

负责任矿产供应链尽责管理政策

Responsible Minerals Supply Chain Due Diligence Management Policy

天华新能锂电事业部（以下简称“我们”）认识到在受冲突影响和高风险区域从事矿产开采、贸易、处理、出口存在可能形成重大负面影响的风险，并认识到我们有尊重人权、不助长冲突的义务，我们承诺采纳并广泛推广如下受冲突影响和高风险区域矿石负责任采购政策，将其纳入与供应商签订的合同和/或协议之中，并根据OECD指南中附录一所列明的五个步骤进行相关的尽职调查工作。这一政策为从开采到终端用户整个过程中的对冲突敏感的采购活动以及供应商的风险意识提供了基本参考。我们承诺不从事任何会为冲突提供资助的活动，承诺遵守联合国相关制裁决议，或者在适用情况下，遵守执行此类决议的国内法律。为此，我们参考中国五矿化工进出口商会（CCCMC）发布的《中国负责任矿产供应链尽责管理指南，第二版》、经济合作与发展组织（OECD）的《关于来自受冲突影响和高风险区域的矿石的负责任供应链尽责管理指南,第三版》、《关于电池和废电池的第 2023/1542(EU)号》、《现代反奴隶制法案 2015》、《RMI ESG Facility-Level Performance Standard》、

制定本公司“负责任供应链尽责管理政策”（以下简称“政策”）。本政策自颁布起生效并适用于公司自己以及所有提供含锂物料的供应商。

Lithium-ion Battery Division of Canmax Technologies Co., Ltd. (hereinafter referred to as "we") recognizes that mining, trading, processing and exporting minerals in conflict-affected and high-risk areas involve risks that may cause a significant negative impact, and that it's our obligation to respect human rights and contribute to no conflict. We are committed to adopting and widely promoting the following policy for responsible sourcing of minerals from conflict-affected and high-risk areas and to incorporating it into contracts and/or agreements with suppliers, and to conducting due diligence in accordance with the five steps set out in the OECD Guidance Annex I. This policy provides a basic reference for conflict-sensitive sourcing activities and supplier risk awareness throughout the entire process, from mining to end-user. We are committed to engaging in no activity that would finance conflict and to complying with relevant UN sanctions resolutions or, where applicable, the domestic laws that implement such resolutions. To this end, we have developed our Responsible Supply Chain Due Diligence

Management Policy (hereinafter referred to as " Policy") with reference to the "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, Second Edition" issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition" issued by the Organisation for Economic Co-operation and Development (OECD) , Regulation (EU) 2023/1542 on Batteries and Waste Batteries, the Modern Slavery Act 2015, the RMI ESG Facility-Level Performance Standard.

公司承诺在锂供应链运营实践中识别和管理以下风险：

The company is committed to identifying and managing the following risks in lithium supply chain operations:

一、关于公司治理 Corporate governance

(一) 直接或间接支持非国家武装团体 Directly or indirectly supporting non-state armed groups

我们不会容忍任何通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供直接或间接的支持。通过矿产开采、运输、贸易、处理或出口为非国家武装团体提供“直接或间接的支持”包括且不限于从非国家武装团体或其关联方购买矿产，向其进行付款，或以其他方式为其提供后勤支援或设备等。这些武装团体或关联方包括：

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, processing or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, processing or export of minerals includes, but is not limited to, purchasing minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

1. 非法控制矿址，或以其他方式控制运输路线、矿产资源交易地、以及供应链上游行为进行控制；

Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain and/or

2. 在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产；

Illegal tax or extortion of money or minerals at the entrance to the mine site, along the transportation routes or at points where minerals are traded; and/or

3. 对中间商、出口企业、或国际贸易商非法征税或勒索。

Illegally tax or extort intermediaries, export companies or international traders.

降低风险 Risk Mitigation

我们将杜绝上游供应商从向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存在关系，我们将立即中止或中断与该供应商的合作。

We will prevent upstream suppliers from making purchases or having any relationship with any party that provides direct or indirect support to non-state armed groups. We will immediately suspend or interrupt our cooperation with such supplier.

(二) 直接或间接支持公共或私人安全武装： Directly or indirectly supporting public or private security armed acts

我们杜绝向非法控制矿址、运输路线以及供应链上游行为主体，在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易者非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。

We strictly prohibit providing direct or indirect support to public or private security forces that illegally control mining sites, transportation routes, and upstream actors in the supply chain, illegally levy taxes or demand money or minerals at the entrances of mining sites, along transportation routes, or at mineral trading points, or illegally levy taxes or blackmail middlemen, export enterprises, or international traders.

我们认可，矿址及/或其周边地区以及/或运输道路沿线的公共或私人安全武装的作用仅是维护法治，包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes shall be solely to

maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes so that legitimate mining and trade is not interfered.

在我们或我们供应链上的任何企业与公共或私人安全武装签订了合约的情况下，我们承诺或者将规定，在与这类安全武装进行合作的过程中将遵守《安全与人权自愿原则》的规定。尤其是，我们将会支持或采取措施运用筛查政策，确保已知的实施过严重侵犯人权行为的个人或安全武装单位不被录用。

Where we or any company in our supply chain contract public or private security forces, we promise or we will require that such security forces shall be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take measures to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

我们将支持或采取措施与中央或地方政府、国际组织和民间社会组织开展合作，共同为如何提高公共安全武装安保费用的透明度、相称性和问责性找到可行的解决方案。

We will support or take measures to cooperate with central or local governments, international organizations and civil society organizations to find feasible solutions on how to improve the transparency, proportionality and accountability of public security armed security costs.

我们将支持或采取措施与当地政府、国际组织和民间社会组织开展互动，避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的负面影响，尤其是对小作坊矿工的负面影响。

We will support or take measures to interact with local governments, international organizations and civil society organizations to avoid or minimise the negative impacts of the presence of public or private security forces at mining sites on vulnerable communities, particularly artisanal miners.

降低风险 Risk Mitigation

我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低

向公共或私人安全武装提供直接或间接支持的风险。在此情况下，如果风险管理计划实施六个月未奏效，我们将中止或中断与供应商的合作。

We will work with stakeholders in the supply chain to develop, adopt and implement risk management plans to prevent or reduce the risk of providing direct or indirect support to public or private security forces. In this case, if the risk management plan is not effective for six months, we will suspend or interrupt our cooperation with suppliers.

(三) 违反法律法规、助长、采购或接触任何严重过失者的风险 The risk of violation of laws and regulations, facilitating, purchasing or contacting any person who is seriously negligent

我们严格遵守经营所在国的法律法规，若遇法规冲突，将以更严格的要求为准。我们承诺系统化管理所有许可、执照及批文，确保及时更新并完整存档。我们持续追踪法律义务履行情况，并保留相关记录。所有不合规事件及整改措施均会被记录，以确保透明和持续改进。

We strictly abide by the laws and regulations of the countries where we operate. In case of any conflict with regulations, we will adhere to the stricter requirements. We commit to systematically managing all licenses, permits and approvals, ensuring timely updates and complete archiving. We continuously track the fulfillment of legal obligations and retain relevant records. All non-compliance incidents and corrective measures will be documented to ensure transparency and continuous improvement.

我们不容忍助长、采购或接触任何严重过失者的风险，包括且不限于：

We do not tolerate the risk of facilitating, purchasing or contacting any person with serious negligence, including but not limited to:

1、违反中国和东道国的法律法规或行业最低标准；

Violation of laws and regulations or industry minimum standards of China and the host country

2、雇佣低于东道国法律法规规定的最低工作年龄的儿童；如果东道国没有关于最低工作年龄的相关法律法规，雇佣低于16岁的儿童；

Employ children below the minimum working age set by the laws and regulations of the host country; If the host country does not have relevant laws and regulations on the minimum working age, hire children under the age of 16.

3、不尊重年轻雇工的权益（指任何达到法律限定最低工龄但未达到18岁的工人）。

Do not respect the rights and interests of young employees (refers to any worker who has reached the minimum length of service stipulated by law but is under the age of 18).

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在助长、采购或接触任何严重过失者、不遵守所在国家的法律法规，出现违反法律法规的行为，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施六个月未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that upstream suppliers have contributed to, purchased or come into contact with any grossly negligent parties, or have failed to comply with the laws and regulations of their respective countries, and have engaged in violations of laws and regulations, we will work with stakeholders in the supply chain to formulate, adopt and implement risk management plans to prevent or mitigate related risks. In this situation, if the risk management plan is not effective after six months of implementation, we will suspend or interrupt the cooperation with the supplier.

（四）风险防控 Risk prevention and control

我们承诺通过健全的治理结构和风险防控机制，识别、评估和应对ESG相关风险，确保合规运营，并提升长期可持续性。将 ESG 风险纳入企业全面风险 管理，通过强化治理和风险防控，降低ESG相关危机，增强投资者信心，实现可持续发展。

We commit to identifying, assessing and responding to ESG-related risks through a sound governance structure and risk prevention and control mechanism, ensuring compliant operations and enhancing long-term sustainability. Integrate ESG risks into the enterprise's comprehensive risk management, reduce ESG-related crises through

strengthened governance and risk prevention and control, enhance investor confidence, and achieve sustainable development.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在忽视ESG风险的行为，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施在双方协定时间内未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that upstream suppliers have engaged in behavior that neglects ESG risks, we will work with stakeholders in the supply chain to develop, adopt and implement risk management plans to prevent or mitigate related risks. In this situation, if the implementation of the risk management plan fails to be effective within the agreed time by both parties, we will suspend or interrupt the cooperation with the supplier.

(五) 贪腐、洗钱和向政府支付的各项费用，违反诚信公平透明责任原则 Corruption, money laundering and various fees paid to the government, violate the principles of integrity, fairness, transparency and responsibility

我们不会提供、承诺、给予或索要任何贿赂，并且抵制索贿，不会为了掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

我们禁止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序；尽最大努力促进与所有业务伙伴间负责的商业实践。

We prohibit bribery in all business activities and transactions, including bribery by agents and other third parties, and formulate standards and approval procedures for gifts and acceptance; Make every effort to promote responsible business practices with all business partners.

如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

If we have reason to believe that there is a risk of money laundering arising from or related to the extraction, trade, processing, transportation or export of minerals obtained through illegaltaxation or extortion at the entrance to a mine site, along a transportation route, or at an upstream supplier's mineral trading location, we will support or take measures to contribute to the effective elimination of money laundering.

我们将确保向政府支付所有与受冲突影响和高风险区域矿石开采、贸易、出口相关的合法税收、费用和特许费，并且承诺根据企业在供应链上所处位置依照《采掘行业透明度行动计划》（EITI）中的各项原则对此类支付进行披露。

We will ensure that all legitimate taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to government. We are committed to disclosing such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI) based on the company' s position in the supply chain.

降低风险 Risk Mitigation

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。在此情况下，如果风险管理计划实施六个月未奏效，风险降低措施未起作用的，供应商违反诚信公平透明责任原则的，我们将中止或中断与上游供应商的合作。

According to the specific position of the enterprise in the supply chain, we promise to cooperate with suppliers, central or local governments, international organizations, civil society and affected third parties as appropriate to improve or track performance with the purpose of taking measurable measures within a reasonable time span to prevent or reduce the risk of adverse impact. In this case, if

the risk management plan has been implemented for six months without effect, If the risk reduction measures do not work, supplier violate the principles of integrity, fairness, transparency and responsibility ,we will suspend or interrupt the cooperation with upstream suppliers.

(六) 信息安全与隐私 Information security and privacy

我们承诺严格遵守《个人信息保护法》（PIPL）等全球隐私法规，确保数据收集、使用和存储的合法性与透明性，通过技术与管理措施，抵御日益复杂的网络威胁。

We commit to strictly adhering to global privacy regulations such as the Personal Information Protection Act (PIPL), ensuring the legality and transparency of data collection, use and storage, and safeguarding against increasingly complex cyber threats through technical and management measures.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在数据泄露等信息安全风险的行为，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施在双方协定时间内未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that there are risky behaviors such as data leakage from upstream suppliers, we will work with stakeholders in the supply chain to formulate, adopt and implement risk management plans to prevent or reduce related risks. In this situation, if the implementation of the risk management plan fails to be effective within the agreed time by both parties, we will suspend or interrupt the cooperation with the supplier.

(七) 研发与创新 Research and development and innovation

我们承诺绿色创新优先、伦理治理、开放协作和透明披露，将创新转化为ESG价值，同时规避技术滥用风险，致力于让每一份创新都成为推动人类可持续发展的正能量。

We commit to prioritizing green innovation, ethical governance, open collaboration and transparent disclosure, transforming innovation into ESG value while avoiding the risk of technology abuse, and are dedicated to making every

innovation a positive force for promoting sustainable human development.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在技术滥用而导致的技术价值与社会价值的错配的风险，我们将与供应链上的利益相关方一起制定、采用和实施改进管理计划，从而防范或降低相关风险，提高上游供应商ESG水平。

If we have reasonable grounds to believe that there is a risk of mismatch between the technical value and the social value caused by the abuse of technology by upstream suppliers, we will work with the stakeholders in the supply chain to formulate, adopt and implement an improvement management plan, thereby preventing or reducing the relevant risk and improving the ESG level of the upstream supplier.

(八) 上游负责任供应链管理 Upstream responsible supply chain management

我们承诺我们致力于将环境、社会和治理（ESG）原则全面融入供应链管理，确保供应链的可持续性和责任感。推动资源高效利用和减少碳足迹，鼓励供应链上下游共同践行绿色实践。严格遵循国际劳工标准和人权原则，确保供应链中无强迫劳动、童工或歧视行为，保障工人健康与安全。坚持透明、合规的采购流程，反对任何形式的腐败与不当商业行为，定期评估供应商的ESG表现。通过定期审查、培训与合作，不断提升供应链的可持续性，与合作伙伴共同应对ESG风险，推动行业进步。我们相信，负责任的供应链管理不仅是企业责任的核心，更是实现长期价值的关键。我们将持续努力，确保供应链成为可持续发展的重要驱动力。

We commit to fully integrating environmental, social and governance (ESG) principles into supply chain management to ensure the sustainability and responsibility of the supply chain. Give priority to suppliers that meet environmental protection standards, promote efficient resource utilization and reduction of carbon footprint, and encourage the entire supply chain to jointly practice green practices. Strictly adhere to international labor standards and human rights principles to ensure that there is no forced labor, child labor or discriminatory behavior in the supply chain, and safeguard the health and safety of workers. Adhere to transparent and compliant procurement processes, oppose any form of corruption and improper business

practices, and regularly assess the ESG performance of suppliers. Through regular audits, training and cooperation, we continuously enhance the sustainability of the supply chain, jointly address ESG risks with partners, and drive industry progress. We believe that responsible supply chain management is not only at the core of corporate responsibility but also the key to achieving long-term value. We will continue to strive to ensure that the supply chain becomes an important driving force for sustainable development.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在供应链风险管理不当导致如社会争议、法律诉讼、声誉损失甚至财务损失等的风险，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施在双方协定时间内未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that upstream suppliers have risks such as social disputes, legal proceedings, reputation damage or even financial losses due to improper supply chain risk management, we will work with stakeholders in the supply chain to formulate, adopt and implement risk management plans to prevent or reduce related risks. In this situation, if the implementation of the risk management plan fails to be effective within the agreed time by both parties, we will suspend or interrupt the cooperation with the supplier.

二、关于环境保护 Environmental protection

(一) 环境许可与报告 Environmental Permits and Reporting

我们承诺严格遵守法律法规，确保所有经营活动均依法取得必要的环境许可并履行完整的环境报告义务。

We promise to strictly abide by laws and regulations, ensuring that all business activities obtain the necessary environmental permits in accordance with the law and fulfill the complete environmental reporting obligations.

降低风险 Risk Mitigation

如果我们有合理理由认为该风险存在，即上游供应商存在未获得或非法获得许可证行为，

或上游供应商与正在实施以上所规定的严重侵权行为的任何一方进行采购或与该方有关联，我们将立即中止或中断与该上游供应商的合作。

If we have reasonable grounds to believe that such a risk exists, namely that the upstream supplier has not obtained or illegally obtained a license, or that the upstream supplier has made purchases with or is associated with any party that is committing the serious infringement as stipulated above, we will immediately suspend or interrupt the cooperation with such upstream supplier.

(二) 土壤、空气、水、森林、有害物质、污染、噪声与震动 Soil, air, water, forests, hazardous substances, pollution, Noise and Vibration

我们确保避免给周围土壤、空气和水的状况造成重大不利影响，严重违反当地相关法律法规，包括制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质。

We commit to preventing significant adverse impacts on surrounding soil, air, and water conditions, and strictly comply with local laws and regulations. This includes prohibiting the manufacture, trade, or use of internationally banned chemicals and hazardous substances due to their high toxicity to organisms, environmental persistence, or potential irreversible ecological effects.

我们承诺减少业务活动对土壤、空气和水的影响，采取经济可行的污染防治措施，优先避免污染，其次控制和降低污染。严格遵循法律法规，持续监测主要污染物排放，确保数据透明公开，并实施减排策略，最大限度降低环境影响。

We pledge to minimize the impact of our operations on soil, air, and water by implementing cost-effective pollution prevention measures, prioritizing avoidance over control and mitigation. In strict compliance with applicable laws and regulations, we conduct ongoing monitoring of key pollutant emissions, ensure transparent public disclosure of data, and implement emission reduction strategies to minimize environmental impact to the greatest extent possible.

我们同意确保遵守化学品和有毒物质管理适用的法律要求，避免制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质。

We commit to full compliance with all applicable chemical and toxic substance regulations, prohibiting the manufacture, trade, or use of internationally banned chemicals and hazardous substances that exhibit: High toxicity to organisms, Environmental persistence, Potential irreversible ecological impacts.

我们不参与、不容忍、不受益于运营前和运营期间由于业务对土壤健康产生不利影响导致土壤侵蚀和土地退化，或违反国内法的土地上开采资源。杜绝滥伐森林，破坏土地物理稳定性的行为，为土地和土壤制定和实施适应性管理计划。

We neither participate in, tolerate, nor benefit from any pre-operational or operational activities that adversely affect soil health leading to soil erosion and land degradation, or from resource extraction conducted on land in violation of domestic laws. We strictly prohibit deforestation and any actions that compromise land stability, and we develop and implement adaptive management plans for land and soil conservation.

我们不参与、不容忍、不受益于运营前和运营期间产生的噪声和震动对人类或野生动物产生重大影响。

We neither participate in, tolerate, nor benefit from any pre-operational or operational activities where noise and vibration cause significant impacts on human communities or wildlife.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在破坏环境生态、损害生境、野生动物、植物和生态系统（包括生态系统服务）的行为，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施在双方协定时间内未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that upstream suppliers have engaged in behaviors that damage the environmental ecology, habitats, wildlife, plants and ecosystems (including ecosystem services), we will work with stakeholders in the supply chain to formulate, adopt and implement risk management plans to prevent or reduce related risks. In this situation, if the implementation of the risk management

plan fails to be effective within the agreed time by both parties, we will suspend or interrupt the cooperation with the supplier.

(三) 循环经济、生物多样性 Circular Economy, Biodiversity

我们探索尽可能使用循环材料减少排放，保护生物多样性，我们承诺将遵守欧盟《关于电池和废电池的第 2023/1542(EU)号》中保护生物多样性，降低对生境、野生动物、植物和生态系统（包括生态系统服务）的损害。

We explore to use circular materials as much as possible to reduce emissions and protect biodiversity. We commit to complying with EU Regulation No. 2023/1542(EU) on Batteries and Waste Batteries to protect biodiversity and reduce damage to habitats, wildlife, plants and ecosystems (including ecosystem services).

降低风险 Risk Mitigation

当发现上游供应商在实践循环经济或保护生物多样性方面存在挑战时，将主动联合供应链合作伙伴共同制定针对性的能力提升方案。通过建立协同改进机制，我们将帮助供应商识别风险、弥补差距，并持续跟踪改善成效，从而系统性提升全供应链的 ESG 绩效表现。

When it is found that upstream suppliers face challenges in practicing a circular economy or protecting biodiversity, we will proactively collaborate with supply chain partners to jointly formulate targeted capacity improvement plans. By establishing a collaborative improvement mechanism, we will assist suppliers in identifying risks, bridging gaps, and continuously tracking the effectiveness of improvement, thereby systematically enhancing the ESG performance of the entire supply chain.

三、关于社会 Society

(一) 《现代反奴隶制法案 2015》 The modern anti slavery act 2015

我们承诺将严格在供应链中不参与、不容忍、不受益于任何阶段出现过奴役和人口贩卖行为。

We are committed to strictly not participating in, tolerating or benefiting from slavery and human trafficking at any stage of the supply chain.

降低风险 Risk Mitigation

如果我们有合理理由认为该风险存在，即上游供应商在任何商业活动环节中存在奴役和人口贩卖行为或上游供应商与正在实施以上所规定的严重侵权行为的任何一方采购或与之存在关联，我们将立即中止或中断与该上游供应商的合作。

If we have reasonable reasons to believe that the risk exists, that is, the upstream supplier has slavery and human trafficking in any link of business activities, or the upstream supplier purchases or is associated with any party who is committing the serious infringement specified above, we will immediately suspend or interrupt our cooperation with the upstream supplier.

(二) 职业健康与安全 Occupational health and safety

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何为其直接和/或间接，雇员和/或在其生产现场的任何人员提供威胁到生命的职业健康与安全环境的一方，或从该方处采购或与之存在关联。

When conducting procurement or production in high-risk areas, we will not benefit from, assist or facilitate any party that provides a life-threatening occupational health and safety environment for its direct and / or indirect employees and / or any personnel on its production site, or purchase from or have connection with it.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商提供威胁到生命的职业健康和安全环境的任何一方采购或与之存在关联，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施在双方协定时间内未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that upstream suppliers procure or are associated with any party that provides a life-threatening occupational health and safety environment, we will work with stakeholders in the supply chain to develop, adopt and implement risk management plans to prevent or reduce related risks. In this situation, if the implementation of the risk management plan fails to be effective within the agreed time by both parties, we will suspend or interrupt the cooperation with the supplier.

(三) 当地社区、土著居民和少数民族、土地权利和小作坊 Local communities, indigenous people and ethnic minorities, land rights and small workshops

我们承诺将遵守欧盟《关于电池和废电池的第 2023/1542(EU)号》中保护当地社区生活，避免对原住民的生活造成影响。

We commit to complying with EU Regulation No. 2023/1542(EU) on Batteries and Waste Batteries to protect the lives of local communities and avoid any impact on the lives of the original residents.

我们不参与、不容忍、不受益于在未获得当地人和土著人自由、预先、知情的同意的土地上开采资源，包括持有法定所有权、租赁权、特许权或许可证的开采商。我们不参与、不容忍、不受益于当地人、土著人和少数民族的文化和遗产未受尊重和保护，或损害当地人传统文化的开采作业。

We do not participate in, tolerate or benefit from the exploitation of resources on land that has not obtained the free, prior and informed consent of both local and indigenous people, including by extractors who hold legal ownership, leasehold rights, franchises or licenses. We do not participate in, tolerate or benefit from mining operations where the cultures and heritages of local people, indigenous people and ethnic minorities are not respected and protected, or which harm the traditional cultures of the local people.

我们避免在世界遗产地或法定保护区开采资源，以及由此给这些遗产的突出普遍价值造成威胁。

We avoid extracting resources in World Heritage sites or legally protected areas, and thereby posing a threat to the outstanding universal value of these heritages.

我们特别关注与小作坊或小规模采矿商相关强迫劳动、童工、不安全工作条件、不受控危险化学品使用和其他重大环境影响的风险。

We are particularly concerned about the risks of forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals and other significant environmental impacts associated with small workshops or small-scale miners.

降低风险 Risk Mitigation

如果我们有合理理由认为该风险存在，即上游供应商存在影响当地社区生活，损害原著居民和少数民族权利、当地社区权益、健康与发展、破坏当地文化遗产的行为，我们将与供应链上的利益相关方一起制定、采用和实施风险管理计划，从而防范或降低相关风险。在此情况下，如果风险管理计划实施在双方协定时间内未奏效，我们将中止或中断与供应商的合作。

If we have reasonable grounds to believe that the risk exists, that is, the upstream suppliers have engaged in behaviors that affect the life of the local community, infringe upon the rights of the indigenous residents and ethnic minorities, the rights and interests of the local community, health and development, or damage the local cultural heritage, we will work with the stakeholders in the supply chain to formulate, adopt and implement a risk management plan to prevent or reduce the relevant risks. In this situation, if the implementation of the risk management plan fails to be effective within the agreed time by both parties, we will suspend or interrupt the cooperation with the supplier.

(四) 与矿产开采、运输、或交易有关的严重侵犯人权行为 Regarding Serious abuses associated with the extraction, transport or trade of minerals

我们既不容忍也不以任何方式获利于、帮助、协助任何一方实施：

We will neither tolerate nor benefit, help or assist any party in any way:

1、任何形式的酷刑、残暴、不人道或有辱人格的待遇；

Any forms of torture, cruel, inhuman and degrading treatment;

2、任何形式的强迫或强制劳动。强迫或强制劳动是指以惩罚相威胁，强迫任何人从事的非本人自愿提供的劳动或服务；

Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily ;

3、最恶劣形式的童工；

The worst forms of child labour;

4、其他严重侵犯和践踏人权的行爲，如大规模性暴力；

Other gross human rights violations and abuses such as widespread sexual violence;

5、战争罪或其他严重违反国际人道主义法的行爲，反人类罪或种族灭绝罪。

War crimes or other serious violations of international humanitarian law, crimes against humanity or crimes of genocide.

降低风险 Risk Mitigation

如果我们有合理理由认为该风险存在，即上游供应商存在以上任意侵犯人权行爲，或上游供应商与正在实施以上所规定的严重侵权行爲的任何一方进行采购或与该方有关联，我们将立即中止或中断与该上游供应商的合作。

If we have reasonable reasons to believe that the risk exists, that is, the upstream supplier has any of the above human rights violations, or the upstream supplier purchases or is associated with any party who is carrying out the serious violations specified above, we will immediately suspend or terminate our cooperation with the upstream supplier.

(五) 员工培训与发展 Employee training and development

我们承诺将提供培训平台和机会，进行基础技能、合规、领导力、可持续发展等多样化培训，系统化提升员工技能。

We promise to provide training platforms and opportunities to conduct diverse training in basic skills, compliance, leadership, sustainable development, etc., and systematically enhance the skills of our employees.

降低风险 Risk Mitigation

如果我们有合理理由认为上游供应商存在违反国际劳工标准，阻碍员工培训与发展的行爲，我们将与供应链上的利益相关方一起制定、采用和实施改进管理计划，从而防范或降低相关风险，提高上游供应商ESG水平。

If we have reasonable grounds to believe that upstream suppliers have violated international labor standards and hindered employee training and development, we

天华新能锂电事业部
管理文件

文件标题：负责任矿产供应链尽责管
理政策

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will work with stakeholders in the supply chain to formulate, adopt and implement improvement management plans, thereby preventing or reducing related risks and enhancing the ESG level of upstream suppliers.

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