

欣旺达电子股份有限公司

供应链可持续发展政策

Sunwoda Electronic Co., Ltd.

Supply Chain Sustainability Policy

一、理念

欣旺达电子股份有限公司（以下简称为“欣旺达”）坚守“创新驱动新能源世界进步”的使命，致力于“成为受人尊重的世界级新能源企业”，全面推动“迈向可持续的未来”的 LEAP 可持续发展战略。欣旺达采取行动支持联合国可持续发展目标(SDGs)落实，遵循并积极践行《世界人权宣言》等国际公约，参考《经合组织负责任商业行为尽责管理指南》、《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》等构建管理体系，尽最大努力推动供应链可持续发展。欣旺达会根据与利益相关方的沟通及时更新政策。

I Philosophy

Sunwoda Electronic Co., Ltd. (hereinafter referred to as "Sunwoda") adheres to the mission of "Innovation Drives the Progress of New Energy World" and is committed to "Becoming a Respected World-Class New Energy Enterprise", fully advancing the sustainability strategy of "LEAP toward a Sustainable Future". Sunwoda takes actions to support the implementation of the United Nations Sustainable Development Goals (SDGs), follows and actively practices international covenants such as the Universal Declaration of Human Rights, and references the OECD Due Diligence Guidance for Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas to build its management system, striving to promote supply chain sustainability to the greatest extent. Sunwoda will update this policy in a timely manner based on communications with stakeholders.

二、目的及范围

欣旺达构建供应链可持续发展体系，协同供应链尽最大努力终止、防范和减轻企业运行、产品及服务对人类及地球带来的不利影响，同时采取措施发挥积极影响。

本政策适用于为欣旺达提供产品或服务的任何主体，包括该主体的子公司、附属机构、分包商，以及供应配套欣旺达产品所需产品与服务的上游供应商，并涵盖在该供应商经营场所作业的全部人员。

当国家法律与国际人权标准存在差异时，我们努力遵循更高的标准。

此外，当国家法律与欣旺达的环境责任、健康和安全标准存在差异时，在不违背国家法律的前提下，我们努力遵循更适合欣旺达可持续发展要求的标准。

II Purpose and Scope

Sunwoda establishes a sustainable development system of supply chain, working with its supply chain to make every effort to end, prevent and mitigate adverse impacts of its operations, products and services on people and the planet, while taking measures to create positive impacts.

This policy applies to any entity that supplies products or services to Sunwoda. This term shall also include such entity's subsidiaries, affiliates and subcontractors, upstream suppliers that provide products and services incorporated into Sunwoda's finished products, and all personnel conducting operations at the Supplier's premises.

Where national laws differ from international human rights standards, we endeavor to follow the higher standard.

Furthermore, where national laws differ from Sunwoda's environmental responsibility, health and safety standards, we endeavor to follow the standards that are more suitable for Sunwoda's sustainable development requirements, as long as national laws are not violated.

三、供应链可持续发展管理方法

欣旺达根据欧盟《电池和废电池法规》(EU 2023/1542)、欧盟《企业可持续发展尽职调查指令》(CSDDD)、《经合组织负责任商业行为尽责管理指南》、RBA 验证评估计划 (VAP) 等法规与标准框架，将可持续发展融入欣旺达的政策与管理体系：

III Supply Chain Sustainability Management Approach

Based on the EU Battery Regulation (EU 2023/1542), EU Corporate Sustainability Due Diligence Directive (CSDDD), the OECD Due Diligence Guidance for Responsible Business Conduct, the RBA Validated Assessment Program (VAP) and other regulatory and standard frameworks, Sunwoda integrates sustainable development into its policies and management systems:

1) 制定、采纳和沟通有关可持续发展行为议题的各项政策，采取的行动包括但不限于：

1) Formulate, adopt and communicate policies on sustainability conduct topics, including but not limited to:

- 审查与更新现有关于可持续发展的议题（如劳工、人权、环境、温室气体排放、信息披露、消费者保护、冲突矿产、供应链管理、尽职调查、废弃物处理、反对贿赂与腐败等）的政策，使其符合国际原则与标准；
- Review and update existing policies on sustainability topics (e.g., labor rights, human rights, environment, greenhouse gas emissions, information disclosure, consumer protection, conflict minerals, supply chain management, due diligence, waste recycling, antibribery and corruption, etc.) to align with international principles and standards;
- 制定具体政策应对欣旺达面临的最重要风险，以风险评估的结果为基础，为企业消除这些风险采取行动提供指导；
- Develop specific policies to address the most significant risks faced by Sunwoda, and provide guidance based on risk assessment results for the company to take actions to eliminate these risks;
- 公开发布欣旺达关于供应链可持续发展政策；
- Publicly release Sunwoda Electronic Co., Ltd. Supply Chain Sustainability Policy;
- 将对相关员工和其他员工进行供应链可持续发展相关政策的宣贯或培训；
- Provide relevant employees and other staff with awareness or training on supply chain sustainable development policies;
- 随着风险在运营、供应链与其它业务关系中的演变，更新政策。
- Update policies as risks evolve in operations, supply chains and other business relationships.

2) 将关于可持续发展行为议题的政策嵌入欣旺达管理体系，采取的行动包括但不限于：

2) Embed policies on sustainability conduct topics into Sunwoda's management systems, including but not limited to:

- 将监督与管理责任分配给相关高级管理人员;
- Assign supervision and management responsibilities to relevant senior management personnel;
- 将实施政策职责分配给相关部门;
- Assign policy implementation responsibilities to relevant departments;
- 制定或调整现有信息与记录保存制度，以收集有关供应链可持续发展管理过程、相关决策与应对措施的信息;
- Establish or adjust existing information and record-keeping systems to collect information on supply chain sustainability management processes, related decisions and response measures;
- 在相关高级管理人员与实施部门之间建立沟通渠道，以分享与记录有关风险和决策的信息;
- Establish communication channels between relevant senior management and implementing departments to share and record information on risks and decisions;
- 通过组建跨职能部门的团队或委员会等方式，分享有关风险的信息与决策，推动各团队与业务部门在供应链可持续发展相关方面达成统一;
- Share information and decisions on risks and promote alignment among teams and business units on supply chain sustainability matters, including through the formation of cross-functional teams or committees;
- 为相关员工提供培训，以帮助其理解并实施供应链可持续发展政策，并提供与其所需足够的资源;
- Provide training to relevant employees to help them understand and implement the Supply Chain Sustainability Policy, and provide sufficient resources as needed;
- 制定员工与相关部门与供应链可持续发展相关的激励措施;

- Develop incentives for employees and relevant departments related to supply chain sustainability;
- 制定、借鉴或调整现有申诉程序;
- Establish, adopt or adjust existing grievance procedures;
- 制定应对风险流程，在政策未得到执行的情况下进行补救。
- Develop risk response processes to provide remedies when the policy is not implemented.

3) 将可持续发展行为期望与政策融入与供应商及其它业务关系的合作中，采取的行动包括但不限于：

3) Integrate sustainable development conduct expectations and policies into cooperation with suppliers and other business relationships, including but not limited to:

- 就供应链可持续发展政策的主要方面与供应商以及其它相关业务关系进行沟通;
- Communicate the key aspects of the Supply Chain Sustainability Policy to suppliers and other relevant business relationships;
- 将关于供应链可持续发展议题的条件与期望纳入供应商及其它业务关系的合同或其它形式的书面协议;
- Incorporate conditions and expectations on supply chain sustainable development topics into contracts or other forms of written agreements with suppliers and other business relationships;
- 制定并实施针对供应商与其它业务关系的可持续发展预审过程。在可行的情况下，根据特定风险与环境调整此类过程，从而聚焦于已被识别与业务关系及其活动或运营领域相关的可持续发展议题;
- Develop and implement a sustainability prescreening process for suppliers and other business relationships. Where feasible, tailor such processes based on specific risks and circumstances, so as to focus on sustainability topics identified as relevant to the business relationship and its activities or operational areas;
- 为供应商与其它业务关系提供足够的资源与培训，使其理解并执行相关政策;

- Provide sufficient resources and training for suppliers and other business relationships to enable them to understand and implement the relevant policies;
- 寻求理解并消除由企业开展业务的方式造成供应链可持续发展政策未能实施的障碍。
- Seek to understand and eliminate barriers to the implementation of the Supply Chain Sustainability Policy caused by the way the company conducts its business.

欣旺达始终以基于风险的管理原则，通过以下方式开展管理：

Sunwoda consistently applies risk-based management principles and carries out management through the following approaches:

1) 识别与评估对供应链可持续发展议题的实际或潜在不利影响

1) Identify and assess actual or potential adverse impacts on supply chain sustainable development topics

- 风险识别的范围主要包括五大领域：健康安全、环境、劳工、道德与管理体系，这五大模块都需要有完善的尽职调查管理体系支持。
- The scope of risk identification mainly covers five areas: health and safety, environment, labor, ethics and management systems, each of which requires a robust due diligence management system.
- 评估风险时要将供应商地理位置风险、劳工风险、健康安全和环境风险、以往审核表现及媒体报道这几个因素包含进来。
- When assessing risks, factors such as supplier geographic risk, labor risk, health, safety and environmental risk, past audit performance and media reports shall be included.
- 地理位置风险：是指和供应商地理位置有关的环境、社会风险，风险可以是国家层面、州或省级行政单位层面、地方层面的，具体视可获得的信息内容而定。通过使用专业研究机构或商业风险数据提供商提供的风险数据平台和风险评估工具查询。
- Geographic risk: it refers to environmental and social risks associated with the supplier's geographic location, which can be at the national, state/provincial, or local level,

depending on the information available. This can be assessed using risk data platforms and risk assessment tools provided by professional research institutions or commercial risk data providers.

- 供应商内在风险：是指供应商的风险情况，例如：与员工人口特征、现场条件、生产工艺相关的风险，以及目前采取的风险管理措施。这项指标包含：劳工风险、健康安全和环境风险，以及针对经营或生产环节所作的重大调整。通过供应商自填风险评估问卷，评估他们的内在风险。
- Supplier inherent risk: it refers to the supplier's risk profile, such as risks related to workforce demographics, site conditions, production processes, and current risk management measures. This indicator includes labor risk, health, safety and environmental risk, and major changes made to operations or production processes. Suppliers are assessed on their inherent risk through self-completed risk assessment questionnaires.
- 过往审核表现：是指经由欣旺达内部人员或第三方审核机构先前出具的审核结果所反映的供应商表现（这项对新供应商不是强制要求），特别是如果发现各类零容忍问题和极其严重不符合项，加强关注问题是否得到妥善解决。通过采用 RBA VAP、SMETA-4P 道德审计、商业社会责任准则(BSCI) 这样的审核项目对供应商的审核表现评级或打分，例如将审核表现级别为 A 类的对应着低风险。
- Past audit performance: it refers to supplier performance reflected in previous audit results conducted by Sunwoda internal staff or third-party audit firms (this is not mandatory for new suppliers). Particular attention should be paid if any zero-tolerance issues or extremely serious non-conformities are found, ensuring that issues are properly resolved. Supplier audit performance is rated or scored using audit programs such as RBA (VAP), SMETA4P ethical audits, or BSCI. For example, an audit performance rating of Class A corresponds to low risk.
- 声誉风险：是指和供应商相关的负面新闻或社交媒体报道，如果供应商涉及生产带客户商标的商品，因媒体关注度更高，则声誉风险也更高。通过大型搜索引擎以及采购来源国或地区的新闻来源、专业媒体、政府间的数据库（如：联合国公布的制裁名单）查询。
- Reputational risk: it refers to negative news or social media reports related to the supplier. If the supplier is involved in producing goods bearing customer trademarks, the

reputational risk is higher due to greater media attention. This is checked using major search engines, news sources from the country or region of procurement, specialized media, and intergovernmental databases (e.g., UN sanctions list).

2) 终止、防范或减轻不利影响

2) End, prevent or mitigate adverse impacts

- 风险终止措施是指尽可能消除识别出的风险，例如：避免下单给高风险供应商，以避免出现与特定材料或者特定国家或地区相关的风险。
- Risk termination measures refer to eliminating identified risks as much as possible, for example: avoid placing orders with high-risk suppliers to prevent risks associated with specific materials or specific countries/regions.
- 风险防范措施是指通过实施积极的应对措施来减少风险升级为重大问题的概率，例如：采用低风险供应商取代高风险供应商，从而最大程度防止风险产生。
- Risk prevention measures refer to reducing the probability that risks escalate into major issues through proactive responses, for example: replacing high-risk suppliers with low-risk suppliers to prevent risks from arising to the greatest extent possible.
- 风险缓解措施是指将风险发生的可能性或产生的影响降至可接受的范围，并制定合适的应对措施。例如当实际或潜在发生风险问题时，要求供应商提供更多信息证明其低风险等级的合理性，针对中等级别问题或轻微不符合项，管控的重点可以聚焦在政策规章或培训上。
- Risk mitigation measures refer to reducing the likelihood or impact of risks to an acceptable level and developing appropriate responses. For example, when actual or potential risks arise, requiring suppliers to provide more information to justify their low-risk rating; for medium level issues or minor non-conformities, the focus of control can be on policies, regulations, or training.

3) 跟踪实施情况与结果

3) Track implementation and results

- 供应商可持续发展表现纳入季度绩效考评表，对其应对气候变化、环境合规、社会责任舆情进行评估，并指导采购决策。
- Supplier sustainability performance is included in the quarterly performance evaluation form, assessing their climate change response, environmental compliance, and social responsibility reputation, and guiding procurement decisions.
- 定期开展供应商可持续发展审核，检验供应商是否存在不符合项的风险。审核还可用于确认风险缓解举措的有效性或管理风险评估期间发现不符合项的根本原因。通过供应商可持续发展审核报告表单评估供应商表现是否符合可持续发展的要求。
- Regular supplier sustainability audits are conducted to check whether suppliers have risks of non-conformities. Audits can also be used to confirm the effectiveness of risk mitigation measures or to manage root causes of non-conformities identified during risk assessments. Supplier performance is assessed against sustainability requirements using the supplier sustainability audit report form.
- 可以接受有资质的第三方机构审核报告，代替合规性年度审核，例如：电子行业供应链社会责任、环境标准和商业道德 RBA VAP 审核，商业社会行为准则 BSCI 审核，供应商商业道德信息交流，Sedex 审核。
- Audit reports from qualified third-party organizations may be accepted in lieu of the annual compliance audit, for example: RBA VAP audits for social responsibility, environmental standards and business ethics in the electronics industry supply chain; BSCI audits; and Sedex audits.

4) 沟通如何消除影响

4) Communicate how impacts are remediated

- 妥善实施整改计划，确保供应商将年度审核时发现的不符合项充分关闭。有效的预防与整改措施计划包含五个步骤：与供应商共同制定整改计划、查看并审批供应商纠正和预防措施计划、监督不符合项的关闭、关闭不符合项、年度审核的结果成为下一年度风险评估的输入。

- Properly implement corrective action plans to ensure that suppliers fully close non-conformities identified during annual audits. An effective, preventive and corrective action plan includes five steps: jointly develop a corrective action plan with the supplier; review and approve the supplier's corrective and preventive action plan; monitor the closure of non-conformities; close non-conformities; and use the results of the annual audit as input for the next year's risk assessment.
- 年度定期回顾供应商可持续发展管理体系，确保整个管理体系持续与企业的运营环境和战略方向保持一致、确保实现目标并有效地管控风险。
- Conduct an annual review of the supplier sustainability management system to ensure that the entire management system remains aligned with the company's operating environment and strategic directions, achieves objectives, and effectively manages risks.

5) 适时实现补救

5) Provide remedy when appropriate

- 当识别到高风险供应商对我司直接造成了不利影响时，应根据影响程度和实际情况及时采取补救措施，包括但不限于道歉、补偿、惩罚性措施等。
- When a high-risk supplier is identified as having caused direct adverse impacts on Sunwoda, timely remedial measures shall be taken according to the extent of impact and actual circumstances, including but not limited to apology, compensation, and punitive measures.
- 如果对我司造成的是间接影响，可以利用自身对业务关系的影响力，征询受影响相关方代表的意见并与之开展合作确定补救的方式。开展补救行动的过程中我们鼓励通过调查、积极对话、合作、干预的方式，尽可能降低不利影响。
- If the impact on Sunwoda is indirect, we may use our influence over the business relationship to consult with representatives of affected stakeholders and cooperate with them to determine the remedy. In carrying out remedial actions, we encourage the use of

investigation, active dialogue, cooperation, and intervention to minimize adverse impacts as much as possible.

四、重点议题

IV Key Topics

欣旺达围绕集团 LEAP 可持续发展战略，发布《**供应商行为准则**》，并要求供应商签署，就法律合规及商业道德、人权与劳工、健康与安全、环境、治理和供应链五个方面对供应商提出明确要求。制定供应链可持续发展专项方案，明确了以低碳、回收材料、尽职调查为核心议题展开专项工作。

Based on the Sunwoda's sustainability strategy, Sunwoda has issued the Supplier Code of Conduct and requires suppliers to sign it, setting forth clear requirements on five aspects: legal compliance and business ethics, human rights and labor, health and safety, environment, governance and supply chain. A dedicated supply chain sustainability program has been developed, identifying low-carbon development, recycled materials, and due diligence as core topics for special initiatives.

五、申诉渠道

V Grievance Channels

欣旺达构建完善的申诉机制，倾听利益相关方的声音，并协同利益相关方积极改善及回应关注。

Sunwoda has established a robust grievance mechanism to listen to the voices of stakeholders and work with them to actively improve and respond to concerns.

六、供应链可持续发展政策遵循或借鉴的国际准则、公约及指南

VI International Standards, Conventions and Guidelines Followed or Referenced by the Supply Chain Sustainability Policy

《世界人权宣言》 <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

Universal Declaration of Human Rights

<https://www.un.org/en/aboutus/universaldeclarationofhumanrights>

《经合组织负责任商业行为尽责管理指南》 <https://mneguidelines.oecd.org/due-diligence-guidance-for-responsible-business-conduct.htm>

OECD Due Diligence Guidance for Responsible Business Conduct.

<https://mneguidelines.oecd.org/due-diligence-guidance-for-responsible-business-conduct.htm>

《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》

<https://mneguidelines.oecd.org/mining.htm>

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from ConflictAffected and high-risk Areas. <https://mneguidelines.oecd.org/mining.htm>

负责任商业联盟 <https://www.responsiblebusiness.org/>

Responsible Business Alliance <https://www.responsiblebusiness.org/>

欧盟《电池与废电池法规》(EU 2023/1542)

[https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1542&qid=1773365876157)

[content/EN/TXT/?uri=CELEX%3A32023R1542&qid=1773365876157](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1542&qid=1773365876157)

EU Battery Regulation (EU) 2023/1542

[https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1542&qid=1773365876157)

[content/EN/TXT/?uri=CELEX%3A32023R1542&qid=1773365876157](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1542&qid=1773365876157)

《企业可持续发展尽职调查指令》(CSDDD)

[https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025SC0080&qid=1773366202494)

[content/EN/TXT/?uri=CELEX%3A52025SC0080&qid=1773366202494](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025SC0080&qid=1773366202494)

Corporate Sustainability Due Diligence Directive (CSDDD) [https://eur-lex.europa.eu/legal-](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025SC0080&qid=1773366202494)

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本政策提供中英文两种版本，若内容上稍有细微出入，请以中文版为准。

This policy is issued in both Chinese and English versions. In the event of any minor discrepancy between the two language editions, the Chinese version shall prevail.