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# Corporate Greenwashing: The Gap Between Zijin Mining's ESG Discourse and Practice

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## Abstract

With the increasing attention of the ESG concept, the ESG information disclosure of enterprises has received unprecedented attention. This study takes Zijin Mining as a case, examines its ESG greenwashing practices, and identifies the underlying motivations and corresponding governance measures. Research shows that Zijin Mining has gaps between discourse and practice at the three levels of environment, society and governance, and creates a corporate image of "good ESG performance" on the surface through strategic disclosure; At the same time, the drive of internal interests and the ambiguity of external ESG disclosure standards create opportunities for corporate ESG greenwashing. Therefore, corporate ESG greenwashing should be curbed by improving internal governance systems and strengthening external regulatory oversight. While deeply analyzing the internal ESG greenwashing practices and motives of Zijin Mining, this article provides specific practical countermeasures for the management of ESG greenwashing practices.

### Keywords

ESG greenwashing, Information disclosure, Zijin Mining, ESG governance measures

## 1. Introduction

In recent years, with the development of the ESG concept, many enterprises have begun to pay attention to their own sustainable development reports. The government and relevant departments have also issued many guidance plans: the Ministry of Ecology and Environment issued the Environmental Information Disclosure System Reform Plan in 2021, and the China Enterprise Reform and Development Research Association issued the Enterprise ESG Disclosure Guidelines, etc. [1]. These programs have promoted the process of domestic ESG information disclosure, but there are still problems with enterprise ESG disclosure. Problems such as greenwashing n corporate ESG reports stand out [2], which weakens the effectiveness and reliability of ESG ratings. Some enterprises in the mineral industry do not understand the concept of ESG and are only willing to disclose information that is beneficial to themselves [3], with a stronger motivation for greenwashing.

In September 2026, CCTV reported that the names of three entities had been incorrectly stated in Zijin Mining's 2026 semi-annual report, which exposed the low accuracy of Zijin Mining's external information disclosure. In addition, MSCI and other institutions gave Zijin Mining a poor ESG rating of B, but Shangdao Ronglu and other institutions gave a better rating of A- [4]. All of this points to a more core question: under the current ESG rating system, is the ESG report of Zijin Mining we see the actual sustainable development performance of the enterprise, or a carefully planned discursive performance?



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Based on the above analysis, this article focuses on the greenwashing practices of ESG information disclosure of Zijin Mining, analyzes the cracks in its discourse and practice, and deeply studies the motives behind it and governance measures. The theoretical contribution and practical value of this article are mainly reflected in: the analysis of the ESG greenwashing practices of enterprises in a specific case not only provides the basis for the ESG greenwashing practices of enterprises for regulators, but also provides sustainable governance measures for enterprises.

## 2. Literature Review and Theoretical Analysis

### 2.1 Theoretical Gaps in ESG Greenwashing Research

At present, most ESG greenwashing research focuses on the following aspects: one is the conceptual definition and type analysis of enterprise ESG greenwashing practices. Some studies define corporate ESG greenwashing as the practice of creating a public image that is more favourable than a company's actual performance through strategically misleading, selective, or exaggerated disclosures concerning environmental, social, and governance issues; The type of enterprise ESG greenwashing can be classified as violating the requirements of “relevance”, “faithful representation”, “comparability”, “verifiability”, “timeliness” and “understandability” [5]. The second is the study of the motivation of greenwashing and management countermeasures. Some scholars believe that in order to win external recognition, enterprises carry out impression management through greenwashing practices [6]; In terms of governance measures, the external mechanism mainly relies on government supervision, social pressure and market governance, while internal governance relies on the ownership structure of enterprises and trade unions [5]. It can be seen that the theoretical gap is that most studies list the types, causes and governance mechanisms of ESG greenwashing practices through overview, and lack an in-depth analysis of the ESG greenwashing practices of a single enterprise.

### 2.2 Specific Manifestations of ESG Disclosure in the Mining Industry

According to the General Rules for Environmental, Social and Governance (ESG) Information Disclosure of Mining Enterprises issued by the China Mining Federation, the ESG disclosure of mining enterprises has distinctive industry characteristics, which can be divided into two dimensions: the first is the double materiality of disclosure, which not only needs to disclose issues that have a significant impact on the company’s financial and business conditions, but also issues that have a significant impact on the surrounding environment, economy and society; The second is to disclose the quantification of indicators. Mining needs to focus on specific data analysis and quantitative disclosure through objective indicators, such as total carbon emissions and total environmental protection investment.

However, the ESG disclosure of the mineral industry still faces the following problems: the overall ESG information disclosure rate of mining companies is low, the continuity of disclosure is poor, and the quality of disclosure is not high [3]. These literature analyses provide a theoretical basis for subsequent research.

## 3. Research Design

### 3.1 Case Selection

The case of this study is Zijin Mining. There are three reasons for choosing this enterprise:

In terms of industry representativeness, Zijin Mining is a large-scale multinational mining group with the exploration and development of gold, copper and other metal minerals as its main business. It is a well-known enterprise in the industry. Through an in-depth analysis of the ESG greenwashing practices of Zijin Mining, we can better understand the quality of the overall ESG disclosure of the mineral industry. In terms of rating contrast, Zijin Mining’s ESG rating has always been in an excellent position in the domestic mining industry, but the company has been exposed for many years to environmental pollution and corruption of corporate executives. This rift between speech and practice shows that the company may be engaging in greenwashing.

In terms of information openness, Zijin Mining has released a large number of readable reports, such as annual reports, ESG reports, etc. As a well-known enterprise in the industry, there are many relevant news and media reports circulating on the Internet, which also enriches the material for the research.



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### 3.2 Data Sources

Zijin Mining's ESG sustainability reports are mainly used to analyse the company's public commitments and strategies for presenting information in ESG disclosures. The annual report of Zijin Mining mainly exposes the cracks in the discourse and practice of the enterprise through specific financial data analysis. Social news and media reports compare specific cases with the promises in the corporate ESG report to reveal suspected greenwashing practices.

### 3.3 Analytical Methods

This study examines Zijin Mining's greenwashing practices through comparative analysis. The enterprise ESG sustainability report, annual report and media coverage are both independent and interconnected. Through pairwise comparisons of these three sources and the identification of inconsistencies within the reports, the study examines the company's greenwashing practices in detail.

## 4. Analysis of Zijin Mining's ESG Greenwashing Practices

### 4.1 Environmental Dimension

Judging from the ESG report of Zijin Mining, it is found that the report usually uses macro-commitment expressions, such as "actively practicing the solemn commitment of 'carbon peaking and carbon neutrality'", and taking "green high-tech first-class international mining group" as a strategic goal. In addition, the report is also keen to show positive indicators. In terms of ecological governance, it is clear that the investment in environmental protection in 2025 is 1.767 billion yuan, and in terms of carbon emissions, GHG emissions intensity per RMB 10,000 of industrial value added decreased by 36% compared with the 2020 baseline. It can be seen that Zijin Mining has built a high-standard environmental target system for itself in the ESG report, shaping a green image with a high sense of social responsibility.

However, judging from the practical performance of Zijin Mining over the years, the company has been reported by the media in many environmental pollution incidents. The wastewater leakage incident at the copper hydrometallurgical plant in 2010 seriously polluted the water quality in the lower reaches of the Futing River; In 2022, the subsidiary of Inner Mongolia Zijin Mining was exposed to illegal mining of 4 million tons, which has seriously damaged the local ecosystem. These cases reflect that there are many non-compliant practices in the practice of green production. Enterprises use low-cost discourse strategies of high-profile propaganda slogans to make investors believe that enterprises have good environmental protection practices, which essentially violates the goal of sustainable development of enterprises.

In addition, although Zijin Mining promotes its green image in the ESG report, the proportion of environmental protection funds to the net profit attributable to shareholders of the parent company is on a downward trend, as shown in Table 1. This shows that with the enhancement of the profitability of Zijin Mining, the marginal effort of environmental protection investment is declining. This practice reflects the gap between the symbolic practices and the substantive practices of Zijin Mining. The report highly emphasizes the actual investment in environmental protection, but ignores the investment intensity that increases but decreases with profits, creating the illusion of sufficient investment.

*Table 1: Zijin Mining's Environmental Investment as a Percentage of Net Profit Attributable to Shareholders of the Parent Company*

| Year | Environmental Investment (RMB 100 Million) | Net Profit Attributable to Shareholders of the Parent Company (RMB 100 Million) | Environmental Investment as a Percentage of Net Profit Attributable to Shareholders of the Parent Company (%) |
|---|---|---|---|
| 2021 | 14.20 | 157 | 9.04% |
| 2022 | 14.67 | 200 | 7.34% |
| 2023 | 13.70 | 211 | 6.49% |
| 2024 | 14.34 | 321 | 4.47% |
| 2025 | 17.67 | 518 | 3.41% |

*Note: Data are sourced from Zijin Mining's annual reports and sustainability reports.*



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## 4.2 Social Dimension

Summarizing the information disclosed at the social level of the ESG report of Zijin Mining, it is found that the company often emphasizes the value concept of "prioritizing the rights and welfare of employees". In terms of strategic management, Zijin Mining adheres to the concept of "life first" and takes "zero work-related fatalities and zero occupational diseases" as the firm goal, and promotes the effective implementation of the responsibility of all employees for work safety. In terms of community security, Zijin Mining put forward the concept of "transparent community" to build harmonious and resilient community relations with a positive attitude and promote community health and well-being. It can be seen that Zijin Mining improves its image with the help of corporate social responsibility (CSR) communication [7].

However, the actual actions of the enterprise reveal another scene. The eight fatal mining accidents in 2025 directly contradicted the target of "zero work-related fatalities", put forward in the ESG report, exposing the serious disconnect between the commitment and practice of Zijin Mining. After the accident, the report tried to transform the responsibility into reasonable compliance with the procedural system through soft measures such as "notification warning" and "convening a meeting", giving investors the illusion of scientific management. In terms of community welfare, the media and complaint platforms often expose the bad impact: in 2011, the Southern Daily reported the "Zijin Mining Dam Collapse Investigation", and the amount of compensation for the victims exceeded 300 million yuan; According to the complaint information of the government service website, the subsidiary of Hunan Zijin Mining involved a number of complaints about forcing employees to work overtime and setting up gates privately to affect the convenience of villagers' entry and exit. These practices reveal inconsistencies between Zijin Mining's disclosures and its actual performance in the social dimension, which violates the principle of "truthful reflection" of ESG information disclosure.

As shown in Table 2, although the absolute amount of the company's safety investment is increasing year by year, its proportion of net profit attributable to shareholders of the parent company is fluctuating and decreasing. It can be seen that the growth rate of profit far exceeds the growth rate of safety investment, and the sincerity of Zijin Mining's safety investment is not enough. The high-growth profitability dilutes the degree of social responsibility of the enterprise, which also provides reasonable evidence for the ESG greenwashing practices of Zijin Mining.

*Table 2: Zijin Mining's Safety Investment as a Percentage of Net Profit Attributable to Shareholders of the Parent Company*

| Year | Safety Investment (RMB 100 Million) | Net Profit Attributable to Shareholders of the Parent Company (RMB 100 Million) | Safety Investment as a Percentage of Net Profit Attributable to Shareholders of the Parent Company (%) |
|---|---|---|---|
| 2021 | 14.93 | 157 | 9.51% |
| 2022 | 21.23 | 200 | 10.62% |
| 2023 | 28.04 | 211 | 13.29% |
| 2024 | 32.01 | 321 | 9.97% |
| 2025 | 34.65 | 518 | 6.69% |

*Note: Data are sourced from Zijin Mining's annual reports and sustainability reports.*

## 4.3 Governance Dimension

According to the ESG report of Zijin Mining in recent years, the company emphasizes the establishment of a perfect sustainable governance structure and decision-making mechanism, and has built a three-level governance structure of "Board of Directors Strategy and ESG Committee-ESG Management Committee-ESG Working Group". In addition, the report emphasizes the construction of a multi-level disclosure system of "daily disclosure + periodic reporting + active rating", and the establishment of an audit and supervision committee composed of accounting professionals to specialize in reviewing financial reports. In terms of compliance and business ethics, the report emphasizes that Zijin Mining adheres to the guidelines of honest operation, opposes unethical business practices and corruption, and optimizes the institutional organization to form a strictly compliant internal supervision agency.

However, based on the dual framework of "good greenwashing" and "bad greenwashing" [8], Zijin Mining presents a typical exaggerated disclosure feature that lacks support from substantive practices. In September 2026, the media reported that in the "Notes on the Main Projects of the Consolidated Financial Statements" section of its semi-annual report, the names of three units were misspelled: among them, "Mozhu Gongka



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County People's Government" was written as "Mozhu Gongka County RMB Government". Although the error did not affect important financial data, it went unnoticed despite several rounds of review, indicating that there were defects in the quality of enterprise information disclosure, which raised questions about other data of the enterprise. In addition, the company has been exposed to the news of corruption of executives and employees for many years: the former general manager of the Inner Mongolia subsidiary in 2021 and the chairman of Longnan Zijin Mining in 2023 were investigated one after another, which contrasts with the image of the company of "responsible and rigorous" in the report. The so-called "rigorous" internal oversight body is essentially ineffective.

In addition, the enterprise reported that "18 corrupt employees were fired and punished" as a positive case to show the determination of "integrity and compliance", avoiding the negative fact of the failure of internal supervision. However, true integrity should not be based on post-discipline, but on a perfect supervision mechanism in advance. The number of people investigated and dealt should not be used as a medal for the success of governance, but as a warning of the failure of internal monitoring. At the same time, the report reveals that "the ESG training coverage rate of the board of directors has reached 100%, and the ESG course has become a compulsory course for new employees", but the high-intensity training investment has not been translated into actual governance effects. Enterprises divert the attention of investors with the help of punishment determination and training data, whitewash the shortcomings of internal governance, and reflect the inconsistencies of words and deeds at the governance level.

## 5. Causes and Governance Measures

### 5.1 Motivations Behind Greenwashing Practices

Previous research suggests that greenwashing is a complex phenomenon driven by multiple interacting factors [9], so it is necessary to analyze the motivation of enterprises' ESG greenwashing practices from multiple angles.

First of all, analyze the internal causes. The most important point is the drive of economic interests. Real environmental restoration and work safety upgrading require a large amount of investment, and the proportion of environmental protection and safety investment decreases with the increase of profitability, largely because managers regard investment funds as "short-term costs" rather than "long-term benefits", and maximize the company's profits by reducing investment funds. The inefficiency of internal management is also one of the internal causes [9]. From the ESG report of Zijin Mining, it can be found that most of the board members have accounting, finance and other backgrounds, and lack of ESG expertise makes it difficult to accurately identify the risks behind ESG information disclosure. As a result, enterprises shape the overall image of responsibility through public commitment, but the real practical activities are contrary to this. In essence, it is a set of sophisticated impression management strategies [9].

In terms of external factors, investors are an important driving factor for the greening of enterprises [10]. ESG information indirectly reflects the value and business status of the enterprise [11]. Nowadays, more and more investors include the ESG performance of the enterprise in the scope of investment assessment [5]. By promoting the words of "dual carbon" and "safeguarding human rights", enterprises reflect the strategic choice of replacing substantive governance with formal compliance [9], so as to improve the ESG rating of enterprises and seek the moral legitimacy and cognitive legitimacy given by external stakeholders [12]. In addition, the flexible space of supervision is also a possible reason. At present, a unified and mandatory ESG quantitative information disclosure system has not been established in China [9], and the flexibility of disclosure rules creates space for selective disclosure. Therefore, Zijin Mining tried to cover up the actual marginal efforts and beautify the company's performance with the absolute value of indicators such as safety investment and environmental protection investment.

### 5.2 Governance Measures for Greenwashing Practices

Some scholars have pointed out that managers play a crucial role in curbing greenwashing [13]. From the perspective of the enterprise itself, it is necessary to strengthen the substantive examination capacity of the supervisory committee. Zijin Mining has repeatedly failed to disclose information in a timely and accurate manner, reflecting the lack of review capacity of the Supervisory Committee. The supervisory committee



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should arrange more ESG professionals to promote field visits to the mines and other places where the enterprise is located, and improve the authenticity of the written data.

In addition, promote the construction of external supervision channels for employees. Today's complaint mechanism mainly relies on the internal reporting system, and the results of governance are not optimistic. Employees have a strong motivation to restrain the ESG greenwashing practices of enterprises [5]. If the content of the complaint is public on the online platform, it is conducive to the formation of a good social supervision function. Some studies have pointed out that the external public evaluation of enterprises is conducive to improving the working environment of employees [14]. It can be seen that the effectiveness of the external supervision mechanism of employees is particularly obvious.

From the perspective of external governance, the supervision of government departments should be strengthened. First of all, it is necessary to establish a clear list of ESG greenwashing practices and develop an intelligent monitoring system [15], which is conducive to dynamic monitoring of enterprises suspected of ESG greenwashing, and increasing the punishment of these enterprises, which can also reduce companies' incentives to engage in greenwashing to a certain extent [15]; Secondly, it is necessary to improve the rules for ESG disclosure and stipulate the mandatory disclosure of ESG information - some studies have shown that mandatory disclosure improves the transparency of information in EU countries [16].

In addition, attracting the attention of the public is also an effective means of governance. Experts can hold lectures to publicize the consequences of greenwashing, and the media can hold special columns to focus on the greenwashing of enterprises, and work with government regulatory departments to promote the implementation of corporate environmental responsibility [15].

## 6. Conclusions and Recommendations

### 6.1 Research Conclusions

This article takes Zijin Mining as an analysis case, and mainly analyzes the greenwashing practices, motives behind and governance measures in the ESG report of Zijin Mining, and forms the following conclusions:

First, Zijin Mining is suspected of ESG greenwashing at the environmental, social and governance levels. At the environmental level, enterprises promote positive goals such as carbon emissions, which creates a huge gap with practice; the absolute value of environmental investment shifts the focus of investors, ignoring the decline of the relative indicator of environmental protection investment as a proportion of net profit. At the social level, enterprises promise to "put life first" and "safeguard human rights", etc. In fact, the company has experienced multiple safety accidents and has disrupted community life. They also use strategic disclosure to shape the corporate image of actively fulfilling social responsibilities through the absolute value of safety investment. At the governance level, the enterprise emphasizes the construction of a perfect ESG supervision committee and supervision mechanism, but in fact, there are still many cases of executives and employees violating the law and discipline; it regards the "dismissal and punishment of corrupt employees" as an anti-corruption achievement, ignoring the essence of "loopholes in the regulatory mechanism".

Second, the motives behind the ESG greenwashing practices of Zijin Mining can be analyzed from both internal and external causes. In terms of internal reasons, the essence is that companies seek to maximise profits while avoiding excessive expenditure on ESG-related activities; the lack of relevant professional talents in the internal ESG committee may also be one of the reasons. From the point of view of external reasons, the non-uniform ESG information disclosure standards in China are an important reason. At the same time, as investors attach importance to ESG information, enterprises can obtain superficial high ratings through ESG greenwashing, catering to the needs of investors.

Third, governance measures should be considered from many aspects. For the company itself, it should strengthen the ESG supervision mechanism, set up layers of supervision and defense lines, and resist the emergence of greenwashing from the root cause; Secondly, it is recommended to establish an external supervision channel for employees, disclose the evaluation of the ESG information of the enterprise on the network platform, and arouse the attention of the enterprise to the ESG greenwashing practices. For regulatory authorities, a unified and high-standard ESG information disclosure system should be improved, requiring mandatory disclosure of important financial data, etc. For the public, we should give full play to the popularity



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of experts and the media, and jointly supervise the practice of social responsibility by enterprises by publicizing the serious consequences of corporate ESG greenwashing practices.

## 6.2 Research Limitations and Future Research Directions

This article has obtained certain research results based on the analysis of Zijin Mining's ESG greenwashing practices, but due to the limited research conditions, there are still some shortcomings in this article. The first is the singleness of the case. This article only takes Zijin Mining as a case to analyze the greenwashing practices, but there are differences in greenwashing practices between each enterprise and each industry, so the research conclusion of this article is limited. Secondly, the limited nature of data. The data in this article comes from the reports released by enterprises on the network platform. It is impossible to obtain first-hand information such as the motivation for greenwashing from within the company. The research conclusion has a certain subjectivity. Finally, there is the limitation of the research method. This article mostly deduces the research conclusions through the descriptive analysis of the text, and does not conduct in-depth empirical research, which will lead to a decrease in the rigor of the research conclusions.

In view of the above shortcomings, the follow-up research can be improved from the following points. One is to expand the scope of case selection. A sample of 50–100 listed companies could be selected for analysis, and samples can be selected from multiple industries to study the commonality of ESG greenwashing practices between different industries and improve the universality of research conclusions. The second is to try to enhance the diversity of data, conduct in-depth employee interviews with enterprises or conduct field research on enterprises, examine the whole process of enterprise ESG disclosure to supervision, and fill the gap in public information. The third is to adjust the research method, develop a multidimensional set of quantitative indicators for greenwashing in the research, with the degree of greenwashing as the dependent variable, and the governance mechanism of each enterprise as the independent variable, carry out empirical tests, and obtain more objective research conclusions.

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