
《海辰 2024 年供应链尽职调查报告》

HITHIUM 2024 Supply Chain Due Diligence Report

厦门海辰储能科技股份有限公司

Xiamen HiTHIUM Energy Storage Technology Co., Ltd.

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一．海辰供应链 ESG 尽职调查背景 Hithium Supply Chain ESG Due Diligence Background

在全球可持续发展浪潮下，ESG 理念已成为企业核心竞争力的重要组成部分。为响应国际 ESG 监管要求，践行负责任供应链管理，降低环境、社会与治理风险，提升企业可持续发展能力，我司积极推进供应链 ESG 尽职调查。此举旨在全面评估供应链合作伙伴的 ESG 表现，确保其符合我司可持续发展战略、客户需求及国际标准，共同构建绿色、透明、负责任的供应链体系。

Under the global sustainable development trend, the ESG concept has become an important part of the core competitiveness of enterprises. In order to respond to international ESG regulatory requirements, practice responsible supply chain management, reduce environmental, social and governance risks, and enhance the sustainable development capabilities of enterprises, our company actively promotes supply chain ESG due diligence. This move aims to comprehensively evaluate the ESG performance of supply chain partners, ensure that they meet our sustainable development strategy, customer needs and international standards, and jointly build a green, transparent and responsible supply chain system.

二 . 审核目的与重要性 Audit Purpose and Importance

本次供应链 ESG 审核旨在评估关键供应商在环境、社会 and 治理方面的表现，确保其符合我司可持续发展要求。通过识别潜在风险、优化供应链管理，我们将持续提升 ESG 绩效，践行企业社会责任，增强客户与市场信任，共同推动可持续发展。

This supply chain ESG audit aims to evaluate the environmental, social and governance performance of key suppliers to ensure that they meet our sustainable development requirements. By identifying potential risks and optimizing supply chain management, we will continue to improve ESG performance, practice corporate social responsibility, enhance customer and market trust, and jointly promote sustainable development.

三 . 审核范围 Audit Scope

1. 审核对象范围 Scope of audit

适用于向海辰储能及其全资、控股或合资公司直接、间接提供最终产品所需要的各种原辅材料供应商。

Applicable to suppliers of various raw and auxiliary materials required to directly or indirectly provide final products to Hithium Energy Storage and its wholly-owned, holding or joint venture companies

2. 审核内容 Review content

1) 环境管理通用要求

General requirements for environmental management

2) 废气管理

Exhaust gas management

3) 废水管理

Wastewater management

4) 废弃物管理

Waste management

5) 噪声与振动控制

Noise and vibration control

6) 能源管理

Energy management

7) 应对气候变化措施

Measures to address climate change

8) 水资源管理

Water management

9) 土壤和生物多样性保护

Soil and biodiversity conservation

10) 职业健康管理通用要求

General requirements for occupational health management

11) 消防安全管理

Fire safety management

12) 化学品管理

Chemical Management

13)职业健康安全

Occupational Health and Safety

14)社会责任履行

Fulfillment of social responsibilities

15)负责任矿产管理

Responsible Mineral Management

16)社区生活环境维护

Community living environment maintenance

17)商业道德规范

Code of Business Ethics

18)知识产权保护

Intellectual property protection

19)信息安全管理

Information security management

本次审核内容覆盖社会责任、环境保护、商业道德 (ESG) 三个维度，包含以上 19 项议题，共 100 个问题点。

The content of this audit covers three dimensions: social responsibility, environmental protection, and business ethics (ESG), including the above 19 topics and a total of 100 questions.

四 . 审核综述 Audit Overview

1. 审核依据 Review Basis

本次审核遵循了国际公认的 ESG 标准和最佳实践，包括但不限于 ISO 14001、ISO 45001、ISO 50001、ISO 14064、ISO 14067、ISO 27001、SA8000《企业社会责任认证标准》、ISO 37001《反商业贿赂管理体系规范和指南》、OECD 中国矿产供应链尽责管理指南、CCCMC 中国矿产供应链尽责管理指南、欧盟电池法等相关国内外法律法规和行业规范。

This audit followed internationally recognized ESG standards and best practices, including but not limited to ISO 14001, ISO 45001, ISO 50001, ISO 14064, ISO 14067, ISO 27001, SA8000 "Corporate Social Responsibility Certification Standards", ISO 37001 "Anti-Commercial Bribery Management System Specifications and Guidelines", OECD China Mineral Supply Chain Due Diligence Guidelines, CCCMC China Mineral Supply Chain Due Diligence Guidelines, EU Battery Law and other relevant domestic and international laws, regulations and industry norms.

2. 审核流程 Review process

海辰严格遵循 OECD 及 CCCMC 等国际国内矿产供应链尽责管理指南，制定了《供应商 ESG 尽职调查管理程序》，系统化推进供应链可持续发展。该程序包含以下关键环节：

Hithium strictly follows the OECD and CCCMC and other international and domestic mineral supply chain due diligence management guidelines, and has formulated the "Supplier ESG Due Diligence Management Procedure" to systematically promote the sustainable development of the supply chain.

The procedure includes the following key links:

- 1) 编制审核清单：由我司 ESG 管理部、第三方咨询机构、第三方审核机构结合海辰 ESG 战略和可持续发展方向，以及国内外 ESG 准则、行业特色、相关监管要求制定 ESG 尽职调查审核清单；

Preparation of audit checklist: Our ESG management department, third-party consulting agency, and third-party audit agency will formulate an ESG due diligence audit checklist based on Hithium's ESG strategy and sustainable development direction, as well as domestic and international ESG standards, industry characteristics, and relevant regulatory requirements;

- 2) 信息收集：由供应商及采购中心收集供应商 ESG 信息以及合作情况信息；

Information collection: Suppliers and the procurement center collect supplier ESG information and cooperation information;

- 3) 风险评估：ESG 管理部根据供应商填报的 ESG 信息表，对其 ESG 风险进行识别、评估和排序，并结合供应商合作情况，筛选需要接受 ESG 尽职调查审核的供应商；

Risk assessment: The ESG Management Department identifies, assesses and ranks the ESG risks of suppliers based on the ESG information forms submitted by them, and selects suppliers that need

to undergo ESG due diligence audits based on the supplier cooperation status;

- 4) 开展审核：开展 ESG 尽职调查审核，开展审核前，ESG 管理部组织被审供应商的相关培训，帮助供应商了解审核范围并提前做好审核准备；制定审核计划，ESG 管理部审核人员与第三方审核人员按期开展相关审核；

Conducting audits: Conducting ESG due diligence audits. Before conducting audits, the ESG Management Department organizes relevant training for audited suppliers to help them understand the audit scope and prepare for the audit in advance; formulates an audit plan, and the ESG Management Department auditors and third-party auditors conduct relevant audits on schedule;

- 5) 整改与跟进：ESG 管理部基于供应商审核结果组织整改培训，协助并指导供应商制定问题项整改计划（CAP），并协商整改期限；

Correction and follow-up: The ESG Management Department organizes rectification training based on the supplier audit results, assists and guides suppliers to formulate problem item correction plans (CAP), and negotiates the rectification period;

- 6) 报告编制：ESG 管理部根据审核结果，编制年度供应链 ESG 尽职调查报告。

Report preparation: The ESG Management Department prepares an annual supply chain ESG due diligence report based on the audit results.

3. 审核团队组成与职责 Audit team composition and responsibilities

- 1) 审核团队组成：由不同背景的专家组成，包括海辰储能 ESG 管理部、第三方审核机构、第三方 ESG 咨询机构等。

Audit team composition: It is composed of experts from different backgrounds, including Hithium Energy Storage ESG Management Department, third-party audit agencies, third-party ESG consulting agencies, etc.

- 2) 审核团队职责：按照审核流程收集信息、编制审核清单、开展审核、结果分析、后续跟踪、撰写审核报告等，并根据审核结果对审核流程进行持续优化。

Audit team responsibilities: Collect information according to the audit process, prepare audit checklists, conduct audits, analyze results, follow up, write audit reports, etc., and continuously optimize the audit process based on the audit results.

五 . 审核发现 Audit findings

1. 审核发现分析 Audit findings analysis

- 1) 所有适用项目中：符合项占比 57%，不符合项占比 43%

Among all applicable items: 57% of items are compliant, 43% of items are non-compliant

- 2) 不符合项中：严重不符合项占比 17%，一般不符合项占比 21%

Among the non-conformities: serious non-conformities accounted for 17%, general non-conformities accounted for 21

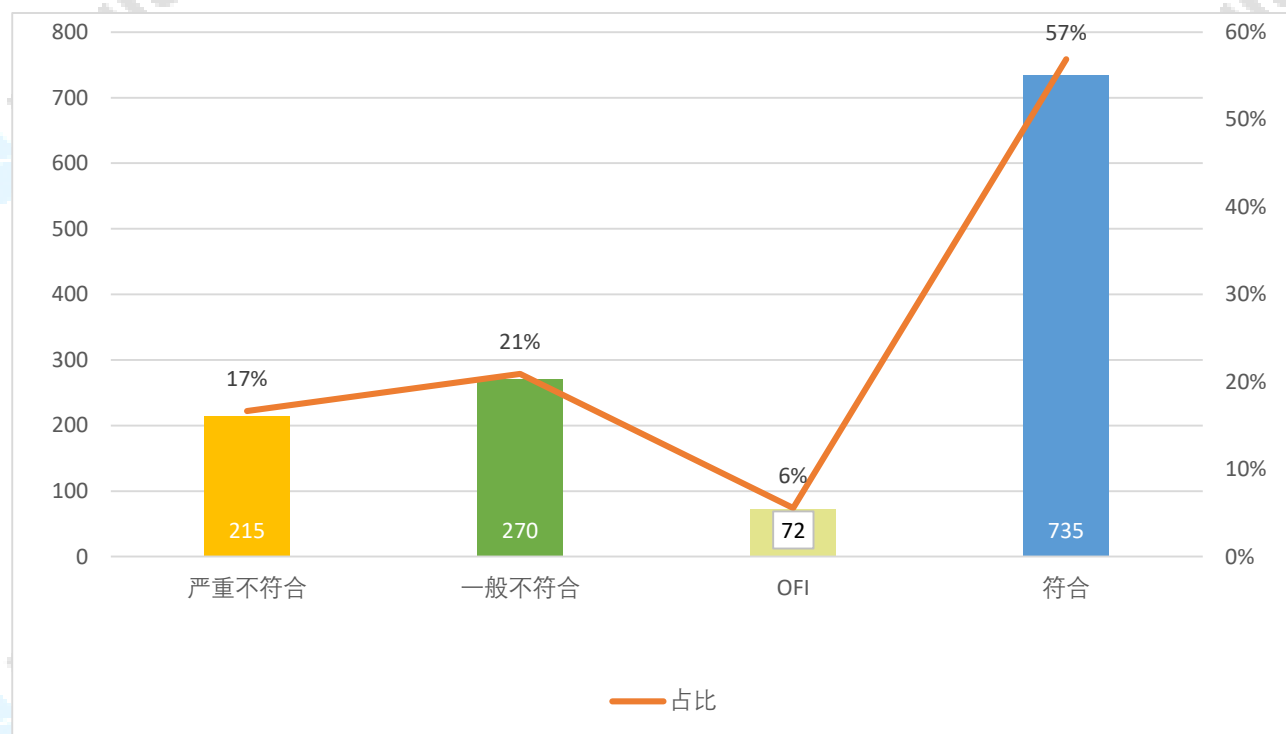


图 1：发现项数量及占比

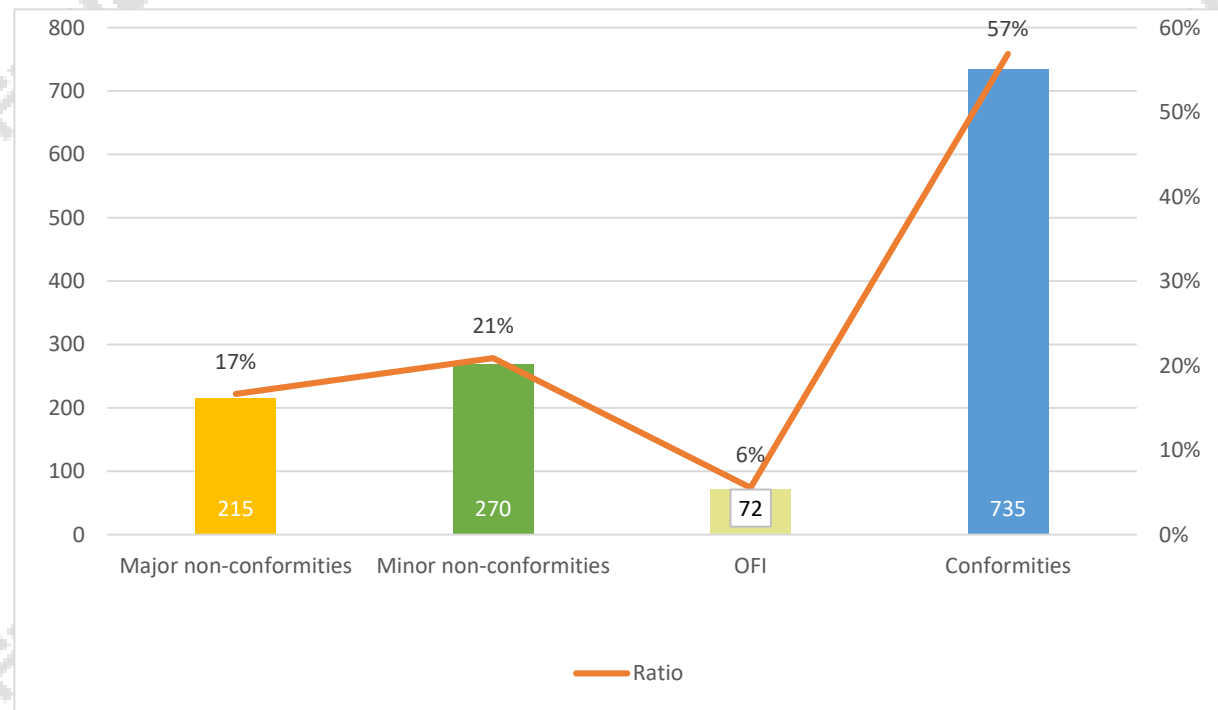


Figure 1: Number and Percentage of Findings

2. 审核发现分析 (按类别) Audit findings analysis (by category)

按审核发现进行统计,发现点数量最高 4 种类别分别是:社会责任、负责任矿产、能源管理、应对气候变化。

According to the audit findings, the four categories with the highest number of findings are: social

responsibility, responsible minerals, energy management, and climate change response.

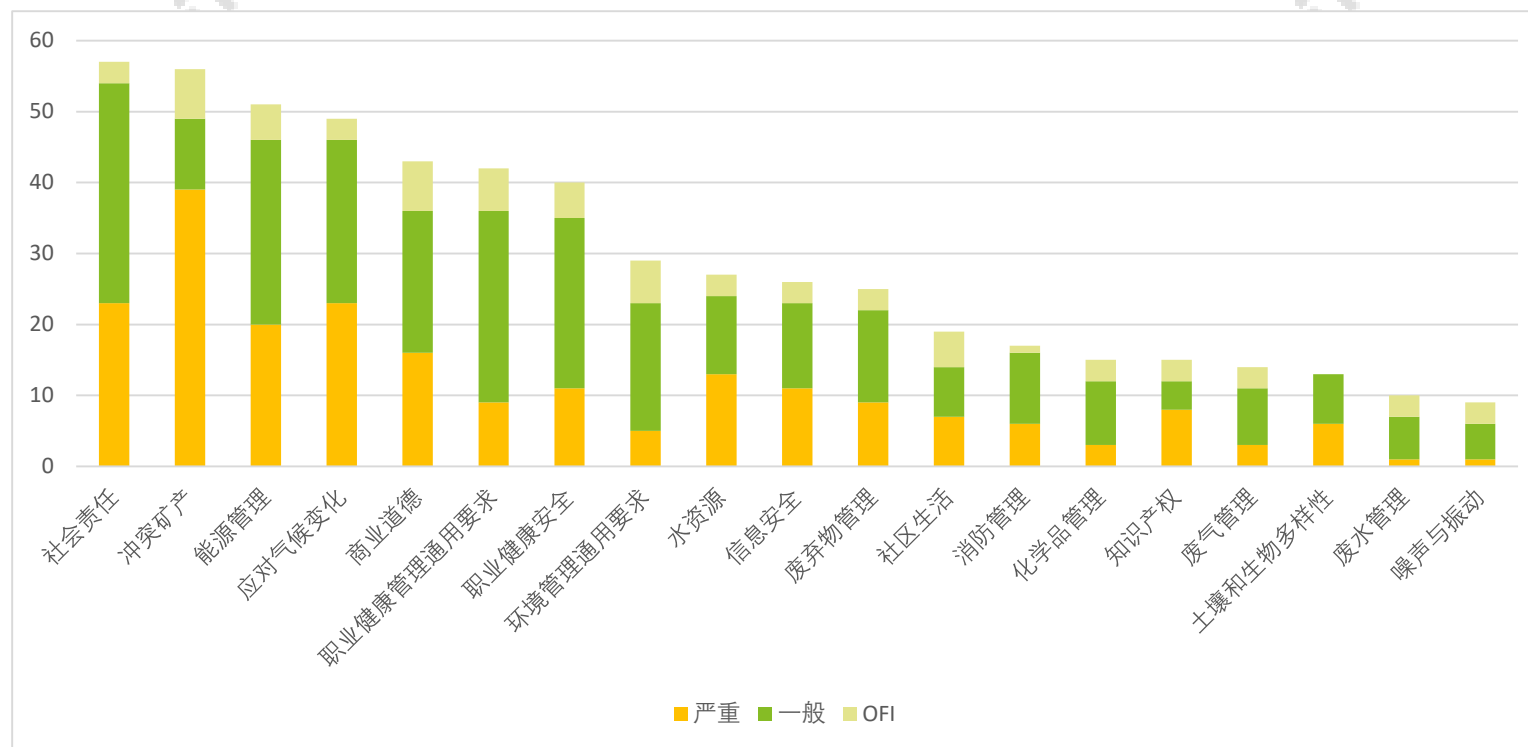


图 2：各类别审核发现项情况

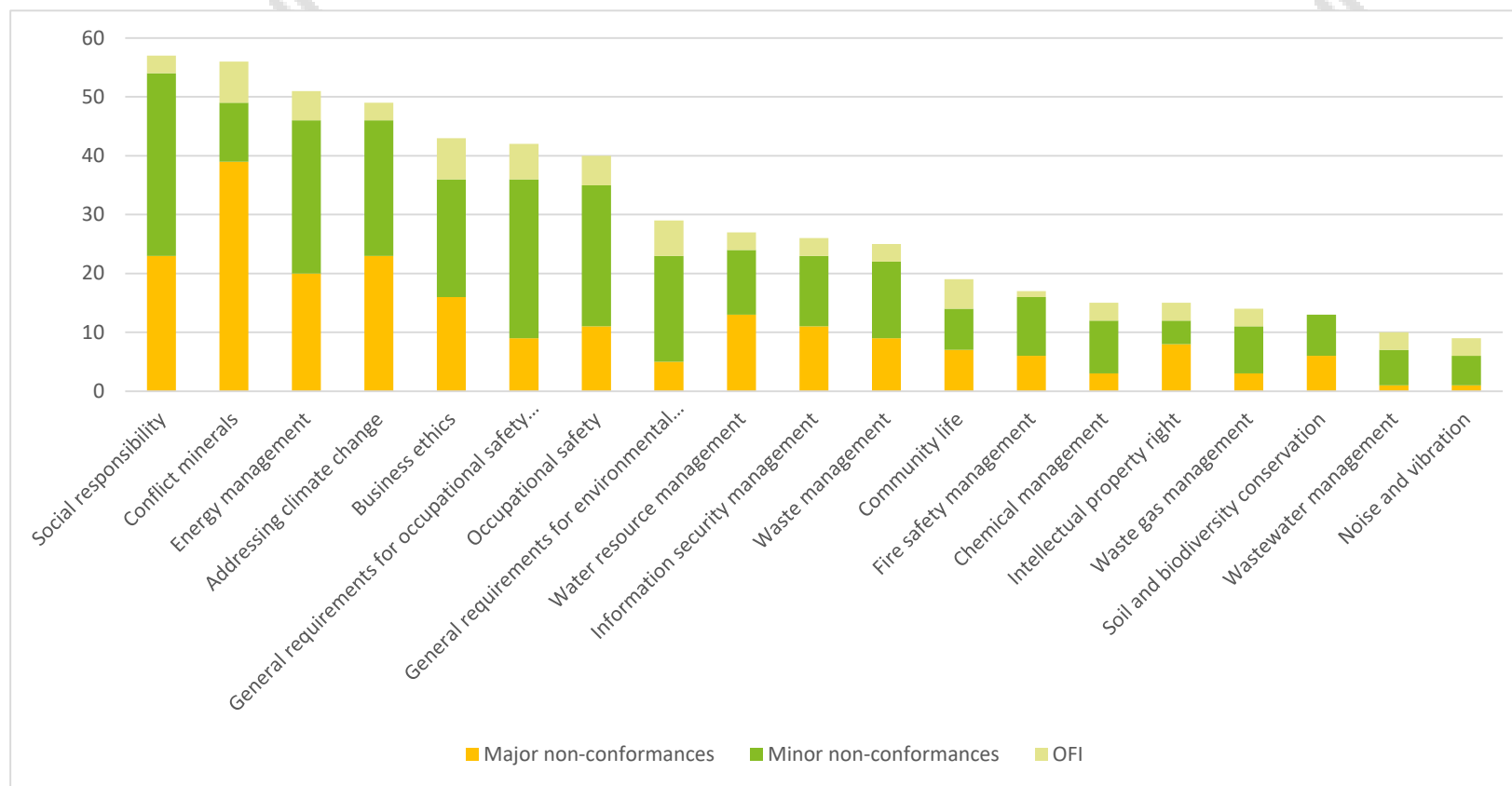


Figure2: Findings by Topics

3. 各类别数据分析-严重不符合 Data analysis of each category - serious non-compliance

严重不符合项前 4 项议题分别是：负责任矿产、应对气候变化、社会责任、能源管理

The top four topics of serious non-compliance are: responsible minerals, climate change response, social responsibility, and energy management.

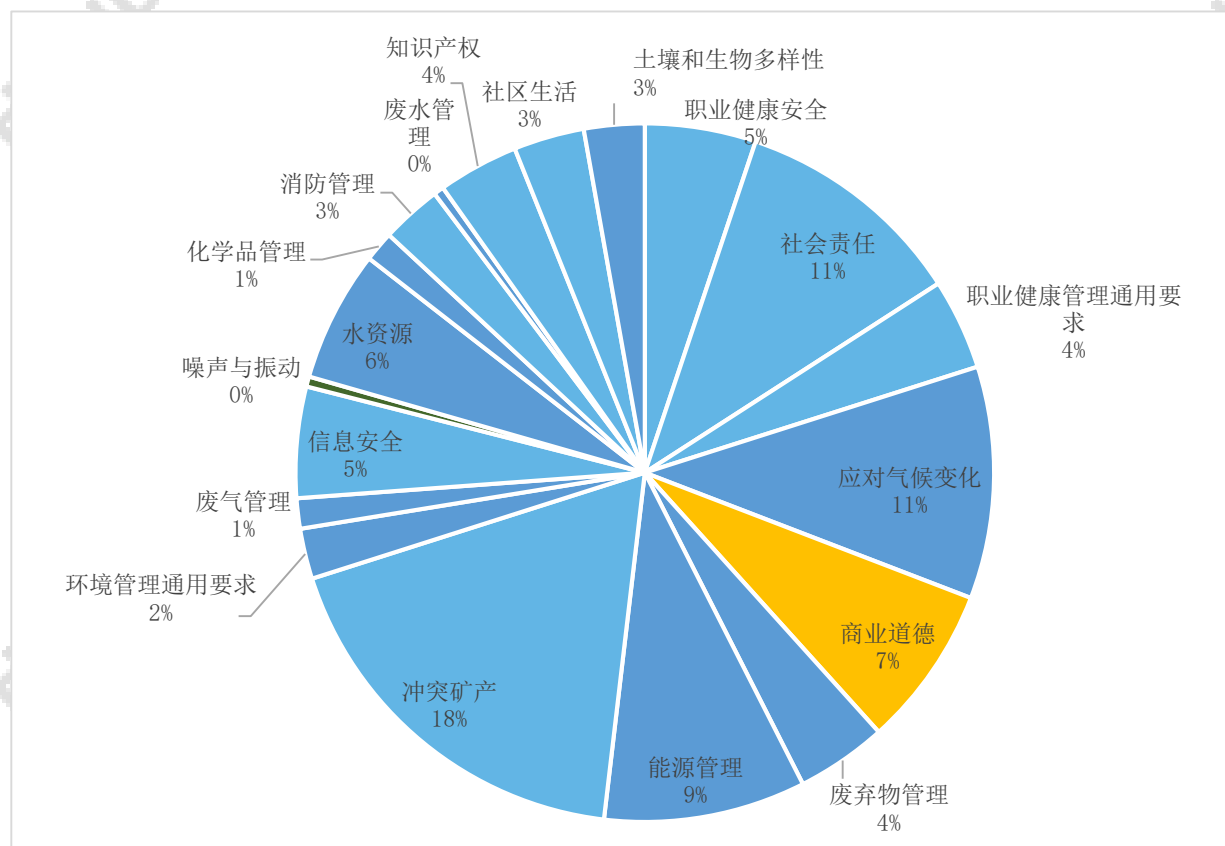


图 3 : 严重不符合项议题占比

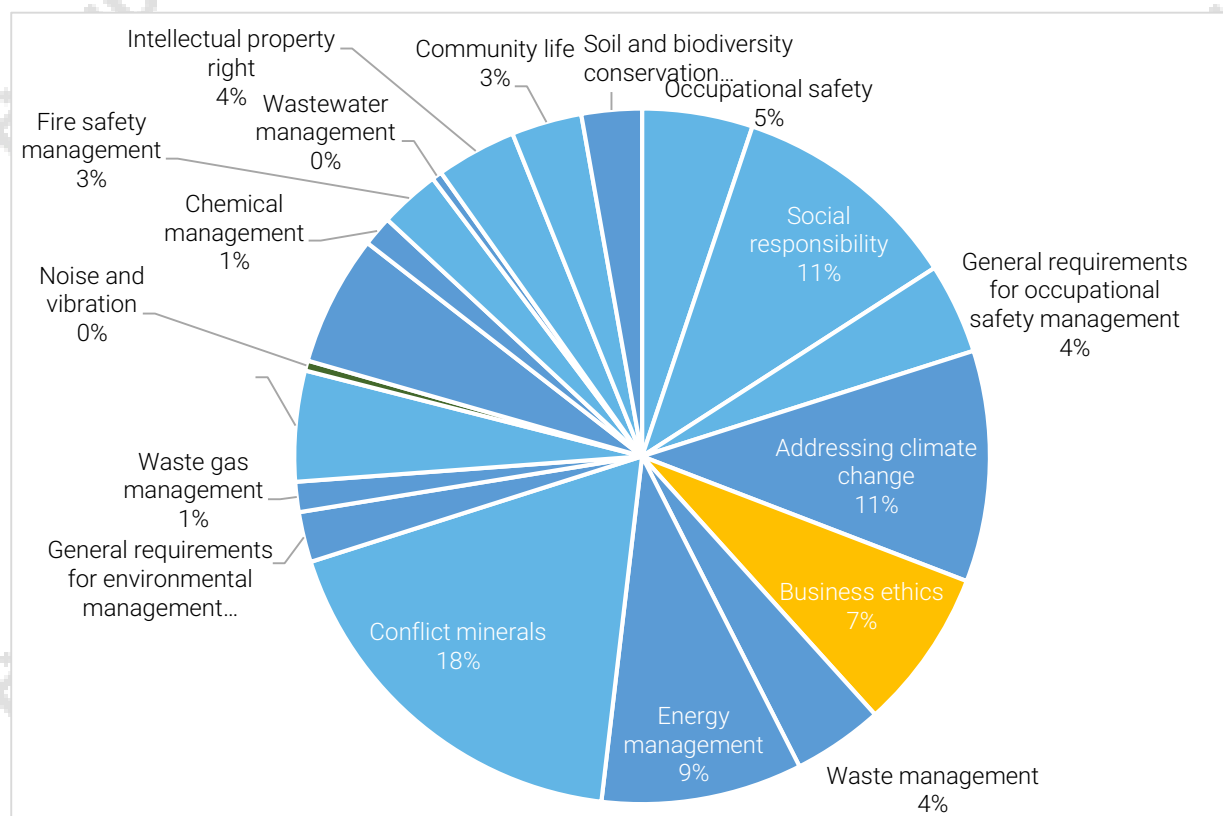


Figure 3 : Major Non-Conformances Topic Ratio

4. 各类别数据分析-一般不符合 Data analysis of each category - generally not compliant

一般不符合项前 4 个议题分别是：社会责任、职业健康安全通用要求、能源管理、职业健康安全

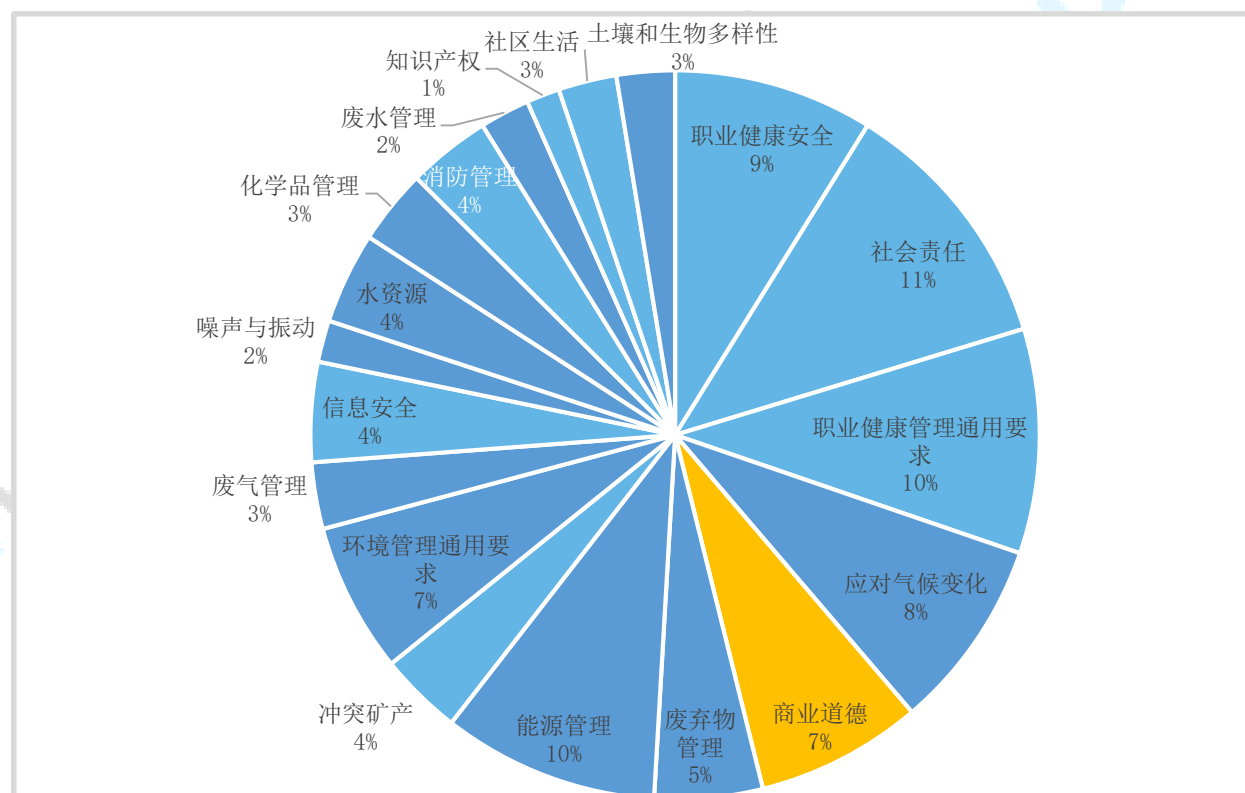


图 4：一般符合项议题占比

Top 4 Minor Non-Conformances : Social responsibility, General requirements for occupational safety management, Energy management , Occupational safety.

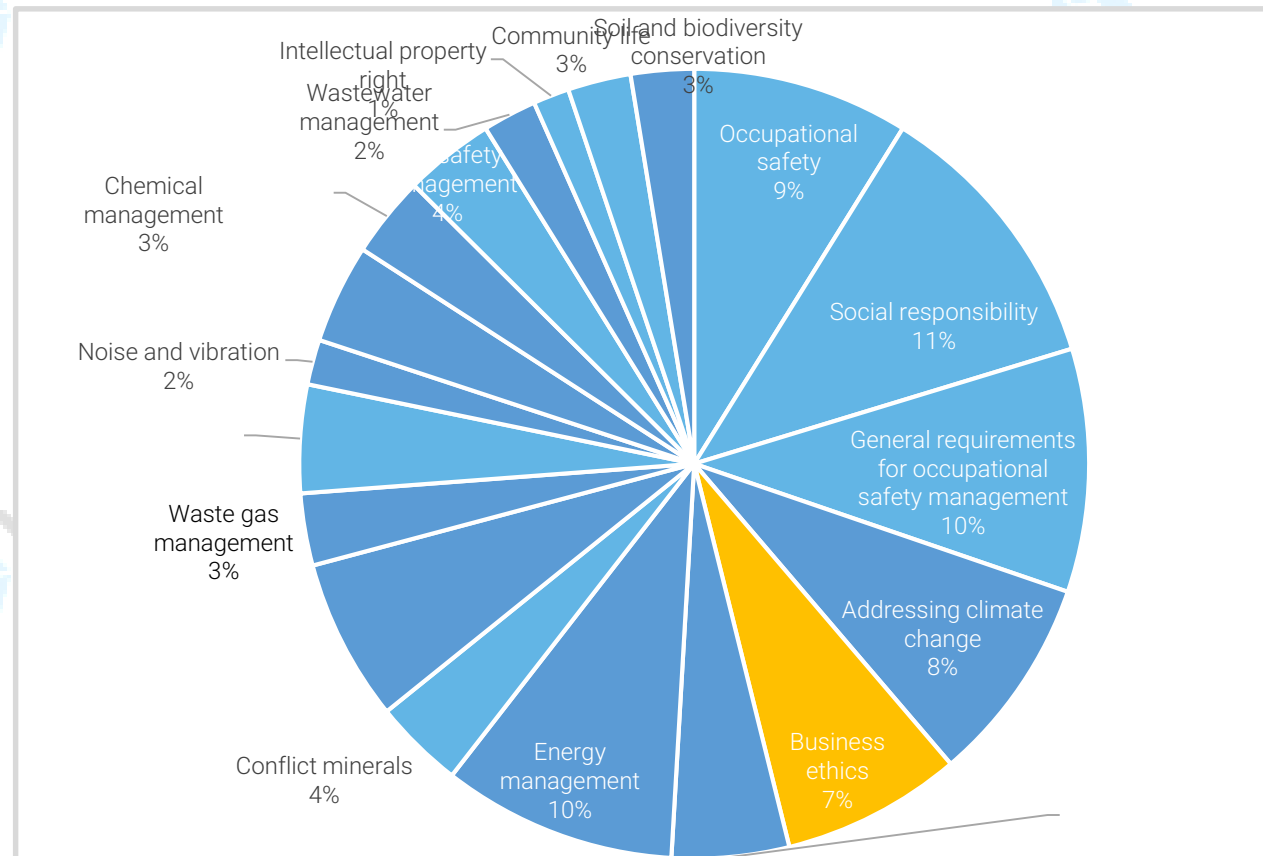


Figure 4 : Minor Non-Conformances Topics Ratio

六．审核结论 conclusion

我司通过 2024 年开展供应链 ESG 尽职调查，发现供应链端的 ESG 表现呈现差异化，部分企业表现优异，但也存在部分企业在常规 ESG 管理议题中表现未达预期。整体而言，对于供应链 ESG 管理是一项持久性的任务，需要与合作伙伴的协同配合，以促进全链条 ESG 水平提升。

Our company conducted supply chain ESG due diligence in 2024 and found that the ESG performance of the supply chain was differentiated. Some companies performed well, but some companies did not meet expectations in conventional ESG management issues. Overall, supply chain ESG management is a long-term task that requires collaboration with partners to promote the improvement of ESG levels across the entire chain.

1. 审核综述 Summary

1) 审核对象 Audit Object

本次审核共对 15 家关键供应商开展 ESG 尽职调查，审核供应商类别涵盖石墨、铝壳、铜箔、集装箱、

电解液、铁锂、消防系统、Pack 铝箱体、集装箱、隔膜、顶盖、铝箔、液冷机组共 11 个类别，I类物料供应商（即涉及重大安全、对产品性能会造成重要影响的物料）占比 100%。

This audit conducted ESG due diligence on 15 key suppliers, covering 11 categories including graphite, aluminum shell, copper foil, container, electrolyte, iron lithium, fire protection system, Pack aluminum box, container, diaphragm, top cover, aluminum foil, and liquid cooling unit. Class I material suppliers (i.e. materials involving major safety and having a significant impact on product performance) accounted for 100%.

2) 审核结果 Result

- 根据本次供应链 ESG 审核结果分析，近 50%的审核项目未达到海辰储能的基本标准要求。其中，负责任矿产管理、气候变化应对、社会责任及能源管理四个关键议题的不符合情况最为突出，将成为公司后续供应链 ESG 管理的重点改进领域。

According to the analysis of the results of this supply chain ESG audit, nearly 50% of the audit items did not meet the basic standard requirements of Hithium Energy Storage. Among them,

the non-compliance with the four key issues of responsible mineral management, climate change response, social responsibility and energy management was the most prominent, and will become the key improvement areas of the company's subsequent supply chain ESG management.

- 作为企业运营基础的职业健康安全和社会责任方面，供应商仍存在系统性管理短板。海辰储能将强化供应商能力建设要求，通过强制性改进措施提升其基础管理水平。

In terms of occupational health and safety and social responsibility, which are the basis of corporate operations, suppliers still have systematic management shortcomings. Hithium Energy Storage will strengthen the requirements for supplier capacity building and improve their basic management level through mandatory improvement measures.

2. 总结评价 Summary and evaluation

评估结果表明，海辰储能核心供应商的 ESG 管理现状与公司可持续发展要求尚存明显差距，主要体现在以下三个维度：

The evaluation results show that there is still a significant gap between the ESG management status of Hithium Energy Storage's core suppliers and the company's sustainable development requirements, which is mainly reflected in the following three dimensions:

1) 基础管理薄弱 Weak basic management

部分供应商在企业常规运营管理方面存在明显短板，社会责任、职业健康安全等基础领域尚未建立规范化管理体系；

Some suppliers have obvious shortcomings in their routine business operations and management, and have not yet established standardized management systems in basic areas such as social responsibility and occupational health and safety;

2) 合规性风险凸显 Compliance risks are highlighted

关键运营环节存在不合规操作，尤其在负责任矿产、环境保护等高风险领域，可能影响供应链的可持续性和稳定性；

Non-compliant operations in key operational links, especially in high-risk areas such as responsible mining and environmental protection, may affect the sustainability and stability of the supply chain;

3) 管理体系缺失 Lack of management system

普遍缺乏系统化的 ESG 管理架构和专业能力，难以有效识别、评估和管控 ESG 风险。

There is a general lack of systematic ESG management framework and professional capabilities, making it difficult to effectively identify, assess and control ESG risks.

七．行动方案 Action Plan

基于 2024 年供应链 ESG 审核结果，海辰储能将采取以下系统性措施，按照短中长期时间规划，推动供应商 ESG 管理能力提升，强化供应链风险管控。自 2025 年 4 月开始，海辰计划：

Based on the results of the 2024 supply chain ESG audit, Hithium Energy Storage will take the following systematic measures to promote the improvement of suppliers' ESG management capabilities and strengthen supply chain risk management in accordance with short-, medium- and long-term time plans.

Starting from April 2025, Hithium plans to:

1. 短中期行动 (0-12 个月) Short- to medium-term actions (0-12 months)

1) 评估标准更新 Update of evaluation criteria

本次修订旨在全面掌握供应商 ESG 管理现状，同时为供应商完善社会责任履行和职业健康安全管理体系提供明确指引。修订后的评估系统将更加系统、客观地反映供应商可持续发展能力，推动供应链 ESG 管理水平整体提升。根据 2024 年供应商 ESG 审核评估结果，对现在评估标准作出如下优化调整：

This revision aims to fully understand the current status of supplier ESG management, and at the same time provide clear guidance for suppliers to improve their social responsibility fulfillment and occupational health and safety management systems. The revised evaluation system will more systematically and objectively reflect the sustainable development capabilities of suppliers and promote the overall improvement of the ESG management level of the supply chain. Based on the

results of the 2024 supplier ESG audit and evaluation, the following optimization adjustments are made to the current evaluation standards:

- 新增专项审核内容 New special audit content :

在现有的 ESG 审核评估清单中补充 “负责任矿产管理”专项审核模块，编制专项清单。

Supplement the “Responsible Mineral Management” special audit module to the existing ESG audit and assessment checklist and compile a special checklist.

- 现有评估板块优化 Optimization of existing evaluation sections:

根据本次审核结果，结合最新出台的国际相关 ESG 法规及同行的 ESG 相关报告，补充关键 ESG 风险指标（如劳工权益保障、职业健康安全等），删除冗余条款，提高评估的针对性和有效性。

Based on the results of this review, combined with the latest international ESG regulations and ESG-related reports from peers, key ESG risk indicators (such as labor rights protection, occupational health and safety, etc.) are supplemented, redundant clauses are deleted, and the pertinence and effectiveness of the assessment are improved.

2) 供应商能力建设支持 Supplier capacity building support

根据本次审核中与供应商相关负责人的沟通交流，发现目前供应商在 ESG 管理领域的负责人经验和能力存在局限，因此，海辰计划通过以下措施提升供应商能力以及建立经验共享工作机制的方式提升供应链 ESG 管理水平。

According to the communication with relevant persons in charge of suppliers during this audit, it was found that the experience and capabilities of the current persons in charge of suppliers in the field of ESG management are limited. Therefore, Hithium plans to improve the ESG management level of the supply chain by enhancing the capabilities of suppliers and establishing an experience sharing working mechanism through the following measures.

- 培训资源赋能 Training resource empowerment :

海辰将与国际权威认证机构合作，共同开发定制化 ESG 专题系列培训课程，内容涵盖负责任矿产管理（例如供应链尽职调查、负责任矿产风险规避等）、社会责任体系搭建（例如劳工权益保障、商业道德规范等）、职业健康安全（例如风险评估、安全防护、应急管理等）、气候变化应对（例如

碳盘查、减排路径规划等)、能源管理体系(例如能效优化、可再生能源应用等)等重点议题,并面向供应商提供免费学习资源。

Hithium will cooperate with international authoritative certification organizations to jointly develop customized ESG-themed series of training courses, covering key topics such as responsible mineral management (such as supply chain due diligence, responsible mineral risk avoidance, etc.), social responsibility system construction (such as labor rights protection, business ethics, etc.), occupational health and safety (such as risk assessment, safety protection, emergency management, etc.), climate change response (such as carbon inventory, emission reduction path planning, etc.), energy management system (such as energy efficiency optimization, renewable energy application, etc.), and provide free learning resources for suppliers.

- 最佳实践案例推广 Best Practice Case Promotion: :

通过年度供应商大会、ESG 专题研讨会等平台, 分享在审核过程中了解到的行业标杆案例与管理工具, 促进供应商间的经验交流与协同提升。

Through platforms such as the annual supplier conference and ESG seminars, we share industry benchmark cases and management tools learned during the audit process to promote experience exchange and collaborative improvement among suppliers.

3) 审核问题点监督与整改 Supervision and rectification of audit issues

- 分级整改要求 Graded rectification requirements :

根据 2024 年审核结果，对被识别的不符合项要求供应商进行分级整改，其中严重不符合项要求限期 3 个月内整改完成，并提交书面报告及佐证材料；一般不符合项限期 6 个月内完成整改，并提交书面整改报告与佐证；OFI（改进机会）不做强制要求，但建议供应商纳入中长期管理优化目标中。

According to the 2024 audit results, suppliers will be required to carry out graded rectification for the identified non-conformities. Severe non-conformities must be rectified within three months, and a written report and supporting materials must be submitted. General non-conformities must be rectified within six months, and a written rectification report and supporting materials must be

submitted. OFI (Opportunities for Improvement) is not a mandatory requirement, but suppliers are advised to include it in the mid- and long-term management optimization goals.

- 闭环管理 Closed-loop management:

对未按期整改或材料不达标的供应商，将纳入下一年度重点审核名单，并安排现场复核，确保问题实质性解决。

Suppliers who fail to make rectifications on time or whose materials do not meet the standards will be included in the key audit list for the next year and will be arranged for on-site reviews to ensure that the problems are substantially resolved.

4) 系统性风险管理体系搭建 Establishment of systemic risk management system

2024 年海辰对供应商 ESG 管理工作重点集中在对供应商进行现场审核，主要建立和完善了尽调的流程和体系，缺失了供应商 ESG 风险的识别，即在尽职调查的信息收集和初步筛查的基础上，对风险进行进一步量化、评估、分级，并制定应对措施。在接下来的一年中，海辰计划建立系统的 ESG 风险管理体系，包括：在 2025 年 Q2 完成并发布《供应商 ESG 风险管理制度》，内容涵盖职能分工、

风险评估(风险分级评估机制)、专项管控(针对高风险领域制定专项管理方案)、应急响应(制定 ESG 风险应急预案) 等。

In 2024, Hithium's ESG management of suppliers will focus on on-site audits of suppliers, mainly establishing and improving the due diligence process and system, but missing the identification of supplier ESG risks, that is, further quantifying, evaluating, and grading risks based on due diligence information collection and preliminary screening, and formulating countermeasures. In the coming year, Hithium plans to establish a systematic ESG risk management system, including: completing and issuing the "Supplier ESG Risk Management System" in Q2 2025, covering functional division of labor, risk assessment (risk grading assessment mechanism), special management and control (formulating special management plans for high-risk areas), emergency response (formulating ESG risk emergency plans), etc.

通过建立供应链 ESG 风险管理，形成“风险预警—尽职调查—风险管理—持续优化”的闭环管理。

By establishing supply chain ESG risk management, a closed-loop management of "risk warning -

due diligence - risk management - continuous optimization" is formed.

2. 长期行动 (12-36 个月) Long-term action (12-36 months)

1) 审核清单优化 Audit checklist optimization

根据连续 3 年的审核结果进行横向对比和多维度分析，持续更新审核内容以及扩大审核对象范围，根据审核分析结果建立绩效挂钩体系，将 ESG 审核结果与供应商绩效挂钩，优化采购决策。

Based on the audit results of three consecutive years, we conduct horizontal comparison and multi-dimensional analysis, continuously update the audit content and expand the scope of audit objects. We establish a performance linkage system based on the audit analysis results, link ESG audit results with supplier performance, and optimize procurement decisions.

2) 支持协助 Support and assistance

持续优化培训体系，扩大培训范围，并建立海辰优秀供应商 ESG 实践案例库，尝试与供应商建立协同创新机制，尤其在应对气候变化、负责任矿产管理增加合作机会。

We will continue to optimize the training system, expand the scope of training, and establish a

Hithium excellent supplier ESG practice case library, and try to establish a collaborative innovation mechanism with suppliers, especially to increase cooperation opportunities in addressing climate change and responsible mineral management.

3) 风险管控 Risk management

持续更新海辰供应商 ESG 风险管理制度，并建立预警机制。

Continuously update Hithium's supplier ESG risk management system and establish an early warning mechanism.