

零毀林政策

Zero Deforestation Policy

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

1. 目的 Purpose

在全球共同应对气候变化的进程中，厦门海辰储能科技股份有限公司（以下简称“海辰储能”“公司”或“我们”）已充分认知到自然为我们提供了应对可持续发展挑战的多种解决方案，其中森林资源在维持全球气候和生态稳定中发挥了关键作用。为了统筹自身营运、全层级价值链供应商及各类商业合作伙伴，共同规避各类毁林相关经营活动，主动推进林地修复与生境复育，稳步推进 2030 年无净毁林阶段性目标，远期实现全价值链无大规模毁林发展愿景，制定此政策。

In the global collective response to climate change, Xiamen Hithium Energy Storage Technology Co., Ltd. (hereinafter referred to as 'Hithium', 'the Company', or 'we') fully recognizes that nature provides us with multiple solutions to address sustainable development challenges, among which forest resources play a critical role in maintaining global climate and ecological stability. This policy is formulated to coordinate our own operations, all tiers of value chain suppliers, and various business partners to jointly avoid all types of deforestation-related business activities, proactively promote forest land restoration and habitat rehabilitation, steadily advance the phased goal of net-zero deforestation by 2030, and achieve the long-term vision of no large-scale deforestation across the entire value chain.

2. 适用范围 Scope

本政策约束范围覆盖集团全部自营营运板块、全层级供应商及所有商业合作伙伴，所有合作主体须同步遵循同等森林保护管控标准。

This policy applies to all self-operated business segments of the Group, all tiers of suppliers, and all business partners. All cooperating entities shall simultaneously adhere to the same forest protection and control standards.

3. 术语定义 Definitions

3.1 零毁林：指通过源头管控、合规采购、生态补偿、植被复育等多重手段，终止各类非法、无序森林砍伐行为，阶段性达成 2030 年集团无净毁林，远期实现全价值链无大规模毁林。

Zero Deforestation: Refers to the termination of all illegal and unregulated forest logging through multiple measures including source control, compliant procurement, ecological compensation, and vegetation rehabilitation, to achieve the Group's net-zero deforestation target by 2030 in phases, and realize no large-scale deforestation across the entire value chain in the long term.

3.2 无净毁林：针对运营建设中不可避免产生的林地、植被扰动，通过增量造林、乡土原生植被复育等生态补偿举措，抵消林地植被损耗，保证公司经营活动不造成森林面积净减少。

Net-Zero Deforestation: For unavoidable disturbances to forest land and vegetation during operations and construction, ecological compensation measures such as incremental afforestation and rehabilitation of native vegetation shall be implemented to offset forest vegetation losses, ensuring that the Company's business activities do not cause a net reduction in forest area.

3.3 高毁林风险物料：存在关联非法砍伐、森林退化区域来源风险的原材料及辅材，包含木材、各类纸材、橡胶、木质包装、木质托盘、林业衍生辅料等。

High Deforestation-Risk Materials: Raw and auxiliary materials with risks associated with illegal logging or sources from forest degradation areas, including timber, various paper materials, rubber, wooden packaging, wooden pallets, and forestry-derived auxiliary materials.

3.4 EUDR：欧盟《零毁林法案》，本公司供应链合规管控核心对标法规，用于规范高风险林业相关原料溯源、产地核查、合规举证全流程。

EUDR: the EU Deforestation Regulation (Regulation (EU) 2023/1115), the core benchmark regulation for the Company's supply chain compliance control, used to standardize the entire process of traceability, origin verification, and compliance documentation for high-risk forestry-related raw materials.

3.5 FSC/PEFC 认证：森林管理委员会（FSC）、森林验证认可计划（PEFC），国际通行森林可持续经营合规认证，为公司纸制品、木质物料采购核心准入凭证。

FSC/PEFC Certification: The Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC), internationally recognized certifications for sustainable forest management compliance, serving as core access credentials for the Company's procurement of paper products and wooden materials.

3.6 价值链尽职调查：针对供应商开展的产地溯源、森林合规资质、原料来源核查、年度合规评估全流程管控工作。

Value Chain Due Diligence: The full-process control work conducted for suppliers, including origin traceability, forest compliance qualifications, raw material source verification, and annual compliance assessments.

4. 职责 Responsibilities

4.1 高层决策机构 Senior Decision-Making Body

本政策经公司董事会战略与可持续发展委员会审议签发，董事会委托 ESG 委员会统筹政策制定、落地监督，并定期向董事会汇报工作进展。

This Policy is reviewed and issued by the Strategy and Sustainability Committee of the Company's Board of Directors. The Board of Directors entrusts the ESG Committee to coordinate policy formulation and implementation supervision, and the ESG Committee shall report work progress to the Board of Directors on a regular basis.

ESG 委员会作为零毁林治理最高决策监督机构，统筹相关战略制定、绩效审议、风险识别与资源问责，委员会由董事长任主任、高管组成，保障零毁林治理顶层落地。

As the supreme decision-making and supervision body for zero-deforestation governance, the ESG Committee coordinates relevant strategy formulation, performance review, risk identification and resource accountability. Chaired by the Chairman of the Board and composed of senior management, the Committee ensures top-down implementation of zero-deforestation governance.

4.2 专职管理机构 Full-Time Administrative Departments

4.2.1 ESG 管理部 ESG Management Department

ESG管理部作为零毁林政策统筹执行部门，牵头编制中长期零毁林实施策略，跟踪国内外相关法规更新，统筹第三方审计、跨部门自查、供应链合规培训、厂区生态修复及对外 ESG 信息披露，对接 CSA 评级、投资者与监管披露要求。

As the overall implementation department for the zero-deforestation policy, the ESG Management Department takes the lead in formulating medium- and long-term implementation strategies for zero deforestation, tracks updates of relevant domestic and overseas laws and regulations, coordinates third-party audits, cross-departmental internal inspections, supply chain compliance training, on-site ecological restoration as well as external ESG information disclosure, and aligns with disclosure requirements for CSA rating, investors and regulatory authorities.

4.2.2 各制造基地厂务管理部及 EHS 部

Facility Management & EHS Departments of All Manufacturing Bases

负责厂区层面零毁林现场落地管理，统筹厂区合规纸材使用、施工植被保护、原生植被培育复育、生态缓解项目实施，同步完成现场数据统计报送，配合 ESG 管理部开展核查与信息归集。

The Facility Management Departments and EHS Departments of each manufacturing base are responsible for on-site execution and management of zero-deforestation requirements within plant areas. They coordinate the use of compliant paper materials, vegetation protection during construction, cultivation and restoration of native vegetation, and delivery of ecological mitigation projects. They also compile and submit on-site statistical data, and cooperate with the ESG Management Department in inspections and information collection.

4.2.3 采购管理部门 Procurement Management Department

将零毁林、EUDR 及森林认证要求纳入绿色采购体系与供应商管理协议，开展高风险林业物料供应链尽职调查与年度评估，源头管控毁林类原料流入，对不合规供应商实施淘汰终止合作，推进 2030 无毁林原料采购目标落地。

The Procurement Management Department integrates requirements on zero deforestation, EUDR and forest certification into the green procurement system and supplier management agreements. It conducts supply chain due diligence and annual assessments for high-risk forestry materials to block raw materials derived from deforestation at the source, phases out and terminates cooperation with non-compliant suppliers, and advances the delivery of the 2030 target of procuring deforestation-free raw materials.

5. 承诺 Commitments

5.1 遵循欧盟零毁林法案管控逻辑，优先针对林木、纸材、橡胶、木质包装等高毁林风险物料开展全流程盘点与管控目标设定，后续逐步延伸覆盖其余具备毁林关联风险的商品及营运使用场景，以终止所有森林砍伐。

Following the control logic of the EU Deforestation Regulation, we prioritize full-process inventory and control target setting for high deforestation-risk materials such as timber, paper, rubber, and wooden packaging, and subsequently extend coverage to other commodities and operational scenarios with deforestation-related risks, with the aim of ending all deforestation.

5.2 从采购源头削减高风险林木类物料耗用，设定时间约束目标，至 2030 年集团全营运场景全面杜绝源自毁林、森林退化区域的产品与原材料使用。

Reduce the consumption of high-risk timber materials from the procurement source, set time-bound targets, and completely eliminate the use of products and raw materials originating from deforestation and forest degradation areas across all Group operational scenarios by 2030.

5.3 主动参与国内外森林保育、零毁林相关行业倡议，对内对外普及森林保护与生物多样性保育价值；联动高校学者、第三方咨询机构、生态保育非营利组织等外部专业力量，持续追踪全球零毁林法规与行业议题演进，制定中长期森林保育与风险管控推进策略。

Proactively participate in domestic and international industry initiatives related to forest conservation and zero deforestation, and promote the value of forest protection and biodiversity conservation both internally and externally; collaborate with external professional forces such as university scholars, third-party consulting institutions, and ecological conservation non-profit organizations to continuously track the evolution of global zero-deforestation regulations and industry issues, and formulate medium- and long-term strategies for forest conservation and risk control.

5.4 常态化对外公开政策落地成效，于公司官方网站可持续发展专区、年度可持续发展报告书完整披露不毁林工作推进进度、供应链核查成果、生态修复实绩等相关信息，接受各界监督。

Regularly disclose the implementation results of this Policy to the public, and fully disclose information on the progress of zero-deforestation work, supply chain verification results, and ecological rehabilitation achievements in the sustainable development section of the Company's official website and in the annual sustainable development report, subject to public supervision.

5.5 针对营运过程中不可避免产生的林地、植被扰动，公司将配套实施增量造林、乡土植被复育等生态补偿举措，确保实现无净毁林，杜绝森林面积净损耗。

For unavoidable disturbances to forest land and vegetation during operations, the Company will implement supporting ecological compensation measures such as incremental afforestation and native vegetation rehabilitation to ensure net-zero deforestation and eliminate net loss of forest area.

6.行动 Actions

6.1 委托生态、可持续发展领域外部专业顾问编制海辰储能生物多样性保育中长期策略计划书，统筹厂区、供应链、项目开发全场景生物多样性保护工作。

Commission external professional consultants in ecology and sustainable development to prepare a medium- and long-term strategic plan for biodiversity conservation of Hithium, coordinating biodiversity protection across all scenarios including factory areas, supply chains, and project development.

6.2 全面推行内部流程电子化管理，推广电子单据、线上审批、数字化申办流程，从运营端持续降低纸质物料消耗。

Comprehensively implement electronic management of internal processes, promote electronic documents, online approvals, and digital application procedures, and continuously reduce the consumption of paper materials from the operational side.

6.3 厂区办公、产品内外包装、项目施工辅材所用纸制品，优先选用取得森林管理委员会（FSC）或森林验证认可计划（PEFC）认证的合规纸材、再生环保纸材，搭配环保油墨开展印刷作业，确保所有纸制品溯源清晰、与非法毁林活动无关联。

For paper products used in factory office operations, product inner and outer packaging, and auxiliary materials for project construction, priority shall be given to compliant paper materials and recycled eco-friendly paper materials certified by the Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certification (PEFC), with eco-friendly inks used for printing operations, ensuring that all paper products have clear traceability and are not associated with illegal deforestation activities.

6.4 结合自有生产基地、储能电站项目园区场地条件，规划适宜区域开展本土濒危、原生植被培育复育、造林；组织员工组建生态保育志愿小组，参与现场养护作业，搭建与项目所在地社区常态化沟通渠道，协同推进区域生态改善。

Based on the site conditions of self-owned production bases and energy storage power station project parks, plan suitable areas for the cultivation, rehabilitation, and afforestation of native endangered and indigenous vegetation; organize employees to form ecological conservation volunteer groups to participate in on-site maintenance work, establish regular communication channels with local communities at project sites, and collaboratively promote regional ecological improvement.

6.5 建立高毁林风险物料供应链尽职调查机制，针对木材、橡胶、木质托盘、林业衍生辅料等品类，要求各级供应商完整提供产地溯源、森林合规认证资料；完善供应商准入与年度评估体系，对存在非法伐木、使用毁林原料的合作厂商终止采购合作。

Establish a due diligence mechanism for the supply chain of high deforestation-risk materials. For categories such as timber, rubber, wooden pallets, and forestry-derived auxiliary materials, require suppliers at all levels to fully provide origin traceability and forest compliance certification documents; improve supplier access and annual evaluation

systems, and terminate procurement cooperation with partners that engage in illegal logging or use deforestation-related raw materials.

6.6 新建生产基地、储能电站、配套基建项目严格规避原生林地、自然保护区、重点生态敏感区，施工阶段最大限度减少地表植被破坏；施工扰动区域完工后完成全范围植被恢复，同步规划年度造林补偿地块，留存完整复育台账用于外部核查与信息披露。

Newly built production bases, energy storage power stations, and supporting infrastructure projects shall strictly avoid primary forest land, nature reserves, and key ecologically sensitive areas, and minimize surface vegetation damage during the construction phase; after completion of construction in disturbed areas, full-scope vegetation restoration shall be completed, annual afforestation compensation plots shall be planned simultaneously, and complete rehabilitation records shall be maintained for external verification and information disclosure.

6.7 向项目合作方、外协服务商、渠道伙伴传达本政策管控要求，在商业合作协议中嵌入零毁林合规条款，定期组织价值链伙伴开展 EUDR 合规、生物多样性保育培训，共同降低产业链毁林风险。

Communicate the control requirements of this Policy to project partners, outsourced service providers, and channel partners, embed zero-deforestation compliance clauses in commercial cooperation agreements, and regularly organize value chain partners to conduct training on EUDR compliance and biodiversity conservation to jointly reduce deforestation risks across the industrial chain.

6.8 每年委托第三方机构开展价值链毁林风险独立审计，内部由可持续发展、采购、基建、法务部门联合开展季度自查，针对违规使用毁林产品、违规扰动林地等行为落实内部整改与绩效问责，并同步实施相应生态补偿工程。

Commission third-party institutions annually to conduct independent audits of deforestation risks in the value chain. Internally, the sustainable development, procurement, infrastructure, and legal departments jointly conduct quarterly self-inspections, implement internal rectification and performance accountability for violations such as the illegal use of deforestation-related products and unauthorized disturbance of forest land, and simultaneously carry out corresponding ecological compensation projects.

厦门海辰储能科技股份有限公司

Xiamen Hithium Energy Storage Technology Co., Ltd.

2025 年 12 月

December 2025