
负责任矿产采购供应商管理准则

Code of supplier management for responsible minerals procurement

1. 目的 /Purpose:

蜂巢能源承诺遵守《中国负责任矿产供应链尽责管理指南》相关政策，并将其纳入供应的管理之中。希望与供应商携手预防和解决供应链上的社会和环境风险，并积极促进相关社会与环保问题的解决，为实现可持续发展作出贡献。蜂巢能源认识到在受冲突影响和高风险区域从事矿产资源开采、交易、处理、出口存在可能造成重大不利影响的风险，并认识到企业有尊重人权、不助长冲突和不对环境和社会产生负面影响的义务，蜂巢能源承诺并且要求我们的商业伙伴在商业活动中识别并避免以下风险：

SVOLT has committed to comply with 《Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains》 and incorporate it into the management of supply chain. We hope to work with suppliers to prevent and solve social and environmental risks in the supply chain, and actively promote the solution of related social and environmental problems, and contribute to the realization of sustainable development. SVOLT recognizes mining, trading, processing, and exporting mineral resources in conflict-affected and high-risk areas may cause significant adverse effects, and realizes that companies should have the responsibilities for respecting human rights, and the obligations not to promote conflicts not have a adverse impact on the environment and society. SVOLT promises and requires our business partners to identify and avoid the following risks in business activities:

2. 范围 /Scope:

本准则适用于电池产品供应链上的所有供应商、分包商及其下级供应商（这里的每一级供应商统称供应商），其生产的产品用在我们的产品上或者提供的相关服务。为确保提供给我们及其供应商的产品所用的材料、元器件和采购及生产过程符合本准则，对其所有材料可适用的约束进行了阐述。

This code applies to all suppliers, subcontractors and their sub-suppliers in the

battery product supply chain (Collectively referred to as suppliers) , whose products are used in our products or related services.To ensure the materials, components that used for our products, and procurement and manufacturing processes comply with this code, restrict the products within the scope of application.

3.参考文件 /Reference Document:

3.1 责任商业联盟行为准则 (Responsible Business Alliance Code of Conduct)

网址: <http://www.responsiblebusiness.org/standards/code-of-conduct/>

3.2 联合国《工商企业与人权指导原则: 实施联合国“保护、尊重和补救”框架指导原则》(2011, NO. A_HRC_RES_17_4) (Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework) , 网址: [https://www.ohchr.org/zh/publications/reference-](https://www.ohchr.org/zh/publications/reference-publications/guiding-principles-business-and-human-rights-implementing)

[publications/guiding-principles-business-and-human-rights-implementing](https://www.ohchr.org/zh/publications/reference-publications/guiding-principles-business-and-human-rights-implementing)

3.3 联合国《世界人权宣言》(1948, NO. 217A(III)) (The Universal Declaration of Human Rights) , 网址:

<https://www.un.org/zh/about-us/universal-declaration-of-human-rights>

3.4 联合国 1591 制裁名单 (1591 Sanctions List) :

<https://www.un.org/securitycouncil/zh/sanctions/1591/materials>

3.5 《中国负责任供应链尽责管理指南》(Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, Sections) , 网址:

<https://www.shuzih.com/pub/828c6c3612f75ee3c231d093700d0fe7/634352dcf77c4fe6bdd7224bc57534e3.pdf>

3.6 《中国对外矿产投资的社会责任指南》的童工和职业健康安全部分 (Chinese Guidelines for Social Responsibility in Outbound Mining Investments, Provisions related to Child Labor and Occupational Health and Safety) , 网址:

<https://www.shuzih.com/pub/828c6c3612f75ee3c231d093700d0fe7/cbc1616851ba4f98852b7180f37fae34.pdf>

3.7 《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职调查指南》(OECD Due Diligence Guidance for Responsible

Supply Chains of Minerals from Conflict-Affected and High-Risk Areas) , 网址:
<http://www.oecd.org/corporate/mining.htm>

3.8 RMI 责任矿产倡议 (Responsible Minerals Initiative) : 网址:
<http://www.responsiblemineralsinitiative.org/>

4. 供应商行为标准/ Standard of Conduct

4.1 劳工实践和人权/Labor practices and human rights

A. 严重侵犯人权的行为/ Violations of human rights

供应商承诺按照国际社会公认的准则维护员工人权, 并给予其尊严和尊重。在开展钴/镍矿产开采、交易、处理、出口等经营活动中, SVOLT 坚决抵制以下行为: 任何形式的酷刑、残暴、不人道和有辱人格的待遇; 任何形式的强迫或强制劳动, 包括任何形式的人口贩运、抵债劳动和监狱劳动; 其他严重侵犯和践踏人权的行爲; 战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

Supplier is committed to upholding the human rights of employees, treating them with dignity and respect in accordance with internationally norms. SVOLT firmly rejects the following actions: degrading treatment; forced labour, including human trafficking, bonded labour and prison labour; serious violations and abuses of human rights and serious violations of international humanitarian law

B. 童工/Child labour

不使用童工, 尤其是最恶劣形式的童工。用工最低年龄参照所在国的法律规定, 或国际劳工组织 138 号公约关于最低工作年龄的规定, 以两者中高标准为准。公司应采取积极有效措施, 防止 18 岁以下儿童从事地下采矿或水下作业、危险机械和工具、超负重搬运以及接触危险物质的工种。避免阻碍儿童接受义务教育和职业培训, 或对其健康、安全和道德造成伤害。

No child labor. The minimum age for employment shall refer to the legal provisions of the host country or the ILO Convention No. 138. Suppliers shall take active and effective measures to prevent children under the age of 18 from engaging in underground mining or underwater operations, hazardous machinery and tools, heavy lifting, and work with hazardous substances. Children have the right to receive

compulsory education and vocational training to ensure their health and safety.

C. 强迫或强制劳动/Forced labour

供应商应承诺按照法律法规的要求，反对强迫劳动和人口贩运，不会允许以任何惩罚来威胁、强迫任何人从事非本人自愿的一切劳动或服务。除了明确反对抵制劳动、监狱劳动、胁迫劳动以外，公司认可员工的移动自由不得受限制，员工有就业和择业的自由。不会要求员工将“保证金”或身份证明文件寄存在公司。

Suppliers should promise to oppose forced labor and human trafficking in accordance with the requirements of laws and regulations, and will not allow any punishment to threaten or force anyone to perform all labor or services that are not voluntary. In addition to expressly opposing labor, prison labor, and coercive labor, the company recognizes that the freedom of movement of employees shall not be restricted, and employees have the freedom of employment and career choice. Do not require employees to deposit "bonds" or identification documents with the company.

D. 直接或间接支持非国家武装团体、私人安全武装/ Direct or indirect support to illegal armed groups and public or private security forces

供应商在原料开采、交易、处理、出口等经营活动中，不会直接或间接为非国家武装团体提供资金、后勤及设备支持，包括以下非法行为或活动：非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制；在矿区入口、矿区运输路线、矿产资源交易地等进行非法征税、勒索钱财或掠夺资源；对中间商、出口企业或国际贸易商非法征税或勒索。

Suppliers will not tolerate any direct or indirect provide financial, logistical and equipment support to non-state armed groups in the extraction, transport, trade, handling or export of minerals. These armed groups or their affiliates include: Illegally control mine sites or otherwise control transportation routes and points where minerals are traded and upstream actors in the supply chain; Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; Illegally tax or extort intermediaries, export companies or international traders.

E. 贿赂、洗钱和税费/ Bribery, money laundering and taxes

供应商不提供、承诺、给予或索要任何贿赂，并且抵制索贿。不为掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、处理、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。应防止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序。供应商应采取有效措施，防止卷入洗钱或为恐怖主义融资。确保向政府支付所有与矿产资源开采、交易、出口相关的合法税收、费用和特许费。

Suppliers will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export. Suppliers shall prohibit bribery in all business activities and transactions, including bribery of agents and other third parties, and formulate standards and approval procedures for gifts; Suppliers should take effective measures to prevent involvement in money laundering or the financing of terrorism. Ensure that all legal taxes, fees and royalties related to the extraction, trade and export of mineral resources are paid to the government.

F. 歧视/ Discriminate

员工应得到尊重。供应商在雇佣、薪酬、接受培训、晋升、终止劳动关系或退休等方面，不得存在因性别或性取向、种族、肤色、年龄、婚姻状况、怀孕与否、宗教、国籍、疾病或残疾导致的歧视。任何员工均不应受到侮辱或体罚，也不应受到身体、性、心理或语言上的骚扰或虐待。

Employees should be treated with respect. Supplier shall not discriminate in employment, compensation, acceptance of training, promotion, termination of labor relations or retirement on the basis of gender or sexual orientation, race, color, age, marital status, pregnancy, religion, national origin, disease or disability. No employee should be subject to humiliation or corporal punishment, or physical, sexual, psychological or verbal harassment or abuse.

G. 安全与保护

供应商须认识到，在高风险的矿区及周边地区、运输道路沿线的公共或私人安全武装的作用仅是依法保障权益，包括保护矿工、维护设备和设施安全、保护

矿区合法运营及运输路线不受非法干扰。

Suppliers should be aware that the role of public or private security forces at the mine sites, surrounding areas and along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

供应商支持或采取措施不予以录用已确认实施过严重侵犯人权行为的公共或私人安全武装。支持或采取措施，与当地政府、国际组织和民间组织开展合作，供应链上的矿产资源通过小作坊或小规模采矿方式开采的，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不利影响，尤其是对小作坊的不利影响。

Suppliers will support or take steps to adopt screening policies to ensure that individuals or units of security forces are known to have been responsible for gross human rights abuses will not be hired. Suppliers will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved. where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

4.2 健康与安全/ Health and Safety

A. 职业健康与安全/ Occupational health and safety

供应商应保证工作场所安全，并努力提供干净卫生的工作环境。员工在接触危险机械、设备或物质时应保证安全。供应商应当向员工提供与工作相关且适当的个人防护装备，并开展相关培训和指导。

Suppliers shall ensure workplace safety and strive to provide a clean and hygienic work environment. Employees shall be safe when handling dangerous machinery, equipment or substances. The supplier shall provide employees with appropriate

personal protective equipment (PPE) and carry out relevant training and guidance.

B. 小规模采矿与手工采矿

供应商具体关注与小作坊或小规模采矿商相关强迫劳动、童工、不安全工作条件、不受控危险化学品使用和其他重大环境影响的风险，寻求与开采区的小作坊或小规模采矿商建立生产关系。

Suppliers are specifically concerned about the risks of forced labor, child labor, unsafe working conditions, uncontrolled hazardous chemical use and other major environmental impacts related to small workshops or small-scale miners in seeking to establish with small workshops or small-scale miners in mining areas Relations of production.

C. 生活条件

供应商应努力为员工提供干净的卫生间设施、饮用水以及清洁食物。公司或劳工代理机构提供的员工宿舍应保持人身安全。

Suppliers shall strive to provide employees with clean toilet facilities, drinking water, and clean food. Staff accommodation provided shall be kept safe by the company or labour agency.

4.3 环境/ Environment

预防污染和节约资源，供应商应当采取措施从源头上降低或消除污染物的排放、释放以及废弃物的产生。

To prevent pollution and save resources, suppliers shall take measures to reduce or eliminate the emission, release and waste generation of pollutants from the source.

供应商确保避免给周围土壤、空气和水的状况造成重大不利影响，严重违反当地相关法律法规，包括制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质，或排放砷和汞。

Suppliers ensure that will not make serious effects on the surrounding soil, air and water, and serious violations of relevant local laws and regulations, including manufacturing, trading, and using the chemicals and hazardous substances banned by international laws due to high toxicity to organisms, environmental persistence, or

potential irreversible ecological effects, or discharging arsenic and mercury.

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

Suppliers are committed to regularly assess and reduce the adverse effects of mining on soil, air and water. Regarding the conditions of the surrounding soil, air and water resources, Suppliers will adopt pollution prevention methods and technologies with technical, financial feasibility and applicability, try to avoid, reduce and control pollution in according with the requirements of relevant laws and regulations of the host country, and monitor the main pollutants discharged by the company, keep abreast of the company's pollution status, clearly record and disclose the monitoring results; and adopt control and reduction strategies.

供应商确保遵守化学品和有毒物质管理适用的法律要求，避免制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质，其中包括按照最高国际标准严格控制砷和汞的排放，管理氰化物，确保危险物质的处置、贮存和运输符合相关的法律法规，确保在过程中无泄漏、无溢溅或以其他形式释放到环境中。

Suppliers agree to be compliance with the applicable legal requirements for the management of chemicals and toxic substances, avoid the manufacturing, trading, and using of chemicals and hazardous substances that are banned by international laws due to high toxicity to organisms, environmental persistence, or potential irreversible ecological effects. These include the discharge of arsenic and mercury and management of cyanide under strict control in accordance with the highest international standards. Suppliers will ensure that the disposal, storage and transportation of hazardous substances comply with relevant laws and regulations in order to ensure that there is no leakage, spills or other forms of release into the environment during the process.

禁止在世界遗产地或法定保护区开采资源，以及由此给这些遗产的突出普遍

价值造成威胁。

Prohibit the exploitation of resources in world heritage sites or legally protected areas and the threat to the outstanding universal value of these sites.

供应商应当识别、标记和管理会对人类或环境造成危险的化学品及其他材料，确保其得到安全处理、移动、储存、使用、回收或再利用和处置。

Suppliers shall identify, label and manage chemicals and other materials that pose a hazard to humans or the environment, ensuring that they are safely handled, moved, stored, used, reused and disposed.

4.4 道德/ Morality

A. 诚信经营/ Integrity

在所有商业交往中都应秉承最高的诚信标准。供应商应采取零容忍政策，禁止任何及所有形式的贿赂、腐败、敲诈勒索和贪污。

The highest standards of integrity are expected in all business dealings. Suppliers shall have a zero tolerance policy, prohibiting all forms of bribery, corruption, extortion and embezzlement.

B. 无不正当利益/ No illegitimate interests

供应商不得承诺、提供、授予、给予或接受贿赂以及为取得非法或不正当优势而提供的其他形式的利益。为获得或保留业务、指示将业务交给任何个人或者以其他方式获得不正当优势而承诺、提供、授予、给予或接受任何有价之物均在受禁之列。应实施监控与执行规程，确保符合反腐败法律。

禁止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序；尽最大努力促进与所有业务伙伴间负责任的商业实践。

Suppliers shall not promise, offer, grant, give or accept bribes, and other forms of advantage offered to obtain an unlawful or undue advantage.

Prohibiting bribery in all business activities and transactions, including bribery of agents and other third parties, and formulate standards and approval procedures for gifts; Make best effort to promote responsible business practices with all business partners.

C. 身份保护及不报复政策/ Identity Protection and Non-Retaliation Policy

除非法律禁止，否则应制定并实施各项规程，确保向检举者提供保护，确保其举报的保密性及匿名性。供应商应为其员工制定沟通程序，使员工能够提出任何问题，而不担心遭到打击报复。

Suppliers shall be develop and implement procedures to ensure the protection of whistleblowers, the confidentiality and anonymity of their reports. Confidentiality and anonymity of reports should be guaranteed. Suppliers must have communication procedures for their employees that allow employees to raise any concerns without fear of retaliation.

4.5 负责任矿产供应链尽责管理

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

If SVOLT has reasonable grounds to believe that such risks exist, SVOLT will immediately develop, adopt and implement risk management plans with suppliers and other stakeholders based on the company's specific position in the supply chain to prevent or lower the land infringements, serious environmental effects, and mitigate the specific risks of small worksites.

4.6 “五步法” 尽职管理框架 OECD 5-step framework

<p>公司政策及管理体系</p> <p>Company Policy & Management System</p>	<p>风险评估</p> <p>Risk Assessment</p>	<p>风险应对</p> <p>Risk Response</p>	<p>审核</p> <p>Audit</p>	<p>报告</p> <p>Report</p>
<p>采纳公司针对矿产供应链的政策，并建立强有力的公司管理系统。</p> <p>Adopt company policy for the supply chain of minerals and establish strong company management systems</p>	<p>根据政策标准，识别并评估供应链中与实际情况相关的风险。</p> <p>Identify and assess risk related to factual circumstances in the supply chain against policy standards</p>	<p>根据政策和评估制定并采纳风险管理计划，包括风险缓解措施。</p> <p>Devise and adopt risk management plan in relation to policy and assessment, including risk mitigation measures</p>	<p>在确定的供应链尽职调查点提供第三方审计，并由第三方进行验证。</p> <p>Provide for third-party audit of supply chain due diligence at identified points with third party verification</p>	<p>在可持续性、企业社会责任或年度报告中公开报告供应链尽职调查实践。</p> <p>Publicly report on supply chain due diligence practices in sustainability, CSR, or annual reports</p>