

欣旺达电子股份有限公司

环境管理声明

Sunwoda Electronic Co., Ltd.

Environmental Management Statement

2026 年 5 月

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1. 目的

Purpose

欣旺达电子股份有限公司（以下简称“欣旺达”“我们”或“公司”）作为一家负责任的企业，我们深知环境保护不仅是法律要求，更是对员工、客户、社区和未来世代的重要承诺。我们致力于在遵守国家及地方环保法规的基础上，以更高的标准推动绿色发展，通过技术创新、资源优化和流程改进，持续降低生产经营对环境的影响、提升环境表现。从节能减排、废弃物管理到可持续发展，我们定期评估进展，确保承诺落到实处。在追求业务发展的同时，我们坚持绿色低碳理念，努力实现经济效益与环境效益的和谐共生。我们相信，可持续发展不仅是责任，更是企业长期竞争力的核心。未来，我们将继续以行动践行绿色承诺，与各方携手共建清洁、健康的环境，为社会的可持续发展贡献力量。

As a responsible enterprise, Sunwoda Electronic Co., Ltd. (hereinafter referred to as "Sunwoda" "We" or "the Company") fully recognizes that environmental protection constitutes not merely a statutory obligation, but also a fundamental commitment to our employees, customers, communities, and future generations. We are committed to advancing green development by adopting elevated operational standards on top of full compliance with national and regional environmental laws and regulations. Through technological innovation, resource optimization, and process upgrading, we persistently mitigate the environmental footprint of our operations and improve our environmental performance. We conduct periodic progress assessments covering energy conservation, emission reduction, waste governance and sustainable development initiatives, to guarantee effective delivery of our pledges. In parallel with business expansion, we uphold green low-carbon development philosophies, endeavoring to realize synergistic harmony between economic returns and environmental performance. We firmly hold that sustainable development represents both a core corporate duty and the bedrock of our long-term competitive edge. Moving forward, we will continue to translate our green pledges into tangible actions, collaborate closely with all stakeholders to foster a clean, eco-friendly and healthy ecosystem, and contribute steadily to society's sustainable advancement.

为规范公司在环境方面的管理要求及措施，经充分征询外部利益相关方意见，特制定本声明文件。公司鼓励与其有业务往来的利益相关方（客户、供应商等）和公司员工共同遵守本声明文件规定。

This statement is formulated to standardize the Company' s environmental management requirements and measures, after full rounds of consultations with external stakeholders. The Company encourages its business counterpart stakeholders (including customers, suppliers and other partners), as well as all internal employees, to comply with the stipulations of this Statement.

2. 适用范围

Scope of Application

本声明适用于欣旺达电子股份有限公司及其合并财务报表范围子公司，覆盖所有业务及员工。

This statement applies to Sunwoda Electronic Co., Ltd. and its subsidiaries within the scope of the consolidated financial statements, covering all business operations and employees across the Group.

3. 管理架构

Management Structure

3.1 公司由高级管理层组成安全生产委员会，该委员会由董事长担任主席，各子企业总经理担任安全生产第一责任人，基于集团可持续发展目标，负责制定公司环境管理目标、方针，并对公司重要环境事项进行决策。公司设立专门的安环管理机构，依据公司整体环境管理目标及方针，制定各项环境管理制度，规划各项环境管理重点工作，并有效推进环境管理工作的落地。

The Company has set up a Safety Production Committee consisting of senior management, with the Chairman of the Board serving as its chairperson. The

general managers of each subsidiary shall act as the primary persons responsible for safety production. Aligned with the Group' s sustainable development goals, the Committee is responsible for formulating the Company' s environmental management objectives and policies, as well as making decisions on key environmental matters. The Company has established a dedicated EHS Management Department. In accordance with the Company' s overarching environmental management objectives and policies, the department develops environmental management systems, outlines key environmental management initiatives, and effectively ensures the implementation of environmental management activities.

3.2 公司设立由董事长担任主席的节能委员会，自上而下明确集团、各园区业务单位的节能管理职责，建立了目标分解、ISO 50001 体系执行推进与监督考核的闭环管理机制。具体职责分工及权限要求详见《2026 年欣旺达集团节能委员会组织架构与人员图》。

The Company has established an Energy Conservation Committee chaired by the Chairman. Clear top-down energy conservation management responsibilities are delineated across the Group and all business units of each industrial park. A closed-loop management mechanism has been rolled out, covering target decomposition, ISO 50001 system deployment & promotion, as well as supervisory assessment. For details on the specific division of responsibilities and authority requirements, please refer to the *2026 Sunwoda Group Energy Conservation Committee Organizational Structure and Staffing Chart*.

4. 管理要求

Management Requirements

为践行绿色发展理念，履行企业环保责任，推动可持续发展，公司识别环境管理关键领域，包括水资源管理、污染物管理、生物多样性管理、化学品管理、应对气候变化和循环经济等，并制定环境管理要求，包括但不限于以下几个方面：

To translate the philosophy of green development into practice, fulfill corporate environmental obligations, and advance sustainable development, the Company has identified core environmental management domains, including water resource management, pollutant management, biodiversity management, chemical management, climate change response, and the circular economy. We have also formulated environmental management requirements covering, but not limited to, the following aspects:

4.1 严格遵守法律法规

Strictly Comply with Laws and Regulations

公司应严格遵守运营地所在国家及地方的相关法律法规、标准及行业规范，确保企业运营合法合规，并定期评估法规变化，确保符合最新监管要求。

The Company shall strictly abide by applicable laws, regulations, technical standards, and industry norms within all jurisdictions of its operation, so as to maintain fully lawful and compliant business activities. The Company will also conduct periodic reviews of regulatory updates to sustain alignment with the latest supervisory requirements.

4.2 控制污染物排放

Pollutant Emission Control

在选址、建设、产品设计、生产、运输等全过程中，公司应识别并评估潜在的环境影响。采取预防性措施，避免或减少污染物的产生及排放。

Across the full lifecycle covering site selection, construction, product design, production and logistics transportation, the Company shall identify and assess all potential adverse environmental impacts. The Company will deploy precautionary control measures to eliminate or curtail the generation and discharge of pollutants.

4.3 与利益相关方充分沟通

Full Stakeholder Engagement & Communication

定期组织员工环保培训，提升全员环境意识，为供应商提供必要的资源，积极支持供应商的环境保护活动，帮助员工及供应商意识到自身活动对环境的影响，并鼓励其做出同样的承诺。同时，与投资者、政府、客户、社区等利益相关方保持沟通，推动供应链绿色化，共同履行环境责任。

The Company shall deliver regular environmental training sessions to employees to raise company-wide environmental awareness. The Company provides suppliers with essential resources and actively backs their environmental stewardship programs. The Company helps employees and suppliers perceive the environmental impacts stemming from their operations and encourages them to adopt aligned environmental pledges. Meanwhile, the Company maintains open communication channels with key stakeholders including investors, regulatory authorities, customers and local communities, to advance green supply chain transformation and jointly uphold shared environmental responsibilities.

5. 管理措施

Management Measures

5.1 环境管理体系认证

Environmental Management System Certification

公司已成功建立并持续完善符合 ISO 14001 标准的环境管理体系，通过系统化的环境因素识别、风险评估和运行控制程序，确保各项环保工作规范有序开展。目前，我们定期开展内部审核和管理评审，及时发现并改进存在的问题，同时每年接受第三方认证机构的外部审核，持续保持认证资格。这套体系已深度融入企业各个业务环节，有效提升了整体环境绩效，实现了环境保护与经营发展的良性互动。

The Company has successfully established and continuously refined an environmental management system fully aligned with the ISO 14001 standard. Through systematic identification of environmental aspects, risk assessment and operational control procedures, the Company ensures all environmental protection work is carried out in standardized, orderly fashion. The Company executes routine internal audits and management reviews to promptly detect and rectify operational deficiencies. It also undergoes annual external audits conducted by accredited third-party certification bodies to sustain valid certification qualification. This management system has been fully embedded across all operations of the enterprise, substantially lifting overall environmental performance and enabling mutually beneficial coordination between environmental protection and operational growth.

5.2 水资源管理

Water Resource Management

公司高度重视水资源的可持续利用，在遵循相关水源使用及排放的适用法律的同时，采取多种措施确保水资源的有效保护和合理利用。大力推广废水循环利用技术，建设完善的废水处理设施，提高水资源重复利用率；严格执行水资源循环利用标准，确保废水处理后达到生产用水或其他合规用水标准，实现水资源的减量化，促进水资源的循环利用。

The Company attaches paramount importance to the sustainable utilization of water resources. While abiding by all prevailing regulatory laws and discharge standards governing water intake and effluent release, the Company deploys multi-pronged measures to deliver effective protection and rational allocation of water resources. The Company vigorously rolls out wastewater recycling technologies, constructs full-set wastewater treatment infrastructure, and elevates the overall water reuse ratio. It rigorously enforces water recycling specifications to guarantee that treated effluent meets criteria for production water supply or other compliant water applications, so as to fulfill water volume reduction targets

and advance circular water resource utilization.

5.3 污染物管理

Pollutant Management

针对生产运营过程中产生的废水、废气、厂界噪声、固体废物，公司均已制定有效的内部管理制度，对其实施严格管控。对于废气排放，我们采用先进的治理设施和在线监测系统，确保各类废气得到有效收集和处理；对于废水管理，我们通过分级处理和循环利用系统，实现生产废水的达标排放和资源化利用；对于固体废物，我们推行分类收集和规范化处置，其中，一般废弃物优先考虑资源化利用途径，危险废物实施全流程管控，委托有资质的危废处置单位进行转运及处置。此外，公司每年还会委托有资质的第三方监测机构定期开展废水、废气、厂界噪声的监测工作，确保各类污染物达标排放。

The Company has formulated robust internal management protocols to impose stringent control over wastewater, exhaust emissions, plant boundary noise and solid waste generated throughout production and operation activities. For exhaust discharge, the Company deploys advanced treatment infrastructure and real-time online monitoring systems to guarantee full collection and effective treatment of all exhaust streams. For wastewater governance, a tiered treatment & recycling system is adopted to achieve compliant discharge and resource recycling of wastewater production. For solid waste, the Company implements categorized collection and standardized disposal protocols. Resource recycling and valorization is prioritized for general non-hazardous waste, whereas hazardous waste undergoes full-lifecycle oversight; its transportation and final disposal are exclusively undertaken by fully licensed hazardous waste service providers. In addition, the Company annually engages accredited third-party monitoring institutions to conduct periodic sampling and testing for wastewater, exhaust emissions and plant boundary noise, ensuring all pollutant discharge consistently meets regulatory compliance standards.

5.4 生物多样性管理

Biodiversity Management

公司严格遵守运营地所在国家的生物多样性保护法律法规，在项目规划选址、建设及运营阶段，将保护生态系统稳定作为关键考虑要素，特别注意远离生态保护区或关键生物多样性区域。

The Company shall strictly abide by all laws and regulations governing biodiversity conservation within every jurisdiction of its operation. Across the full lifecycle of projects — including planning, site selection, construction and operational phases — the Company takes ecosystem stability conservation as a core evaluation factor and exercises rigorous due diligence to site all facilities away from ecological protection zones and critical biodiversity habitats.

5.5 化学品管理

Chemicals Management

公司严格遵守化学品和有毒有害物质管理适用的相关法律要求，避免使用因对生物体具有高毒性、对环境具有破坏性、或具有潜在的不可逆生态影响而受到国际及国家禁令的化学品和危险物质。此外，公司内部已建立严格的危险化学品管理制度，确保危险化学品的全过程规范化管理。配备了完善的工程控制设施和个人防护装备并定期开展化学品安全培训及应急演练，确保化学品各管理环节的安全性和可靠性。

The Company shall strictly comply with all applicable statutory requirements governing the administration of chemicals, toxic, harmful and hazardous substances. It prohibits the deployment of any chemicals and dangerous substances banned by international conventions or national regulators, where such materials exhibit high toxicity to organisms, destructive environmental impacts, or carry risks of irreversible ecological damage. Furthermore, the Company has established stringent internal protocols for hazardous chemicals to deliver standardized full-lifecycle oversight. The Company deploys complete

engineered containment systems and full sets of personal protective equipment (PPE) and delivers routine chemical safety training plus emergency response drills, so as to safeguard the safety and reliability of every stage within the chemicals management workflow.

5.6 环保培训与宣导

Environmental Training and Awareness Campaigns

对内部员工实施分层级、分岗位的常态化环保培训，并通过知识竞赛、线上答题等形式强化全员环保意识；针对供应商群体，我们将在采购合同中明确环保要求，推动供应链整体绿色转型；与政府部门保持密切沟通，配合环保政策宣贯与实施；向投资者定期披露环境绩效信息；面向周边社区，我们将建立开放透明的沟通机制，及时回应居民关切；对客户群体，我们通过产品说明、服务协议等渠道传递环保理念，并收集客户环保反馈以持续改进。

The Company delivers regular environmental training programs for internal employees with layered, role-specific curricula. It reinforces company-wide environmental awareness via engagement activities including knowledge contests and online assessment quizzes. For supplier partners, the Company stipulates binding environmental criteria within procurement contracts to drive end-to-end green supply chain transformation. The Company maintains sustained liaison with regulatory authorities to support the rollout and enforcement of environmental policies and publishes periodic environmental performance disclosures for investors. For neighboring local communities, the Company operates an open, transparent communication framework to promptly address resident concerns. For customers, the Company communicates eco-friendly principles through product specifications, service agreements and other formal channels, and collects customer environmental feedback to fuel continuous operational improvement.

5.7 应对气候变化

Addressing Climate Change

公司积极响应“碳达峰、碳中和”战略，搭建了自上而下气候治理结构，落实应对气候变化的管理职责，以科学的管理体系和高效的管理举措，全方位强化公司应对气候变化的能力。公司通过提高运营过程中的能源使用效率，明确减排路径，提升清洁能源使用占比；充分识别及评估对公司具有重要潜在影响的气候风险与机遇，纳入企业风险控制体系；与合作伙伴分享优秀实践，对管理表现优秀的合作伙伴给予支持，增强供应链应对气候变化的韧性。

The Company actively aligns with the national carbon peaking and carbon neutrality strategy. It establishes a top-down climate governance framework and enforces clear management accountabilities for climate response. Supported by robust scientific management systems and efficient operational measures, the Company comprehensively bolsters its organizational capacity to tackle climate change impacts. The Company elevates operational energy efficiency, maps out definitive emission reduction pathways, and scales up the share of renewable & clean energy in its energy mix. It fully identifies and assesses material climate risks and opportunities, integrating these findings into the enterprise-wide risk control system. The Company also exchanges industry best practices with partner entities, delivering targeted support to partners with outstanding climate management performance, so as to lift overall climate resilience across the supply chain ecosystem.

5.8 循环经济

Circular Economy

公司全方位推进“四化”（全球化、数字化、智能化、绿色化）发展战略，将循环经济理念与产业发展深度融合，为社会提供绿色解决方案。公司积极推行可回收性设计（Design for Recycling, DfR）与再生材料高比例应用；以先进技术研发为基础，通过开

发电池回收前沿技术，以实现高效、环保、快捷、低能耗的市场需求；建设全球电池回收网络及回收基地，与供应链伙伴建立紧密合作关系，打造上下游生态大循环和锂电产品小循环，规模化辐射电池产业链条向可持续发展循环经济转型。

The Company fully advances its four-fold development strategy encompassing globalization, digital transformation, intelligent operation and green low-carbon upgrade. It deeply integrates circular economy philosophies into industrial development to deliver sustainable green solutions for society at large. The Company actively rolls out Design for Recycling (DfR) frameworks and accelerates high-volume application of post-consumer recycled (PCR) raw materials. Leveraging robust advanced R&D capabilities, the Company pioneers cutting-edge lithium-ion battery recycling technologies to satisfy market demands for high efficiency, eco-friendliness, fast processing and low energy consumption. By constructing a global lithium-ion battery recycling network and dedicated recycling hubs, and building long-term close partnerships with supply chain counterparts, the Company establishes a full upstream-downstream industrial ecological cycle alongside a closed-loop circulation system for lithium-ion finished products. This scaled model steers the entire battery industrial chain toward sustainable circular economy transition.

5.9 能源管理

Energy Management

公司建立系统化的能源管理体系，持续提升能源使用效率、优化能源结构，并系统化管理气候相关风险与机遇。公司定期开展全面能源审计，系统诊断各运营环节的能源使用状况与绩效；设定明确、可量化的能源节约与温室气体减排目标，并将其纳入公司整体战略绩效管理；制定并实施节能减排行动计划，切实降低能源消耗与碳排放；积极推动能源结构绿色转型，在运营中优先采购和使用可再生能源，并探索参与绿色电力交易，积极开展绿证认购与交易；定期评估目标达成与措施实施进展，并将结果向管理层报告。同时，公司为全体员工提供节能减排活动及培训，鼓励全员参与节能实践，持续夯实能源管理基

础。

The Company has established a systematic energy management framework to continuously boost energy utilization efficiency, optimize the energy mix, and administer climate-related risks and opportunities in a structured manner. The Company carries out full-scale periodic energy audits to diagnose energy consumption status and operational performance across all production and operation links; it sets clear, quantifiable targets for energy conservation and GHG emission reduction, and integrates such targets into the Group's overall strategic performance management system; it formulates and rolls out dedicated energy-saving and emission-reduction action plans to deliver tangible cuts in energy usage and carbon output. The Company drives the low-carbon green transition of its energy portfolio: it prioritizes the procurement and deployment of renewable energy across operational sites, explores participation in wholesale green power transactions, and actively engages in green certificate subscription and trading. The Company conducts periodic progress reviews for target delivery and measure execution and submits formal progress reports to senior management. In parallel, the Company delivers company-wide training and practical activities on energy conservation and emission reduction, encouraging all staff to participate in energy-saving practices and steadily consolidating the foundational infrastructure of corporate energy management.

5.10 有害物质管理

Hazardous Substance Management

公司承诺加强有害物质减少与消除（HSF）管理，依据适用法律法规及客户要求，持续优化内部控制标准，确保产品符合 RoHS、REACH、《欧盟电池与废电池法规》等环保要求。我们将在产品设计和材料导入阶段优先考虑环境友好型材料选择，持续评估可行的替代技术方案，积极探索减少或逐步淘汰有害物质的机会，并公开披露相关工作及目标进展。

The Company commits to rigorous Hazardous Substances Free (HSF) management for the reduction and elimination of hazardous substances. In compliance with prevailing applicable legislations, regulatory requirements and customer specifications, the Company perpetually upgrades its internal control benchmarks to guarantee all products satisfy environmental compliance criteria including RoHS, REACH, and the EU Battery Regulation (Regulation (EU) 2023/1542). The Company prioritizes the selection of eco-friendly raw materials throughout product design and material sourcing & validation stages. It continuously evaluates feasible alternative technical solutions, proactively identifies pathways to cut usage or phase down and fully eliminate hazardous substances, and publicly discloses implementation progress and milestone performance against established targets.

6. 审查与动态更新

Review and Updates

随着环境管理法规以及公司运营情况的变化，公司将适时对本声明进行更新与修订。政策更新与修订将遵循以下原则：

- (1) 结合公司发展战略和市场变化，调整环境管理目标和原则；
- (2) 根据最新法律法规和国际准则，完善环境管理措施与标准；
- (3) 结合环境管理要求与实践进展，持续提升环境绩效。

The Company shall update and revise this Statement in a timely manner to adapt to shifts in environmental regulatory provisions and internal operational conditions. All policy revisions and updates shall abide by the three principles set out below:

- (1) Adjust environmental management objectives and guiding principles in alignment with the Group' s development strategy and market fluctuations;
- (2) Refine environmental management measures and benchmarks

pursuant to the latest statutory regulations and international normative standards;

(3) Drive sustained uplift in environmental performance by aligning environmental management mandates with on-site practical progress and operational best practices.

7. 附则

Supplementary Provisions

本政策于发布之日起生效。

This Statement shall take effect as of the date of issuance.

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Sunwoda Electronic Co., Ltd. reserves the right of final interpretation.

本声明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 Statement 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.