

浙江吉利控股集团有限公司 可持续原材料政策

Zhejiang Geely Holding Group Co., Ltd. Sustainable Raw Materials Policy

1. 总体描述 General Description

负责任采购是浙江吉利控股集团有限公司（以下简称“吉利控股集团”“公司”或“我们”）可持续发展承诺的重要部分。作为一家负责任的全球化企业，吉利控股集团践行联合国 2030 可持续发展目标相关要求，高度重视包括冲突矿产在内的高风险关键原材料带来的环境及人权风险，致力于在整个供应链中以可持续和负责任的方式采购用原材料。

Zhejiang Geely Holding Group Co., Ltd. (“Geely Holding”, “the Group”, or “we” for short) regards responsible procurement a crucial part of its commitment to sustainable development. As a responsible global enterprise, Geely Holding acts in line with relevant requirements of the United Nations Sustainable Development Goals (SDGs). The Group attaches great importance to the environmental and human rights risks incurred by high-risk critical raw materials, including conflict minerals, and strives to procure raw materials in a sustainable and responsible manner throughout the entire supply chain.

吉利控股集团参考联合国《工商业与人权》《经合组织负责任商业行为尽责管理指南》《中国负责任矿产供应链尽责管理指南》以及驱动可持续（Drive Sustainability）《汽车可持续发展实用指南》等国际、国内和行业指导原则和框架，制定并实施符合全球标准的可持续原材料管理体系，并要求供应商制定政策、管理系统和尽职调查措施，以充分应对风险。

In compliance with the *UN Guiding Principles on Business and Human Rights*, the *OECD Due Diligence Guidance for Responsible Business Conduct* (OECD Guidance), the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains*, the *Global Automotive Sustainability Practical Guidance* developed by the Drive

Sustainability, and other international, Chinese, and industry guidelines and frameworks, Geely Holding has formulated and implemented a sustainable raw materials management system that aligns with global standards. The Group also mandates suppliers to develop policies, management systems, and due diligence measures to fully guard against risks.

2. 适用范围 Scope of Application

本政策适用于吉利控股及所属子集团/分子公司。

This Policy applies to Geely Holding and its subsidiaries and branches.

3. 我们的承诺 Our Commitments

吉利控股集团评估并分析关键原材料供应商的可持续性风险，采取预防和缓解措施，在供应商的配合下努力确保供应链的透明和可追踪，以可持续的方式开采关键原材料。

We assess and analyze the sustainability risks of critical raw material suppliers, and take preventive and mitigating measures accordingly. We work with suppliers to ensure the transparency and traceability of the supply chain, and source critical raw materials sustainably.

承诺主动从产品和供应链中消除冲突矿物，确保公司采购的原材料产品中所含有的矿物或金属在开采或交易时不存在侵犯人权、违反商业道德、危害环境的情形，且其销售所得不得用以资助武装冲突。

We pledge to proactively remove conflict minerals from our product lists and supply chains. We ensure that the minerals or metals in our sourced raw materials are extracted and traded without violating human rights, breaching business ethics, or causing environmental harm, and that their sales proceeds are not used to finance armed conflicts.

4. 我们的行动 Our Actions

- 建立关键原材料风险管理体系及申诉机制，并将其明确传达给供应商。吉利控股集团在《供应商行为准则》《供应商可持续发展执行确认函》等文件中明确要求供应商应对其供应链中的相关矿物和金属开展尽职调查，确保在矿产等关键原材料采购中打造负责的供应链。

We establish a risk management system and a complaint mechanism for critical raw materials and clearly communicate them to suppliers. We make it explicit in documents such as the *Supplier Code of Conduct* and *Supplier Sustainability Implement Acknowledgment Letter* that suppliers are required to conduct due diligence on the minerals and metals in their supply chains, so as to ensure a responsible supply chain when procuring critical raw materials such as minerals.

- 建立正式的流程和操作系统来开展跟踪供应链,识别和评估关键原材料风险,并依据企业实际情况适时动态调整。

We develop formal processes and operating procedures to track the supply chain, identify and assess risks associated with critical raw materials, and make timely and dynamic adjustments according to the actual situation of the Group.

- 针对已识别的关键原材料风险,设计并实施应对策略。在冶炼厂、精炼厂(SOR)、供应商层面制定风险管理计划,鼓励技术革新,尽量减少、替代或消除高风险原材料,以减轻或补救来自受冲突影响和高风险地区原材料所带来的风险。

We devise and implement countermeasures against the identified risks associated with critical raw materials. We also develop risk management plans for smelters and refineries (SOR), and suppliers. Additionally, we encourage technological innovation to minimize, substitute, or eliminate the use of high-risk raw materials, thereby alleviating or remedying the risks brought by raw materials from conflict-affected and high-risk areas.

- 根据经合组织指南,对相关供应商进行尽职调查。委托独立审计,对供应商的可持续发展绩效进行深入评估,确保工人受到尊重,以及业务运营在环境和道德上无害。

In compliance with the OECD Guidance, we conduct due diligence on related suppliers. We entrust independent audits to conduct thorough assessments of suppliers'

sustainability performance, making sure that workers are respected and that business operations are environmentally sustainable and ethically sound.

- 利用区块链等技术和工具，对关键原材料进行标准化管理，建立供应链数字化平台，号召 Tier N 供应商加入平台，以提升供应链透明和可追踪性。

We leverage technologies and tools such as blockchain for standardized management of critical raw materials. We have developed a digital supply chain platform and called on Tier N suppliers to join the platform, thereby boosting the transparency and traceability of the supply chain.

- 如果确定供应链中的供应商违反上述要求，吉利控股集团将努力采取补救措施，帮助供应商解决违规行为，包括但不限于直接沟通和合规教育培训。如果未能对已识别的违规行为进行持续改进，公司也可能会重新评估与违规供应商的业务关系。

If it is ascertained that a supplier in the supply chain has violated the above requirements, Geely Holding will make every effort to take remedial measures to assist the supplier in resolving the violation, including but not limited to direct communication and compliance education and training. The Group may also re-evaluate the business relationship with the non-compliant supplier who fails to correct the identified non-compliant behavior on an ongoing basis.

5. 监察与披露 Monitoring and Disclosure

吉利控股集团将定期监察本政策的执行情况，适时检讨本政策，并在年度可持续发展报告中披露相关信息。

Geely Holding will regularly monitor the implementation of this Policy, review it in time, and disclose relevant information in the annual sustainability report.

6. 申诉与举报 Grievance and Reporting

如果您有可持续原材料管理相关的意见或问题，可以通过邮箱 sustainability@geely.com 与我们联系。吉利控股集团接受各利益相关方监督，并保证会对申诉、举报人的身份严格保密。

If you have any opinions or questions about our sustainable raw material management, please contact us at sustainability@geely.com. We accept supervision from all stakeholders and keep the identity of complainants and whistleblowers strictly confidential.