

# 上海格派镍钴材料股份有限公司

## 受控文件

(管理文件)

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### 上海格派镍钴材料股份有限公司

#### 负责任矿产供应链尽责管理政策

## Due Diligence Policy on Responsible Mineral Supply Chain

### 一、导言和目的

#### Introduction and objectives

上海格派镍钴材料股份有限公司（以下简称“格派股份”或“我们”）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，并认识到我们有尊重人权、不助长冲突和不对环境和社会产生负面影响的义务。我们承诺将按照 CCCMC（五矿化工进出口商会）发布的《中国负责任矿产供应链尽责管理指南》和 OECD（经合组织）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》（以下简称“《中国指南》和《经合组织指南》”），并参考负责任矿产倡议（RMI）编制的《矿产供应链全球负责任采购尽职调查标准—所有矿产》以及欧盟电池法案，制定我们的《负责任矿产供应链尽责管理政策》（以下简称“政策”）。

Greatpower Nickel and Cobalt Materials Co., Ltd. (hereinafter "Greatpower" or "we") recognizes that there are risks of significant adverse impacts associated with the mining, trading, handling, and export of mineral resources in conflict-affected and high-risk areas. We also acknowledge our obligation to respect human rights, refrain from contributing to conflict, and avoid negative impacts on the environment and society. We hereby commit to developing our Due

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Diligence Policy on Responsible Mineral Supply Chain (hereinafter the "Policy") in accordance with the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains* established by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) and the *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* established by the Organization for Economic Co-operation and Development (OECD) (hereinafter "*The Chinese Guidelines*" and "*The OECD Guidelines*"), and with reference to *Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains (All Minerals)* developed by the Responsible Minerals Initiative (RMI), as well as the *EU Batteries Regulation*.

## 二、实施细则

### Implementing rules

我们将此政策按照《中国指南》和《经合组织指南》在钴、镍、锂等矿产资源供应链中推行和广泛传播，并将其纳入与供应商签订的合同和协议之中。这一政策为矿产资源供应链全过程涉及冲突敏感的采购活动以及供应商的风险意识提供参考。我们承诺遵守联合国相关制裁决议，遵守适用执行此类决议的国内法律，不参与任何会为冲突提供帮助或便利的行为。

We promote and widely disseminate this policy throughout the supply chains of cobalt, nickel, lithium, and other mineral resources in accordance with *The China Guidelines and The OECD Guidelines*, and incorporate it into contracts and agreements with our suppliers. This policy serves as a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness throughout the process of mineral resource supply chain. We commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions and commit to refraining from any action which contributes to or facilitates a conflict.

为此，我们承诺在钴、镍和锂供应链运营实践中按《经合组织指南》附录一列明的五步框架法，并参考《中国指南》规定的六步法来识别、管理和避免以下风险：

Therefore, we commit to applying, in our operational practices in the cobalt, nickel and lithium supply chains, the five-step framework as set out in Annex I to *the OECD Guidelines*, and to taking into account the six-step approach under *the China Guidelines*, in order to identify, manage and avoid the following risks:

#### (一)、严重侵犯人权的行为

##### Serious human rights abuses

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：

We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

1.任何形式的酷刑，残忍、不人道和有辱人格的待遇；

Any forms of torture or cruel, 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愿提供的劳动或服务；

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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

3.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）；

The worst forms of child labor (Hazardous work is one of the worst forms of child labour);

4.其他严重侵犯和践踏人权的行爲，如大规模性暴力；

Other gross human rights violations and abuses such as widespread sexual violence;

5.战争罪或其他严重违反国际人道法的行爲，反人类罪或种族灭绝。

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

## 降低风险

### Risk mitigation

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。

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 human rights abuses.

## （二）、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 non-state armed groups and public or private security forces

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：

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, processing or export of mineral resources. “Direct or indirect support” to non-state groups through the extraction, transport, trade, processing or export of mineral resources includes, but is not limited to, procuring resources from, making payments to or otherwise providing logistical assistance or equipment to, illegal organized armed groups or their affiliates who:

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 extraction sites or otherwise control transportation routes, points where mineral resources 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 mineral resources at points of access to extraction sites, along transportation routes or at points where mineral resources are traded; and/or

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.

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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。

We will eliminate direct or indirect support to public or private security forces who illegally control extraction sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or mineral resources at point of access to extraction sites, along transportation routes or at points where mineral resources are traded; or illegally tax or extort intermediaries, export companies or international traders.

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。

We recognize that the role of public or private security forces at the extraction 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 workers, equipment and facilities, and protecting the extraction site or transportation routes from interference with legitimate extraction and trade.

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 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 the recognized international standards and guidance documents concerning public or private security forces. 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.

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。

We 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.

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。

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal operators where mineral resources in the supply chain are extracted through artisanal or small-scale operators, to adverse impacts associated with the presence of

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security forces, public or private, on extraction sites.

## 降低风险

### **Risk mitigation**

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

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.

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。同时，如果我们发现在一定程度上有可能存在有违上文中关于“提高公共安全武装安保费用的透明度、相称性和问责性”，以及“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”的行为的情况下，将采取同样的应对措施。

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 suppliers and other stakeholders to prevent or mitigate the risk of 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, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. At the same time, the same response will be taken if we find that such behavior is possible to some extent that are contrary to the above statements on “improving the transparency, proportionality and accountability in payments made to public security forces” and “avoiding or minimising the adverse impacts of the presence of armed security forces, public or private, on vulnerable groups, particularly small-scale operators” .

### **(三)、腐败、洗钱和向政府支付的各项费用**

#### **Corruption, money laundering and payments to governments**

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。

We will not offer, promise, give or demand any bribes, and will resist the solicitation of

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bribes to conceal or disguise the origin of mineral resources, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral resources extraction, trade, processing, transport and export.

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。

We will prohibit bribery in all business practices and transactions, including those of agents and other third-parties, and set criteria and approval procedures with respect to the offer or acceptance of gifts; use the greatest efforts to promote responsible business practices with all business partners.

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。

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, processing, transport or export of mineral resources derived from the illegal taxation or extortion of mineral resources at points of access to extraction sites, along transportation routes or at points where mineral resources are traded by upstream suppliers.

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。

We commit to take effective measures to prevent the involvement in money laundering and financing of terrorism, e.g. by establishing and publishing the identity and beneficial ownership of suppliers and customers; monitoring transactions for unusual or suspicious activity; and maintaining records of cash transactions that occur above the relevant defined financial threshold under applicable law.

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位置，对此类支付进行披露。

We will ensure that all taxes, fees, and royalties related to mineral resources 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, we commit to disclose such payments.

## **降低风险**

### **Risk mitigation**

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, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil

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society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable time scales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

#### **(四)、关于职业健康与安全**

##### **Regarding occupational health and safety**

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。

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.

##### **降低风险**

##### **Risk mitigation**

如果我们有合理理由认为上游供应商提供如“关于职业健康与安全”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。

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 “Regarding occupational health and safety”.

#### **(五)、关于童工**

##### **Regarding child labour**

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。

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.

##### **降低风险**

##### **Risk mitigation**

如果我们有合理理由认为该风险存在，即上游供应商正从“关于童工”中所规定的任何

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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。

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 “Regarding child labour” .

#### **(六)、关于反对歧视与结社自由**

##### **Regarding non-discrimination and freedom of association**

我们承诺招聘和雇佣员工时，不得因种族、宗教信仰、年龄、国籍、性取向、性别、性别认同和性别表现、婚姻状况、怀孕、政治派别或残障等其他类似因素而歧视他人。

We commit to non-discrimination in hiring and employing employees, without any prejudice based on race, religion, age, nationality, sexual orientation, gender, gender identity and expression, marital status, pregnancy, political affiliation, or disability.

我们承诺在法律允许范围内，不得干涉、阻挠或禁止员工组建或加入各类组织、选举代表、参与集体谈判以及开展各项合法活动。

We ensure that, within the bounds of the law, we do not interfere, obstruct, or prohibit employees from forming or joining various organizations, electing representatives, participating in collective negotiations, and engaging in other lawful activities.

#### **(七)、关于环境保护**

##### **Regarding environmental protection**

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的一方或从该处采购或与之存在关联。我们将支持或采取措施定期评估、降低采矿对土壤、空气、水造成的不利影响。

土壤、空气、水不利影响包括不限于：

(i) 土壤，包括土壤污染、土壤侵蚀、土地利用和土地退化；

(ii) 空气，包括温室气体排放等空气污染；

(iii) 水，包括海底和海洋环境，包括水污染、用水、水量（洪水或干旱）和获取水的机会；

While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate significant adverse impacts regarding ambient soil, air and water conditions, or source from or be linked to any party with gross violation of local laws and regulations. We will support or take actions to evaluate periodically to minimize the adverse impacts of extraction regarding soil, air and water.

Adverse impacts on soil, air, and water include, but are not limited to:

(i) Soil, including soil contamination, soil erosion, land use, and land degradation;

(ii) Air, including air pollution such as greenhouse gas emissions;

(iii) Water, including seabed and marine environments, encompassing water pollution, water use, water volume (floods or droughts), and access to water.

我们承诺在经营活动中控制震动和噪声，最大限度的减少对周边环境的影响。

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We commit to controlling vibration and noise in our operations to minimize the impact on the surrounding environment to the greatest extent possible.

我们承诺将致力于提高能源效率，使用清洁能源，并最大程度地减少能源消耗与温室气体排放。

We commit to improving energy efficiency, using clean energy, and minimizing energy consumption and greenhouse gas emissions to the greatest extent possible.

当识别和控制释放到环境中会造成危险的化学物质及其他材料，确保这些物质得到安全处理、运输、存储、使用、回收或再利用和处置。

When identifying and controlling hazardous chemicals and other materials that could be released into the environment, we ensure these substances are handled, transported, stored, used, recycled or reused, and disposed of safely.

我们承诺在经营、工业加工和清洁设施中产生的废水、固体废物和残渣在排放或处置前，应当按照法规要求对其进行监测、控制和处理。

We commit to monitoring, controlling, and treating wastewater, solid waste, and residues generated from operations, industrial processing, and cleaning facilities in accordance with regulatory requirements before discharge or disposal.

我们承诺在供应链中致力于保护生物多样性，避免因自身的经济活动影响野生动物、植物生态系统。

We commit to protecting biodiversity in our supply chain, avoiding impacts on wildlife and plant ecosystems due to our economic activities.

#### **(八)、关于资源开采（保护土著居民权利支持社区发展）**

#### **Regarding resource extraction ((Protecting indigenous rights and supporting community development)**

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、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，或违反国内法的土地上开采资源。

We do not participate in, tolerate, or profit from the exploitation of resources from land where the free, prior and informed consent of local and indigenous peoples has not been obtained, a legal title, lease, concession, or license has been obtained illegally, or national laws have been violated.

我们承诺保护并支持当地社区的发展。

We are committed to protecting and supporting the development of local communities.

#### **(九)、关于文化、遗产保护和法定保护区**

#### **Regarding culture, heritage protection and legally protected areas**

我们不参与、不容忍、也不受益于从不尊重、不保护当地人和土著人文化和遗产，或损害当地人传统文化和遗产以及在法定保护区的采矿作业中开采或采购资源。

We do not participate in, tolerate, or profit from extracting or sourcing resources from mining operations where the culture and heritage of local and indigenous peoples have not been respected and protected, or where traditional cultures and heritage of local peoples have been harmed.

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### (十)、关于土地征用与安置

#### **Regarding land expropriation and resettlement**

在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何通过非法或未获自由、事先和知情同意的方式征用土地，或未提供公平补偿及合理安置方案的一方，或从该方处采购或与之存在关联。

While sourcing from or operating in high-risk areas, we will not profit from, assist with, facilitate, or source from, or be linked to any party that expropriates land illegally or without free, prior and informed consent, or fails to provide fair compensation and reasonable resettlement.

关于反对歧视与结社自由、环境保护、资源开采、文化、遗产保护和法定保护区、土地征用与安置的风险管理

#### **Regarding risk management of non-discrimination and freedom of association, environmental protection, resource extraction, culture, heritage protection and legally protected areas, land expropriation and resettlement :**

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，从而防范或降低相关的具体风险。风险降低措施未起作用的，我们将中断或终止与上游供应商的合作。

If we have reasonable grounds to believe that such risks exist, we will immediately work with suppliers and other stakeholders to develop, adopt, and implement a risk management plan based on the company's specific position in the supply chain to prevent or mitigate the identified risks. If the risk mitigation measures do not work, we will suspend or terminate our cooperation with upstream suppliers.

### 三、政策传播

#### **Policy dissemination**

本政策适用于格派股份及其所有控股子公司，以及涉及钴、镍、锂等矿产资源供应链的供应商及其上游参与方。

This policy applies to Greatpower and all of its holding subsidiaries, as well as to suppliers involved in the supply chains of cobalt, nickel, lithium and other mineral resources and their upstream participants.

我们将本政策告知供应链上下游商业伙伴，并要求供应商将此政策传达给其上游，以确保我们的供应链中不出现助长冲突和侵犯人权（尤其是儿童权益）的情形。

We will communicate this policy to our upstream and downstream business partners along the supply chain and require our suppliers to convey this policy further upstream, so as to ensure that our supply chain does not contribute to conflicts or human rights violations, particularly those affecting the rights and interests of children.

我们呼吁所有从事矿产开采、处理、贸易、出口的企业或者使用相关制品的企业一起建立负责任供应链尽责管理体系，避免助长冲突和侵犯人权，尤其是儿童权益。

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We call on all companies involved in mineral mining, processing, trading, and export, or those using mineral-related products, to work together to build a responsible supply chain due diligence management system, and to avoid fueling conflicts or human rights abuses, especially with respect to children.

#### 四、政策更新

##### **Policy updates**

本政策自发布之日起生效,我们将根据标准变化和市场需求每年对政策进行审查以确认是否需要更新,最新政策将发布于公司官网: <https://www.greatpowercn.com/>。

This policy is effective as of the date of issuance. We will review it annually to determine whether updates are needed in light of changes in standards and market demands. The latest version of the policy will be published on the company's official website: <https://www.greatpowercn.com/>

上海格派镍钴材料股份有限公司  
Greatpower Nickel & Cobalt Materials Co., Ltd

2026年5月12日

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