

供应链 ESG 计划

Supply Chain ESG Program

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

基于厦门海辰储能科技股份有限公司(以下简称“海辰储能”或“公司”)“HIMPACT”可持续发展战略与“合作共赢”核心支柱,公司已将 ESG 融入供应链全生命周期管理。本计划旨在阶段性构建以供应链尽职调查与动态管理为核心的管理体系,明确各治理层级权责,确保公司采购实践符合《经合组织负责任商业行为准则》《经合组织跨国企业准则》《联合国工商企业与人权指导原则》《经合组织受冲突影响和高风险地区矿产负责任供应链尽职调查指南》《联合国反腐败公约》等国际标准、公约、法规,联合供应链伙伴共筑可持续储能产业生态。

Based on the "HIMPACT" sustainability strategy and the core pillar of "Win-win Cooperation" of Xiamen Hithium Energy Storage Technology Co., Ltd. (hereinafter referred to as "Hithium" or "the Company"), the Company has integrated ESG into the full life cycle management of its supply chain. This plan aims to build a management system centered on supply chain due diligence and dynamic management in stages, clarify responsibilities of each governance level, and ensure that the Company's procurement practices comply with international standards, conventions and regulations such as OECD Guidelines for Responsible Business Conduct, OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and United Nations Convention against Corruption, and unite with supply chain partners to jointly build a sustainable energy storage industry ecosystem.

2. 适用范围 Scope of application

海辰储能及其全资/控股子公司之采购体系及直接物料(含 OEM)相关供应链伙伴。

The procurement system and direct material-related (including OEM) supply chain partners of Hithium and its wholly-owned/holding subsidiaries.

3. 职责 Responsibilities

3.1 最高责任决策机构

Highest Responsibility and Decision-making Body

海辰储能 ESG 供应链管理体系的最高责任与决策机构为董事会（及其下设的战略与可持续发展委员会）。

The highest responsibility and decision-making body for Hithium's ESG supply chain management system is the Board of Directors (and its subordinate Strategy and Sustainability Committee).

董事会全面负责审批供应链 ESG 战略规划、基本政策及核心绩效目标，对供应链重大 ESG 风险负有明确、直接和最终治理责任。

The Board of Directors is fully responsible for approving the supply chain ESG strategic planning, basic policies, and core performance targets, bearing clear, direct, and ultimate governance responsibility for major ESG risks in the supply chain.

董事会下设的战略与可持续发展委员会每年至少听取 2 次供应链 ESG 专项评估汇报。

The Strategy and Sustainability Committee under the Board of Directors shall receive reports on special supply chain ESG assessments at least twice annually.

3.2 管理层与负责任采购工作组

Management and Responsible Procurement Working Group

公司设立由高管及分管领导组成的 ESG 委员会，下设“负责任采购工作组”。

负责任采购工作组具体统筹供应链 ESG 风险筛查、现场审计以及负责任矿产尽调体系的闭环管理。

The Company establishes an ESG Committee composed of senior executives and leaders in charge, under which a "Responsible Procurement Working Group" is set up. The Responsible Procurement Working Group specifically coordinates the supply chain ESG risk screening, on-site audits, and the closed-loop management of the responsible mineral due diligence system.

4. 管理措施 Management Measures

4.1 内部采购流程审查与合规一致性机制

Internal Procurement Process Review and Compliance Consistency Mechanism

海辰储能建立由 ESG 管理部与采购中心协同执行的采购流程内部审查与动态绩效管控机制，确保采购决策与《合作伙伴行为准则》《供应商管理协议》《供应商合规承诺》的有关要求保持高度一致：

Hithium has established an internal procurement process review and dynamic performance control mechanism collaboratively executed by the ESG Management Department and the Procurement Center, ensuring that procurement decisions are highly aligned with the "Code of Conduct for Partners", the Supplier Management Agreement, and the Supplier Compliance Commitment:

4.1.1 部门职责分工与跨部门审查协同

Departmental Division of Responsibilities and Cross-departmental Review Synergy

ESG 管理部：1. 负责供应链 ESG 管理规定制定，包括负责任/冲突矿产、供应链合规溯源、ESG 评估规则；2. 供应链尽职调查实施与赋能提升；3. 供应链 ESG 风险筛查与处置的闭环管理。

ESG Management Department: 1. Responsible for formulating ESG management regulations for the supply chain, including responsible/conflict minerals, supply chain compliance traceability, and ESG assessment rules. 2. Implementation and empowerment of due diligence in the supply chain. 3. Closed loop management of ESG risk screening and mitigation in the supply chain.

采购中心：负责协助信息收集、确认审核结果，汇总 ESG 审核评分并直接纳入年度综合绩效评价体系。

Procurement Center: Responsible for assisting in information collection, confirming audit results, summarizing ESG audit scores, and directly incorporating them into the annual comprehensive performance evaluation system.

4.1.2 行为准则一致性与冲突避免机制

Code of Conduct Consistency and Conflict Avoidance Mechanism

公司将供应商年度 ESG 审核结果计入年度综合绩效。评分以自评与现场审核组成的“基准审核分数”为初始参考,并结合“动态绩效调整机制”实施加减分核算(首次整改全部通过奖励加分;整改计划逾期提交、措施延迟或未完成则依规扣分)。

The company will include the annual ESG audit results of suppliers in the annual comprehensive performance. The scoring is based on the "benchmark audit score" composed of self-evaluation and on-site audit as the initial reference, and combined with the "dynamic performance adjustment mechanism" to implement point addition and subtraction calculation (all first-time rectifications will be rewarded with points; if the rectification plan is submitted late, the measures are delayed or not completed, points will be deducted according to regulations) .

零容忍红线风控: 针对触发 ESG 管理红线的关键问题(即零容忍项), 限制其绩效等级上限并在未按期完成整改时进阶降低绩效等级, 确保 ESG 绩效直接影响商业合作与合同授予决策, 从根源上消除采购操作与企业 ESG 战略的潜在冲突。

Zero-Tolerance Red Line Risk Control: For key issues triggering ESG management red lines (i.e., zero-tolerance items), the upper limit of their performance rating is restricted, and the performance rating is further downgraded if rectification is not completed on schedule, ensuring that ESG performance directly impacts commercial cooperation and contract awarding decisions, and eliminating potential conflicts between procurement operations and corporate ESG strategies from the root.

4.1.3 审查频次与监督汇报

Review Frequency and Supervision Reporting

审查报告直接提交至董事会战略与可持续发展委员会, 查出的问题及整改复核闭环情况须在 180 天内完成汇报。

Review reports shall be submitted directly to the Strategy and Sustainability Committee of the Board of Directors, and the identified issues along with the closed-loop status of rectification reviews must be reported within 180 days.

4.2 供应商 ESG 全生命周期管理计划流程

Supplier ESG Full Life Cycle Management Plan Process

4.2.1 阶段一：风险识别与供应链分类映射

Stage 1: Risk Identification and Supply Chain Classification Mapping

公司建立供应链 ESG 风险识别与分类地图，每年根据采购品类、地理位置、历史合规记录及 ESG 基本信息表单评估结果，将直接物料供应商及代工厂核心供应商初步划分为高、中、低风险等级。对其中中、高风险供应商，围绕劳工管理、职业健康安全、环境管理、商业道德及可持续采购五个实质性议题开展专项 ESG 审核。

The Company establishes a supply chain ESG risk identification and classification map, and annually classifies direct material suppliers and core suppliers of contract factories into high, medium, and low risk levels based on procurement categories, geographical locations, historical compliance records, and ESG basic information forms. Conduct special ESG audits for medium and high-risk suppliers, focusing on five substantive issues: labor management, occupational health and safety, environmental management, business ethics, and sustainable procurement.

4.2.2 阶段二：准入门槛与最低 ESG 要求

Stage 2: Admission Threshold and Minimum ESG Requirements

最低 ESG 合规门槛设定：公司制定《HC-ESG23-001-004 供应商 ESG 风险管理规定》，涵盖禁止强迫劳动/童工、基本职业健康安全、环境管理、合规排污与碳数据披露、反腐败合规等底线要求。所有新供应商准入及旧供应商续约时，必须满足最低要求。

Minimum ESG Compliance Threshold Setting: The Company formulated the "HC-ESG23-001-004 Supplier ESG Risk Management Regulations", covering bottom-line requirements such as prohibition of forced/child labor, basic occupational health and safety, environmental management and compliant discharge and carbon data disclosure, and anti-corruption compliance. All new supplier admissions and old supplier contract renewals must meet the minimum requirements.

纠正期与淘汰（排除机制）：对于初审未能达到最低 ESG 要求但具备改进潜力的基本供应商，公司将下发整改通知并提供纠正机会，要求供应商按期完成整改，具体整改要求参照《HC-ESG23-001-004 供应商 ESG 风险管理规定》。若供应商在上述规定的时间内仍无法达到最低 ESG 要求，则将被坚决排除在合同签订范围之外，并从潜在供应商名单及合格供应商名录（AVL）中移除，直至其完成全面纠正并重新通过验证。

Correction Period and Elimination (Exclusion Mechanism): For basic suppliers failing to meet the minimum ESG requirements in the initial review but possessing improvement potential, the Company will issue a rectification notice and provide an opportunity for correction, requiring suppliers to complete the rectification on schedule. Specific rectification requirements refer to the "HC-ESG23-001-004 Supplier ESG Risk Management Regulations". If the supplier still fails to meet the minimum ESG requirements within the aforementioned stipulated time, they shall be firmly excluded from the scope of contract signing and removed from the potential supplier list and the Approved Vendor List (AVL) until they complete comprehensive correction and pass verification again.

4.2.3 阶段三：综合选择评估与优先考虑机制

Stage 3: Comprehensive Selection Assessment and Priority Consideration Mechanism

公司在供应商选择和合同授予的决策体系中将 ESG 表现设定为独立且具有明确权重的核心评估项：

The Company sets ESG performance as an independent core assessment item with a

clear weight in the decision-making system for supplier selection and contract awarding:

评审维度 Assessment Dimension	评估要点与验证依据 Assessment Points and Verification Basis
ESG 可持续发展绩效 ESG Sustainability Performance	劳动与人权、职业健康安全与环境、碳排放管理、商业道德。 Labor and Human Rights, Occupational Health and Safety and Environment, Carbon Emission Management, Business Ethics

4.2.4 阶段四：常态化监测、现场审计与纠正预防（CAPA）

Stage 4: Normalized Monitoring, On-site Audit, and Corrective Actions and Preventive Actions (CAPA)

公司每年对上一自然财年的核心及高风险供应商实施现场 ESG 审计或第三方独立评估。对审计中发现的中低风险问题，供应商提交 CAPA（纠正与预防措施计划）；对于触发极端合规红线的供应商，将按照《HC-ESG23-001-004 供应商 ESG 风险管理规定》要求其立即改善，如未按时完成将被立即暂停或终止业务合作。

The Company conducts on-site ESG audits or third-party independent assessments of its core and high-risk suppliers for the previous fiscal year annually. For medium and low-risk issues identified during the audit, suppliers must submit a CAPA (Corrective Action and Preventive Action Plan); for suppliers triggering extreme compliance red lines, immediate improvement will be required in accordance with the HC-ESG23-001-004 Supplier ESG Risk Management Regulations.

Failure to complete on time will result in immediate suspension or termination of business cooperation.

4.2.5 阶段五：供应商能力建设与可持续共建计划

Stage 5: Supplier Capacity Building and Sustainable Co-creation Plan

为帮助供应商持续提升 ESG 管理能力，海辰储能定期开展“供应商可持续发展赋能计划”，包括提供碳足迹核查工具培训、EHS 现场合规指导等项目。

To help suppliers continuously enhance their ESG management capabilities, Hithium regularly carries out the "Supplier Sustainability Empowerment Plan", which includes providing carbon footprint verification tool training, EHS on-site compliance guidance, and other projects.

4.3 采购人员及内部利益相关者能力建设计划

Procurement Personnel and Internal Stakeholder Capacity Building Plan

培训覆盖对象：覆盖公司采购部门全体员工、供应链管理人员及跨部门利益相关者（包括但不限于高级管理层和其他职能，如质量、EHS 等团队成员，确保培训不局限于中低层）。

Training Target Audience: Covers all employees in the Company's procurement department, supply chain management personnel, and cross-departmental stakeholders (including but not limited to senior management and other corporate functions, such as quality teams, EHS teams, etc., ensuring that training is not limited to middle and lower levels).

培训内容与角色分工：培训内容专门聚焦于采购人员及内部利益相关者在供应商 ESG 项目中所扮演的角色，以及买方日常行动与决策如何影响公司 ESG 目标的实现，包括《供应商管理协议》执行要点、ESG 审计与风险识别技巧、避免商业条款与常规 ESG 要求的冲突等。

Training Content and Role Division: The training content specifically focuses on the roles played by procurement personnel and internal stakeholders in supplier ESG projects, and how daily buyer actions and decisions affect the realization of the Company's ESG goals, including execution key points of the "Supplier Management Agreement", ESG audit and risk identification skills, avoiding conflicts between

commercial terms and generic ESG requirements.

频次：培训每年至少举行 2 次。

Frequency: Training is held at least 2 times a year.

5. 附则 Supplementary Provisions

本计划经董事会授权制定，由董事会战略与可持续发展委员会审阅并批准通过，由 ESG 管理部负责日常管理与解释。倘若本计划因公司需求和 ESG 发展趋势而作出必要更改，有关更改将提交至公司董事会战略与可持续发展委员会，以供其审阅，并应至少每三年一次呈予董事会战略与可持续发展委员会，以供其批核。

This plan has been developed with the authorization of the Board of Directors, reviewed and approved by the Board's Strategy and Sustainability Committee, and is subject to day-to-day management and interpretation by the ESG Management Department. Should any necessary amendments be required to this Plan in response to the Company's evolving needs or ESG trends, such amendments shall be submitted to the Board's Strategy and Sustainability Committee for review and shall be presented to the Committee at least once every three years for approval.

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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