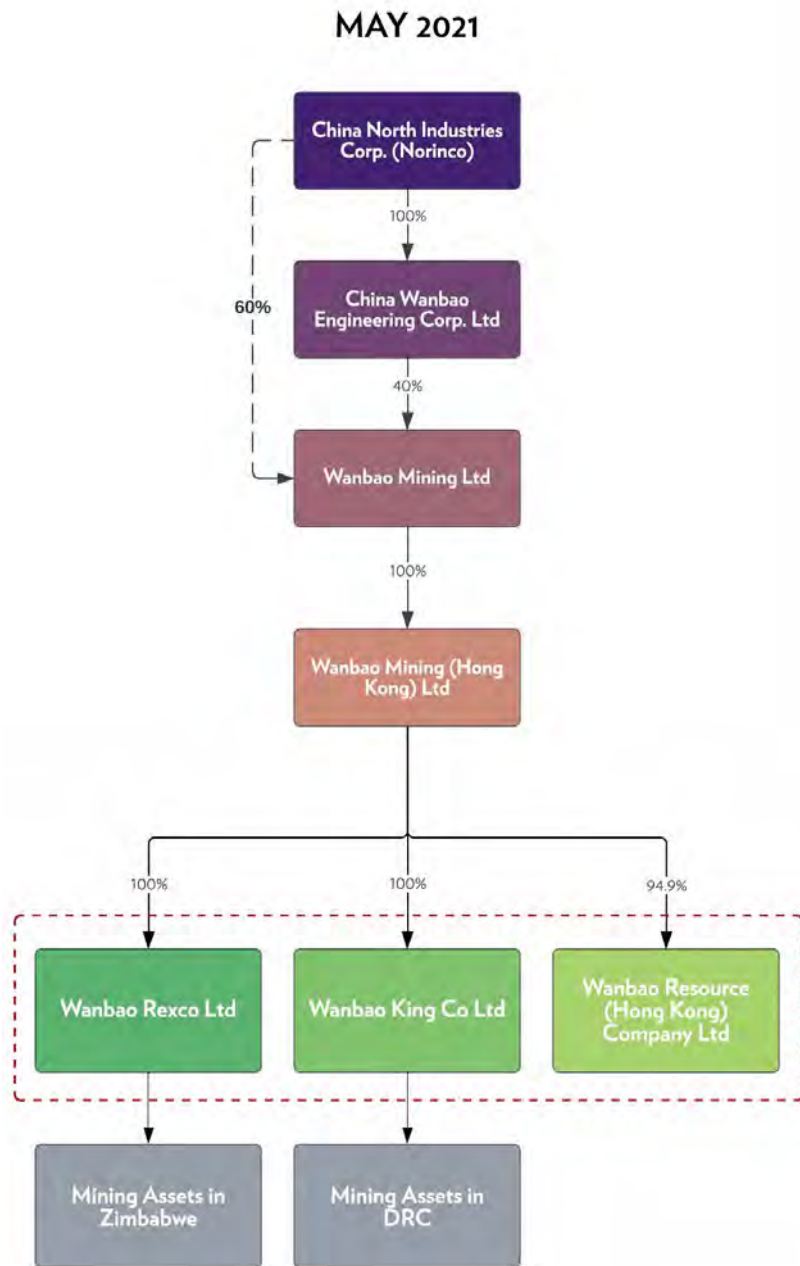
- NORIN MINING (HONG KONG) - ASSISTANT GM OF RESOURCES DEVELOPMENT DEPARTMENT
- NORIN MINING (BEIJING) - ASSISTANT GM OF RESOURCES DEVELOPMENT DEPARTMENT (M&A DEPT.)
- WANBAO MINING LTD. - (FORMER) ASSISTANT GM OF RESOURCES DEVELOPMENT DEPARTMENT; AND PROJECT MANAGER
- MYANMAR WANBAO MINING COPPER LTD. - (FORMER) DEPUTY DIRECTOR OF SUPPLY DEPARTMENT; AND SITE GEOLOGIST

# TIMELINE

- 1981** ▶ China North Industries Corporation - Norinco an SOE established
- 1985** ▶ China Wanbao Engineering Corporation established
- 1986** ▶ Norinco International Cooperation Ltd - Norinco International established
- 1990s** ▶ China and Saudi Arabia formed defense trade partnership; PLA Strategic Rocket Force established the Golden Wheel Engineering Company to facilitate sales of DF missiles to Saudi Arabia
- 1999** ▶ China North Industries Group Corporation Ltd - Norinco Group established
- 2003** ▶ Norinco sanctioned by Bush Administration for alleged sales of missile components to Iran
- 2004** ▶ Wanbao Mining Ltd established
  - ▶ Wanbao Mining Copper Co Ltd established
- 2010** ▶ Wanbao Mining International Trading Co Ltd established
  - ▶ Myanmar Wanbao Mining Copper Ltd - MONYWA LPT established
- 2011** ▶ Myanmar Yang Tse Copper Ltd established
  - ▶ Wanbao Mining Ltd established
- 2020** ▶ Norinco Group was indirectly included in the investment ban by Trump Administration for ties to the PLA
- 2021** ▶ Norinco Group was added to Department of Treasury's OFAC
  - ▶ Norin Mining established
    - Norin Mining Hong Kong established
  - ▶ Norin Mining International Trading Ltd established
  - ▶ Wanbao Mining's Hong Kong assets/companies changed their names and assets from "Wanbao Mining" to "Norin Mining" and remained in Hong Kong
  - ▶ Wanbao Mining executives transferred to Norin Mining
  - ▶ Wanbao Mining, Myanmar Yang Tse Copper Ltd, and Myanmar Wanbao Mining Copper Ltd were placed on Department of Commerce BIS' Entity List
- 2022** ▶ Norin Mining signed strategic partnership with Saudi Arabia's Ajlan & Bros Mining Co Ltd to advance Saudi Vision 2030 and China's Belt-and-Road Initiative
  - ▶ Chen Defang - a former Wanbao Mining and Norin Mining senior executive became President of Norinco Corporation
- 2023** ▶ Saudi Arabian Military Industries (SAMI) in arms deal talks with Norinco Group







Ownership + Names Changed 18 June 2021



# SUPPORTING DOCUMENTATION

## EXECUTIVE SUMMARY



In September 2023, 2430 Group investigated the efforts of a Norinco Group subsidiary, Norin Mining, to acquire an Australian private equity firm's shares of its copper mining operations in Zambia. Any connection to Norin, however, carries high risk because Norin's parent company, Norinco Group, is a People's Republic of China (PRC) state-owned enterprise (SOE) - a Chinese government entity subject to the direction of the Communist Party of China (CCP).

The CCP does not hide its efforts to dominate worldwide strategic minerals. In 2006, the PRC announced plans to stockpile minerals it deemed critical to supply security and protection against price fluctuation.<sup>1</sup> The PRC consumes 52 percent of the world's refined supply of copper but PRC's international mining presence grossly exceeds its domestic needs. According to researchers from Rice University, "Strong positions in the copper value chain can facilitate China's larger industrial policy goals of making China-based enterprises, often 'locally' controlled, indispensable hardware and technology suppliers for new energy development worldwide."<sup>2</sup> That "new energy development" includes the transition to electric vehicles, batteries, and the attendant growth in electric transmission infrastructure.

PRC's ambitions harm the interests of Western mining and copper-dependent downstream industries on their face, but the reality is worse. While the PRC is open about its overall economic and strategic goals, it relies on deception, misrepresentation, bribery, and other unsavory methods to achieve them. Toward those ends, the CCP relies on a network of SOEs, putatively private and disconnected subsidiaries, and partnerships.

2430 Group investigates and exposes these methods. 2430 Group is a nonpartisan, nonprofit research organization comprising PRC experts, data scientists, open-source intelligence (OSINT) investigators, engineers, and veterans of the U.S. government and military. 2430 Group combines language skills, data, engineering talent, and PRC expertise to uncover the PRC's malign activities. 2430 has identified previous hidden efforts by Chinese SOEs to acquire a strategic data center, to infiltrate communications' systems via supply chain, and to place employees with connections to the CCP into Western technology companies.

The investigation into Norinco revealed multiple ties to the People's Liberation Army (PLA). In addition, Norinco is on the Department of Treasury's Office of Foreign Assets Control (OFAC) list of sanctioned entities, and its subsidiary Norin Mining's former executives were senior officials of Wanbao Mining, another Norinco Group subsidiary; Wanbao Mining is on the Department of Commerce's Entity List.

Western governments have sanctioned Norinco Group and its various subsidiaries multiple times over the past thirty years for a variety of offenses, including arms transfers and human rights violations.

## CREATION OF NORIN MINING FROM THE SANCTIONED WANBAO MINING

Norinco Group's subsidiary China North Industries Corporation (Norinco)<sup>3</sup> created Norin Mining Beijing and Norin Mining Hong Kong (北方矿业; 北方矿业香港) in June 2021, just weeks before the Department of Commerce (DOC) placed Wanbao Mining (万宝矿产) and its Myanmar mining operation companies on the Entity List (86 FR 35391, 7/6/21).<sup>4</sup> The timing of Norinco Group's creation of Norin Mining looks like a deliberate effort to bypass the sanctions imposed on Wanbao Mining and its operations in Myanmar. The transfer of senior executives such as Geng Yi (耿一) from Wanbao Mining to the new Norin Mining Beijing and Hong Kong<sup>5</sup> let Wanbao Mining continue its post-sanction, restricted operations while its former executives continued their overseas mining work under the new subsidiaries. According to a published accounting audit dated 28 April 2022 for the calendar year 2021, Wanbao Mining (Myanmar) was still a subsidiary of Norinco International Cooperation Co. Ltd.<sup>6</sup> Thus, both the people and organizations responsible for the sanctioned Wanbao operations continued to report to and receive their pay from Norinco.

## BACKGROUND ON WANBAO, ITS EXECUTIVES, AND THE NEW NORIN

Norinco Group (China North Industries Group Corporation and China Ordnance Industries Group Corporation) and partner companies began establishing mining-focused entities in the PRC and Hong Kong in approximately 2004. These were organized under Wanbao Mining Limited, a company 100-percent controlled by Norinco Group subsidiary Norinco Corporation through direct and indirect shareholdings. Wanbao Mining Limited gradually secured mining concessions in Myanmar, Zimbabwe, Sudan, and the Democratic Republic of Congo (DRC). Hong Kong-registered subsidiaries managed the company's participation in these projects, which have consistently taken the form of joint ventures, typically with local partners. The mining section of Norinco Corporation's website claims these mining projects as its own, underscoring the Wanbao-Norinco tie.

- Wanbao Mining (Hong Kong) Limited, a subsidiary of Wanbao Mining Limited, appears to have served as the primary holding company for other Hong Kong-registered members of the Wanbao group. The Hong Kong corporate registry shows that Wanbao Mining (Hong Kong) Limited established Wanbao Rexco Limited (Rexco - Resource Extraction Co; Hong Kong registration 0969669) on 11 May 2005. Open-source information indicates that Wanbao Rexco Limited was the vehicle for Wanbao's participation in Global Platinum Resources, the platinum mining joint venture that it launched in partnership with the Zimbabwean military.<sup>7</sup>
- According to Hong Kong corporate registry information, Wanbao Mining (Hong Kong) Limited established Wanbao Kingco Limited (Hong Kong registration 0892739) on 30 March 2004. Open-source information indicates that Wanbao Kingco Limited was the entity through which Wanbao held its 70-percent stake in the Compagnie Minière de Kambove, its joint venture in the DRC.<sup>8</sup>
- Wanbao Resources (Hong Kong) Limited, another Wanbao subsidiary, appears to have served to manage Wanbao's interest in FEZA Mining, SAS, a DRC-registered company involved in cobalt mining. Congolese corporate records indicate that Huayou International Mining Limited, a major Chinese cobalt miner, also holds shares in FEZA Mining.<sup>9</sup>



## PRE-SANCTION TRANSFER AND RENAMING OF EXISTING WANBAO ASSETS

In June 2021, in apparent anticipation of the Myanmar-related sanctions on the Wanbao subsidiaries,<sup>10</sup> Norinco renamed and transferred the ownership of the Hong Kong-based subsidiaries through which Wanbao controlled its African mining assets.

- According to Chinese corporate registry information, Norinco Corporation established Beijing-based Norin Mining Limited (Unified Social Credit Identifier 91110102MA04BD33XY) on 8 June 2021. Chinese corporate records identify Norinco Corporation as the company's sole shareholder.
- On 18 June 2021, according to Hong Kong corporate registry information, Norin Mining Limited established Norin Mining (Hong Kong) Limited (Hong Kong registration 3059287). Corporate records identify Norin Mining Limited as the company's sole shareholder.
- Wanbao Rexco Limited underwent a similar name and ownership change on 18 June 2021. Control of the company – now renamed Norin Rexco Limited – shifted from Wanbao Mining (Hong Kong) Limited to the newly created Norin Mining (Hong Kong) Limited, according to Hong Kong corporate registry information. Control of Wanbao Mining's stake in its Zimbabwean mining operations passed to Norin Mining because of this ownership transfer.
- Wanbao Kingco Limited, the entity controlling Wanbao Mining's stake in its DRC mines, underwent a similar transformation on the same day, according to Hong Kong corporate registry information. Norin Mining (Hong Kong) Limited replaced Wanbao Mining (Hong Kong) Limited as the sole shareholder of the company, now renamed Norin Mining Kingco Limited.
- Also on 18 June 2021, according to Hong Kong corporate records, Wanbao Resources (Hong Kong) Company Limited was renamed Norin Mining Resources (Hong Kong) Limited and saw its controlling shareholder change from Wanbao Mining (Hong Kong) Limited to Norin Mining Resources (Hong Kong) Limited. These changes left intact the 5.1-percent interest in the company held by Jinchuan Group Limited.

## PROBLEMATIC PRACTICES AND ASSOCIATIONS

Wanbao Mining/Norin Mining has demonstrated a preference for partnering with armed forces, often with links to repressive regimes, and is alleged to have engaged in or benefited from corruption. In Myanmar, the company reportedly maintained poor safety standards, participated in the forcible resettlement of local communities, and benefited from the violent suppression of labor strikes involving its workers.<sup>11</sup>

- Myanmar-based sources, including a former staff member of Myanmar Wanbao and a non-Myanmar national who worked closely with Norin Mining President Geng Yi at the Letpadaung mine, reported that the company relied on bribery and intimidation to carry out its operations, consistently flouted safety rules, and did little to otherwise improve extremely poor working conditions.<sup>12</sup>

- A 2015 report by Amnesty International alleged that Myanmar Wanbao “directly engaged in forced evictions at Letpadaung” by providing authorities with bulldozers used to destroy crops.<sup>13</sup> The same report also claims that Myanmar Wanbao allowed police forces to use its facility as a base from which to attack peaceful protesters.
- In the early period of its mining activity in the DRC, Wanbao was reportedly partnered with a company beneficially owned by members of the country’s former ruling and notoriously corrupt Kabila family.<sup>14</sup>
- Wanbao is alleged to have secured some mining concessions in part through the provision of arms by parent company Norinco Corporation.
- Norinco reportedly provided arms and military equipment to the government of Zimbabwe in exchange for platinum concessions awarded to Global Platinum Resources (GPR), the Zimbabwean military’s joint venture with Wanbao Rexco.<sup>15</sup>
- Carter Center researchers reported that some of the revenue from Wanbao’s early mining joint ventures in the DRC were used to pay off debt the DRC government owed Norinco for arms.<sup>16</sup>

## **NORINCO IS AN ESTABLISHED BAD ACTOR**

Norinco Group, Norin Mining’s majority shareholder, has a long history of involvement in activities contrary to US national security interests and international stability, particularly through illegal arms trading. Norinco has sold armaments to governments that are actively engaged in civil war or known to have poor human rights records including: Libya, Russia, South Sudan, Sudan, Venezuela, and Zimbabwe.

- Ukrainian fighters have reported finding Norinco-made munitions on the battlefield.<sup>17</sup> In June 2022, trade data reportedly showed Norinco shipments of assault rifles were sent to Russia after the invasion of Ukraine.<sup>18</sup>
- Norinco contributed to the conflict in Darfur by providing weapons to the government of Sudan and was subsequently included on the “highest offenders list” published by the Sudan Divestment Task Force.<sup>19</sup>
- Norinco sent weapons to the government of South Sudan in 2014 and 2015 at the height of the civil war.<sup>20</sup>
- In 2008 a shipment of arms bound for Zimbabwe, reportedly sent by Norinco, was blocked by the government of South Africa over human rights concerns related to violence against civilians under Zimbabwean President Robert Mugabe.<sup>21</sup>
- Norinco met with Libyan officials to discuss a potential arms package in 2011 while Libya was under an international arms embargo.<sup>22</sup>
- Norinco manufactured anti-riot equipment that the Venezuelan national guard reportedly used in its violent suppression of protests in 2017.<sup>23</sup>



## **INTERNATIONAL MILITARY AND DEFENSE PARTNERSHIP: THE CASE OF SAUDI ARABIA**

On 8 September 2022, Norin Mining Co. Ltd. (Beijing) and Saudi Arabia's Ajlan & Bros Mining Co. Ltd. signed a strategic cooperation agreement to advance both countries' national campaigns: Saudi Vision 2030 and PRC's Belt-and-Road Initiative.<sup>24</sup> Since the formal establishment of the two countries' diplomatic relationship in 1990, Saudi Arabia and the PRC have enjoyed various commercial and defense partnerships. For example, the two governments created the "Golden Wheel Engineering Company" (金轮工程公司) project to facilitate the sales of PRC's Dongfeng (DF; 东风) series of missiles from the PRC's PLA (Strategic) Rocket Force to Saudi Arabia's Royal Saudi Strategic Missile Force.<sup>25</sup> Given the two countries' close and continuing military ties, the PRC and its Defense SOEs have therefore established multiple business partnerships in Saudi Arabia. As a subsidiary of a PRC Defense SOE, Norin Mining's strategic partnership with Saudi Arabia is the latest example of this ongoing relationship.

## **NORINCO AND NORINCO GROUP'S CRIMINAL PAST**

Norinco has a long history of illegal arms trade and other criminal activities. Infamous examples include:

- In 1996, Norinco Dalian executives and 2000 confiscated illegal firearms were highlighted as a result of a U.S. Customs Service and ATF sting operation named "Operation Dragon Fire."<sup>26</sup>
- In 2003, Norinco was sanctioned by the Bush Administration for its alleged sales of missile components to Iran.<sup>27</sup>

In 2020, Norinco Group was indirectly included in the investment ban by the Trump Administration against companies with ties to the PLA; Executive Order (EO) 13959 (Non-SDN CMIC-EO13959).<sup>28</sup> In 2021, the Biden Administration amended EO 13959 with EO 14032 that included 59 Chinese Military Industrial Complex Companies, and it identified "Norinco Group" by name. The amended EO also transferred the authority to identify targeted companies from the Department of Defense to the Department of Treasury's OFAC.<sup>29</sup>

## **RISKS AND RECOMMENDATIONS**

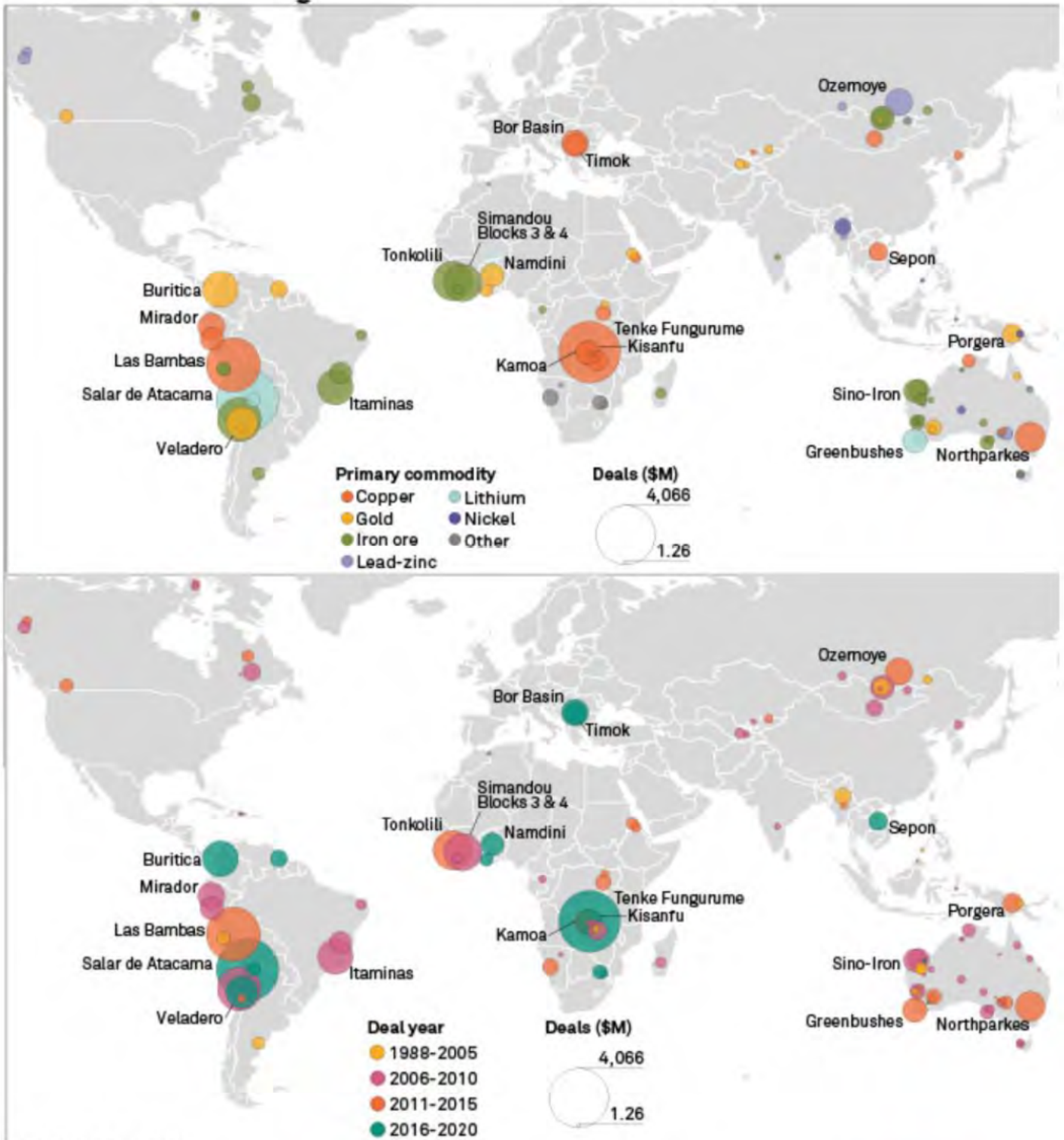
Given that Article 7 of PRC's National Intelligence Law and Article 77 of PRC's National Security Law compel PRC organizations and citizens to assist PRC national security and military institutions, any data or communications between Foreign Client and the PRC SOE and SOE subsidiaries will likely be collected and exploited for commercial gains under the guise of national security, especially when the industry falls in PRC's strategic sector.<sup>30</sup> Therefore, any business dealings with the PRC would require extreme recognition of these obligations and attendant caution.



PRC SOEs are known for graft and parasitism as partners. Many examples show partnerships with PRC SOEs create legal challenges but also cyber attacks and coercive extraction of intellectual property, physical assets, and funds. An arrangement with Norin Mining will bring high business and reputational risks to the Foreign Client if Norin Mining continues Wanbao Mining's exploitative practices. This conclusion derives from the exploitative practices of Norinco Group's other mining companies and the transfer of the same executives from Norinco's problematic (sanctioned) mining company Wanbao Mining in Myanmar to the newly established Norin Mining Beijing and Hong Kong. Therefore, it is highly recommended, wherever possible, that Foreign Clients maintain direct, close supervision of the local mining operation, including labor treatment and wages, environmental protection and waste disposal, native land rights, fair compensation for land acquisition, accounting, and compliance with all relevant regulations and laws.

Given the Saudi Government's long-standing defense partnership with the PLA and the PRC defense industry and the latest strategic partnership between Saudi's Ajlan & Bros Mining and Norin Mining, the entrenchment of the PRC and its military in the Middle East is a threat to U.S. interests in the region. Therefore, it is recommended for the federal government to approach the Saudi Arabia government and inquire into the plans and intentions of Norin Mining in the Middle East and Africa.

Appendix A: China's Overseas Mining M&A Deals 1988-2020 (S&P Global Market Intelligence)<sup>31</sup>



Data as of Feb. 10, 2021.  
 For deals which include multiple assets, the total value has been assigned to the main asset.  
 Other includes platinum, U3O8 and coal.  
 Map credit: Elizabeth Thomas  
 Source: S&P Global Market Intelligence

**S&P Global**  
 Market Intelligence





## Appendix B: Norin Mining (北方矿业) and Its Parent Organizations

Norin Mining (Hong Kong) Co. Ltd. ((北方矿业(香港)有限公司)) is located in Room 2711, 27/F West Tower Shun Tak Centre at #168-200 Connaught Rd Central, Sheung Wan, Hong Kong. The company incorporated on 18 June 2021 and registered with the Hong Kong Government's Companies Registry under # 3059287.<sup>32</sup>

The company's Beijing HQ - Norin Mining (Beijing) Limited - is located at # A-12 Guanganmen Street South (广安门南街) Xicheng District (西城区), Beijing. It is registered in mainland China on 8 June 2021 with PRC Unified Social Credit Code # 91110102MA04BD33XY, PRC Import/Export Business Code # 1100MA04BD33X, and PRC Customs Registry # 110291036Q.<sup>33</sup>

Norin Mining (Beijing and Hong Kong)'s Parent SOE Companies. The Ultimate Beneficial Owner (UBO) are state-owned entities:

- Top Tier: Norinco Group and Northern/North Industries Corporation (北方工业有限公司; Unified Social Credit Code # 91110000100000307G).
- Tier 2: Norinco International Co. Ltd. (北方国际有限公司) and Norinco International Partnership Co. Ltd. or Norinco International Cooperation Co. Ltd. (北方国际合作有限公司; Unified Social Credit Code # 91110000192472028J).

A brief timeline of China North Industries Corporation (Norinco), Wanbao, and Norin:

1981 - China North Industries Corporation - Norinco an SOE (中国北方工业公司; PRC Unified Social Credit ID 91110000100000307G)

1985 - China Wanbao Engineering Corporation (中国万宝工程公司; PRC Unified Social Credit ID 91110000100003671U)

1986 - Norinco International Cooperation Ltd - Norinco International (北方国际合作股份有限公司; PRC Unified Social Credit ID 91110000192472028J)

1999 - China North Industries Group Corporation Ltd - Norinco Group (中国兵器工业集团公司; PRC Unified Social Credit ID 91110000710924910P)

2004 - Wanbao Mining (Beijing) Ltd (万宝矿产有限公司; PRC Unified Social Credit ID 911100007675008606)

2004 - Wanbao Mining (Hong Kong) Copper Co Ltd (万宝矿产香港铜业有限公司; HK Registration ID 0892910)

2010 - Wanbao Mining International Trading (Hong Kong) Co Ltd (万宝矿产国贸香港有限公司; HK Registration ID 1454180)

2010 - Myanmar Wanbao Mining Copper Ltd - MONYWA LPT ((万宝矿产(缅甸)铜业有限公司))

2011 - Myanmar Yang Tse Copper Ltd (缅甸杨子铜业有限公司)

2011 - Wanbao Mining (Hong Kong) Ltd - (万宝矿产香港有限公司; HK Registration ID 1567676)

2021 - Norin Mining (Beijing) (北方矿业有限责任公司; PRC Unified Social Credit ID 91110102MA04BD33XY)

2021 - Norin Mining (Hong Kong) (北方矿业香港有限公司; HK Registration ID 3059287)

2021 - Norin Mining International Trading (Hong Kong) Ltd (北方矿业国贸香港有限公司; HK Registration ID 3059294)

## Appendix C: Transfer of Executives Internally at Norinco

Prior to their positions at Norin Mining Hong Kong and Beijing, executives had held positions at other Norinco subsidiaries. Below are Norin Mining executives that have been identified as former Wanbao Mining (万宝矿产) executives or current Norinco senior officials:

- Geng Yi (耿一):<sup>34</sup>
  - Norin Mining (Hong Kong) - President.
  - Norin Mining (Beijing) - CCP Committee Party Secretary (党委书记); and Board Member.
  - Wanbao Mining Ltd. (万宝矿产有限公司) - (former) Deputy GM; and Safety Director.
  - Myanmar Wanbao Mining Copper Ltd. ((万宝矿产(缅甸)铜业公司)) - (former) Managing Director.
  - Myanmar Yang Tse Copper Ltd. (缅甸扬子铜矿公司) – (former) Chairman.
  
- Chen Defang (陈德芳):<sup>35</sup>
  - Norinco - President.<sup>36</sup>
  - Norin Mining (Beijing) - (former) Director.
  - Wanbao Mining (Beijing) - (former) Legal Representative.
  
- Liu Jinkui (刘金奎):<sup>37</sup>
  - Norinco - Vice-President.
  - Norin Mining (Beijing) - Chairman.
  
- Ma Weiguo (马卫国):<sup>38</sup>
  - Norin Mining (Beijing) - General Manager.
  - Wanbao Mining (Beijing) - (former) Director.
  
- Wang Wei (王伟):
  - Norin Mining (Beijing) - Vice Chairman.
  - Wanbao Mining (Beijing) - (former) Director.
  
- Yin Qinghua (殷清华):
  - Norin Mining (Beijing) - Finance Officer; Chief Accountant.
  - Wanbao Mining (Beijing) - (former) Finance Officer.
  
- Wu Chengyun (吴程贇):<sup>39</sup>
  - Norin Mining (Hong Kong) - Assistant GM of Resources Development Department.
  - Norin Mining (Beijing) - Assistant GM of Resources Development Department (M&A Dept.).
  - Wanbao Mining Ltd. - (former) Assistant GM of Resources Development Department; and Project Manager.
  - Myanmar Wanbao Mining Copper Ltd. - (former) Deputy Director of Supply Department; and Site Geologist.





- <sup>1</sup> Institute of Developing Economies. (2023) "China's Mining Footprint in Africa." [IDE DB]. 28 Sep 2023. [https://www.ide.go.jp/English/Data/Africa\\_file/Manualreport/cia\\_08.html#:~:text=the%20United%20States.,In%202006%2C%20China%20announced%20plans%20to%20set%20up%20strategic%20mineral,the%20security%20of%20resource%20supplies.](https://www.ide.go.jp/English/Data/Africa_file/Manualreport/cia_08.html#:~:text=the%20United%20States.,In%202006%2C%20China%20announced%20plans%20to%20set%20up%20strategic%20mineral,the%20security%20of%20resource%20supplies.)
- <sup>2</sup> Koelsch J., Michot-Foss M., Collins G., & Lewis S.W. (2021) "Chinese Firms Position Themselves for an Energy Transition Copper Supercycle." Baker Institute. 5 Apr 2021. <https://www.bakerinstitute.org/research/chinese-firms-position-energy-transition-copper-supercycle.>
- <sup>3</sup> Norinco International Cooperation (北方国际合作股份有限公司) is also known as Norinco International Partnership or "Norinco International" in corporate documents. Norin Mining and Wanbao Mining are placed under Norinco International's administrative control.
- <sup>4</sup> Bureau of Industry and Security (BIS). (2023) "Supplement No. 4 to Part 744 of the Export Administration Regulations (Entity List)." U.S. Department of Commerce. 19 May 2023. pgs. 24-25. <https://www.bis.doc.gov/index.php/documents/regulations-docs/2326-supplement-no-4-to-part-744-entity-list-4/file.>
- <sup>5</sup> Geng Yi is the President at Norin Mining Hong Kong and the CCP Party Secretary (and Board Member) at Norin Mining Beijing; see Appendix C for other examples of personnel transferred from Wanbao to Norin.
- <sup>6</sup> Norinco International Cooperation Co. Ltd. (2022) "Norinco International Annual Financial Report for Calendar Year 2021 (北方国际合作股份有限公司: 2021年报)." April 2022.
- <sup>7</sup> Business Times. (2020) "Army, Chinese deal collapses". Business Times. 24 Jun 2020. [https://businesstimes.co.zw/army-chinesedeal-collapses/.](https://businesstimes.co.zw/army-chinesedeal-collapses/)
- <sup>8</sup> Congo Mines. (2023) "Compagnie Minière de Kambove (COMIKA)". [Congo Mines DB]. 2023. [https://congominer.org/drc\\_companies/183-compagnie-mini%C3%A9re-de-kambove.](https://congominer.org/drc_companies/183-compagnie-mini%C3%A9re-de-kambove.)
- <sup>9</sup> Democratic Republic of Congo (DRC) 2021. "Extract from the Trade and Property Credit Register (Extrait du Registre du Commerce et du Credit Mobilier)" 16 OCT 2021; Foo T., Kalic N., & Roest G. (2021) "Clifford Chance advises Wanbao Mining on its partnership with Managem to develop Sudan's gold mines". Clifford Chance. 27 Apr 2021. <https://www.cliffordchance.com/news/news/2021/04/clifford-chance-advises-wanbao-mining-on-its-partnership-with-ma.html>.
- <sup>10</sup> U.S. Department of State. (2021) "The United States Takes Further Actions against the Burmese Military Regime." U.S. Department of State. 02 Jul 2021. Accessed here [https://www.state.gov/the-united-states-takes-further-actions-against-the-burmese-military-regime/.](https://www.state.gov/the-united-states-takes-further-actions-against-the-burmese-military-regime/)
- <sup>11</sup> Hilton I. (2013) "China in Myanmar: implications for the future." NOREF: Norwegian Peacebuilding Resource Centre. October 2013. pgs. 4-5. [https://www.files.ethz.ch/isn/172094/822f00b4d7da6439a3252789b404f006.pdf.;](https://www.files.ethz.ch/isn/172094/822f00b4d7da6439a3252789b404f006.pdf.) The Irrawaddy. (2021) "Myanmar Military-Chinese Copper Mining Stops as Workers Join Anti-Coup Protests." The Irrawaddy. 11 Feb 2021. <https://www.irrawaddy.com/news/burma/myanmar-military-chinese-copper-mining-stop-workers-join-anti-coup-protests.html>.
- <sup>12</sup> Ash L. (2013) "Burma learns how to protest against Chinese investors." BBC News. 24 Jan 2013. <https://www.bbc.com/news/magazine-21028931>; The Nation. (2014) "Wanbao to proceed with mining as workers are freed." The Nation Thailand. 21 May 2014. <https://www.nationthailand.com/international/30234216>; Amnesty International. (2015) "Urgent Action: Thousands at Risk of Forced Eviction." Amnesty International. UA: 98/15 Index: ASA 16/1563/2015 Myanmar. 05 May 2015. <https://www.amnesty.org/en/wp-content/uploads/2021/05/ASA1615632015ENGLISH.pdf>.
- <sup>13</sup> Amnesty International. (2015) "Myanmar: Open for business? Corporate crime and abuses at Myanmar copper mine". Amnesty International. UA Index Number: ASA 16/0003/2015. 10 Feb 2015. [https://www.amnesty.org/en/documents/ASA16/0003/2015/en/.](https://www.amnesty.org/en/documents/ASA16/0003/2015/en/)
- <sup>14</sup> Goethals S, Okenda J.P., & Mbaya R. (2009) "Chinese Mining Operations in Katanga DRC" Rights & Accountability in Development (RAID). September 2009. <https://raid-uk.org/wp-content/uploads/2023/03/drc-china-report.pdf>.
- <sup>15</sup> Africa Confidential. (2013) "Arms-for-minerals trades exposed". Africa Confidential Vol 54 No 25. 13 Dec 2013. [https://www.africa-confidential.com/article/id/5142/Arms-for-minerals\\_trades\\_exposed.](https://www.africa-confidential.com/article/id/5142/Arms-for-minerals_trades_exposed.)



- <sup>16</sup> The Carter Center. (2017) "A State Affair: Privatizing Congo's Copper Sector". November 2017. [https://www.cartercenter.org/resources/pdfs/news/peace\\_publications/democracy/congo-report-carter-center-nov-2017.pdf](https://www.cartercenter.org/resources/pdfs/news/peace_publications/democracy/congo-report-carter-center-nov-2017.pdf).
- <sup>17</sup> Williams M. & O'Donnell J. (2023) "Ukraine says it is finding more Chinese components in Russian weapons". Reuters. 16 Apr 2023. <https://www.reuters.com/world/europe/ukraine-says-it-is-finding-more-chinese-components-russian-weapons-2023-04-14/>.
- <sup>18</sup> Banco E. & Aarup S.A. (2023) "'Hunting rifles' really? China ships assault weapons and body armor to Russia". Politico. 16 Mar 2023. <https://www.politico.com/news/2023/03/16/chinese-rifles-body-armor-russia-ukraine-00087398>.
- <sup>19</sup> MFPRSI. (2014) "Total Universe of Companies Per Sudan Divestment Task Force". Iowa State Legislature. 23 Jul 2014. <https://www.politico.com/news/2023/03/16/chinese-rifles-body-armor-russia-ukraine-00087398>.
- <sup>20</sup> Kuo L. (2015) "China's largest weapons manufacturer is allegedly selling arms to South Sudan—again". Quartz. 26 Aug 2015. <https://qz.com/africa/488342/chinas-largest-weapons-manufacturer-is-allegedly-selling-arms-to-south-sudan-again>.
- <sup>21</sup> Kunambura A. (2020) "Zimbabwe: Mortgaging of Minerals for Arms a Misplaced Priority" Zimbabwe Independent cited on All Africa. 07 Feb 2020. <https://allafrica.com/stories/202002070388.html>.
- <sup>22</sup> Bromley M., Duchatel M, & Holtom P. (2013) "China's Exports of Small Arms and Light Weapons". Stockholm International Peace Research Institute (SIPRI). 38 Oct 2013. <https://www.files.ethz.ch/isn/171425/SIPRI38.pdf>.
- <sup>23</sup> Browne M., Marcolini B., Koettl C., & Reneau N. (2017) "The Anti-Protest Gear That Despots Love". The New York Times. 23 Dec 2017. <https://www.nytimes.com/video/world/asia/10000005573465/anti-protest-gear-china-venezuela.html>.
- <sup>24</sup> Ajlan & Bros. Holding. (2022) "Norin Mining and Ajlan & Bros Mining signed strategic cooperation agreement." Ajlan & Bros. Holding Co. Ltd. 08 Sep 2022. <https://ajlanbros-holding.com/ar/article/206-Norin-Mining-and-Ajlan-Bros-Mining-signed-strategic-cooperation-agreement>.
- <sup>25</sup> Beraud-Sudreau L., Brewster D, Cairns C, Cliff R., Ellis R. E., Herlevi A., Kamphausen R., Lee R., Nantulya P., Nouwens M., Pincus R., & Wuthnow J. (2022) "Enabling a More Externally Focused and Operational PLA – 2020 PLA Conference Papers." U.S. Army War College Press. Ch 7: PLA Rocket Force-as-a-Service. 27 July 2022. pgs. 151-153. <https://press.armywarcollege.edu/cgi/viewcontent.cgi?article=1947&context=monographs>.
- <sup>26</sup> Adams J.M. (1996) "U.S. Foils Major Smuggling Operation." Chicago Tribune. 24 May 1996. <https://www.chicagotribune.com/news/ct-xpm-1996-05-24-9605240246-story.html>.
- <sup>27</sup> Dobbs M. & Kessler G. (2003) "U.S. Penalizes Chinese Firm Over Alleged Missile Aid to Iran." The Washington Post. 23 May 2003. <https://www.washingtonpost.com/archive/politics/2003/05/23/us-penalizes-chinese-firm-over-alleged-missile-aid-to-iran/df81f93b-0f13-4476-8313-de1f13199438/>.
- <sup>28</sup> Executive Order on Amending Executive Order 13959 – Addressing the Threat from Securities Investments that Finance Communist Chinese Military Companies. EO 13959. 13 Jan 2021. <https://trumpwhitehouse.archives.gov/presidential-actions/executive-order-amending-executive-order-13959-addressing-threat-securities-investments-finance-communist-chinese-military-companies/>.
- <sup>29</sup> Office of Foreign Assets Control (OFAC). (2022) "Chinese Military-Industrial Complex Sanctions Regulations." U.S. Department of Treasury. 16 Feb 2022. <https://www.federalregister.gov/documents/2022/02/16/2022-03378/chinese-military-industrial-complex-sanctions-regulations>.

<sup>30</sup> Levine D. (2014) “U.S. charges Chinese man with hacking into Boeing.” Reuters. 11 Jul 2014. <https://www.reuters.com/article/boeing-china-cybercrime/u-s-charges-chinese-man-with-hacking-into-boeing-idINL2N0PM2FV20140711>; Siddiqui Z. & Bing C. (2023) “Chinese hackers spying on US critical infrastructure, Western intelligence says.” Reuters. 25 May 2023. <https://www.reuters.com/technology/microsoft-says-china-backed-hacker-targeted-critical-us-infrastructure-2023-05-24/>; Bajak F. (2023) “Chinese spies breached hundreds of public, private networks, security firm says.” AP News. 15 June 2023. <https://apnews.com/article/barracuda-mandiant-cybersecurity-china-hackers-a52d1595c9108d2c58df11e38756600d>.

<sup>31</sup> Thomas E. (2021) “Chinese overseas mining”. S&P Global Market Intelligence. 10 Feb 2021. <https://www.spglobal.com/marketintelligence/en/news-insights/videos/battery-metals-unbated-long-term-need-for-supply-security-despite-short-term-headwinds>.

<sup>32</sup> Open Corp Data. (2023) “北方矿业(香港)有限公司: Norin Mining (Hong Kong) Limited.” [Global Legal Entity Identifier Foundation (GLEIF) DB]. 2023. <https://opencorpdata.com/lei/655600jk46brgeapsj04>.

<sup>33</sup> Qi Xin Bao (启信宝). “北方矿业有限责任公司: Noring Mining” [Qixin DB]. 2023. <https://www.qixin.com/company/a396d1b8-974c-419b-8630-f0c11ff1f3dd>.

<sup>34</sup> European Times. (2014) “Playing a key role in boosting the development of Myanmar’s mining industry.” The European Times. 2014. <https://the-european-times.com/yang-tse-wanbao/>.

<sup>35</sup> Norinco. (2023) “(Norinco) successfully completed the 2023 Country Research Competition.” (公司成功举办2023年国别研究大赛). Norinco. 27 Jul 2023. [http://www.norinco.com/art/2023/7/27/art\\_5272\\_453209.html](http://www.norinco.com/art/2023/7/27/art_5272_453209.html).

<sup>36</sup> Norinco. (2023) “Chen Defang delivers message to new employees: achieve the new era of Norinco youth and work with ideals, responsibility, grit, and willingness to struggle (陈德芳寄语新员工: 做有理想, 敢担当, 能吃苦, 肯奋斗的新时代北方青年).” Norinco. 25 Jul 2023. [http://www.norinco.com/art/2023/7/25/art\\_5272\\_453207.html](http://www.norinco.com/art/2023/7/25/art_5272_453207.html).

<sup>37</sup> Norinco. (2023) “(Norinco) successfully completed the 2023 Country Research Competition.” (公司成功举办2023年国别研究大赛). Norinco. 27 Jul 2023. [http://www.norinco.com/art/2023/7/27/art\\_5272\\_453209.html](http://www.norinco.com/art/2023/7/27/art_5272_453209.html).

<sup>38</sup> Qi Xin Bao (启信宝). “万宝矿业有限公司: Wanbao Mining.” [Qixin DB]. 2023. <https://www.qixin.com/company/2bd90fd9-0e4f-45a6-b75d-cefd49a944d8>.

<sup>39</sup> LinkedIn China. “Channing Wu.” [LinkedIn Page]. 2023. <https://cn.linkedin.com/in/channing-wu/en> and <https://cn.linkedin.com/in/channing-wu>.

