

负责任矿山的采购准则

Code of procurement for responsible minerals

中航锂电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，中航锂电承诺采纳并广泛传播《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。为此，中航锂电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：

CALB 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. CALB has committed to adopt and widely promote the policies of 《Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains》 and incorporate it into the management of supply chain. Therefore, CALB promises and requires our business partners to identify and avoid the following risks in business activities:

1. 严重侵犯人权的行为 Serious violations of human rights

1.1 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：
CALB neither tolerates nor profits from, encourages, assists or facilitates any party's implementation in any way:

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. Forced or compulsory labor refers to the threat of punishment, forcing anyone to perform labor or services that is not provided voluntarily by the person;

③ 最恶劣形式的童工； The worst form of child labor

④ 其他严重侵犯和践踏人权的行爲，如大规模性暴力； Other serious violations and abuses of human rights, such as large-scale sexual violence;

⑤ 战争罪或其他严重违反国际人道法的行为，反人类罪或种族灭绝。 War crimes or other serious violations of International Humanitarian Law, crimes against humanity or genocide.

2. 直接或间接支持非法的有组织武装团体和公共或私人安全武装 Direct or indirect support to illegal armed groups and public or private security forces

2.1 我们不容忍任何通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供直接或间接的支持。通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供“直接或间接的支持”，包括且不限于从非法的有组织武装团体或其关联方购买资源，向其付款，或以其他方式向其提供后勤支援或设备等。这些武装团体或关联方： CALB 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 them. These armed groups or their affiliates include:

① 非法控制矿址，或以其他方式控制运输路线、矿产资源交易点以及供应链的上游行为主体； Illegally control mine sites or otherwise control

transportation routes and points where minerals are traded and upstream actors in the supply chain;

② 在矿址入口、运输路线沿线或矿产资源交易点非法征税或者勒索钱财或矿产资源; Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded

③ 对中间商、出口企业或国际贸易商非法征税或勒索。Illegally tax or extort intermediaries, export companies or international traders.

2.2 我们将杜绝向非法控制矿址、运输路线以及供应链上游参与方，在矿址入口、运输路线沿线或矿产资源交易点非法征税或勒索钱财或矿产资源，或者向中间商、出口企业或国际贸易商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。CALB agree to eliminate direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain, who illegally tax or extort money or minerals at point of access to mine sites along transportation routes or at points where minerals are traded and who illegally tax or extort intermediaries, export companies or international traders.

2.3 我们认可，矿址、周边地区和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。CALB accept the fact 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.

2.4 在我们或我们供应链上的任何企业或商业关系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，这类安全武装需被公认的处理公共

或私人安全武装的国际标准和指导性文件所认可。尤其是，我们将支持或采取措施，运用筛查政策，确保已知实施过侵犯人权行为的个人或安全武装单位不被录用。Where CALB or any company in our supply chain contract with public or private security armed force. CALB commit to or will require these security force will be engaged in international standard or guidance document which are generally recognized in dealing with public or private security armed force. In particular, CALB 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.

2.5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，共同制定提高公共安全武装安保费用的透明度、相称性和问责性的可行解决方案。CALB 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.

2.6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。CALB 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.

2.7 降低风险 Risk mitigation

2.7.1 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 CALB has reasonable grounds to believe that the upstream suppliers purchase from or are associated with any party that has seriously violated human rights, CALB will immediately suspend or discontinue the engagement with that supplier.

2.7.2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。In accordance with the specific position of the company in the supply chain, CALB 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. These forces illegally control mine sites, transportation routes and upstream actors in the supply chain or control mine sites, transportation routes and upstream actors in the supply chain, and tax or extort money or minerals at point of access to mine sites along transportation routes or at points where minerals are traded or tax or extort intermediaries, export companies or international traders. In such cases, CALB will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

3. 腐败、洗钱和向政府支付的各项费用 Corruption, money laundering

and various fees paid to the government

3.1 我们不提供、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。CALB 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.

3.2 我们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。CALB prohibit 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.

3.3 如果我们有理由认为，存在因开采、交易、处理、运输或出口在矿址入口、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。CALB will support efforts, or take steps, to contribute to the effective elimination of money laundering where CALB 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.

3.4 我们承诺采取有效措施，防止卷入洗钱或恐怖主义融资，例如：通过明确和发布供应商、客户身份和实际所有权等，监测异常或可疑活动的交易，保存高于适用法律法规中金额上限的现金交易记录。CALB promise to take

effective measures to prevent being involved in money laundering or terrorist financing, for example, by clarifying and publishing the identity and actual ownership of suppliers and customers, monitoring transactions of abnormal or suspicious activities, and keeping records of cash transactions higher than the upper limit of the amount in applicable laws and regulations

3.5我们将确保向政府支付所有与受冲突影响和高风险区域矿产资源开采、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境置，对此类支付进行披露。CALB will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, CALB commit to disclose such payments

3.6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，以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。In accordance with the specific position of the company in the supply chain, CALB commit to engage with suppliers, central or local governmental authorities, international organizations, 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. CALB will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

4. 土地权利、排放和小作坊 Land rights, emissions and small worksites

4.1 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、特许权或許许可证

的开采商。CALB do not participate in, tolerate, benefit from the exploitation of mineral resources without freely and prior consent of locals and indigenous people, including those miners who have legal ownership, lease rights, franchises or permits.

4.2 我们不参与、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。CALB do not participate in, tolerate, and benefit from the mining operations where the culture and heritage of locals and indigenous peoples are not respected and protected or damage the traditional culture of locals.

4.3 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。CALB do not participate in, tolerate, or benefit from the exploitation of mineral resources that has illegally obtained legal ownership, lease rights, franchises or permits, or violates domestic laws.

4.4 我们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。CALB ensure that CALB 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.

4.5 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。CALB 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, CALB will adopt pollution prevention methods and technologies with technical, financial feasibility and applicability, try to avoid, reduce and control pollution in accordance 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.

4.6 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。CALB 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. CALB 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.

4.7 我们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。CALB prohibit the exploitation of resources in world heritage sites or legally protected areas and the threat to the outstanding universal value of these sites.

4.8 我们具体关注与小作坊或小规模采矿工相关强迫劳动、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。CALB 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.

4.9 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 CALB has reasonable grounds to believe that such risks exist, CALB 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.

公司名称 Company:

签署代表 Signature:

日期 Date: