《环境管理政策》

Environmental Management Policy

厦门海辰储能科技股份有限公司

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1. 目的 Purpose

作为一家负责任的企业，厦门海辰储能科技股份有限公司（以下简称“海辰”“公司”或“我们”）深知自身在环境保护方面的重要角色与应尽责任，积极践行低碳环保使命，将环境保护理念深度融入企业战略与运营全链条。

As a responsible enterprise, Xiamen Hithium Energy Storage Technology Co., Ltd. (hereinafter referred to as “Hithium”, “the Company” or “we”) acknowledges its critical role and inherent responsibility in environmental protection. We actively pursue our mission of low-carbon and environmentally friendly development, embedding the concept of environmental protection deeply into the Company’s overall strategy and the entire value chain of operations.

公司严格遵循《中华人民共和国环境保护法》等相关法律法规，响应国家“双碳”战略目标及全球能源转型趋势，依托“HIMPACT 2037”可持续发展战略，围绕“绿色创新”核心支柱，持续推动技术研发、产业链协同与产品全生命周期管理，不断探索经济效益与环境效益的协同发展路径。

The Company strictly complies with the Environmental Protection Law of the People’s Republic of China and other relevant laws and regulations. In response to China’s “dual carbon” strategic goals and the global energy transition, and underpinned by the “HIMPACT 2037” sustainability strategy, we uphold “Green Innovation” as a core pillar. We continuously advance technological research and development, strengthen value chain collaboration, and promote product life-cycle management, thereby exploring synergistic pathways for economic and environmental benefits.

为系统性强化环境管理，提升环境治理绩效，公司特制定本《环境管理政策》（以下简称“本政策”），明确公司在环境管理方面的承诺、原则与行动方向，指导各业务板块在实际运营中落实绿色低碳发展要求。

To systematically strengthen environmental management and enhance environmental governance performance, the Company has developed this Environmental Management Policy (hereinafter referred to as “the Policy”). It sets out our commitments, principles, and key actions in environmental management and guides all business segments in implementing green and low-carbon development practices throughout their operations.

2. 适用范围 Scope

本政策适用于厦门海辰储能科技股份有限公司及其附属公司，覆盖公司在全球范围内的研发、生产、销售与服务等各类业务场景。

The Policy applies to Xiamen Hithium Energy Storage Technology Co., Ltd. and its subsidiaries, and covers the Company's global business activities, including research and development, manufacturing, sales, and services.

公司鼓励客户、供应商、承包商及其他与海辰有业务往来的外部利益相关方理解并遵循本政策，共同推动环境保护与可持续发展实践在价值链中的有效落实。

The Company encourages customers, suppliers, contractors, and other external stakeholders engaged in business with Hithium to align with this Policy, thereby jointly promoting the effective implementation of environmental protection and sustainability practices across the value chain.

3. 术语定义 Definitions

3.1 综合能源消耗密度（单位销售量）：指报告期内企业综合能源消耗总量与同期产品销售量的比值，通常以"吨标准煤/万元营收"或"兆瓦时/吨产品"等为单位。该指标反映了单位经济产出所消耗的能源量，是衡量企业能源使用效率的核心绩效参数。

Comprehensive Energy Consumption intensity (per-unit sales volume): Refers to the ratio of an enterprise's total comprehensive energy consumption within the reporting period to its product sales volume in the same period. It is usually measured in units such as "ton of standard coal / RMB 10,000 revenue" or "MWh / ton of product". This indicator reflects the energy consumed per unit of economic output and serves as a core performance parameter for evaluating corporate energy-use efficiency.

3.2 用水强度（单位产能）：指报告期内企业总取水量（不含循环水）与同期产能（如产量、处理量等）的比值，反映单位生产活动对水资源的使用效率。

Water-use Intensity (per-unit production capacity): Refers to the ratio of an enterprise's total water intake (excluding circulating water) within the reporting period to its production capacity (e.g. output, treatment capacity) in the same period. It reflects the water resource-use efficiency per unit of production activity.

3.3 废气中氮氧化物和硫氧化物排放密度（单位销售量）：指报告期内企业排放的氮氧化物、硫氧化物总量与同期产品销售量的比值，反映单位经济产出所产

生的大气污染物负荷，是衡量企业大气环境绩效的关键参数。

Emission intensity of Nitrogen Oxides and Sulfur Oxides in Waste Gas (per-unit sales volume): Refers to the ratio of total nitrogen oxides and sulfur oxides emitted by an enterprise within the reporting period to its product sales volume in the same period. It reflects the air pollutant load generated per unit of economic output and acts as a key parameter for assessing corporate atmospheric environmental performance.

3.4 有害废弃物排放密度（单位销售量）：指报告期内企业产生的有害废弃物总量与同期产品销售量的比值，反映单位经济产出所伴随的有害废弃物负荷，是衡量企业末端治理能力和循环经济水平的量化依据。

Hazardous Waste Generation intensity (per-unit sales volume): Refers to the ratio of total hazardous waste generated by an enterprise within the reporting period to its product sales volume in the same period. It reflects the hazardous waste load accompanying per unit of economic output and provides quantitative evidence for evaluating corporate end-of-pipe treatment capacity and circular-economy performance.

3.5 自身运营温室气体排放量：依据《温室气体核算体系》（GHG Protocol），指企业拥有或控制的排放源所产生的温室气体排放，对应范围一温室气体排放。该指标是企业碳盘查和碳履约的基础数据，也是制定科学碳目标（SBTi）的核心基准。

Greenhouse Gas Emissions from Own-operations: In accordance with the GHG Protocol, it refers to greenhouse gas emissions generated from emission sources owned or controlled by the enterprise, corresponding to Scope 1 greenhouse gas emissions. This indicator constitutes baseline data for corporate carbon inventory and carbon compliance, as well as the core benchmark for setting Science-Based Targets (SBTi).

4.职责 Responsibilities

4.1高层决策Executive Decision-Making

本政策在公司董事会下设的战略与可持续发展委员会认可下制定，并委托ESG委员会，负责政策的制定和监督实施，并定期向董事会报告。

This policy is formulated with the endorsement of the Strategy and Sustainability Committee of the Company's Board of Directors. The Board entrusts the ESG

Committee to formulate and oversee the implementation of this policy, and to report to the Board on a regular basis.

ESG委员会作为公司可持续发展战略与管理的核心机构，负责环境保护相关战略的决策与监督，包括规划环境方针与目标、审议环境绩效指标、监督战略落地进度，识别与评估环境领域的可持续发展风险与机遇，推动公司环境治理能力持续提升。

As the core governance body for the Company's sustainability strategy and management, the ESG Committee is responsible for decision-making and oversight of environmental protection strategies. Its duties include formulating environmental policies and objectives, reviewing environmental performance indicators, monitoring the progress of strategic implementation, identifying and assessing sustainability risks and opportunities in the environmental domain, and continuously enhancing the company's environmental governance capabilities.

ESG 委员会由董事长担任主任委员，高级管理层担任委员，确保环境相关决策在公司治理层面得到有效落实。

The ESG Committee is chaired by the Chairman of the Board, with senior management serving as members, to ensure that environment-related decisions are effectively implemented at the corporate governance level.

4.2专职管理机构 Dedicated Management Bodies

ESG 管理部作为公司可持续发展战略的执行与统筹部门，负责制定环境相关战略目标，推动碳中和路径实施，组织碳盘查与碳足迹认证，分解年度碳管理指标，并负责编制ESG 报告、披露气候风险，确保环境信息透明、合规且对接外部监管与投资者需求。

The ESG Management Department, as the executive and coordinating unit of the Company's sustainability strategy, is responsible for formulating environmental strategic objectives, advancing the implementation of the carbon neutrality roadmap, organizing carbon inventories and carbon footprint certifications, allocating annual carbon management targets, and preparing ESG reports. It also discloses climate-related risks to ensure that environmental information is transparent, compliant, and aligned with the requirements of external regulators and investors.

EHS 工作组作为公司环境、健康与安全管理的核心职能部门，负责环境管理体系的运行维护与持续改进，统筹污染监测与合规控制，建立环境风险台账

和应急机制，组织环境合规审计与专项培训，持续提升公司环境风险防控能力与合规管理水平。

The EHS Working Group, as the core functional unit for environmental, health, and safety management, is responsible for the operation, maintenance, and continuous improvement of the environmental management system. It oversees pollution monitoring and compliance control, establishes environmental risk registers and emergency response mechanisms, organizes environmental compliance audits and specialized training, and strengthens the Company's capacity for environmental risk prevention and compliance.

各制造基地生产部作为现场运营与排放控制的直接责任单位，负责落实清洁生产与节能减排方案，监测并配合披露排放数据，规范开展废弃物分类与危险废物处置，建立应急响应机制，推动现场环保培训与员工参与，持续提升低碳运营与环境安全管理水平。

The Production Departments of each manufacturing base, as the direct units responsible for on-site operations and emissions control, are tasked with implementing cleaner production and energy conservation and emission reduction programs. They monitor and support the disclosure of emissions data, standardize waste segregation and hazardous waste disposal, establish emergency response mechanisms, and promote on-site environmental training and employee engagement, thereby further strengthening low-carbon operations and environmental safety management.

各制造基地厂务管理部作为能源、水务及基础设施运行的核心部门，负责落实绿色工厂建设要求，统筹能源、水资源、废弃物及基础设施的日常管理与优化，推进光伏、余热回收、节水改造等资源效率提升项目，确保危险废物规范管理，并配合开展气候风险评估与防灾改造，持续提升工厂的绿色化和气候韧性水平。

The Facility Management Departments of each manufacturing base, as the core units for energy, water, and infrastructure operations, are responsible for implementing the requirements of green factory construction. They coordinate the daily management and optimization of energy, water resources, waste, and infrastructure, advance resource efficiency improvement projects such as solar PV, waste heat recovery, and water-saving retrofits, ensure the compliant management of hazardous waste, and support climate risk assessments and disaster-prevention

upgrades, thereby continuously enhancing the factories' environmental sustainability and climate resilience.

4.3 政策执行问责机制 Policy Implementation Accountability Mechanism

为确保本政策在各层级得到有效执行，公司建立了覆盖“决策—执行—监督”全链条的政策执行问责机制。

To ensure the effective implementation of this Policy at all levels, the Company has established a policy implementation accountability mechanism covering the entire chain of “decision-making — execution — supervision.”

ESG委员会作为环境管理的最高决策机构，对本政策的最终执行成效承担监督责任，定期审议政策执行情况与绩效达成进度。

The ESG Committee, as the highest decision-making body for environmental management, bears oversight responsibility for the ultimate effectiveness of this Policy and regularly reviews its implementation status and performance progress.

各责任部门负责人为本政策在所辖范围内的第一责任人，须将政策要求分解为年度行动计划与绩效指标，纳入部门关键绩效指标（KPI）考核体系。

Heads of each responsible department are the primary accountable persons for the implementation of this Policy within their respective scopes. They are required to translate policy requirements into annual action plans and performance indicators, which are incorporated into the department's Key Performance Indicator (KPI) assessment system.

公司通过年度环境管理评审、内部审核及绩效评估等机制，对政策执行情况进行定期检查与问责，确保环境管理目标与政策承诺的闭环落实。

The Company conducts regular reviews and accountability assessments of policy implementation through annual environmental management reviews, internal audits, and performance evaluations, ensuring closed-loop fulfillment of environmental management objectives and policy commitments.

5. 管理措施 Management Measures

5.1环境管理 Environmental Management

海辰始终坚持绿色发展理念，承诺将环境保护贯穿于战略规划与运营实践之中，不断推进环境绩效的持续改进。

Hithium consistently upholds the principle of green development and is committed to integrating environmental protection throughout its strategic planning and operational practices, while continuously improving its environmental performance.
我们致力于制定科学、可衡量的环境管理目标，持续减少运营活动对环境的影响，确保公司在合规经营的基础上不断提升环境治理水平。

We are dedicated to setting scientific and measurable environmental management objectives, continuously reducing the environmental impact of our operations, and ensuring that the Company enhances its environmental governance standards while maintaining regulatory compliance.

海辰环境管理目标

Hithium Environmental Management Targets

议题Issue	目标Target
能源管理 Energy Management	到2028年，综合能源消耗密度（单位销售量）较2023 年下降10%。 By 2028, to reduce comprehensive energy consumption intensity (per unit of sales) by 10% compared with 2023.
水资源管理 Water Resource Management	到2028年，用水强度（单位产能）较2023年下降25%。 By 2028, to reduce water use intensity (per unit of production capacity) by 25% compared with 2023.
污染排放管理 Emissions Management	到2028年，废水保持100%达标排放，废气中氮氧化物和硫氧化物排放密度（单位销售量）较 2023年降低20%。By 2028, to ensure 100% compliance of wastewater discharge and reduce the emission intensity of nitrogen oxides and sulfur oxides in exhaust gases (per unit of sales) by 20% compared with 2023.
废弃物管理 Waste Management	到2028年，有害废弃物排放密度（单位销售量）较2023年减少20%。 By 2028, to reduce hazardous waste emission intensity (per unit of sales) by 20% compared with 2023.
应对气候变化 Climate Change Response	到2034年，自身运营温室气体排放量较2023年减少58.80%。 By 2034, to reduce greenhouse gas emissions from the Company's own operations by 58.80% compared with 2023.

5.1.1 构建全生命周期环境管控体系 Establish a Whole Life- Cycle Environmental Control System

公司将环境治理纳入战略体系，依据ISO 14001 建立涵盖废水、废气、废弃物、噪声等因子的环境管理制度，覆盖建设项目与运营过程的全生命周期，保障环境风险有效识别与控制。

The Company incorporates environmental governance into its strategic framework and, in accordance with ISO 14001, establishes an environmental management system covering factors such as wastewater, exhaust gas, waste, and noise. This system spans the entire life cycle of construction projects and operational processes, ensuring that environmental risks are effectively identified and controlled.

5.1.2 完善环境合规与应急管理机制 Improve Environmental Compliance and Emergency Management Mechanisms

公司严格执行《中华人民共和国环境影响评价法》等法律法规，定期开展环境影响评估与风险检测，制定《突发环境事件应急预案》，明确应急响应流程和职责分工，提升突发环境事件的处置与响应能力。

The Company strictly complies with the Law ofthe People's Republic of China on Environmental Impact Assessment and other relevant laws and regulations, conducts regular environmental impact assessments and risk monitoring, and formulates the Emergency Plan for Environmental Accidents. The plan defines emergency response procedures and responsibilities to strengthen the Company's capacity to handle and respond to unforeseen environmental incidents.

5.1.3 强化全员生态意识与能力建设 Strengthen Ecological Awareness and Capacity Building Across the Workforce

公司通过常态化环境合规培训和环保创新激励机制，持续提升员工在危险废物管理、废气治理等方面的实务能力。同时，我们引导员工深入了解公司业务活动对环境可能造成的影响，增强环境责任感和参与意识，推动生态理念融入日常工作实践。

The Company continuously enhances employees' practical capabilities in areas such as hazardous waste management and exhaust gas treatment through regular environmental compliance training and eco-innovation incentive mechanisms. At the same time, we encourage employees to develop a deeper understanding of the potential environmental impacts of the Company's business activities, thereby fostering a stronger sense of environmental responsibility and engagement, and embedding ecological values into daily work practices.

5.2 能源管理 Energy Management

海辰秉承“节能降耗、绿色制造”的能源管理方针，致力于以科学、有序的管理手段提升能源利用效率，持续优化生产过程中的能耗结构与强度。

Hithium adheres to the energy management principle of “energy conservation, consumption reduction, and green manufacturing”. The Company is committed to improving energy efficiency through scientific and systematic management measures while continuously optimizing the structure and intensity of energy use in production processes.

我们设定明确的能源绩效目标，力争到 2028年实现综合能源消耗密度（单位销售量）较2023年下降10%，以实质性行动支持绿色低碳转型。

We set clear energy performance targets and strive to achieve a 10% reduction in comprehensive energy consumption intensity (per unit of sales) by 2028 compared with 2023, thereby taking concrete actions to support the green and low-carbon transition.

5.2.1 建立标准化能源管理体系 Establish a Standardized Energy Management System

公司制定并实施《能源管理手册》，建立覆盖目标设定、风险识别、绩效评估、数据采集与持续改进的标准化能源管理体系。依托“策划-实施-检查-改进（PDCA）”的运行机制，公司每年开展至少一次内部能源审核与管理评审，持续优化能源管理流程和执行效果。

The Company has developed and implemented the Energy Management Manual to establish a standardized energy management system that encompasses target setting, risk identification, performance evaluation, data collection, and continuous improvement. Leveraging the “Plan-Do-Check-Act (PDCA)” cycle, the Company conducts at least one internal energy audit and management review annually to continuously optimize energy management processes and their effectiveness.

公司构建能源管理中心系统，实现关键设备与工序的能耗数据实时采集与动态监测，为能源绩效分析与决策提供数据支持。公司定期组织开展专项能源审计，识别能源使用中的低效和浪费问题，提出针对性的节能技改建议，并通过前后期数据对比，评估节能改进措施的实际效果和能耗下降幅度，确保节能行动计划落地见效。

An energy management center system has been established to enable real-time data collection and dynamic monitoring of energy consumption from key

equipment and processes, providing robust data support for energy performance analysis and decision-making. The Company also organizes regular specialized energy audits to identify inefficiencies and waste in energy use, propose targeted energy-saving technical improvements, and assess the actual results and reduction achieved through comparative data analysis before and after implementation, ensuring the effectiveness of energy-saving initiatives.

5.2.2推进清洁能源应用 Promote the Use of Clean Energy

公司积极推动能源结构优化，通过建设并运营屋顶光伏电站，系统化引入可再生能源用于生产环节，同时结合绿色电力采购，持续提升清洁能源在总用电中的占比。为进一步降低碳排放，公司在重点工艺环节推进天然气替代传统能源使用，助力生产运营向高效、低碳方向转型。

The Company actively advances the optimization of its energy structure by building and operating rooftop photovoltaic power stations and systematically integrating renewable energy into production processes. In combination with green electricity procurement, these efforts continuously increase the proportion of clean energy in total electricity consumption. To further reduce carbon emissions, the Company promotes the replacement of traditional energy sources with natural gas in key production processes, thereby supporting the transition of production operations toward greater efficiency and lower carbon emissions.

5.2.3推动节能降耗技术优化 Advance Energy-Saving and Consumption-Reduction Technologies

公司持续加大节能技术研发与改造投入，通过设备更新、工艺优化和系统管理等手段提升能源利用效率。公司实施一系列节能项目，包括冷却塔更换、供水泵降频运行、空压系统降载及除湿机温控优化等，有效减少能源消耗，推动公司向绿色制造与高效运营不断迈进。

The Company continuously increases investment in the research, development, and upgrading of energy-saving technologies, improving energy efficiency through equipment renewal, process optimization, and system management. A series of energy-saving projects have been implemented, including cooling tower replacement, variable-frequency operation of water pumps, load reduction in compressed air systems, and dehumidifier temperature control optimization. These initiatives effectively reduce energy consumption and drive the Company's progress toward green manufacturing and efficient operations.

5.2.4 强化协同与持续改进机制 Strengthen Synergy and Continuous Improvement Mechanisms

公司围绕“能源管理与双碳融合”主题开展专项培训，提升员工在能源管理、目标制定、能效评审及相关法规方面的知识与实操能力。为激发全员参与，公司设立“节能创新奖”，鼓励员工在节能降耗、技术改进及管理优化中提出有效建议与实践方案。

The Company conducts specialized training on the theme of “integration of energy management and dual-carbon goals” to enhance employees’ knowledge and practical skills in energy management, target setting, energy efficiency evaluation, and relevant regulations. To encourage broad participation, the Company has established the “Energy-Saving Innovation Award” to motivate employees to contribute effective suggestions and practical solutions in energy conservation, technological improvements, and management optimization.

5.3水资源管理 Water Resources Management

海辰始终将水资源的高效利用与保护作为履行环境责任的重要组成部分，致力于在生产运营全过程中推动节水减排与循环利用，到2028年实现用水强度（单位产能）较2023年下降25%。公司持续优化用水结构，推进节水改造与回用机制建设，不断提升水资源利用效率。

Hithium regards the efficient utilization and protection of water resources as an integral part of fulfilling its environmental responsibility. The Company is committed to promoting water conservation, wastewater reduction, and recycling throughout the entire production and operation process, with the goal of reducing water use intensity (per unit of production capacity) by 25% by 2028 compared with 2023. The Company continuously optimizes its water use structure, advances water-saving retrofits and reuse mechanisms, and steadily improves water resource efficiency.

5.3.1 建立智能化水资源管理体系 Establish an Intelligent Water Resources Management System

公司引入智能厂务水资源管理系统，实现水质数据与废水回用率的实时监测、分析与预警，提升用水过程的可视化和精细化管理水平。结合系统运行，公司定期开展全流程用水评估，识别生产、生活及配套环节中的节水潜力和资

源回用机会，作为优化用水结构、制定节水改造方案和提升水资源利用效率的重要依据。

The Company has introduced an intelligent plant water resource management system to enable real-time monitoring, analysis, and early warning of water quality data and wastewater reuse rates. This enhances visualization and refinement of water use management. In conjunction with system operations, the Company conducts regular full-process water assessments to identify conservation potential and resource reuse opportunities across production, domestic, and auxiliary processes. These assessments serve as the basis for optimizing water use structure, developing water-saving retrofit programs, and improving water resource efficiency.

5.3.2 推进水资源循环利用与节水改造 Promote Water Recycling and Conservation Retrofits

公司持续推进水资源的高效利用与循环再生，实施纯水设备浓水回用、中水回用、锅炉冷凝水回收等系统性措施，提升水资源的重复利用率。围绕节水目标，公司同步开展多项节水技改项目，包括节水型生活器具的推广应用、园区绿化喷灌系统的优化改造、水表远传监控平台的建设与运行，实现从源头到末端的全过程节水控制，不断强化节水成效。

The Company continuously promotes the efficient use and recycling of water resources by implementing systematic measures such as concentrated water reuse in purified water equipment, reclaimed water reuse, and boiler condensate recovery, thereby improving the rate of water reuse. In line with its conservation goals, the Company is carrying out multiple water-saving technical retrofit projects, including the promotion of water-efficient appliances, optimization of landscape irrigation systems, and the construction and operation of a remote water meter monitoring platform. These initiatives enable comprehensive water conservation control from source to end use, continuously reinforcing water-saving outcomes.

5.3.3 开展员工节水意识建设 Strengthen Employee Awareness of Water Conservation

公司通过持续开展节水宣传与专项培训，不断增强员工的节水意识与规范用水行为，倡导节约用水的良好习惯，引导员工在日常工作中主动识别节水机会、落实节水措施，逐步构建全员参与的节水文化与管理氛围。

The Company enhances employee awareness of water conservation and promotes standardized water-use practices through continuous awareness campaigns and

specialized training. Employees are encouraged to develop good habits of water saving, actively identify opportunities for conservation in their daily work, and implement relevant measures. In this way, the Company fosters a water-saving culture and management atmosphere that engages all employees.

5.4原材料管理Raw Material Management

海辰积极推动绿色替代与资源循环利用，力求逐步替代并淘汰原材料中的有害物质，减少原材料使用对环境和社会的负面影响。

Hithium actively promotes green substitution and resource recycling, aiming to gradually replace and eliminate hazardous substances in raw materials, thereby reducing the negative environmental and social impacts associated with raw material use.

5.4.1 推进有害物质替代 Promote the Substitution of Hazardous Substances

公司严格管控原材料中的有害物质，制定合规使用清单，并在产品设计和供应链管理中推广使用更环保、可回收的替代材料。我们要求供应商提供符合RoHS、REACH 等法规标准的原材料，结合产品研发进程持续优化材料选型与替代方案，并建立追踪机制，动态评估实施成效。

The Company strictly controls hazardous substances in raw materials by establishing a compliance list of permitted uses and promoting the adoption of more eco-friendly and recyclable alternatives in product design and supply chain management. We require suppliers to provide raw materials that comply with RoHS, REACH, and other regulatory standards, continuously optimizing material selection and substitution plans in line with product development processes, and establishing a tracking mechanism to dynamically evaluate the effectiveness of implementation.

此外，公司持续加大绿色材料研发投入，与行业伙伴共同探索可行的替代路径，构建安全、环保、可追溯的原材料管理体系。

In addition, the Company continuously increases investment in green material research and development, working with industry partners to explore feasible substitution pathways and to build a safe, environmentally friendly, and traceable raw material management system.

5.4.2 提高再生原材料使用比例 Increase the Use of Recycled Raw Materials

公司积极推动再生金属资源的应用，逐步提高其在总采购量中的占比。通过对原材料生命周期内环境与社会影响风险的评估，公司划定高风险原材料清

单，明确优先管理及替代对象。基于风险评估结果，我们推进第三方认证的可持续原材料采购，确保原材料来源具备可追溯性、环境合规性与社会责任保障，避免来自高环境风险（如生态敏感或生物多样性重点区域）或人权争议地区的采购行为。

The Company actively promotes the use of recycled metal resources, gradually increasing their share in total procurement. By assessing the environmental and social risks throughout the raw materials' life cycle, the Company establishes a high-risk raw materials list, specifying items for priority management and substitution. Based on the risk assessment results, we advance the procurement of sustainably sourced raw materials certified by third parties, ensuring that all sources are traceable, environmentally compliant, and socially responsible, while avoiding procurement from areas with high environmental risks (such as ecologically sensitive or biodiversity-priority regions) or regions associated with human rights controversies.

5.4.3加强绿色采购管理 Strengthen Green Procurement Management

公司建立覆盖环境合规、社会责任与材料可持续性的供应商审核与管理机制，要求所有原材料供应商签署《供应商管理协议》，明确限制或禁止使用有害物质的承诺。公司定期组织采购团队开展可持续原材料专题培训，提升其在材料选择、风险识别与责任履行方面的专业水平。

The Company has established a supplier assessment and management mechanism covering environmental compliance, social responsibility, and material sustainability. All raw material suppliers are required to sign the Supplier Management Agreement, which sets out explicit commitments to restrict or prohibit the use of hazardous substances. The Company also regularly organizes specialized training on sustainable raw materials for its procurement teams to enhance their professional capabilities in material selection, risk identification, and responsible sourcing.

5.5 污染排放管理 Pollution Emission Management

海辰坚持严格的环保合规管理，致力于实现从源头预防到末端治理的全过程污染控制，持续提升废水和废气的综合治理水平。公司设定明确的减排目标：到2028年，废水保持100%达标排放，废气中氮氧化物和硫氧化物排放密度（

单位销售量）较2023年降低20%，有序推进污染物减量化与排放合规化管理，助力绿色制造体系不断升级。

Hithium adheres to strict environmental compliance management and is committed to achieving comprehensive pollution control from source prevention to end-of-pipe treatment, continuously enhancing the overall management of wastewater and exhaust gases. The Company has set clear emission reduction targets: by 2028, ensure 100% compliant wastewater discharge, and reduce the emission intensity of nitrogen oxides and sulfur oxides in exhaust gases (per unit of sales) by 20% compared with 2023. These efforts systematically advance pollutant reduction and compliant discharge management, supporting the ongoing upgrade of the green manufacturing system.

5.5.1加强污染物排放监测与治理 Strengthen Pollutant Emission Monitoring and Treatment

公司建立健全污染物排放监测机制，围绕废水、废气等重点排放源定期开展自行监测，并委托具备省级及以上资质的第三方机构开展独立检测，确保排放数据真实、有效、合规。通过优化生产工艺、升级治理设施及加强运行维护，公司有效降低废水污染物浓度和废气中颗粒物及挥发性有机物的排放强度，持续提升污染防治能力与环境绩效。

The Company has established a comprehensive pollutant emission monitoring mechanism, carrying out regular self-monitoring of key emission sources such as wastewater and exhaust gases, while also commissioning independent testing by qualified third-party institutions at the provincial level or above to ensure that emission data are accurate, reliable, and compliant. Through process optimization, facility upgrades, and strengthened operations and maintenance, the Company effectively reduces pollutant concentrations in wastewater as well as particulate matter and volatile organic compounds emissions in exhaust gases, thereby continuously enhancing its pollution control capacity and environmental performance.

5.5.2 完善环境应急响应机制 Improve Environmental Emergency Response Mechanisms

公司制定并实施《紧急应变管理程序》《事故调查报告与处理管理规定》，在发生液体废物泄漏、废气管道泄漏、大气污染防治设施异常等突发情况时，立

即启动应急预案，由责任部门快速处置并跟进监督，同时开展事故调查，落实纠正与预防措施，确保应急处理高效、可控。

The Company has formulated and implemented the Emergency Response Management Procedures and the Regulations on Accident Investigation, Reporting and Handling. In the event of sudden incidents such as liquid waste leakage, exhaust pipeline leakage, or abnormal operation of air pollution control facilities, the emergency plan is immediately activated. The responsible department promptly carries out emergency handling and follow-up supervision while conducting accident investigations and implementing corrective and preventive measures, ensuring that emergency response is efficient, controlled, and effective.

5.6废弃物管理 Waste Management

海辰聚焦废弃物减量化、无害化与合规化管理，持续提升资源利用效率和环境绩效。公司制定明确的减排目标：到2028年，有害废弃物排放密度（单位销售量）较2023年减少20%，通过流程优化、源头控制与末端管理相结合的方式，构建闭环、高效的废弃物管理体系。

Hithium focuses on the waste minimization, harmless treatment, and compliance management, with the aim of continuously improving resource efficiency and environmental performance. The Company has set a clear reduction target: by 2028, reduce hazardous waste emission intensity (per unit of sales) by 20% compared with 2023. By integrating process optimization, source control, and end-of-pipe management, the Company is building a closed-loop and efficient waste management system.

5.6.1 完善废弃物全流程管理机制 Improve Whole-Process Waste Management Mechanisms

公司对危险废物实施全过程闭环管理，分类储存于专属区域，配备必要的泄漏防护与应急设施，严格执行台账管理和转移联单制度。所有危险废物均委托具备合法资质的单位进行无害化处置，并建立电子台账，实现废弃物产生、存储、转移与处置的实时记录与全程可追溯。一般固体废弃物按“可回收”“不可回收”分类收集后分别委外处理或由环卫系统清运，确保各类废弃物的规范与合规管理。

The Company implements full-process closed-loop management of hazardous waste, storing it in designated areas with necessary leakage protection and

emergency facilities, while strictly enforcing ledger management and transfer manifest systems. All hazardous waste is entrusted to legally qualified units for harmless treatment. An electronic ledger is maintained to achieve real-time recording and full traceability of waste generation, storage, transfer, and disposal. General solid waste is collected separately as "recyclable" or "non-recyclable" and is either outsourced for treatment or collected and transported by municipal sanitation services, ensuring standardized and compliant management of all waste categories.

5.6.2 开展废弃物审计评估 Conduct Waste Audits and Assessments

公司定期开展废弃物审计，全面识别废弃物产生的重点环节和优化空间，分析各工序或区域的废物排放强度及处置绩效，为制定减量化目标与改进策略提供数据支持，推动废弃物管理从被动处置向源头控制转变。

The Company regularly conducts waste audits to comprehensively identify key stages of waste generation and areas for improvement. It analyzes waste discharge intensity and disposal performance across different processes and areas, providing data support for setting reduction targets and developing improvement strategies. These efforts drive the transition of waste management from passive disposal to proactive source control.

5.6.3 推进废弃物减量与资源化回收 Promote Waste Reduction and Resource Recycling

公司围绕减量化与资源化利用两大方向，系统提升废弃物管理水平。在源头减量方面，公司通过优化生产工艺、提升制程良率和原材料精细化管理，有效减少废弃物产生量。在循环利用方面，公司持续加大在废弃物减量与再利用技术领域的研发投入，推动减废工艺创新与回收利用路径升级。Focusing on waste minimization and resource utilization, the Company systematically enhances its waste management practices. For source reduction, the Company optimizes production processes, improves yield rates, and strengthens refined management of raw materials to effectively reduce waste generation. For recycling, the Company continues to increase investment in R&D for waste reduction and reuse technologies, driving innovation in waste minimization processes and upgrading recycling pathways.

公司积极推进固废零填埋工作，参考《锂离子电池无废工厂评价规范》开展无废工厂认证[1]，通过统一整合分类回收体系，优化废弃物资源化处理流程，

最大限度减少填埋处置量。同时，公司严格管控废弃物外部转移处置环节，确保合规与全程可追溯，持续实现零填埋。

The Company actively advances zero-landfill initiatives for solid waste, pursuing "No-Waste Factory" certification[1] in reference to the Evaluation Specification of No-waste Factories for Lithium-ion Batteries. By unifying and integrating classification and recycling systems and optimizing waste resource treatment processes, the Company minimizes landfill disposal. At the same time, it strictly controls external waste transfer and disposal to ensure compliance and full traceability, steadily achieving zero landfill.

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[1] 根据《锂离子电池无废工厂评价规范》，企业获得无废工厂称号的同时可获得固废零填埋证书，等效于其他"废弃物零填埋"证书。

According to the Evaluation Specification of No-waste Factories for Lithium-ion Batteries, enterprises that are awarded the title of No-Waste Factory can simultaneously obtain a Zero Landfill Certificate for solid waste, which is equivalent to other "Zero Waste to Landfill" certificates.

5.6.4 开展员工培训与行为引导 Conduct Employee Training and Behavioral Guidance

公司持续组织废弃物分类、危险废物识别、污染预防与资源回收等专题培训，提升员工环保意识与操作规范性，增强其在分类收集、污染控制与回收利用中的主动性与执行力，推动构建全员参与的减废文化。

The Company continuously organizes specialized training on waste classification, hazardous waste identification, pollution prevention, and resource recycling. These initiatives enhance employees' environmental awareness and operational standardization, strengthening their initiative and execution in waste segregation, pollution control, and recycling practices. Through these efforts, the Company fosters a waste-reduction culture that engages all employees.

5.7应对气候变化 Climate Change Response

海辰致力于以科技创新驱动低碳转型，系统构建具备应对气候风险能力的韧性体系，全链条推进碳减排进程，助力全球实现1.5℃温控目标，确保于2034年前实现自身运营温室气体排放量较2023年减少58.80%。

Hithium is committed to driving low-carbon transformation through technological innovation, systematically building a resilient system capable of addressing climate risks, and advancing carbon reduction across the entire value chain. The Company supports the global goal of limiting temperature rise to 1.5°C and is committed to reducing greenhouse gas emissions from its own operations by 58.80% by 2034 compared with 2023.

5.7.1 气候治理与体系构建 Climate Governance and System Development

公司成立由董事长牵头的气候应对工作小组，建立覆盖"决策-执行-监督"的三级治理体系，统筹推动《气候韧性行动计划》的制定与落地。公司将供应链碳管理纳入整体治理框架，推动核心供应商协同减碳，并依据ISO 14064标准每年开展全范围温室气体排放盘查，持续强化碳排数据的合规性与完整性。

The Company has established a Climate Response Task Force, led by the Chairman, and developed a three-tier governance system covering "decision-making, execution, and supervision" to coordinate the formulation and implementation of the Climate Resilience Action Plan. Supply chain carbon management is incorporated into the overall governance framework, driving core suppliers to jointly reduce carbon emissions. In accordance with ISO 14064 standards, the Company conducts an annual

full-scope greenhouse gas inventory to continuously strengthen the compliance and integrity of carbon emission data.

5.7.2 气候韧性建设Building Climate Resilience

公司加强基础设施气候适应能力建设，优化厂房结构并建设雨水收集系统，制定《极端天气应急预案》，并定期开展防汛、断电等场景的应急演练。针对海外绿色贸易壁垒，公司前瞻性优化供应链碳足迹，全面提升企业的气候适应能力与转型韧性。

The Company enhances the climate adaptation capacity of its infrastructure by optimizing plant structures and installing rainwater collection systems. It has formulated an Extreme Weather Emergency Plan and regularly conducts emergency drills for scenarios such as flooding and power outages. In response to overseas green trade barriers, the Company proactively optimizes the carbon footprint of its supply chain, thereby strengthening its overall climate adaptability and resilience in transformation.

5.7.3 低碳技术创新与应用 Low-Carbon Technology Innovation and Application

公司持续推进低碳技术研发与场景化应用，重点开发专用钠离子电池和大容量长时储能系统，通过先进材料体系和高能效设计降低产品全生命周期碳足迹。同时，公司自主开发覆盖生产、物流、回收全链条的碳管理平台，支撑碳排放的精细化管理。

The Company continuously advances the research, development, and practical application of low-carbon technologies, focusing on specialized sodium-ion batteries and large-capacity long-duration energy storage systems. By leveraging advanced material systems and high-efficiency designs, the Company reduces the carbon footprint across the full life cycle of its products. In addition, the Company has independently developed a carbon management platform covering the entire chain of production, logistics, and recycling, enabling refined management of carbon emissions.

5.7.4 低碳文化宣贯 Promotion of a Low-Carbon Culture

公司通过内部培训、文化活动和数字化平台持续强化员工低碳意识，鼓励员工积极提出气候友好型优化建议，推动形成“战略引领、全员参与”的企业应对气候变化治理格局。

The Company strengthens employee awareness of low- carbon practices through internal training, cultural activities, and digital platforms. Employees are encouraged to actively propose climate-friendly optimization measures, fostering a corporate governance framework for climate change response characterized by “strategic leadership and full employee participation”.

5.8生物多样性保护 Biodiversity Protection

海辰承诺尊重自然生态系统，将生物多样性保护纳入企业运营全过程，力求于 2050 年前实现生物多样性“净积极影响 ”。公司依循“避免-最小化-恢复-补偿 ”的缓解层次结构，评估和管理业务对生态系统的潜在影响，助力构建生态友好型供应体系。

Hithium is committed to respecting natural ecosystems and integrating biodiversity protection throughout its operations, with the goal of achieving a "net positive impact" on biodiversity by 2050. Following the mitigation hierarchy of “avoid-minimize-restore-offset”, the Company assesses and manages the potential impacts of its business activities on ecosystems, contributing to the development of an eco-friendly supply system.

5.8.1 开展生物多样性风险评估 Conduct Biodiversity Risk Assessments

如适用，公司在新建项目选址与设计阶段引入基于特定位置的生物多样性风险评估机制，参照自然相关财务信息披露工作组（TNFD）提出的LEAP（定位-评价-评估-应对）方法，委托具备资质的第三方机构系统识别潜在生态影响，评估范围覆盖公司自有运营及毗邻区域，并延伸至上游原材料采购及下游储能产品应用与处置环节。

If applicable, at the site selection and design stages of new projects, the Company introduces location-specific biodiversity risk assessment mechanisms. Referring to the LEAP (Locate- Evaluate-Assess-Prepare) approach proposed by the Taskforce on Nature-related Financial Disclosures (TNFD), qualified third- party institutions are engaged to systematically identify potential ecological impacts. The scope of assessment covers the Company’s own operations and adjacent areas. It also extends upstream to raw material procurement and downstream to the application and disposal of energy storage products.

在风险识别过程中，公司综合考量因自然资源依赖可能导致的生物多样性丧失风险（如水资源消耗）及因运营和产品生命周期可能引发的影响风险（如

废弃电池处置不当、污染物排放），并将评估结果纳入公司整体风险管理体系。

During risk identification, the Company takes into account biodiversity loss risks arising from dependence on natural resources (e.g. water consumption) as well as impact risks potentially caused by operations and product life cycles (e.g. improper disposal of waste batteries, pollutant emissions). The results of these assessments are incorporated into the Company's overall risk management system.

通过风险评估，公司能够全面管理生物多样性相关风险，如合规、运营及声誉风险，确保公司产品在全生命周期内的开发和应用与生态保护相协调。

Through these assessments, the Company can comprehensively manage biodiversity-related risks (e.g. compliance, operational, and reputational), ensuring that its products' development and application throughout their life cycle align with ecological protection.

5.8.2 实施栖息地保护与修复工程 Implement Habitat Protection and Restoration Projects

如适用，在生产基地规划中，公司预留生态绿地与缓冲区域，因地制宜种植本地多层次植被，提升栖息地质量与生态连通性，并在重点区域同步开展土壤保护与生态修复，包括防渗处理、雨水回收利用及生态边坡治理等，预防土壤污染与水体富营养化风险，助力区域生态系统稳定性提升。

If applicable, in production base planning, the Company reserves ecological green spaces and buffer zones, planting locally appropriate multi-layered vegetation to improve habitat quality and ecological connectivity. In key areas, the Company simultaneously undertakes soil protection and ecological restoration measures, including anti-seepage treatments, rainwater reuse, and ecological slope management. These efforts help prevent soil contamination and water eutrophication risks, contributing to the stability of regional ecosystems.

5.8.3 推动生态协同与合作共治 Promote Ecological Synergy and Collaborative Governance

公司将生物多样性保护要求纳入供应链管理体系，要求核心供应商签署承诺书，明确不得在国家或国际重点生物多样性区域附近开展有潜在破坏性的经营活动。公司通过供应商审核、信息披露与能力培训，推动上下游企业绿色转型与生态合规。

The Company integrates biodiversity protection requirements into its supply chain management system, requiring core suppliers to sign commitments explicitly prohibiting potentially destructive activities in or near nationally or internationally recognized biodiversity priority areas. Through supplier audits, disclosure, and capacity-building training, the Company advances green transformation and ecological compliance across the upstream and downstream value chain.

公司积极参与由政府、科研机构及公益组织牵头的生态共建项目，支持野生动植物监测、生物多样性补偿机制及公众教育，构建多方参与、协同治理的生态保护格局。

The Company also actively participates in ecological co- construction projects led by governments, research institutions, and non-profit organizations, supporting wildlife monitoring, biodiversity offset mechanisms, and public education. These initiatives foster a collaborative governance framework for ecological protection involving multiple stakeholders.

6. 政策实施与迭代 Policy Implementation and Iteration

公司每两年联合外部专家修订本政策，并广泛征询外部利益相关者的意见和建议，确保政策内容与行业发展趋势、监管要求及利益相关方期望保持一致。

The Company revises the Policy every two years in collaboration with external experts and extensively solicits feedback and suggestions from external stakeholders, ensuring that the Policy remains aligned with industry development trends, regulatory requirements, and stakeholder expectations.

在发生重大业务调整（如设立海外工厂、并购整合等）后，公司应在3个月内组织开展本政策的适配性评估，必要时及时修订以适应新的经营环境和管理需求。

In the event of major business adjustments (such as the establishment of overseas factories or mergers and acquisitions), the Company shall conduct an adaptability

assessment of the Policy within three months and, where necessary, revise it in a timely manner to adapt to new operational environments and management requirements.

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

2025 年 9月

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