



浙江海创锂电科技有限公司

Zhejiang Hitrans Lithium Battery Technology Co.,Ltd.

Responsible management policy for responsible mineral resource supply chain

负责任矿产资源供应链的尽责管理政策

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to adverse impacts to society, Hitrans commits to adopt the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Chinese Guidance), published by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Edition 3 published by the OECD (OECD Guidance). The scope of application for Zhejiang Haichuang Lithium Electric Technology Co., Ltd. nickel, cobalt, manganese, lithium, and other minerals supply chain; We will disseminate this policy widely and implement it in the supply chain of mineral resources in accordance with the China Guidelines and the OECD Guidelines.

认识到在高风险区域从事矿产开采、交易、处理、出口存在可能形成重大负面影响的风险, 并认识到我们有尊重人权、不对社会产生负面影响的义务, 海创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) 和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), 并将其纳入与矿产资源供应商签订的合同或协议之中, 适用范围为浙江海创锂电科技有限公司的镍、钴、锰、锂、等矿产供应链; 我们将广泛传播这个政策, 并且将此政策按照《中国指南》和《OECD 指南》在矿产资源供应链中推行。

Regarding serious abuses associated with the extraction, transport or trade of minerals:与矿产开采、运输、或交易有关的严重侵权行为:

1. While sourcing from, or operating in high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of: 在高风险区域开展采购或经营活动时, 我们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:
 - i. the worst forms of child labour (Hazardous work is one of the worst forms of child labour)¹; 最恶劣形式的童工 (危害性工作是最恶劣形式童工中的一种)

¹Many activities in artisanal mining are considered hazardous as it includes work underground, under water, carrying heavy loads, work with dangerous machinery and tools and working with toxic chemicals such as mercury and cyanide. The ILO includes in its definition of hazardous child labour “work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to



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- ii. any forms of torture, cruel, inhuman and degrading treatment; 任何形式的酷刑、残暴、不人道和有辱人格的待遇;
- iii. any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily; 任何形式的强迫或强制劳动, 即以惩罚相威胁, 在他人非自愿的情况下迫使从事一切劳动或服务;
- iv. other gross human rights violations and abuses such as widespread sexual violence; 其他严重侵犯和践踏人权的的行为, 如普遍的性暴力行为;
- v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide. 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

Regarding risk management of serious abuses:对严重侵权行为的风险管理

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1. 如果我们有合理理由认为该风险存在, 即上游供应商正从实施第 1 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, 我们将立即中止或中断与该上游供应商的合作。

Regarding direct or indirect support to non-state armed groups:关于直接或间接支持非国家武装团体

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who: 我们不会容忍任何通过矿产开采、运输、交易、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、交易、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, 支付费用, 或以其他方式为其提供后勤支援或设备等。

temperatures, noise levels, or vibrations damaging to their health”, ILO Recommendation 190 to C182, Section II Hazardous work, item 3d

1 手工矿区的许多活动被认为是有害的, 因为它包括地下工作、水下工作、搬运重物、使用危险的机械和工具以及使用有害化学品, 例如水银和氰化物。ILO 在建议 190 至 C182 的第二节有害工作, 3d 条款中定义了有害童工, 即在不健康的环境下工作, 例如可能将儿童暴露在有害物质、药剂或工艺中, 或者使其承受会损害其健康的温度, 噪音或震动。

http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312528:NO).



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- i. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or 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；并/或
- ii. illegally tax or extort money or minerals resources at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or 在矿区入口、通往矿区沿线或矿产资源交易地非法征税或者勒索钱财或自然资源；并/或
- iii. illegally tax or extort intermediaries, export companies or international traders. 对中间商、出口企业或国际贸易商非法征税或勒索。

Regarding risk management of direct or indirect support to non-state armed groups:对向非国家武装团体提供直接或间接支持的风险管理

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3. 如果我们有理由认为，上游供应商从向非国家武装团体（见第三段中定义）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，我们将立即中止或中断与该供应商的合作。

Regarding public or private security forces:关于公共或私人安全武装：

5. We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders. 我们同意根据第十段之规定，杜绝向非法控制矿区、运输路线以及供应链上游参与方；在矿区入口、通往矿区的沿线或矿产资源交易点非法征税、勒索钱财或矿产资源；对中间商、出口企业或国际贸易商非法征税或勒索钱财的公共或私人安全武装提供直接或间接支持。
6. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or 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. 我们认可，矿区及/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、保护矿区或运输路线以使合法的开采和交易不受干扰。



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7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with internationally recognised standards. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.在我们或我们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，我们承诺或者将规定，这类安全武装须和国际认可标准一致。尤其是，我们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。
8. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations 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.我们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。
9. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners 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.我们将支持或采取措施，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区给弱势群体带来的不利影响，尤其是对小作坊的不利影响。

Regarding risk management of public or private security forces:对公共或私人安全武装的风险管理：

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.如果我们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，立即与供应商和利益相关方一起制定、采用和实施风险管理计划，从而使第五段中所述的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奏效，我们将中止或中断与上游供应商的合作。我们发现在一定程度上有可能存在违背第8段和第9段行为的情况下，将采取同样的应对措施。



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Regarding bribery and fraudulent misrepresentation of the origin of minerals:关于行贿受贿及矿产原产地的欺诈性失实陈述:

11. We will not offer *directly or indirectly*, 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, *or failing to follow relevant international standards and conventions for anticorruption*. 我们不会直接或间接地提出、承诺、给予或索要任何贿赂，并且抵制索贿，不会为了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或不遵守相关国际反腐败标准和惯例。

Regarding money laundering:关于洗钱:

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers. 如果我们有理由认为，存在因开采、交易、处理、运输或出口在矿区入口、运输路线沿线、或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产资源所引起或与之相关的洗钱风险，我们将支持或采取措施，为有效消除洗钱行为做出贡献。

Regarding the payment of taxes, fees and royalties due to governments:关于向政府支付的税收、费用及特许费:

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with internationally recognised transparency standards. 我们将确保向政府支付所有高风险区域矿石开采、交易、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，对此类支付根据国际认可的透明度标准进行披露。

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments: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

14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities,



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international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation of 6 months. 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。风险降低措施实施六个月未奏效，我们将中止或中断与上游供应商的合作。

Regarding occupational health and safety:

关于职业健康与安全

15. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and / or indirect employees and / or any person present on the party's operations. 在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何为其直接和/或间接雇员和/或在其生产现场的任何人员提供威胁到生命的职业健康与安全环境的一方，或从该方处采购或与之存在关联。

Regarding risk management of occupational health and safety:

关于职业健康与安全的风险管理：

16. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing life threatening occupational health and safety conditions as defined in paragraph 15. 如果我们有合理理由认为上游供应商提供如 15 条中所定义的威胁到生命的职业健康和安全环境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。

Regarding child labour:关于童工

17. While sourcing from, or operating in high-risk areas, we will not employ, profit from, assist with, or facilitate, or source from, or be linked to, any party employing, profiting from, assisting with, or facilitating the employment of children under the minimum working age which is legally prescribed by the host country laws and regulations. If there is no relevant host country law or regulation, the minimum working age shall be 16 years. 在高风险区域开展采购或开展经营活动时，我们将不会雇佣、获利于、协助或为低于东道国法律或法规规定的最低工作年龄的儿童就业而提供便利或跟其采购或与其有关联。如果东道国没有相关的法律或法规规定，最低工作年龄为 16 岁。



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Regarding risk management of child labour: 关于童工的风险管理

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party employing children as defined in paragraph 17. 如果我们有合理理由认为该风险存在，即上游供应商正从第 17 条所规定的任何一方雇佣童工进行采购或与该方有关联，我们将立即中止或中断与该供应商的合作。

Regarding land rights, emissions and artisanal operators: 关于土地权利、排放和小作坊

We do not participate in, tolerate, or benefit from the absence of the free, prior, informed consent of local and indigenous people

The extraction of resources on land, including those who hold legal titles, leases, concessions or permits. Hai Chuang Technology does not participate

Does not tolerate and does not benefit from the lack of respect and protection for the culture and heritage of local and indigenous people or from the detriment of local traditions The mining of culture.

We do not participate in, tolerate or benefit from the exploitation of resources on land where legal title, tenure, concession or permit have been illegally obtained, or where domestic law has been violated. Seafront ensures that significant adverse effects on the condition of the surrounding soil, air and water are avoided. Serious violations of local laws and regulations, including the manufacture, trade, use of chemicals and hazardous substances subject to international bans because of their high toxicity to organisms, environmental persistence, or potential irreversible ecological effects, or the release of arsenic and mercury.

We commit to periodically assess and mitigate the adverse impacts of mining on soil, air and water. Consider the surrounding soil and air

And the conditions of water resources, adopt pollution prevention methods and technologies with technical and financial feasibility and applicability, and try to avoid, reduce and control pollution; According to the relevant laws and regulations of the host country, the main pollutants discharged by enterprises should be monitored, and the pollutant discharge status of enterprises should be mastered in time, and the monitoring results should be clearly recorded and publicized. Adopt strategies to control or reduce emissions.

We agree to ensure that abide by the laws of the chemicals and toxic substances shall be applicable to the management requirements, avoid using for manufacturing, trading and biology high toxicity, environmental persistence, or potentially irreversible ecological impact under the international ban on chemicals and hazardous substances, including in accordance with the highest international standards of strict control of arsenic and mercury emissions, management of cyanide, Ensure that hazardous substances are handled, stored and transported in accordance with relevant laws and regulations, and that there is no leakage, spillage or other form of release into the environment during the process.

We prohibit the exploitation of resources in World Heritage sites or statutory protected areas, and the resulting impact on the outstanding universal value of these sites Threat.

We specifically focus on the risks of forced Labour, child Labour, unsafe working conditions, uncontrolled use of hazardous chemicals and other significant environmental impacts associated



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with small workshops or small-scale miners and seek to establish production relationships with small workshops or small-scale miners in mining areas.

我们不参与、不容忍、也不受益于在未获得当地人和土著人自由、预先、知情的同意的土地上开采资源，包括持有法定所有权、租赁权、特许权或许可证的开采商。海创科技不参与、不容忍、也不受益于当地人和土著人的文化和遗产未受尊重和保护，或损害当地人传统文化的开采作业。

我们不参与、不容忍、也不受益于在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源。海创科技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。

我们承诺定期评估、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，随时掌握企业排污状况，并明确记录、公开监测结果；采取控制或减少排放的策略。

我们同意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和危险物质，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、无溢溅或以其他方式释放到环境中。

我们禁止在世界遗产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。

我们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。

Risk management on land rights, emissions and small workshops: 关于土地权利、排放和小作坊的风险管理

If we have reasonable grounds to believe that there is such a risk, we will, depending on where the company is in the supply chain, immediately develop, adopt and implement a risk management plan with suppliers and other stakeholders to prevent or mitigate violations Land rights, causing significant adverse environmental impacts or specific risks associated with small workshops or small-scale miners.

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。