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**
	编号：A1

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“我司”）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，并认识到我司有尊重人权、不助长冲突的义务，我司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。我司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，我司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》《国际人权法案》《联合国工商业与人权指导原则》《经合组织跨国企业准则》《国际劳工组织关于跨国企业和社会政策的三方原则宣言》《经合组织负责任商业行为尽职调查指南》制定我司“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天华新能锂电事业部及

其下属各子公司，包括但不限于宜宾市天宜锂业科创有限公司、四川天华时代锂能有限公司、奉新时代新能源材料有限公司；以及适用于我司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 "our company") 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 is our obligation to respect human rights and contribute to no conflict. Our company is 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. Our company is 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, our company has 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, International Bill of Human Rights, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, OECD Due Diligence Guidance for Responsible Business Conduct. This policy is effective upon issuance and applies to Lithium-ion Battery Division of Canmax Technologies Co., Ltd. and its subsidiaries, including but not limited to Tyeeli(Yibin)Co., Ltd., Tyeeli(Meishan)Co., Ltd., Tyeeli(Fengxin)Co., Ltd., as well as all our suppliers providing lithium-containing materials.

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

我司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：

Our company 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；

Illegally controlling mining sites, or otherwise controlling transportation routes, locations for mineral resource transactions, and upstream activities 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

我司将拒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，我司将立即中止或中断与该供应商的合作。

Our company will refuse to purchase from or have any relationship with any upstream supplier that provides direct or indirect support to any non-state armed group. Our company will immediately terminate or suspend our cooperation with such a 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 Forces

我司拒绝向非法控制矿址、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。

Our company refuses to provide 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.

我司认可，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。

Our company recognizes 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.

在我司或我司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，我司承诺或者将规定，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，我司将会支持或采取措施运用筛查政策，从而避免已知的实施过严重侵犯人权行为的个人或安全武装单位被录用。

Where our company or any company in our supply chain contract public or

private security forces, our company promises or our company will require that such security forces shall be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, our company will support or take measures to implement screening policies, in order to prevent individuals or security armed units that have committed serious human rights violations in the past from being hired.

我司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。

Our company 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.

我司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。

Our company 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

我司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达到我司要求，我司将中止或中断与供应商的合作。

Our company will work together with the stakeholders in the supply chain to develop, adopt and implement a risk management plan, in order 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 fails to meet our requirements after six months of implementation, our company will terminate or suspend cooperation with the supplier.

（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

我司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。我司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。我司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。

Our company strictly abides by the laws and regulations of the countries

where our company operates. In case of any conflict with regulations, our company will adhere to the stricter requirements. Our company commits to systematically managing all licenses, permits and approvals, ensuring timely updates and complete archiving. Our company continuously tracks the fulfillment of legal obligations and retains relevant records. All non-compliance incidents and corrective measures will be documented to ensure transparency and continuous improvement.

我司不容忍助长、采购或接触任何严重过失者的风险，包括且不限于：

Our company will not tolerate the risks of encouraging, procuring or engaging with any individuals who have committed serious misconduct, 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 legally required minimum working age but is under 18 years old).

降低风险 Risk Mitigation

如果我司合理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，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably believes that the upstream suppliers are encouraging, procuring or contacting any individuals with serious misconduct, or are not complying with the laws and regulations of the relevant countries, and if there are any violations of laws and regulations, our company will work with the stakeholders in the supply chain to develop, adopt and implement a risk management plan, thereby preventing or reducing the associated risks. Under such circumstances, if the risk management plan fails to meet our company's requirements after six months of implementation, our company will terminate or

suspend cooperation with the supplier.

（四）风险防控 Risk Prevention and Control

我司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，合规运营，并提升长期可持续性。我司将 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。

Our company promises to identify, assess and manage ESG-related risks through a sound governance structure and risk prevention mechanism, operate in compliance with regulations, and enhance long-term sustainability. Our company integrates ESG risks into the enterprise's comprehensive risk management, reduces ESG-related crises through strengthened governance and risk prevention and control, enhances investor confidence, and achieves sustainable development.

降低风险 Risk Mitigation

如果我司合理认为上游供应商存在忽视 ESG 风险的行为，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably believes that the upstream supplier has engaged

in behavior that neglects ESG risks, our company will work together with the stakeholders in the supply chain to develop, adopt and implement a risk management plan, thereby preventing or reducing the relevant risks. In this case, if the implementation of the risk management plan does not meet our company's requirements within the agreed time frame by both parties, our company will terminate or suspend 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, Violation of the Principles of Integrity, Fairness, Transparency and Responsibility

我司不会提供、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。

Our company 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.

我司禁止一切业务活动和交易中的贿赂行为，包括但不限于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任的商业实践。

Our company strictly prohibits any form of bribery in all business activities and transactions, including but not limited to bribery by agents and other third parties. We have established standards and approval procedures for gift-giving and receiving; we will do our utmost to promote responsible business practices with all business partners.

如果我司合理认为，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，我司将支持或采取措施，为有效消除洗钱行为做出贡献。

If our company reasonably believes that there is a risk of money laundering caused by or related to the illegal taxation or extortion carried out during the mining, trading, processing, transportation or export at the mine entrance, along the transportation route, or at the mineral trading locations of upstream suppliers, our company will support or take measures to contribute to the effective elimination of money laundering activities.

我司将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。

Our company will pay all legal taxes, fees and royalties related to the mining,

trading and export of minerals in areas affected by conflicts and high-risk regions to the government. We also commit to disclosing such payments in accordance with the principles outlined in the Extractive Industries 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，我司承诺与供应商、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达到我司要求，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，我司将中止或中断与上游供应商的合作。

Based on the specific position of the enterprise in the supply chain, our company promises to cooperate with suppliers, central or local governments, international organizations, civil society, and affected third parties as appropriate. With the aim of taking measurable measures within a reasonable time frame to prevent or reduce the risk of adverse impacts, our company will improve or track the performance. In this case, if the risk management plan fails to meet our requirements after six months of implementation, the risk reduction measures do not work, or the supplier violates the principles of honesty, fairness, and transparency, our company will terminate or suspend cooperation with the

upstream supplier.

（六）信息安全与隐私 Information Security and Privacy

我司承诺严格遵守《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。

Our company commits 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

如果我司合理认为上游供应商存在数据泄露等信息安全风险的行为，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably believes that the upstream supplier has engaged in behaviors such as data leakage that pose information security risks, our company will work together with the stakeholders in the supply chain to develop, adopt and implement a risk management plan, thereby preventing or reducing

the relevant risks. In this case, if the implementation of the risk management plan does not meet our company's requirements within the agreed time frame by both parties, our company will terminate or suspend cooperation with the supplier.

（七）研发与创新 Research and Development and Innovation

我司承诺绿色创新优先、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。

Our company commits to prioritizing green innovation, ethical governance, open collaboration and transparent disclosure, transforming innovation into ESG value while avoiding the risk of technology abuse, and is dedicated to making every innovation a positive force for promoting sustainable human development.

降低风险 Risk Mitigation

如果我司合理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，我司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 our company reasonably believes that there is a risk of mismatch between the technical value and social value due to the improper use of technology by the upstream suppliers, our company will work together with the stakeholders in the

supply chain to develop, adopt and implement an improvement management plan, thereby preventing or reducing the relevant risks and enhancing the ESG level of the upstream suppliers.

（八）上游负责任供应链管理 Upstream Responsible Supply Chain Management

我司承诺致力于将环境、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。我司相信，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。 我司将持续努力，确保供应链成为可持续发展的重要驱动力。

Our company commits to fully integrating environmental, social and governance (ESG) principles into supply chain management to ensure the sustainability and responsibility of the supply chain. Our company gives priority to suppliers that meet environmental protection standards, promotes efficient resource utilization and reduction of carbon footprint, and encourages the entire supply chain to jointly practice green practices. Our company strictly adheres 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 safeguards the health and safety of workers. Our company adheres to transparent and compliant procurement processes, opposes any form of corruption and improper business practices, and regularly assesses the ESG performance of suppliers. Through regular audits, training and cooperation, our company continuously enhances the sustainability of the supply chain, jointly addresses ESG risks with partners, and drives industry progress. Our company believes that responsible supply chain management is not only at the core of corporate responsibility but also the key to achieving long-term value. Our company will continue to strive to ensure that the supply chain becomes an important driving force for sustainable development.

降低风险 Risk Mitigation

如果我司合理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，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably believes that the upstream supplier has improper supply chain risk management, which may lead to risks such as social disputes,

legal lawsuits, reputational damage, even financial losses, our company will work together with the stakeholders in the supply chain to formulate, adopt and implement a risk management plan, thereby preventing or reducing such risks. In this case, if the implementation of the risk management plan does not meet our requirements within the agreed time frame by both parties, our company will terminate or suspend 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

我司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。

Our company promises 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

如果我司合理认为该风险存在，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，我司将立即中止或中断与该上游供应商的合作。

If our company reasonably deems that such a risk exists, that is, if the upstream supplier has engaged in the act of not obtaining or illegally obtaining licenses, or if the upstream supplier has conducted any procurement with or has an association with any party that is currently committing the aforementioned serious infringement acts, our company will immediately terminate or suspend cooperation with that 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

我司避免给周围土壤、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。

Our company prevents significant adverse impacts on surrounding soil, air, and water conditions, and strictly complies 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.

我司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。

Our company pledges 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, our company conducts ongoing monitoring of key pollutant emissions, ensures transparent public disclosure of data, and implements emission reduction strategies to minimize environmental impact to the greatest extent possible.

我司同意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。

Our company agrees to comply with the legal requirements applicable to the management of chemicals and toxic substances, and to avoid manufacturing, trading, or using chemicals and hazardous substances that are subject to international bans due to their high toxicity to living organisms, environmental persistence, or potential irreversible ecological impacts.

我司承诺建立系统化管理方法，负责任地处置或回收固体废弃物（无害）及残渣，跟踪和记录相关数据；

Our company commits to establishing a systematic management approach, responsibly disposing of or recycling solid waste (without harm) and residues,

and tracking and recording relevant data.

我司要求工厂遵守环境相关法律法规，落实安全生产责任，防范并减少运营过程中对员工、承包商及相关方造成的风险。

Our company requires the factory to comply with environmental-related laws and regulations, fulfill safety production responsibilities, and prevent and reduce risks to employees, contractors and other relevant parties during the operation process.

我司不参与、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。

Our company neither participates in, tolerates, nor benefits 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. Our company strictly prohibits deforestation and any actions that compromise land stability, and our company develops and implements adaptive management plans for land and soil conservation.

我司不参与、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。

Our company neither participates in, tolerates, nor benefits 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

如果我司合理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，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably believes that the upstream suppliers have engaged in behaviors that damage the environment and ecology, harm habitats, wildlife, plants and ecosystems (including ecosystem services), our company will work with the stakeholders in the supply chain to develop, adopt and implement a risk management plan, thereby preventing or reducing the associated risks. In this case, if the implementation of the risk management plan does not meet our requirements within the agreed time frame by both parties, our company will terminate or suspend cooperation with the supplier.

（三）能源消耗与温室气体排放 Energy Consumption and Greenhouse Gas Emissions

我司承诺跟踪、记录并公开报告能源消耗以及范围 1、范围 2 和范围 3 重要类别的温室气体排放，并鼓励供应商相应开展节能减排行动。我司最大程度减少能源消耗与温室气体排放，努力提高产品的可再生能源电力比例。

Our company promises to track, record and publicly report energy consumption as well as the emissions of key categories of greenhouse gases such as scope 1, scope 2 and scope 3. Our company also encourages suppliers to take corresponding actions for energy conservation and emission reduction. Our company strives to minimize energy consumption and greenhouse gas emissions, and endeavors to increase the proportion of renewable energy in our products.

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

我司探索使用循环材料减少排放，保护生物多样性，我司承诺将遵守欧盟《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。

Our company explores to use circular materials to reduce emissions and protect biodiversity. Our company commits to complying with Regulation (EU) 2023/1542 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，我司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, our company will proactively collaborate with supply chain partners to jointly formulate targeted capacity improvement plans. By establishing a collaborative improvement mechanism, our company 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

我司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。

Our company is 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

如果我司合理认为该风险存在，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，我司将立即中止或中断与该上游供应商的合作。

If our company reasonably deems that such a risk exists, that is, if the upstream supplier engages in any form of slavery or human trafficking during any business process, or if the upstream supplier has conducted or is associated with any of the serious infringements as stipulated above, our company will immediately terminate or suspend cooperation with that 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，我司不会获利于、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, our company 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

如果我司合理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，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably deems that any party of the upstream supplier, or any related party thereof, provides a working environment that poses a threat to the occupational health and safety of life, our company will work together with the stakeholders in the supply chain to formulate, adopt and implement a risk management plan, thereby preventing or reducing the relevant risks. In this case, if the implementation of the risk management plan does not meet our requirements within the agreed time frame by both parties, our company will terminate or suspend 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

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

Our company commits 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.

我司不参与、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。我司不参与、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。

Our company does 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. Our company does 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.

我司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。

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

我司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。

Our company is 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

如果我司合理认为该风险存在，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，我司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达到我司要求，我司将中止或中断与供应商的合作。

If our company reasonably deems that such a risk exists, that is, if the upstream supplier engages in behaviors that affect the local community's life, infringe upon the rights of the original residents and ethnic minorities, damage the rights and interests of the local community, the health and development of the community, and destroy the local cultural heritage, our company will work with the stakeholders in the supply chain to formulate, adopt and implement a risk management plan, thereby preventing or reducing the relevant risks. In this

case, if the implementation of the risk management plan does not meet our requirements within the agreed time frame by both parties, our company will terminate or suspend 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 Serious Human Rights Violations Related to Mining, Transportation or Trading of Minerals

我司既不容忍也不以任何方式获利于、帮助、协助任何一方实施：

Our company 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为，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为，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

如果我司合理认为该风险存在，即上游供应商存在以上任意侵犯人权行为，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，我司将立即中止或中断与该上游供应商的合作。

If our company reasonably deems that such a risk exists, that is, if the upstream supplier has committed any of the aforementioned human rights violations, or if the upstream supplier has conducted any procurement with or has any association with any party that is currently committing the aforementioned serious infringement acts, our company will immediately terminate or suspend cooperation with that upstream supplier.

（五）员工培训与发展 Employee Training and Development

我司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。

Our company promises 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

如果我司合理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为，我司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 our company reasonably believes that the upstream suppliers have engaged in behaviors that violate international labor standards and hinder employee training and development, our company will work with the stakeholders in the supply chain to develop, adopt and implement improvement management plans, thereby preventing or reducing related risks and enhancing the ESG level of the upstream suppliers.

（六）尊重工会自由与集体谈判权 Freedom of Association and Collective Bargaining

我司承诺尊重员工依法自由结社、加入或不加入工会的权利，尊重员工通过工会或代表进行集体谈判的权利，不因员工参与工会活动而对其进行歧视、威胁或打击报复。

我司支持在合法、自愿、平等的基础上与员工代表开展建设性对话，共同促进和谐稳定的劳动关系。

Our company promises to respect employees' right to freedom of association, to join or not join trade unions in accordance with the law, and to bargain collectively through trade unions or representatives. Our company will not discriminate against, threaten or retaliate against employees for participating in union activities. Our company supports constructive dialogue with employee representatives on a lawful, voluntary and equal basis to jointly promote harmonious and stable labor relations.

降低风险 Risk Mitigation

如果我司合理认为上游供应商存在违反国际劳工标准，阻碍员工自由结社或集体谈判的行为，我司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 our company reasonably believes that the upstream suppliers have engaged in behaviors that violate international labor standards and hinder employees' freedom to form unions or engage in collective bargaining, our company will work with the stakeholders in the supply chain to develop, adopt and implement improvement management plans, thereby preventing or reducing related risks and enhancing the ESG level of the upstream suppliers.

四、政策传播与实施 Policy Communication and Implementation

我司将本政策告知有关供应商，并要求我司的供应商将此政策传达给其上游，以保障我司的供应链中不出现助长冲突、侵犯人权尤其是儿童权益的情形。我司致力于逐步将本政策纳入与供应商签订的具有约束力的承诺之中。

Our company has informed the relevant suppliers of this policy and requested that our suppliers convey it to their upstream partners, in order to ensure that no situations that fuel conflicts or violate human rights, especially those related to children's rights, occur in our company's supply chain. Our company is committed to gradually incorporating this policy into the binding commitments signed with suppliers.

我司呼吁所有从事矿产开采、处理、贸易、出口的企业或者使用相关制品的企业一起建立负责任供应链尽责管理体系，避免助长冲突和侵犯人权，尤其是儿童权益。

Our company calls on all enterprises engaged in mining, processing, trading and exporting of minerals, as well as those using related products, to jointly establish a responsible supply chain accountability management system, in order to avoid fueling conflicts and violating human rights, especially the rights of children.

本政策自 2025 年 10 月 23 日起发布并生效。审核频率为一年一次；审核后如需修

订，将基于实际业务需要适时启动，修订版自其发布之日起适用。

This policy will come into effect on October 23, 2025. The review frequency is once a year. If revisions are needed after the review, they will be initiated promptly based on actual business needs. The revised version will be applicable as of its effective date.