

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》)、《可持续矿业守则》, 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》), 负责任采矿倡议 (IRMA)《矿产负责任勘探、开采和加工标准》等相关标准, 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 undertakes to adopt the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (hereinafter referred to as the "Chinese Guidelines") and the Sustainable Mining Code issued by the China Chamber of Commerce for Import and Export of Minerals and Chemicals (CCCMC), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) (hereinafter referred to as the "OECD Guidance") issued by the Organisation for Economic Co-operation and Development (OECD), and the Standard for Responsible Mining issued by the Initiative for Responsible Mining Assurance (IRMA). It undertakes to widely disseminate the following Responsible Mineral Supply Chain Management Policy for conflict-affected and high-risk areas, and to incorporate it into contracts and/or agreements concluded 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相关国家法律。

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 conflict and to comply with the relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

本公司承诺在相关的负责任矿产包括锡、钨、钽、金、锂、铜、铝、云母、石墨等供应链中识别与管理以下风险。

The Company undertakes to identify and manage the following risks in the supply chains of relevant responsible minerals, including tin, tungsten, tantalum, gold, lithium, copper, aluminium, mica and graphite.

一类风险

Category I Risks

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以下行为：

1. When carrying out procurement or business activities in conflict-affected and high-risk areas, Hithium Energy Storage will neither tolerate nor in any way profit from, help, assist or facilitate the commission by any party of the following acts:

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。

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.

这些武装团体或关联方可能存在如下侵权行为：

These armed groups or their affiliates may be involved in the following infringences:

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
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
3. 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 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 extort 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 Storage recognizes that the role of public or private security forces at the mine site and/or its surroundings and/or along the transport routes 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 transport routes 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 the security costs of public security forces.

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。

Hithium Energy Storage will support or take measures to engage with local governments, international organizations and civil society organizations to avoid or minimize the negative impacts on vulnerable groups arising from the stationing of public or private security forces at mining sites, in particular the negative impacts on miners in artisanal and small-scale mines (ASM).

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 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：

Regarding bribery and fraudulent misrepresentation of the 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 temptation and will not 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 places where upstream suppliers trade minerals, 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所在国关于向政府部门缴纳的税费信息公开的要求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 requirements of the host country regarding the disclosure of information on taxes and fees paid to government departments, 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，我们将暂时中止或终止与上游供应商的合作。对采用风险管理计划后需要降低的风险，企业应额外进行风险评估。若风险管理计划六个月内未取得明显效果，行贿、受贿及对矿产产地进行欺诈性失实陈述、洗钱、以及向政府缴纳税款、费用、特许费等行为的风险未能得到遏制或降低的话，企业应暂时停止或中断与供应商的合作，时间至少是三个月，并在暂时中止合作的同时对风险管理计划进行修订，阐明贸易关系恢复之前改进工作所应达到的绩效目标

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. Where risks remain to be mitigated after the adoption of a risk management plan, the company shall carry out additional risk assessments. If the risk management plan fails to achieve significant results within six months, and the risks of bribery and fraudulent misrepresentation of mineral origin, money laundering, and payment of taxes, fees and royalties to governments are not contained or reduced, the company shall temporarily suspend or interrupt its cooperation with suppliers for at least three months, and shall concurrently revise the risk management plan during the suspension, specifying the performance targets that the improvement work must achieve before the trade relationship is resumed.

二类风险

Category II Risks

对生态环境造成的负面影响

Adverse impacts on the ecological environment

海辰储能不容忍、也不受益于供应链中各类对生态环境造成的影响包括但不限于以下:

Hithium Energy Storage does not tolerate, nor benefits from, the following impacts on the ecological environment in its supply chains, including but not limited to:

1. 未能开展彻底的环境影响评价, 未能最大程度减少废物产生和有害气体排放, 未能永久关闭矿山并对矿址进行修复, 未能进行资源保护与废物回收利用, 未能实施环境风险管理, 未能保护生物多样性, 未努力持续改进环境绩效管理, 无法有效补偿在采矿生命周期中对环境管理和生态足迹造成的残余影响

Failure to conduct thorough environmental impact assessments; failure to

minimize waste generation and harmful gas emissions; failure to permanently close mines and rehabilitate mining sites; failure to conserve resources and recycle waste; failure to implement environmental risk management; failure to protect biodiversity; failure to strive for continuous improvement of environmental performance management; and inability to effectively compensate for residual impacts on environmental management and the ecological footprint over the mining life cycle.

2. 在世界遗产地（WHS）或法定保护区开采或采购资源， 或在世界遗产地或法定保护区的缓冲区内采矿， 或开采后的资源运输经过世界遗产地或法定保护区， 由此对这些遗产的突出普遍价值构成威胁；

Extracting or purchasing resources in World Heritage Sites (WHS) or legally protected areas, or extracting within the buffer zone of the World Heritage Sites or legally protected areas, or transporting the extracted resources through the World Heritage Sites or legally protected areas, may threaten the prominence value of these sites.

3. 矿区开展采掘、爆破、建设、运输等活动， 导致的一系列潜在的不利影响， 包括空气污染、过多粉尘和噪音；

Mining, blasting, construction, transportation and other activities in the mining area, may cause a series of potential adverse impacts, including air pollution, excessive dust and noise;

4. 危险废物在内的危险材料（燃料、炸药、化学品等）的使用、贮存、运输与处置造成的环境污染；

Environmental pollution caused by the use, storage, transportation and disposal of hazardous materials (fuels, explosives, chemicals, etc.), including hazardous waste;

5. 产品生命周期产生大量温室气体排放， 对全球气候产生负面影响；

A large amount of greenhouse gas will be generated over a product's life cycle,

which has a potential impact on the global climate.

6. 给周围土壤、空气和水的状况造成不利影响，严重违反国际和国内相关法律法规，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品与危险物质，或进行砷和汞的排放。

Causes adverse impacts on the surrounding soil, air and water, and seriously violates relevant international and domestic laws and regulations, including manufacturing, trading, and using chemicals and hazardous substances that are subject to international bans due to high toxicity to organisms, environmental persistence, or potential irreversible ecological effects, or discharge of cadmium and mercury;

7. 矿区废物堆和其他堆料，在雨水的影响下侵蚀矿区和场地设施，并流入天然河道造成河道堵塞或污染；

Waste piles and other open storages in the mining area will erode the mining area and in-site facilities along the erosion of rainwater, and flow into the natural river course to block or pollute the river water;

8. 矿区开展的运营与活动可能造成周围水资源污染，污染源包括废水，矿物废料（覆盖层、细粒矿物、卤水、石膏、尾矿、副产品矿物等），其他危险物质（油、化学品，如氰化物和汞）、沉淀物、污泥、污水等。

The operations and activities carried out in the mining area may cause pollution of the surrounding water resources. Pollution sources include wastewater, mineral waste (overburden, fine-grained minerals, brine, gypsum, tailings, by-product minerals, etc.). Other sources include hazardous substances (oil, chemicals such as cyanide and mercury), sediment, waste water, sludge, sewage, etc.

关于对生态环境影响的风险管理：

Risk management for adverse impacts on the ecological environment:

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，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，对风险进行改善或跟踪。当出现严重影响且风险降低措施不能起作用的，我们将暂时中止或终止与上游供应商的合作。

If Hithium Energy Storage has reasonable grounds to believe that such risks exist, Hithium Energy Storage will, based on its specific position in the supply chain, immediately develop, adopt and implement a risk management plan together with suppliers and other stakeholders, with the aim of taking significant measures within a reasonable time span to prevent or reduce risks with negative impacts, and to improve or track the risks. Where severe impacts occur and the risk mitigation measures fail to work, we will temporarily suspend or terminate cooperation with upstream suppliers.

对人权、劳工权利以及社区、社会造成的负面影响

Adverse impacts on human rights, labor rights, communities and society

海辰储能不容忍、也不受益于供应链中各类对人权、劳工权利以及社区、社会造成的影响包括但不限于以下：

Hithium Energy Storage does not tolerate, nor benefits from, the following impacts on human rights, labour rights, and communities and society in its supply chains, including but not limited to:

1. 违反中国和东道国的法律法规或行业最低标准;

Violate the laws and regulations or minimum industrial standards of China and the host country;

2. 雇佣低于东道国法律法规规定的最低工作年龄的儿童，如果东道国没有关于最低工作年龄的相关法律法规，则为雇佣低于 16 岁的儿童;

Employ children under the minimum working age specified by the laws and regulations of the host country. If the host country does not have relevant laws and regulations on the minimum working age, hire children under the age of 16;

3. 不尊重年轻雇工（指任何达到法律限定最低工龄但未达到 18 岁的工人）的权益；

Disrespect the rights and interests of young employees (refers to any worker who has reached the legal minimum working age but has not reached the age of 18);

4. 未能根据当地法律法规要求与员工建立规范的劳动关系；

Fail to establish a standardized labor relationship with employees in accordance with local laws and regulations;

5. 以虚假学徒训练、连续短期合同或不明确的分包约定等形式逃避劳动及社会保障；

Evasion of labor and social security contributions in the form of false apprenticeship training, continuous short-term contracts or unclear subcontracting agreements;

6. 在招聘、工作、职业培训及雇佣待遇等场景中缺少多元、公平、包容管理原则，因种族、肤色、性别、宗教、政治倾向、国籍、社会地位或其他原因而歧视员工；

Absence of diversity, equity and inclusion principles in recruitment, work, vocational training and employment treatment, and discrimination against workers on the grounds of race, colour, sex, religion, political opinion, nationality, social status or other reasons;

7. 违反法律或集体协议规定，未能支付常规工时工资和加班工资，或支付标准低于法定最低标准，或非法、无授权情况下扣除薪酬；

Violate laws or collective agreements, fail to pay regular working hour wages and overtime wages, or payment standards lower than the legal minimum standard, or deduction of wages illegally or without authorization;;

8. 未能遵守适用的法律法规及行业标准中关于工时和休息、休假的要求；

Fail to comply with applicable laws, regulations and industry standards regarding working hours, rest, and vacation requirements

9. 未能保障员工的结社自由权利，禁止或阻碍员工选举员工代表、成立或加入工会，以及进行劳资双边协商；

Fail to protect employees' right to freedom of association, prohibit or hinder employees from electing employee representatives, establishing or joining workers' unions, and conducting negotiations between employers and employees;;

10. 未能保证员工工作区域及现场住房、宿舍（如有）的饮用水安全，食物贮存设施安全，盥洗设施干净卫生；

Fail to ensure the safety of drinking water in the work area, on-site housing and dormitory (if any), the safety of food consumption and storage facilities, and clean and sanitary toilet facilities;

11. 未能预防并管控物理、化学、生物、放射性质的健康与安全，危害风险评估需考虑到员工生产活动中的各方面情况，包括机械与移动设备使用、化学品贮藏与处理、对烟气或粉尘的接触；

Fail to prevent and control physical, chemical, biological, and radioactive hazards to health and safety; Risk assessment should take into account all aspects of employees' production activities, including the use of machinery and mobile equipment, storage and handling of chemicals, and exposure to smoke or dust;

12. 未能采取切实措施，避免工作场所伤亡、事故与职业疾病；

Fail to take practical measures to avoid injuries, accidents and occupational diseases at the workplace;

13. 未能防控疫情、地震、火灾、泥石流、塌陷、落石等对员工人身健康安全的威胁；

Fail to prevent and control threats to the personal health and safety of employees, such as pandemics, earthquakes, fires, mudslides, collapses, and rockfalls;

14. 未能预防并解决会直接或间接对工作产生危害的情况，如疲劳、酗酒、药物滥用、高传染性疾病等；

Fail to prevent and resolve situations that directly or indirectly harm employees, such as fatigue, alcoholism, drug abuse, highly infectious diseases, etc.;

15. 工作场所中长期接触潜在的有毒元素，比如：矿物粉尘（例如：导致石棉沉着病或矽肺的矿物）和其他颗粒、柴油烟气、瓦斯、卤水，高分贝噪声等可能导致工人患上不可恢复的慢性职业病；

Long-term exposure to potentially toxic elements in the workplace, such as mineral dust (including minerals that cause asbestosis or silicosis) and other particles, diesel fume, gas, brine, high-decibel noise, etc. may cause irreversible chronic occupational diseases

16. 在未获得当地人和原住民自由、事先和知情同意的土地上开采资源，包括未获得土地持有法定所有权、租赁权、特许权或许可证的开采商的同意；

Extracting resources on land that has not obtained the free, prior and informed consent of locals and indigenous people, including the consent of the extractor who has the legal title, right to lease, concession or permit of the land;

17. 未保障当地人和原住民言论自由和有意义的参与权，存在针对原住民的报复、恐吓与暴力行为。

Failure to safeguard the freedom of expression and meaningful participation of local and indigenous peoples, and the existence of retaliation, intimidation and violence against indigenous peoples

18. 在不尊重、不保护当地人和原住民文化和遗产，或损害当地人传统文化的采矿作业中开采或采购资源；

Mining in or purchasing resources from mining operations that do not respect or protect the culture and heritage, or damage the traditional culture of local and indigenous people

19. 非自愿搬迁导致的人权侵害，特别是对当地贫困群体和弱势群体，包括妇女、儿童产生的负面影响；

Human rights violations caused by involuntary relocation, especially the negative impacts on the local poor and vulnerable groups, including women and children;

20. 采矿活动对周边社区带来健康与安全风险，例如尾矿坝、水库等的结构安全，威胁社区的火灾和爆炸风险、道路的运输安全、危险商品的运输与处理、对水质和水量的影响，以及传播传染病的可能性，例如：由于劳工大量涌入导致的呼吸和性传播疾病，吸毒、酗酒、性别暴力和其他心理影响。

Mining activities bring health and safety risks to surrounding communities, such as the structural safety of tailings dams, reservoirs, etc., risks of community fire and explosion, transportation safety of corridors, transportation and handling of hazardous products, impacts on water quality and volume, and the possibility of spreading infectious diseases, such as respiratory and sexually transmitted diseases caused by the influx of labor, drug abuse, alcohol abuse, gender-based violence, and other psychological effects.

关于人权、劳工权利以及社区、社会的风险管理：

Risk management for human rights, labour rights, and communities and society:

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，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，对风险进行改善或跟踪。当出现严重影响且风险降低措施不能起作用的，我们将暂时中止或终止与上游供应商的合作。

If Hithium Energy Storage has reasonable grounds to believe that such risks exist, Hithium Energy Storage will, based on its specific position in the supply chain, immediately develop, adopt and implement a risk management plan together with suppliers and other stakeholders, with the aim of taking significant measures within a reasonable time span to prevent or reduce risks with negative impacts, and to improve or track the risks. Where severe impacts occur and the risk mitigation measures fail to work, we will temporarily suspend or terminate cooperation with upstream suppliers.

对所在国经济的公平发展和社区民众生计造成的负面影响：**Negative impacts on the fair development of the host country's economy and community livelihoods;**

1. 海辰储能不容忍、也不受益于供应链中各类对国际经济的公平发展和社区民众生计造成的影响包括但不限于以下：未能以合法、规范的途径获取矿区许可、租赁权、特许经营权等，存在可能的贿赂及其他形式的腐败；

Fail to obtain mining licenses, lease rights, concessions, etc. through legal and standardized approaches, and there may be bribery and other forms of corruption

2. 矿区关闭过程中由于缺少完善的修复计划而对工人就业，以及周边社区生计带来的负面影响；

Unemployment and other negative impacts on the livelihoods of surrounding communities due to the lack of a comprehensive restoration plan during the closure of the mining area

3. 矿产贸易等环节存在腐败、行贿的现象，未能制定完善合规机制预防、避免以及处理相关风险；

Corruption and bribery exist in the mineral trade and other stages, and fail to develop a comprehensive compliance mechanism to prevent, avoid and address related risks

4. 未能按照所在地法律法规缴纳税费，存在偷税漏税的风险；

Fail to pay taxes and fees in accordance with local laws and regulations, there is a risk of tax evasion

5. 存在扰乱市场公正秩序，存在垄断、恶性竞争等行为；

There are actions that disrupt the fair order of the market, monopoly, and vicious competition

6. 在对采掘业透明度或信息公开提出要求的国家投资或经营，未能按照其要求公开投资和向政府缴纳税收的情况。

Fail to disclose investment and taxation payment to the government when investing or operating in countries require extractive industry transparency or information disclosure

关于国经济的公平发展和社区民众生计造成的风险管理：

Risk management for the equitable development of the host country's economy and the livelihoods of local communities:

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，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，对风险进行改善或跟踪。当出现严重影响且风险降低措施不能起作用的，我们将暂时中止或终止与上游供应商的合作。

If Hithium Energy Storage has reasonable grounds to believe that such risks exist, Hithium Energy Storage will, based on its specific position in the supply chain, immediately develop, adopt and implement a risk management plan together with suppliers and other stakeholders, with the aim of taking significant measures within a reasonable time span to prevent or reduce risks with negative impacts, and to improve or track the risks. Where severe impacts occur and the risk mitigation measures fail to work, we will temporarily suspend or terminate cooperation with upstream suppliers..

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.

2026 年 10 月

Oct 2026

