

# 负责任矿产供应链尽责管理政策

## Responsible Mineral Supply Chain Management Policy

厦门海辰储能科技股份有限公司  
Xiamen HiTHIUM Energy Storage Technology Co., Ltd.

厦门海辰储能科技股份有限公司(以下简称“海辰”或“海辰储能”)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,并认识到海辰储能有尊重人权、不助长冲突的义务,海辰储能承诺采纳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》(以下简称《中国指南》)、经济合作与发展组织(OECD)发布的《经济合作与发展组织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)(以下简称《OECD指南》),广泛推广如下受冲突影响和高风险区域《负责任矿产供应链尽责管理政策》,并将其纳入与供应商签订的合同和/或协议之中。

Xiamen Hithium Energy Storage Technology Co., Ltd. (Hereinafter referred to as "Hithium" or "Hithium Energy Storage") recognizes that there is a risk that mineral exploitation, trade, processing and export in conflict-affected and high-risk areas may have a significant negative impact, and that Hithium Energy Storage has the obligation to respect human rights and not contribute to conflict. Hithium Energy Storage promises to adopt the Guidelines for Responsible Mineral Supply Chain Management in China (hereinafter referred to as the Guidelines in China) issued by the China Chamber of Commerce for Import and Export of Minerals and Chemicals (CCCMC). The Organization for Economic Cooperation and Development (OECD)'s Organization for Economic Cooperation and Development (OECD) Responsible Supply Chain Management Guidance for Minerals from Conflict-Affected and High-Risk Areas, Third Edition (OECD Guidance), broadly promotes the following Responsible Supply Chain Management Policy for Minerals from Conflict-Affected and High-Risk Areas, and include them in contracts and/or agreements with suppliers.

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。海辰储能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。

This policy provides a basic reference for conflict-sensitive procurement activities and supplier risk awareness throughout the process from mining to end users. Hithium

Energy Storage undertakes not to engage in any activity that would contribute to the financing of the conflict and to comply with the relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

相关的负责任矿产包括锡、钨、钽、金、锂、铜、铝、云母、石墨等。

Relevant responsible minerals include tin, tungsten, tantalum, gold, lithium, copper, aluminium, mica and graphite, etc.

**与矿产开采、运输、或贸易有关的严重侵权行为：**

**Serious infringements relating to the exploitation, transport, or trade of minerals:**

1. 在受冲突影响和高风险区域开展采购或经营活动时，海辰 储能既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施：

Hithium Energy Storage will neither tolerate nor in any way benefit, help, assist or facilitate any party in the procurement or operation activities in the conflict-affected and high-risk areas:

- 1) 任何形式的酷刑，残忍、不人道和有辱人格的待遇；

Any form 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作为威胁榨取的任何个人的、并非该人自愿提供的劳动或服务；

Any form of forced or compulsory labour. Forced or compulsory labour means any work or service which is extracted from any individual under the threat of punishment and which the individual has not offered voluntarily;

- 3) 最恶劣形式的童工；

Worst forms of child labour;

- 4) 其他严重侵犯和践踏人权的行为，如普遍的性暴力行为；

Other serious 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 genocide.

### **对严重侵权行为的风险管理**

#### **Managing the risk of serious violations**

如果海辰储能有合理理由认为该风险存在，即上游供应商正从实施上条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，海辰储能将立即中止或中断与该供应商的合作。

If Hithium Energy Storage has reasonable grounds to believe that there is a risk that an upstream supplier is purchasing from or associated with any party that commits a serious infringement as described in the preceding article, Hithium Energy Storage will immediately suspend or discontinue its cooperation with such supplier.

### **关于直接或间接支持非国家武装团体：**

#### **With regard to direct or indirect support to non-State armed groups:**

海辰储能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：

Hithium Energy Storage will not tolerate any direct or indirect support to non-State armed groups through mineral exploitation, transportation, trade, processing or export. Providing "direct or indirect support" to a non-State armed group through mineral exploitation, transport, trade, processing, or export includes, but is not limited to, purchasing minerals from, making payments to, or otherwise providing logistical support or equipment to non-State armed groups or their affiliates. These armed groups or related parties are:

1. 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体；并/或：

Illegal control of mining sites, or other control of transport routes, mineral trading points, 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；并/或对中间商、出口企业、或国际贸易者非法征税或勒索。

Illegal taxation or extortion of money or minerals at the entrance to a mining site, along a transportation route, or at a mineral trading point; and/or Illegal taxation or extortion of middlemen, exporters, or international traders.

**对向非国家武装团体提供直接或间接支持的风险管理：**

**Management of the risk of providing direct or indirect support to non-State armed groups:**

如果海辰储能有理由认为，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，海辰储能将立即中止或中断与该供应商的合作。

If Hithium Energy Storage has reason to believe that an upstream supplier procures from or has a relationship with any party that provides direct or indirect support to a non-State armed group, Hithium Energy Storage will immediately suspend or discontinue its cooperation with that supplier.

**关于公共或私人安全武装：****With regard to public or private security forces:**

1. 海辰储能同意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。

Hithium Energy Storage agrees to refrain from 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 tax or solicit money or minerals at the entrance of mining sites, along transportation routes or at mineral trading points, or illegally tax or extort intermediaries, exporters or international traders.

2. 海辰储能认可，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。

Hithium Energy recognizes that the role of public or private security forces at the mine site and/or its surroundings and/or along the haul road is solely to uphold the rule of law, including safeguarding human rights, protecting the safety of miners, equipment and facilities, and protecting the mine site or haul road from interference with legitimate mining and trade.

3. 在海辰储能或海辰储能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，海辰储能承诺或者将规定，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，海辰储能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。



In the event that Hithium Energy Storage or any enterprise in the supply chain of Hithium Energy Storage has signed a contract with public or private security forces, Hithium Energy Storage undertakes or will stipulate that it will abide by the Voluntary Principles on Security and Human Rights in the process of cooperating with such security forces. In particular, Hithium Energy Storage will support or take measures to apply screening policies to ensure that individuals or security armed units known to have committed serious human rights violations are not recruited.

4. 海辰储能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。

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

5. 海辰储能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，在这种情况下，供应链上的矿产是通过小作坊或小规模采矿的方式开采出来的小作坊。

Hithium Energy Storage will support or take steps to interact with local governments, international organizations and civil society organizations to avoid or minimize the negative impacts of the presence of armed public or private security forces on mining sites on vulnerable populations, in particular absentee workers in small workshops, where minerals in the supply chain are extracted by means of small workshops or small-scale mining. out of small workshops.

#### **对公共或私人安全武装的风险管理：**

**Risk management for public or private security forces:**

如果海辰储能发现在一定程度上存在此类风险，将根据企业在供应链上所处的具体位置，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使第 5 段中所述的为公共或私人安全武装提供直接或间接支持的风险得到遏制或降低。如果风险管理计划实施六个月未起作用，海辰储能将暂时停止或中断与上游供应商的合作。

If Hithium Energy Storage finds that such risks exist to a certain extent, it will immediately develop, adopt and implement a risk management plan for upstream suppliers and other stakeholders according to the specific position of the enterprise in the supply chain, so that the risks of providing direct or indirect support to public or private security forces described in the fifth paragraph can be contained or reduced. If the risk management plan fails to work for six months, Hithium Energy Storage will temporarily suspend or interrupt its cooperation with upstream suppliers.

**关于行贿受贿及矿产原产地的欺诈性失实陈述：****Fraudulent misrepresentation regarding bribery and origin of minerals:**

海辰储能不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、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。

Hithium Energy Storage will not offer, promise, make or ask for any bribes, and will resist the temptation to offer bribes in order to conceal or falsify the origin of minerals and falsely report the taxes, fees and royalties payable to the government for mineral mining, trade, processing, transportation, export and other activities.

**关于洗钱：****With regard to money-laundering:**



如果海辰储能有理由认为，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，海辰储能将支持或采取措施，为有效消除洗钱行为做出贡献。

If Hithium Energy Storage has reason to believe that there is a risk of money laundering arising from or in connection with the mining, trading, processing, transporting or exporting of minerals derived from illegal taxation or extortion at the entrance to the mine site, along the transportation route, or at the place where the upstream supplier minerals are traded, Hithium Energy Storage will support or take measures to contribute to the effective elimination of money laundering.

**关于向政府支付的税收、费用及特许费：**

**With respect to taxes, fees and royalties paid to the Government:**

海辰储能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。

Hithium Energy Storage will ensure the payment to the government of all legitimate taxes, fees and royalties related to the mining, trade and export of minerals in conflict-affected and high-risk areas, and undertakes to disclose such payments in accordance with the principles of the Extractive Industries Transparency Initiative (EITI) based on the company's position in the supply chain.

**对行贿受贿及矿产原产地的欺诈性失实陈述、洗钱及向政府支付的税收、费用、特许费的风险管理：**

Risk management of bribery and fraudulent misrepresentation of mineral origin, money laundering and payment of taxes, fees and royalties to governments:

根据企业在供应链上所处的具体位置，海辰储能承诺与供应商、中央或地方政府机关、国际组织、民间社会以及受影响的第三方酌情进行合作，本着在合理的时间跨度内采取显著措施防范或降低有负面影响的风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，海辰储能将暂时停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, Hithium Energy Storage undertakes to cooperate with suppliers, central or local government agencies, international organizations, civil society and affected third parties as appropriate to improve or track performance with the aim of taking significant measures to prevent or reduce risks with negative impacts within a reasonable time span. If the risk reduction measures do not work, Hithium Energy Storage will temporarily suspend or interrupt its cooperation with upstream suppliers.

#### 关于土地权利、排放和小作坊：

On land rights, emissions and small workshops:

1. 海辰储能不参与、不容忍、也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。海辰储能不参与、不容忍、也不受益于当地人和土著人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。

Hithium Energy Storage does not participate in, tolerate, or benefit from the extraction of resources on lands without the free, prior and informed consent of local and indigenous peoples, including by those who hold legal title, lease, concession, or permit. Hithium Energy Storage does not participate in, tolerate, or benefit from mining operations that fail to respect and protect the culture and heritage of local and indigenous people, or that damage the traditional culture of local people.

2. 海辰储能不参与、不容忍、也不受益于在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源。海辰储能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药品与危险物质，或排放砷和汞。

Hithium Energy Storage does not participate in, tolerate, or benefit from the exploitation of resources on lands where legal ownership, leases, concessions, or licenses have been obtained illegally, or in violation of domestic law. Hithium Energy Storage ensures that significant adverse effects on the surrounding soil, air and water conditions are avoided, and serious violations of relevant local laws and regulations are avoided, including the manufacture, trade, use of chemicals and hazardous substances that are internationally banned due to high toxicity to organisms, environmental persistence, or potential irreversible ecological effects, or the release of arsenic and mercury.

3. 海辰储能承诺定期评估、降低采矿对土壤、空气、水造成的不利影响。考虑周围土壤、空气和水资源的条件，采取具有技术、资金可行性与适用性的污染预防方法与技术，尽力避免、降低、控制污染；按照东道国的相关法律法规要求，对企业排放的主要污染物进行监测，随时掌握企业污染状况，并明确记录、公开监测结果；采取控制与减少排放策略。

Hithium Energy Storage promises to regularly assess and reduce the adverse effects of mining on soil, air and water. Take into account the conditions of surrounding soil, air and water resources, adopt pollution prevention methods and technologies with technical and financial feasibility and applicability, and try to avoid, reduce and control pollution; according to the requirements of relevant laws and regulations of the host country, monitor the main pollutants discharged by enterprises, keep abreast of the pollution situation of enterprises at any time, and clearly record and publicize the monitoring results; adopt emission control and reduction strategies.

4. 海辰储能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，确保危险物质的处置、贮存和运输符合相关的法律法规，确保在过程中无泄漏、无溢溅或以其他方式释放到环境中。

Hithium Energy Storage agrees to ensure compliance with the applicable legal requirements for the management of chemicals and toxic substances, to avoid the manufacture, trade and use of chemicals and hazardous substances that are internationally banned due to their high toxicity to organisms, environmental persistence, or potential irreversible ecological effects, and to ensure that the disposal, storage and transportation of hazardous substances comply with relevant laws and regulations. Ensure that there are no leaks, spills, or other releases to the environment during the process.

5. 海辰储能禁止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。

Hithium Energy Storage prohibits the exploitation of resources in World Heritage sites or statutory protected areas, and thus poses a threat to the outstanding universal value of these heritage sites.

6. 海辰储能具体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，寻求与开采区的小作坊或小规模采矿商建立生产关系。

Specifically focused on 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, Hithium Energy Storage seeks to establish production relationships with small workshops or small-scale miners in the mining area.

### 关于土地权利、排放和小作坊的风险管理：

#### **Risk management on land rights, emissions and small workshops:**

如果海辰储能有合理理由认为存在此类风险，海辰储能将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低侵害土地权利、引发重大不利环境影响或与小作坊或小规模采矿商相关的具体风险。

If Hithium Energy Storage has reasonable grounds to believe that such risks exist, Hithium Energy Storage will immediately develop, adopt and implement a risk management plan with suppliers and other stakeholders to prevent or mitigate the specific risks associated with land rights violations, significant adverse environmental impacts, or small workshops or small-scale miners, depending on the company's specific location in the supply chain.

### 关于职业健康与安全：

#### **On occupational health and safety:**

在进行采购或生产时，海辰储能不会获利于、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环境的一方，或从该方处采购或与之存在关联。

Hithium Energy Storage will not profit from, assist, facilitate, purchase from, or be affiliated with any party that provides a life-threatening occupational environment for its direct and/or indirect employees and/or any person at its production site in the procurement or production.

### 关于职业健康与安全的风险管理：

**Risk management for occupational health and safety:**

如果海辰储能有理由认为上游供应商提供威胁到生命的职业环境，或从有该情况的任何一方采购或存在关联，海辰储能将立即中止或中断与该供应商的合作。

If Hithium Energy Storage has reason to believe that an upstream supplier provides a life-threatening occupational environment, or purchases from or is associated with any party in such a situation, Hithium Energy Storage will immediately suspend or discontinue its cooperation with such supplier.

**关于童工：****On child labour:**

在进行采购或经营时，海辰储能不会雇佣低于东道国法律或法规规定的最低工龄的儿童，不会获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业提供便利，不会从有该情形的任何一方采购或与其有关联。

Hithium Energy Storage will not employ, benefit, assist or facilitate the employment of children below the minimum working age required by the laws or regulations of the host country, nor will it purchase from or be associated with any party in such circumstances when purchasing or operating.

如果东道国没有相关的法律或法规规定，最低工作年龄为 16 周岁。

If there is no relevant law or regulation in the host country, the minimum working age is 16.

**关于童工的风险管理：****Risk management on child labour:**

如果海辰储能有理由相信上游供应商雇佣了东道国法律或法规规定的童工，或从有该情



况的任何一方采购或存在关联，海辰储能将暂时中止或中断与上游供应商的合作。

If Hithium Energy Storage has reason to believe that the upstream supplier employs child labor as required by the laws or regulations of the host country, or purchases from or is related to any party in this situation, Hithium Energy Storage will temporarily suspend or suspend its cooperation with the upstream supplier.

对本政策的疑问和建议请发邮件至：ESG.office@hithium.com

**Questions and suggestions regarding this policy should be directed to:**  
ESG.office@hithium.com

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

2025 年 3 月

March 2025