

广东佳纳能源科技有限公司

Guangdong Jiana Energy Technology Co., Ltd.

供应链尽责管理政策

Supply Chain Due Diligence Management Policy

广东佳纳能源科技有限公司（以下简称“我们”）认识到，钴、镍、锰等矿产原料开采、交易、处理、出口等经营活动过程中可能产生重大的社会和环境风险，并认识到公司有尊重人权、消除和管控相关风险的责任。为此，我们承诺采纳中国五矿化工进出口商会（CCCCMC）发布的《中国负责任矿产供应链尽责管理指南》、经济合作与发展组织（OECD）发布的《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》与欧洲议会和欧盟理事会（EP and Council）发布的《关于电池和废电池的2023/1542(EU)号》的相关内容，制定本公司“供应链尽责管理政策”（以下简称“政策”）。本政策适用于广东佳纳能源科技有限公司及其所有控股子公司。

Guangdong Jiana Energy Technology Co., Ltd. (hereinafter referred to as "we") recognizes that mining, trading, processing, and exporting mineral raw materials such as cobalt, nickel, and manganese may involve significant social and environmental risks. We further acknowledge our responsibility to respect human rights and to eliminate and manage such risks. To this end, we commit to adopting the relevant provisions of the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCCMC), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas issued by the Organisation for Economic Co-operation and Development (OECD), and the Regulation on Batteries and Waste Batteries issued by the European Parliament and the Council of the European Union (EP and Council). Based on these frameworks, we have established this Supply Chain Due Diligence Management Policy (hereinafter referred to as the "Policy"). This Policy applies to Guangdong Jiana Energy Technology Co., Ltd. and all its subsidiary companies.

公司承诺在供应链运营实践中识别和管理以下风险：

The company is committed to identifying and managing the following risks in its supply chain operations:

一、严重侵犯人权的行为

Article 1: Gross Human Rights Violations

在开展原料开采、交易、处理、出口等经营活动中，我们既不容忍，也不以任何方式获利于、助长、协助或便利任何一方实施：

In the course of mining, trading, processing, and exporting raw materials, we neither tolerate nor benefit in any way from, contribute to, assist in, or facilitate any party's involvement in:

- 1、任何形式的酷刑、残暴、不人道和有辱人格的待遇；

Any form of torture, cruelty, inhuman, or 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相威胁，强迫任何人从事的非本人自愿提供的劳动或服务；

Any form of forced or compulsory labor, which refers to work or service extracted from any person under the threat of penalty and for which the person has not offered themselves voluntarily;

- 3、任何形式的歧视，歧视是指不因性别或性取向、种族、肤色、宗教、国籍等原因，在雇佣、薪酬、接受培训、晋升、终止劳动关系或退休等方面采取歧视性做法，任何人均不应受到侮辱或体罚，也不应受到身体、心理或语言上的骚扰或虐待；

Any form of discrimination is prohibited. Discrimination refers to any discriminatory practices in employment, salary, training, promotion, termination of labor relationship or retirement, regardless of factors such as gender or sexual orientation, race, skin color,

religion, or nationality. No one should be subjected to insults, corporal punishment, physical, psychological or verbal harassment or abuse.

4、童工，尤其是最恶劣形式的童工；

Child labor, particularly the worst forms of child labor;

5、其他严重侵犯和践踏人权的行为；

Other serious violations and abuses of human rights;

6、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；

War crimes, crimes against humanity, genocide, or other grave breaches of international humanitarian law;

7、现代奴役制（强迫、奴役、契约、贩运或役运）。

Modern slavery (including forced labor, servitude, bonded labor, human trafficking, or indentured labor).

降低风险：

Risk Reduction Measures:

如果我们有合理理由认为上游供应商从有严重侵犯人权行为的任何一方采购或与之存在关联，我们将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier sources from or is associated with any party involved in gross human rights violations, we will immediately suspend or terminate cooperation with that supplier.

二、非国家武装团体

Article 2: Non-State Armed Groups

我们在原料开采、运输、交易、处理及出口等经营活动中，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：

In our mining, transportation, trading, processing, and export operations, we will neither directly nor indirectly provide financial, logistical, or material support to non-state armed groups, including the following illegal activities:

- 1、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；

Illegally controlling mining sites or otherwise exerting control over transportation routes, mineral trading locations, or upstream actors in the supply chain;

- 2、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；

Imposing illegal taxes, extorting money, or plundering resources at mine entrances, transportation routes, or mineral trading hubs;

- 3、对中间商、出口企业或国际贸易商非法征税或勒索。

Extorting or imposing illegal levies on intermediaries, exporters, or international traders.

降低风险：

Risk Reduction Measures:

如果我们有合理理由认为上游供应商从向非国有组织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在关联，我们将立即中止或中断与该供应商的合作。

If we have reasonable grounds to believe that an upstream supplier sources from or is linked to any party providing direct or indirect support to non-state armed groups, we will immediately suspend or terminate cooperation with that supplier.

三、公共或私人安全武装

Article 3: Public or Private Security Forces

我们认识到，高风险区域的矿区及周边地区、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。

We recognize that the role of public or private security forces in high-risk areas—such as mining sites and surrounding regions, as well as along transportation routes—is solely to uphold lawful rights and interests. This includes protecting miners, safeguarding equipment and facilities, and ensuring the legal operation of mining sites and transportation routes free from unlawful interference.

我们承诺，支持或采取措施不予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，同时与当地政府、国际组织和民间社会组织开展合作，避免或最大限度地降低本公司雇佣的公共或私人安全武装给当地社区或弱势群体带来的不利影响。

We commit to supporting or implementing measures to avoid employing public or private security forces with confirmed records of gross human rights violations. Furthermore, we will collaborate with local governments, international organizations, and civil society groups to prevent or minimize any adverse impacts that our engagement of such security forces may have on local communities or vulnerable groups.

降低风险：

Risk Reduction Measures:

我们将根据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，从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。这些安全武装非法控制矿址、运输路线和供应链上游参与方，在矿址入口、运输线路或矿产交易点非法征税或勒索钱财或矿产资源，或对中间商、出口公司或国际贸易商

非法征税或勒索，我们有理由认为存在风险。在此情况下，如果风险管理计划实施六个月未奏效，我们将中止或中断与供应商的合作。

Based on our specific position within the supply chain, we will promptly collaborate with suppliers and other stakeholders to develop, adopt, and implement risk management plans to prevent or mitigate the risks of providing direct or indirect support to public or private security forces. These forces may illegally control mining sites, transportation routes, or upstream supply chain participants; impose illegal taxes, extort money, or plunder resources at mine entrances, transport routes, or mineral trading points; or levy illegal taxes or extort intermediaries, export companies, or international traders—situations we reasonably consider high-risk. In such cases, if the risk management plan fails to yield results after six months of implementation, we will suspend or terminate cooperation with the supplier.

四、腐败、洗钱和向政府支付的各项费用

Article 4: Corruption, Money Laundering, and Government Payments

我们不提供、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、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。

We neither offer, promise, give, nor solicit bribes, and we resist any solicitation for bribes. We will not engage in bribery to conceal or falsify the origin of mineral resources, nor to misrepresent taxes, fees, or royalties payable to governments for activities related to the mining, trading, processing, transportation, or export of mineral resources.

我们承诺，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。

We are committed to preventing bribery in all business activities and transactions, including those involving agents and other third parties. Clear standards and approval procedures are established for giving and receiving gifts.

我们承诺采取有效措施，防止卷入洗钱或为恐怖主义融资。我们将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，并承诺根据企业在供应链上所处位置，对此类支付进行披露。

We pledge to implement effective measures to prevent involvement in money laundering or the financing of terrorism. We will ensure that all legally required taxes, fees, and royalties related to the mining, trading, and export of mineral resources are paid to governments. Based on our position in the supply chain, we commit to disclosing such payments.

降低风险：

Risk Reduction Measures:

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将中止或中断与上游供应商的合作。

Depending on our specific position in the supply chain, we commit to collaborating with suppliers, central or local governments, international organizations, civil society, and affected third parties, as appropriate. The aim is to improve or monitor performance by implementing measurable steps within a reasonable timeframe to prevent or mitigate risks of adverse impacts. Should risk mitigation measures prove ineffective, we will suspend or terminate cooperation with upstream suppliers.

五、环境保护、资源开采、文化和遗产、当地社区、土著居民保护以及小规模采矿

Article 5: Environmental Protection, Resource Extraction, Cultural and Heritage Preservation, Local Community and Indigenous People Protection, and Artisanal/Small-Scale Mining

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何给周围土地、空气和水造成重大不利影响，严重违反当地相关法律法规的一方，也不会从该方采购或与之有关联。

When sourcing or producing in high-risk areas, we will neither benefit from, assist, nor facilitate any party that causes significant adverse impacts on surrounding soil, air, or water, or that seriously violates local laws and regulations. We will not source from or be associated with such parties.

我们不参与、不容忍、也不受益于任何未经当地社区与土著人民自由、事先和知情同意，或在非法获得法定所有权、租赁权、特许权或许可证或违反当地法律的土地或领土开采资源的行为。我们会保护当地社区生活，避免对原住民的生活造成影响。

We do not participate in, tolerate, or benefit from any resource extraction activities that occur without the Free, Prior, and Informed Consent of local communities and indigenous peoples, or that are conducted on land or territories where legal ownership, leases, concessions, or permits were obtained illegally or in violation of local laws. We are committed to protecting local communities and avoiding adverse impacts on the livelihoods of indigenous peoples.

我们不参与、不容忍、也不受益于任何有损当地人和土著人文化遗产的采矿作业，以及在法定保护区进行的采矿作业，以及由此给这些遗产的突出普遍价值造成威胁。

We do not participate in, tolerate, or benefit from any mining operations that damage the cultural heritage of local communities and indigenous peoples, or mining operations conducted in legally protected areas that may threaten the outstanding universal value of such heritage.

我们特别关注与手采矿或小规模采矿商相关的强迫劳动、童工、不安全工作条件、不受控危险化学品使用和会产生其他重大环境影响的风险，寻求与开采区的手采矿或小规模采矿商建立合法合规的生产关系。

We pay particular attention to risks associated with artisanal or small-scale mining operations, including forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals, and other significant environmental impacts. We seek to establish legally compliant production relationships with artisanal and small-scale miners in sourcing areas.

降低风险：

Risk Reduction Measures:

如果我们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商相关的具体风险。

If we have reasonable grounds to believe such risks exist, we will—based on our specific position in the supply chain—promptly collaborate with suppliers and other stakeholders to develop, adopt, and implement risk management plans. These plans aim to prevent or mitigate risks related to land rights violations, significant adverse environmental impacts, or issues specific to artisanal or small-scale mining operations.

六、有毒害物质、噪音与震动、能源使用、废物与残留物

Article 6: Toxic Substances, Noise and Vibration, Energy Consumption, Waste and Residues

我们承诺，识别和控制释放到环境中会造成危险的化学物质和其他材料，确保这些物质被安全的处理、运输、储存、使用、回收、或再利用处置。

We commit to identifying and controlling the release of hazardous chemicals and other materials into the environment, ensuring that these substances are safely handled, transported, stored, used, recycled, or disposed of.

我们不参与、不容忍、不受益于运营前和运营期间产生的噪声和震动对人类或野生动物产生重大影响。

We do not participate in, tolerate, or benefit from the noise and vibration generated during pre-operation and operation that have a significant impact on humans or wildlife.

我们承诺在工作场所级或企业级对能源消耗和空气污染如对温室气体排放进行跟踪和记录，寻求具有成本效益的方式以提高能源效益并尽可能减少能源消耗与温室气体排放。

We commit to tracking and documenting energy consumption and air pollution (including greenhouse gas emissions) at both the workplace and corporate levels, while seeking cost-effective measures to enhance energy efficiency and minimize energy use and GHG emissions to the greatest extent possible.

经营活动，工业加工和清洁设施中产生的废水，废气和固体废物在排放或处置前，公司应当按照要求对其进行监测，控制和处理，避免废水流入海洋破坏海床及海洋环境、废气及固体废物破坏土壤及周边社区及生态环境。

The company shall monitor, control, and treat wastewater, exhaust gases, and solid waste generated from business activities, industrial processing, and cleaning facilities before discharge or disposal, in accordance with relevant requirements. This is to prevent wastewater from flowing into the ocean and damaging the seabed and marine environment, as well as to avoid exhaust gases and solid waste from harming soil, surrounding communities, and the ecological environment.

降低风险：

Risk Reduction Measures:

如果我们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，从而防范或降低因不妥善处理有害物质、废物与残留物、噪音和震动及能源使用带来的相关具体风险。

If we have reasonable grounds to believe that such risks exist, we will, based on the specific position of the enterprise in the supply chain, immediately work together with suppliers and other stakeholders to develop, adopt and implement a risk management plan, thereby preventing or reducing the specific risks associated with the improper handling of hazardous substances, waste and residues, noise and vibration, as well as energy usage.

七、生物多样性与植物、土地保护

Article 7: Biodiversity and Plant, Soil Protection

我们深刻认识到，工业活动与土地开发可能对生态系统造成不可逆的影响，包括但不限于：栖息地、野生动植物、植物群落以及生态系统破坏、生态系统服务的损害、物种多样性丧失、土地退化及森林资源锐减。

We fully recognize that industrial activities and land development may cause irreversible impacts on ecosystems, including but not limited to: habitat fragmentation, wildlife and plant community degradation, ecosystem disruption, impairment of ecosystem services, biodiversity loss, land degradation, and sharp declines in forest resources.

公司承诺，在生产经营活动中尽可能减少业务对生物多样性带来的负面影响，最大限度地减少对自然环境的干扰，避免直接砍伐森林，并积极推动土地资源的可持续利用。

The company is committed to minimizing the negative impacts of our operations on biodiversity, reducing interference with the natural environment to the greatest extent possible, avoiding direct deforestation, and actively promoting the sustainable use of land resources.

降低风险：

Risk Reduction Measures:

如果我们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，从而降低对生物多样性及土地资源破坏相关的具体风险。

If we have reasonable grounds to believe such risks exist, we will—based on our specific position in the supply chain—immediately collaborate with suppliers and other stakeholders to develop, adopt, and implement risk management plans to mitigate specific risks related to biodiversity loss and land degradation.

八、结社自由与集体协商

Article 8: Freedom of Association and Collective Bargaining

公司承诺，遵守所在国家和地区的相关法律规定，工人享有加入工会，进行谈判以及集体协商的自由，公司也应尊重其不加入此类活动的权利。职工和或职工代表不应受到歧视，且应能够在工作场所行使其代表职能。

The company promises to abide by the relevant laws and regulations of the countries and regions where it operates. Workers are entitled to join trade unions, engage in negotiations and conduct collective consultations. Workers and/or their representatives should not be discriminated against and should be able to exercise their representative functions in the workplace.

降低风险：

Risk Reduction Measures:

如果我们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，从而解决限制其工人结社自由与集体协商相关的具体风险。

If we have reasonable grounds to believe such risks exist, we will promptly collaborate with suppliers and other stakeholders to develop, adopt, and implement a risk management plan tailored to the company's specific position in the supply chain. This plan will address concrete risks related to restrictions on workers' freedom of association and collective bargaining rights.

九、人身安全与职业健康

Article 9: Personal Safety and Occupational Health

公司承诺，在从事原料开采、运输、交易、处理及出口等经营活动中，不会直接或间接支持、参与和关联任何存在严重威胁人身安全和严重职业健康的行为。

The company commits that in its operations involving raw material extraction, transportation, trading, processing, and export, it will not directly or indirectly support, participate in, or be associated with any activities that pose severe threats to personal safety or occupational health.

公司承诺，将采取有效措施，保持员工、承包方和其他相关方在工作中的身心健康，防止由于不当的工作条件，包括不安全的建筑、化学品和机械设备等造成健康伤害，并持续改善工作环境。

The company pledges to implement effective measures to safeguard the physical and mental well-being of employees, contractors, and other relevant parties in the workplace. This

includes preventing health hazards caused by improper working conditions, such as unsafe structures, chemicals, and machinery, while continuously improving the work environment.

公司将本着持续改进的原则，将该政策融入公司管理体系及各相关部门职责，纳入与供应商的合同或协议之中。对于供应商，我们会根据我们的风险管理流程评估风险，并根据尽责采购管理流程进行采购，对于每笔交易会严格审查对应文件并保留记录。我们设立了申诉渠道广泛听取意见并持续改善。公司同时承诺遵守联合国相关制裁决议，并加强同行业及有关利益相关方的沟通与合作，广泛传播该政策，并籍此持续提高公司的供应链尽责管理能力。

Guided by the principle of continuous improvement, the company will integrate this policy into its management system and the responsibilities of relevant departments, as well as incorporate it into contracts or agreements with suppliers. For suppliers, we will assess risks according to our risk management procedures and conduct procurement following due diligence processes. Each transaction will undergo strict document review with records retained. We have established grievance channels to gather broad feedback for ongoing improvement. The company further commits to complying with relevant United Nations sanctions resolutions and enhancing communication and cooperation with industry peers and stakeholders. This policy will be widely disseminated to continuously strengthen the company's supply chain due diligence capabilities.

该政策自发布之日起生效。

This policy comes into effect as of the date of its release.

广东佳纳能源科技有限公司

Guangdong Jiana Energy Technology Co., Ltd.

2025 年 12 月

December 2025