

负责任矿产供应链尽责管理政策

Responsible Mineral Supply Chain

Due Diligence Policy

上海杉杉新材料有限公司（以下简称“杉杉科技”、“我们”、“公司”）认识到在受冲突影响和高风险区域从事矿产开采、贸易、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、不助长冲突和不对环境和社会产生不利影响的义务。我们承诺采纳并广泛传播《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”）、《中国负责任矿产供应链尽责管理指南》（第二版）（以下简称“中国指南”）、《冲突矿产法规》（Regulation (EU) 2017/821）、《多德-弗兰克华尔街改革和消费者保护法》第 1502 条等相关内容，并将其纳入到与供应商签订的合同或协议之中。

Shanghai Shanshan New Material Co., Ltd. (hereinafter referred to as “Shanshan Technology”, “we”, or “the Company”) recognizes the risk that conducting mineral mining, trading, processing, and export activities in conflict-affected and high-risk areas may give rise to significant negative impacts, as well as our obligation to respect human rights, not to aggravate conflicts, and not to exert adverse environmental and social effects. Shanshan Technology is committed to adopting and widely disseminating the relevant contents of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (Third Edition) (hereinafter referred to as the “OECD Guidance”), the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains* (Second Edition) (hereinafter referred to as the “China Guidelines”), the *EU Conflict Minerals Regulation* (Regulation (EU) 2017/821) and Section 1502 of the US *Dodd-Frank Act*, and incorporating such provisions into the contracts or agreements signed with our suppliers.

本政策为矿产供应链全过程涉及冲突敏感的采购活动以及供应商提高风险意识提供了基本参考。本政策适用于上海杉杉新材料有限公司及其所有分子公司的天然石墨等矿产供应链。

This policy provides reference for conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user. This policy applies to the natural graphite and other mineral supply chains of Shanghai Shanshan New Materials Co., Ltd. and all its subsidiaries and affiliated companies.

公司建立负责任矿产尽责管理组织架构，在公司可持续供应链管理委员会的指导和监督下，设立负责任采购供应链尽职调查管理者代表，由总部供应链部牵头实施具体工作，其他相关部门协调配合，共同推进负责任矿产采购。

The Company has established an organizational framework for responsible mineral due diligence. Under the guidance and supervision of the Sustainable Supply Chain Management Committee, a Management Representative for Responsible Sourcing & Supply Chain Due Diligence has been appointed. The Corporate Supply Chain Department takes the lead in executing specific initiatives, with coordination and collaboration from other relevant departments, to jointly advance the practice of responsible mineral procurement.

公司始终坚持道德采购，承诺不使用来自冲突地区的矿产资源，也明确要求供应商不得使用来自冲突地区以及违反公司政策的矿产资源。公司承诺不从事任何会为冲突提供资助的活动，承诺遵守联合国相关制裁决议，遵守执行此类决议的国内法律。

The Company consistently upholds ethical sourcing, commits not to use mineral resources from conflict regions, and explicitly requires suppliers not to use mineral resources from conflict regions or those that violate Company policy. The Company undertakes not to engage in any activities that would finance conflict. Shanshan complies with relevant United Nations sanctions resolutions, and domestic laws implementing such resolutions.

一、关于童工及其风险管理

I. Regarding Child Labor

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任何形式的儿童就业提供便利或跟其有关联。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。

When procuring or conducting business activities in high-risk areas, we will not employ, benefit from, assist, or facilitate the employment of children below the minimum working age as stipulated by the host country's laws or regulations, nor have any association with such employment. If the host country has no relevant laws or regulations, the minimum working age is 16.

如果我们有合理理由认为该风险存在，即上游供应商正从雇佣童工的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供应商的合作。

If we have reasonable grounds to believe that such risk exists—i.e., upstream suppliers are sourcing from or are associated with parties employing child labor—we will immediately suspend or terminate cooperation with such suppliers.

二、关于劳工与人权及其风险管理

II. Regarding Labor and Human Rights

在受冲突影响和高风险区域开展采购或开展经营活动时，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：

While sourcing from, or operating in, conflict-affected and 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:

2.1 最恶劣形式的童工（即童工从事的工作环境，很可能损害其健康、安全或道德）；

The worst forms of child labor (i.e., work environments likely to harm the health, safety, or morals of children);

2.2 任何形式的酷刑，残忍、不人道和有辱人格的待遇；

Any forms of torture, cruel, inhuman and degrading treatment;

2.3 任何形式的强迫或强制劳动，即以惩罚作为威胁榨取的任何个人的、非自愿提供的劳动或服务；

Any forms of forced or compulsory labor, 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;

2.4 其他严重侵犯和践踏人权的行爲，如普遍的性暴力行为；

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

2.5 战争罪或其他严重违反国际人道主义法的行为，反人类罪或种族灭绝罪；

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

2.6 任何以暴力、威胁或者限制人身自由的方法强迫他人劳动的行为；

Any act of forcing another person to work by means of violence, threat or restriction of personal freedom;

2.7 任何不尊重员工，因性别或性取向、种族、肤色、年龄、婚姻状况、怀孕与否、宗教、国籍、疾病或残疾等歧视员工的行为；

Any act of disrespecting employees or discriminating against them on the grounds of gender or sexual orientation, race, skin color, age, marital status, pregnancy status, religion, nationality, illness or disability;

2.8 任何反对员工工会自由，集体结社和谈判自由的行为。

Any act that interferes with employees' freedom to form trade unions, as well as their freedoms of collective association and collective bargaining.

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上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 abuses as defined.

三、关于直接或间接支持非国家武装团体的行为及其风险管理

III. Regarding Direct or Indirect Support to Non-State Armed Groups

我们不会容忍任何通过矿产开采、运输、贸易、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、贸易、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，向其进行付款，或以其他方式为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, 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:

3.1 非法控制矿址，或以其他方式控制运输路线、矿产交易点以及供应链的上游行为主体；

Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

3.2 在矿址入口、运输路线沿线或矿产交易点非法征税或者勒索钱财或矿产；

Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;

3.3 对中间商、出口企业、或国际贸易者非法征税或勒索。

Illegally tax or extort intermediaries, export companies or international traders.

如果我们有理由认为，上游供应商从向非国家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系，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 as defined above.

四、关于公共或私人安全武装及其风险管理

IV. Regarding Public or Private Security Forces

我们同意根据以下对公共或私人安全武装的风险管理的规定，杜绝向非法控制矿址、运输路线以及供应链上游行为主体，在矿址入口、运输路线沿线或矿产交易点非法征税或索要钱财或矿产，或者向中间商、出口企业或国际贸易者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 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.

我们认可，矿址及/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 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.

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，在与这类安全武装进行合作的过程中将遵守《安全与人权自愿原则》的规定。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。

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 Voluntary Principles on Security and Human Rights. 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。

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当地政府、国际组织和民间社会组织开展互动，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负面影响，尤其是对小作坊矿工的负面影响，在这种情况下，供应链上的矿产是通过小作坊或小规模采矿的方式开采出来的小作坊。

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.

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，立即制定、采用和实施上游供应商及其他利益相关方风险管理计划，从而使第1段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起作用，我们将暂时停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有违第4段和第5段内容的行为的情况下，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 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 1, 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 4 and 5, we will respond in the same vein.

五、关于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、特许费及其风险管理

V. Regarding Bribery and Fraudulent Misrepresentation of the Origin of Minerals

我们不会提出、承诺、进行或索要任何贿赂，并且抵制诱惑，不会为了掩盖或伪造矿产原产地，虚报矿产开采、贸易、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 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.

如果我们有理由认为，存在因开采、贸易、处理、运输或出口在矿址入口、运输路线沿线、或上游供应商矿产交易地进行非法征税或勒索而得的矿产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, 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.

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石开采、贸易、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依照《采掘行业透明度行动计划》（EITI）中的各项原则对此类支付进行披露。

We 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, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

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。风险降低措施未起作用的，我们将暂时停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 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.

六、关于环境及其风险管理

VI. 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。

When procuring or producing in high-risk areas, we will not provide benefits, assistance, or convenience to any party that causes significant adverse impacts on surrounding soil, air, water, or other seriously violates relevant with local laws and regulations, nor will we source from or be associated with such parties. We will support or take measures to regularly assess and reduce the adverse impacts of mining on soil, air, and water.

我们遵守化学品及有毒物质管理相关法律法规，严禁生产、经营和使用具有高生物毒性、环境持久性或潜在不可逆生态影响并被国际明令禁止的化学品与危险物质。我们严格管控厂区生产噪音排放，确保符合国家及行业相关标准。我们积极践行节能降耗理念，优化生产工艺与设备运行效率，持续降低单位产品能耗，提升能源利用水平。我们规范各类生产及办公废弃物的分类、贮存、转运与处置流程，严禁违规排放。

We comply with the relevant laws and regulations governing the management of chemicals and toxic substances, and strictly prohibit the production, trading and use of chemicals and hazardous substances that are internationally banned due to their high biotoxicity, environmental persistence or potential irreversible ecological impacts. We strictly control the production noise emissions from the factory premises to ensure compliance with the relevant national and industry standards. We actively practice the concept of energy conservation and consumption reduction, optimize production processes and equipment operation efficiency, continuously reduce the energy consumption per unit of product, and improve the level of energy utilization. We standardize the classification, storage, transfer and disposal processes of various types of production and office waste, and strictly prohibit illegal discharge.

七、关于职业健康安全及其风险管理

VII. 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或间接雇员或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。

When procuring or producing in high-risk areas, we will not benefit from, assist, or facilitate any party that provides life-threatening occupational health and safety conditions for its direct or indirect employees or any personnel at production sites, nor will we source from or be associated with such parties.

如果我们有合理理由认为上游供应商从提供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，我们将立即终止或中断与该供应商的合作。

If we have reasonable grounds to believe that upstream suppliers are sourcing from or are associated with any party providing life-threatening occupational health and safety conditions, we will immediately terminate or suspend cooperation with such suppliers.

本政策于官网公开，且公司告知并要求供应商将此政策传达给其上游，以确保本公司的供应链中不出现侵犯人权、主张冲突的情况。公司也呼吁供应链上下游企业遵守相关法规要求，承担负责任采购的责任，构建安全、稳定、透明的可持续供应链。

This policy is publicly available on the Company's official website, and the Company requires suppliers to convey this policy to their upstream partners, ensures that no human rights violations or conflict advocacy occur within the supply chain. The Company also calls on all upstream and downstream enterprises in the supply chain to comply with relevant legal requirements, assume liability of responsible sourcing, and build a safe, stable, transparent, and sustainable supply chain.

公司设立申诉沟通渠道，邮箱：supplychain@shanshan.com。如供应商存在如下行为情况，可通过上述邮箱向杉杉科技进行反馈：

The Company has established a complaint and communication channel, with the email address: supplychain@shanshan.com. If suppliers have any of the following situations, they may provide feedback to Shanshan Technology via the above email:

(1) 已识别的与本公司供应链相关联的风险与挑战；

Identified risks and challenges associated with the Company's supply chain;

(2) 本公司供应链尽责管理体系和措施存在的差距和不足；

Gaps and deficiencies in the Company's supply chain due diligence management system and measures;

(3) 其他具有充足证据支持的涉及供应链的相关建议和意见。

Other relevant suggestions and opinions related to the supply chain supported by sufficient evidence.

附件一：回执函

Attachment I: Acknowledgment Letter

上海杉杉新材料有限公司

Shanghai Shanshan New Material Co., Ltd.

生效日期：2025 年 9 月

Effective Date: Sep., 2025

附件一：

Attachment I:

回执函 Acknowledgment Letter

我方已收悉上海杉杉新材料有限公司《负责任矿产供应链尽责管理政策》，充分理解并认同该政策中关于负责任矿产采购的各项要求。为保障双方合作的合规性与可持续性，我方在此郑重承诺：

We have received the *Responsible Mineral Supply Chain Due Diligence Policy* issued by Shanghai Shanshan New Materials Co., Ltd., and fully understand and endorse all requirements concerning responsible mineral procurement set forth in this Policy. To ensure the compliance and sustainability of our cooperation, we hereby solemnly commit as follows:

1. 严格遵守该政策，将负责任矿产采购要求全面融入我方内部采购管理体系及供应链全流程；

We will strictly comply with this Policy and fully integrate the requirements for responsible mineral procurement into our internal procurement management system and the entire supply chain process.

2. 积极配合贵公司开展矿产供应链尽职调查工作，及时、准确提供所需的相关资料（如矿产来源证明、供应商资质文件等）；

We will actively cooperate in conducting mineral supply chain due diligence, and provide the required relevant materials (including but not limited to mineral origin certificates, supplier qualification documents, etc.) in a timely and accurate manner.

3. 加强对我方上游矿产供应商的管理与审核，推动上游合作伙伴共同践行负责任矿产采购理念，确保所供应产品涉及的天然石墨等矿产符合该政策要求；

We will strengthen the management and audit of our upstream mineral suppliers, promote our upstream partners to jointly practice the concept of responsible mineral procurement, and ensure that minerals such as natural graphite involved in the products we supply meet the requirements of this Policy.

4. 如政策内容发生更新，我方将主动跟进学习，并及时调整内部管理措施，确保持续合规。

In the event of any updates to the content of this Policy, we will take the initiative to study the updated version and adjust our internal management measures in a timely manner to ensure continuous compliance.

我方将以该政策为指导，切实履行供应链主体责任，共同维护合规、可持续的矿产供应链生态。

Guided by this Policy, we will earnestly fulfill our responsibilities as a mainstay of the supply chain and work together with you to maintain a compliant and sustainable mineral supply chain ecosystem.

特此回执。

Hereby acknowledge receipt.

供应商名称：

Supplier Name:

签字或盖章：

Signature or Seal: