

中伟股份 ESG 政策

ESG Policy of CNGR

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1 简介

1 Introduction

中伟新材料股份有限公司（中伟股份 300919.SZ）成立于2014年9月，为湖南中伟控股集团有限公司旗下控股子公司、上市主体，是专业的锂电池新能源材料综合服务商。作为国家战略性新兴产业中的新材料、新能源领域，公司被认定为国家企业技术中心、国家技术创新示范企业，获得“国家智能制造工厂”、“国家绿色工厂”等示范项目称号。中伟股份以材料至善、科技致伟为使命，矢志成为全球领先的新材料科学公司。公司认为，可持续发展是行业未来的发展方向，是应对全球能源结构转型及气候变化风险的重要路径选择，更是落实我国科学发展观的重要理念与举措。公司立足于自身的行业性质及目标追求，全心全意为所有合作伙伴及人类社会发展创造价值，同时希望通过强化自身的环境、社会、管治（ESG）管理，提升业务 ESG 绩效表现。

Established in September 2014 and listed on the Shenzhen Stock Exchange (stock abbreviation: CNGR; stock code: 300919), CNGR Advanced Materials Co., Ltd. (CNGR, or the Company for short) is a holding subsidiary of Hunan CNGR Holding Group Co., Ltd. It is a professional comprehensive service provider of lithium battery new energy materials. In the field of advanced materials and new energy within the national strategic emerging industries, CNGR has won numerous national honors, such as National Enterprise Technology Center, National Technological Innovation Demonstration Enterprise, National Intelligent Manufacturing Factory, and National Green Factory for its demonstration projects. With the mission of Materials to Perfection, CNGR is committed to developing itself into a world-leading science company in advanced materials. It believes that sustainability is the future trend of this industry, a key solution to address global energy structure transition and climate change risks. Sustainability is also a vital concept and measure to implement China's scientific outlook on development. Based on its quality and goals in the industry, CNGR is dedicated to creating value for all partners and the development of human society. It also aims to enhance its ESG performance in its business by strengthening management in this regard.

为此，中伟股份明确提出和谐生态、卓越共赢、求实自律三大ESG运营理念，力求在与自然友好、各类合作伙伴共同进步以及公司治理等方面践行可持续发展。公司结合自身业务特征和国内外最佳实践，基于诚信、平等、透明等原则与利益相关方展开全面

沟通，用心倾听利益相关方的回馈与意见，及时有效地回应利益相关方的诉求和期望，并根据反馈对公司可持续发展规划及实践进行更新和调整。我们参考国际相关标准、指南和倡议工具，结合相关政策指引、行业发展趋势、公司发展战略及外部专家建议，构建与自身业务相关的ESG重大议题，在ESG报告中对所有议题进行一一回应，并对高实质性议题在报告中进行重点披露。公司已于2023年12月更新治理架构，将董事会战略委员会升级为战略与ESG委员会，后续亦将持续完善ESG管理体系以及制定ESG制度，力求实现全面且一流的ESG管理，以负责任的态度为可持续发展贡献中伟力量。

To this end, CNGR has articulated three core ESG operational philosophies of "harmonious ecology, excellence and win-win, practicality and self-discipline" to deliver sustainability in areas such as fostering a friendly relationship with nature, advancing together with various partners, and enhancing corporate governance. CNGR combines its business characteristics with the best domestic and international practices to engage in comprehensive communication with stakeholders based on principles of integrity, equality, and transparency. It actively listens to stakeholders' feedback and opinions, responds to their demands and expectations in a timely and effective manner, and updates and adjusts its sustainability plans and practices based on the feedback. Under the guidance of related international standards, guidelines and initiatives, as well as relevant national policies, industry development trends, the Company's development strategies, and external expert advice, CNGR identifies significant ESG issues related to our business. In the ESG report, it will respond to all issues one by one and highlight the most material issues. CNGR updated its governance structure in December 2023, transforming the Strategy Committee of the Board of Directors to the Strategy and ESG Committee. Moving forward, CNGR will continue to refine its ESG management system and establish ESG regulations, striving to achieve a comprehensive and top-tier ESG management approach. With a responsible attitude, it aims to contribute to sustainable development.

2 适用范围

2 Scope of Application

本政策适用于中伟股份全球各运营地及子分公司，以及中伟股份在全球直接或间接控制或经营的产业设施，所有员工、董事和管理人员。中伟股份承诺对非本公司控股的

合资企业施加影响，要求与敦促他们根据本政策的规定行事。同时，中伟股份要求与敦促供应商¹及合作伙伴参考并遵从本政策的相关规定。

This Policy applies to all employees, directors and management personnel of CNGR and its subsidiaries and branches operating globally, as well as to all industrial facilities directly or indirectly controlled or operated by CNGR worldwide. CNGR is committed to exerting influence on joint ventures not controlled thereby and requiring and urging them to abide by this Policy. Meanwhile, CNGR requires and urges its suppliers ¹ and partners to refer to and abide by the relevant provisions of this Policy.

3 政策承诺

3 Policy Commitments

3.1 环境

3.1 Environment

3.1.1 气候变化与能源管理

3.1.1 Climate Change and Energy Management

中伟股份严格遵从巴黎协定，实行合规高效的应对气候变化、碳中和与能源管理措施。公司遵守《中华人民共和国节约能源法》和《中华人民共和国可再生能源法》，落实能耗降低并促进可再生能源使用。中伟股份董事会全面负责气候变化风险管理事宜，以国际财务报告准则基金会（IFRS Foundation）国际可持续发展准则理事会（ISSB）制定的气候有关披露标准为要求，形成自上而下的气候化管理架构和应对方案，在应对气候变化、碳中和以及能源管理方面设定目标。对此，中伟股份承诺：

CNGR strictly adheres to the Paris Agreement and implements compliant and efficient measures to address climate change, achieve carbon neutrality, and manage energy. It reduces energy consumption and popularizes renewable energy in accordance with the Energy Conservation Law and the Renewable Energy Law of the People's Republic of China. The Board of Directors is fully responsible for climate change risk management. In line with the climate-related disclosure standards set by the International Financial Reporting Standards

¹ 就本政策而言，供应商是指直接向中伟股份提供、销售或租赁材料、产品或服务的任何个人或组织。
1 For the purpose of this Policy, the supplier is defined as any individual or organization that directly provides, sells, or leases materials, products, or services to CNGR.

Foundation (IFRS Foundation) and the International Sustainability Standards Board (ISSB), a top-down management framework and response plans for climate change are established. CNGR sets targets for addressing climate change, achieving carbon neutrality, and managing energy. In this regard, CNGR is committed to:

- 于2025年中国境内基地实现清洁能源电力达到100%;
Achieving 100% clean energy power at its bases in China by 2025;
- 于2040年实现运营碳中和;
Achieving carbon neutrality in operation by 2040;
- 参照科学碳目标倡议 (SBTi) 制定碳减排目标, 定期追踪目标进展, 并向社会各利益相关方公开;
Setting carbon emission reduction targets based on the Science Based Targets initiative (SBTi), regularly tracking the progress, and disclosing information to all stakeholders;
- 不断加强基地现有设施节能改造, 扩大新建基地对高效率、低能耗设施的使用;
Continuously strengthening the energy-saving transformation of existing facilities in the bases and using more facilities with higher efficiency and low energy consumption in the new bases;
- 参考国际财务报告准则S2号 (IFRS S2) , 识别、分析及评估运营相关的气候实体风险、转型风险及机遇, 并定期披露;
Identifying, analyzing and evaluating climate-related risks associated with operations based on IFRS S2, including physical risks and transition risks, as well as opportunities, and disclosing this information regularly.
- 年度回复CDP气候变化问卷;
Completing the CDP Climate Change Questionnaire every year;
- 向内部及外部利益相关方推广气候变化相关知识, 加强各方对气候变化的认知。
Disseminating climate change-related knowledge to internal and external stakeholders to enhance their awareness and understanding of climate change.
- 在气候变化等环境政策的制定与实施过程中, 积极征询社区、政府、专家等外部利益相关方的意见, 提升政策的科学性与可行性。
Actively consulting external stakeholders such as communities, authorities, and

experts during the development and implementation of its environmental policy, including those related to climate change, to enhance its relevance and effectiveness.

3.1.2 环境与资源影响

3.1.2 Environmental and Resource Impacts

中伟股份重视自身运营所带来的环境与资源影响，严格遵守《中华人民共和国环境保护法》《中华人民共和国循环经济促进法》，制定环境管理政策与循环经济方案。中伟股份要求环境保护政策原则上覆盖所有业务范围与供应商，并围绕产品设计、生产、废弃电池回收三大模块，逐步开展资源循环使用管理。对此，中伟股份承诺：

CNGR values the environmental and resource impacts of its operations, strictly abides by the Environmental Protection Law of the People's Republic of China and the Circular Economy Promotion Law of the People's Republic of China, and has made environmental management policies and circular economy programs in place. CNGR strives to ensure that its environmental protection policies generally cover all business areas and suppliers. It will gradually implement resource recycling management in three major business sectors: product design, production, and waste battery recycling. In this regard, CNGR is committed to:

- 落实环境管理政策体系，在所有运营地积极开展环境管理标准体系认证工作，保护周边环境；
Implementing the environmental management policy system, actively certifying the environmental management standard system at all operation sites, and protecting the surrounding environment;
- 践行绿色生产，尽力减少生产、运营、办公、物流运输等各个环节的天然能源与资源消耗；
Practicing green production by striving to reduce the consumption of natural energy and resources across all stages, including production, operations, office activities, and logistics transportation.
- 面向内部所有员工（包括实习生及劳务派遣工）开展环境保护意识提升培训；
Providing environmental protection awareness training for all internal employees (including interns and contractual employees);

- 合规披露所有正面与负面的环境信息，包括各类环境影响的罚款。

Complying with disclosure requirements by reporting all positive and negative environmental information, including any fines related to various environmental impacts.

3.1.3 污染物排放

3.1.3 Pollutant Discharge

中伟股份严格按照运营地当地法律法规与政策标准要求开展分级分类的废弃物与污染物管控，减少或降低各类污染物排放水平，确保达到合规要求，不对社会和环境造成危害。同时，中伟股份根据《EHS奖惩管理制度》，通过与各单位第一责任人签订《安全生产责任书》确保EHS年度绩效的完成。公司依据Global Reporting Initiative (GRI)、深圳证券交易所等机构的ESG披露要求对污染物排放情况进行披露。对此，中伟股份承诺：

CNGR strictly adheres to local laws, regulations, and policy standards at its operation sites to implement a tiered and categorized approach to waste and pollutant management. It aims to reduce or lower the levels of various pollutants discharged to ensure compliance and to prevent harm to society and the environment. It also ensures the achievement of annual EHS performance targets by signing a Work Safety Responsibility Statement with the primary responsible persons of various units according to the Management Regulations on EHS-related Rewards and Punishments. CNGR discloses its pollutant discharge information in accordance with the ESG disclosure requirements set by the Global Reporting Initiative (GRI) and the Shenzhen Stock Exchange. In this regard, CNGR is committed to:

- 提升危险废弃物、有害气体、污水废水的处理能力，在可行范围内实现100%无害化处理；

Improving the disposal capacity for hazardous wastes, harmful gases, sewage and wastewater, aiming to achieve 100% non-hazardous disposal within feasible limits.

- 从2022年起，在可行范围内不断降低污染物排放强度，设立COD、废气、固废减排目标：到2035年，COD、氮氧化物（NO_x）、硫氧化物（SO_x）、持久性有机污染物（POP）、挥发性有机化合物（VOC）、危害性空气污染物（HAP）以及颗粒物（PM）总量排放达到峰值；废弃物总体回收率方面，以2022年

为基准年，到2030年废弃物总体回收率逐年提高5%，至2030年提升至40%；

From 2022, continuously reducing the pollutant emission intensity where practicable, and setting targets for COD, waste gas, and solid waste reduction: By 2035, the total emissions of COD, nitrogen oxides (NO_x), sulfur oxides (SO_x), persistent organic pollutants (POPs), volatile organic compounds (VOCs), hazardous air pollutants (HAPs), and particulate matter (PM) are expected to peak. In terms of overall waste recycling rates, with 2022 as the baseline year, the Company plans to increase the overall waste recycling rate by 5% each year, targeting a 40% recycling rate by 2030.

- 大力加强固废资源化工作；
Ramping up efforts to the solid waste recycling;
- 提升内部所有员工对污染物处理和降低排放的意识和认知；
Enhancing the awareness and understanding of all internal employees on pollutant disposal and emission reduction;
- 鼓励员工、供应商和客户履行自己的污染物排放责任，践行有关承诺；
Encouraging employees, suppliers and customers to perform their pollutant discharge responsibilities and to act on their commitments;
- 监察及评估进度及表现，以达到持续的改善。
Monitoring and assessing progress and performance to achieve continuous improvement.

3.1.4 应对水压力

3.1.4 Coping with Water Stress

中伟股份重视自身水资源管理能力，严格遵守《中华人民共和国水法》，要求水资源管理政策原则上覆盖所有业务范围及所有供应商；在基地建设选址前、建设过程中、生产环节均开展用水风险评估，积极识别运营地当地水资源高风险地区情况，评估水资源压力带来的物理风险²、声誉风险³和法律监管风险⁴，积极就水资源使用效率提升加强

2 物理风险：与水量（稀缺性和洪水）和不适合使用的水质（污染）有关的风险——United Nations Global Compact;

2 Physical Risks: Risks associated with water quantity (scarcity and flooding) and water quality issues (pollution) - as defined by the United Nations Global Compact;

3 声誉风险：与对公司品牌造成的影响有关的风险，并能够影响客户的采购决策——United Nations Global Compact;

与外界的合作，对水资源治理成本的财务量化进行严格管理。对此，中伟股份承诺：

CNGR attaches great importance to its water resources management capability and strictly abides by the Water Law of the People's Republic of China. The water resource management policy is designed to cover all business areas and all suppliers. Before site selection for base construction, during the construction process, and throughout production, CNGR conducts water usage risk assessments to actively identify areas of high water resource risk at its operation sites. It evaluates the physical risks ², reputation risks ³, and legal and regulatory risks ⁴ associated with water resource stress. Furthermore, it actively collaborates with external partners to enhance water resource usage efficiency and strictly manages the financial quantification of costs related to water resource management. In this regard, CNGR is committed to:

- 开展水足迹盘查工作，并不断扩大水足迹盘查的业务范围，积极推动供应链开展节水工作；

Conducting water footprint assessments, continuously expanding the scope of these assessments, and actively promoting water-saving initiatives throughout the supply chain;

- 定期在业务运营地开展水资源压力风险分析、识别和评估工作；

Conducting regular analysis, identification and assessment of water stress risks at its operation sites;

- 提高水资源循环利用率，至2025年，水资源循环利用率70%；

Improving the recycling rate of water resources to reach 70% by 2025;

- 单吨产品排水强度目标，以2020年为基准年，每年减少3.5%，至2026年达到11立方米/吨产品；

Setting a target for wastewater discharge intensity per ton of product, with 2020 as the baseline year, aiming to reduce by 3.5% each year, reaching 11 m³ per ton of product by 2026;

- 减少或避免在水资源高风险地区开展生产运营；

3 Reputation Risks: Risks related to the impact on the Company's brand, which can affect customers' purchasing decisions - as defined by the United Nations Global Compact.

4 法律监管风险：与政府有效管理水资源和可持续性的能力有关的风险——United Nations Global Compact.

4 Legal and Regulatory Risks: Risks associated with the government's ability to effectively manage water resources and sustainability - as defined by the United Nations Global Compact.

Minimizing or avoiding production and operations in areas at high water resource risk;

- 不断提升内部所有员工水资源保护意识和认知;

Continuously enhancing the awareness and understanding of all internal employees regarding water resource conservation;

- 遵循所有适用于水资源管理的法律法规与现行标准，公开披露水资源使用和处理相关信息。

Complying with all laws, regulations and current standards related to water resources management, and disclosing relevant information on the use and treatment of water resources.

3.1.5 生物多样性保护

3.1.5 Biodiversity Conservation

中伟股份认为恢复和修缮所有生物栖息地、保护生物多样性是世界性议题之一，公司重视自身运营和生产对生物多样性的影响，支持并遵守联合国环境规划署发起的《生物多样性公约》，积极识别自身生物多样性风险，促进自身对生物多样性的净积极影响（NPI）。对此，中伟股份承诺：

CNGR believes that the restoration and rehabilitation of all habitats and biodiversity conservation are among the global issues. CNGR places great importance on the impact of its operations and production activities on biodiversity, supporting and complying with the Convention on Biological Diversity initiated by the United Nations Environment Programme (UNEP). It actively identifies its biodiversity risks and promotes a net positive impact (NPI) on biodiversity. In this regard, CNGR is committed to:

- 尽量减少业务活动对维持生物多样性的所有潜在不利影响，在可行范围内减少栖息地干扰、退化和运营期间对栖息地的间接影响，全面保护运营地附近生物多样性及生态系统；

Minimizing all potential adverse impacts of business activities on the maintenance of biodiversity, reducing habitat disturbance, degradation and indirect impacts on habitats during operations to the extent feasible, and comprehensively protecting biodiversity and ecosystems near its operation sites;

- 避免直接砍伐森林，且避免引入通过砍伐森林开展业务运营的供应商；
Avoiding direct deforestation and refraining from engaging suppliers that conduct business operations through deforestation;
- 避免在全球和国家重要生物多样性保护地区附近开展施工或生产运营；
Avoiding construction or production activities near globally and nationally important biodiversity conservation areas;
- 邀请第三方专业机构对运营点附近生物多样性状况（栖息地现状、物种数量、保护情况）进行评估；
Inviting third-party professional organizations to assess the biodiversity status near operational sites, including habitat conditions, species quantities, and conservation status;
- 设定中伟股份生物多样性保护战略目标及管理方法；
Establishing its strategic objectives and management methods for biodiversity conservation;
- 引入TNFD框架并最终披露TNFD报告；
Adopting the Taskforce on Nature-related Financial Disclosures (TNFD) framework and ultimately disclosing the TNFD report;
- 向内部及外部利益相关方推广生物多样性相关知识。
Disseminating biodiversity-related knowledge to internal and external stakeholders.

3.2 社会

3.2 Society

3.2.1 产品与研发

3.2.1 Products and R&D

中伟股份充分认识到环境保护、节约能源资源的重要性和必要性，不断追求绿色产品开发，持续降低生产运营活动对环境、社会的负面影响。公司严格遵守项目运营区域的知识产权与信息保护相关法律法规，积极保护自主知识产权，同时充分尊重他人知识产权。对此，中伟股份承诺：

CNGR fully recognizes the importance and necessity of environmental protection and resource conservation, so it is committed to continuously pursuing the development of green

products and reducing the negative impacts of its production and operational activities on the environment and society. CNGR strictly adheres to the intellectual property and information protection laws and regulations of the project operation areas. It actively protects its own intellectual property rights while fully respecting the intellectual property rights of others. In this regard, CNGR is committed to:

绿色产品开发

Development of Green Products

- 将后续运营、生产过程中减少能源使用、水资源使用以及减少废弃物产生纳入产品开发阶段的考虑中;

Incorporating considerations for reducing energy consumption, water usage, and waste generation into the product development stage for subsequent operations and production processes;

- 在产品开发/设计时考虑生产与使用过程中的环境标准、健康影响，并引入有毒有害物质的可替代产品;

Considering environmental standards and health impacts during production and use in product development/design, and introducing alternative products to toxic and harmful substances;

- 遵循相关法律法规及标准，对产品及物质进行危害评估，并披露产品中SVHC⁵物质的含量对健康和环境的风险;

Following the relevant laws, regulations, and standards to conduct hazard assessments on products and substances, and disclosing the risks to health and the environment associated with the content of SVHC (Substances of Very High Concern)⁵ substances in the products;

- 持续探索绿色包装方案，优先选取可循环、可降解、轻量化的包装材料;

Continuously exploring green packaging solutions and prioritizing recyclable, biodegradable and lightweight packaging materials;

5 即Substances of Very High Concern, 高度关注物质, 指满足欧盟REACH法规第57条款规定的物质。REACH法规指欧盟《化学品注册、评估、许可和限制》, 于2007年6月1日起实施, 对欧洲化学品生产、贸易、使用安全进行规范。

5 Substances of Very High Concern mean substances meeting the provisions of Article 57 of the EU REACH Regulation. The REACH Regulation means the EU Regulation on the Registration, Evaluation, Authorization, and Restriction of Chemicals, implemented on June 1, 2007 to regulate the safe production, trade, and use of chemicals within Europe.

- 开展产品的全生命周期分析。

Conducting the full life cycle analysis of products.

知识产权保护

Intellectual Property Protection

- 尊重知识产权，做好自主知识产权保护工作；

Respecting intellectual property rights and protecting independent intellectual property rights;

- 充分尊重合作方知识产权，严格在授权范围内使用其知识产权。

Fully respecting the intellectual property rights of partners and using their intellectual property rights only with authorization.

3.2.2 化学品管理

3.2.2 Chemical Management

中伟股份高度重视化学品安全管理工作，严格遵守《危险化学品安全管理条例》《优先控制化学品名录》、欧盟《限制有害物质指令》（RoHS）、欧盟《化学品注册、评估、授权和限制（REACH）法规》及《鹿特丹公约》等公约、法律法规，针对高危化学品制定了《危险化学品安全管理制度》《有害物质管理制度》等，明确危险化学品生产、储存、使用、经营、运输和废弃处置等环节管理职责划分。对此，中伟股份承诺：

CNGR takes the chemical safety management seriously and strictly adheres to the Regulations on the Safety Management of Hazardous Chemicals, the List of Chemicals under Priority Control, the EU Restriction of Hazardous Substances (RoHS) Directive, the EU Regulation on the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) and the Rotterdam Convention, as well as other conventions, laws and regulations. In response to high-risk chemicals, it has established the Regulations on Safety Management and the Regulations on Hazardous Substances Management, which clearly delineate management responsibilities across various stages, including the production, storage, use, operation, transportation, and disposal of dangerous chemicals. In this regard, CNGR is committed to:

- 强化公司内部化学品管理观念，进行相关培训；

Strengthening the concept of chemical management within the company and

conducting relevant training;

- 依照危害性对化学品进行分类，建立化学品分级管治清单，完善有害物质风险等级管控制度与措施，确保化学品监管效果；

Classifying chemicals according to their hazards, establishing a hierarchical control list of chemicals, and improving the risk level management system and measures for hazardous substances to ensure effective chemical supervision;

- 对产品以及使用的原料进行环境影响评价与危害程度评估；

Conducting environmental impact assessments and hazard assessments on products and raw materials used;

- 持续关注高风险化学品的可替代材料研究，并陆续开展原料替代计划。

Continuously focusing on the research on alternative materials for high-risk chemicals, and gradually implementing raw material substitution plans.

3.2.3 客户关系管理

3.2.3 Customer Relationship Management

中伟股份秉承“以客户为中心”的服务理念，以优质产品与卓越服务为达成客户满意度提供充分的保障，快速响应客户需求，对客户投诉和意见反馈积极响应并妥善处理，达到客户期望。

CNGR adheres to the service philosophy of "customer-centric", providing a solid guarantee for customer satisfaction through high-quality products and exceptional services. It responds to customer needs and actively addresses complaints and feedback, ensuring that customer expectations are met.

3.2.4 平等、多元与包容

3.2.4 Equality, Diversity and Inclusion

中伟股份严格遵守履行《国际人权宪章》所规定的国际公认人权以及国际劳工组织《关于工作中基本原则和权利宣言》，以及国家相关法律法规所阐述的内容，尊重全体员工及受影响社区的人权，极力避免经营中的人权问题。公司秉承让员工、供应商、承包商等合作伙伴的人权受到充分尊重和保护原则，密切开展各利益相关方的合作。对此，中伟股份承诺：

CNGR strictly adheres to the internationally recognized human rights stipulated in the

International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, as well as the relevant national laws and regulations. It also respects the human rights of all employees and affected communities and makes every effort to avoid human rights issues in its operations. It upholds the principle of fully respecting and protecting the human rights of employees, suppliers, contractors, and other partners, and actively engages in close collaboration with all stakeholders. In this regard, CNGR is committed to:

多元平等雇佣

Diversified and Equal Employment

- 所有业务不存在现代奴役行为、不雇佣和使用一切形式的强迫和强制劳动，严禁雇佣童工，抵制一切形式的强迫劳动；

Eliminating modern slavery in all businesses, not employing and using all forms of forced and compulsory labor, strictly prohibiting the employment of child labor, and resisting all forms of forced labor;

- 在治理薄弱和（或）侵犯人权行为普遍存在的地区经营业务时，按照国际最佳实践制定有效的人权政策、开展人权尽职调查或人权风险评估，采取措施防止或减低人权方面的风险；

Adopting effective human rights policies, conducting human rights due diligence or human rights risk assessment and taking measures to prevent or mitigate human rights risks when operating in areas where governance is weak and/or where human rights violations are widespread, in accordance with international best practices;

- 严格遵守项目所在地劳动法律法规要求，坚持多元、包容、平等的雇佣和用工原则。依法签订劳动合同，保障合理的工作时间和薪酬福利，提供共融互助的工作环境；

Strictly following the requirements of local labor laws and regulations, and adhering to the principles of diversified, inclusive and equal employment. Signing labor contracts according to law, ensuring reasonable working hours, salary and welfare, and providing a working environment of integration and mutual assistance;

- 坚持避免让员工遭受性别、性别认同、性取向、种族、族裔、宗教、年龄、婚姻状况、怀孕、残疾、医疗状况、国籍或其他受法律保护的特征的歧视、性及

非性骚扰、恐吓或暴力。公司致力消除在雇佣和用工方面的歧视，积极为弱势群体提供就业机会，保障女性员工合法权益。抵制任何形式的歧视和暴力，不容忍任何形式的侵犯和人格践踏；

Consistently avoiding discrimination, sexual and non-sexual harassment, intimidation or violence based on gender, gender identity, sexual orientation, race, ethnicity, religion, age, marital status, pregnancy, disability, medical condition, nationality, or other legally protected characteristics; The Company is committed to eliminating discrimination in employment, actively providing employment opportunities for vulnerable groups, and protecting the legitimate rights and interests of female employees, It also rejects any form of discrimination and violence and forbids any form of violation and abuse of human dignity;

- 开通侵权匿名投诉渠道，保护员工人权。当任何员工通过渠道报告自身人权受到侵害时，将受到保护，且不受任何形式报复。

Establishing anonymous complaint channels for infringement to protect the human rights of employees. When any employee reports violations of his/her human rights through the channel, he/she will be protected from any form of retaliation.

人才留存与发展

Talent Retention and Development

- 重视人才留存与发展，承诺畅通员工职业发展路径，为各层级员工提供完备的职业技能培训与职业晋升通道，助力员工成长；

Attaching importance to talent retention and development, promising to smooth the career development path of employees, providing complete vocational skills training and career promotion channels for employees at all levels, and helping employees grow;

- 按照相关法律法规要求执行工作时间、福利管理、招聘、解聘等内部管理；
Implementing internal management such as working hours, welfare management, recruitment and dismissal in accordance with the requirements of relevant laws and regulations;
- 通过多种措施充分保障员工权益、重视其安全与健康，并通过激励引导和培训助力人才发展；

Fully protecting the rights and interests of employees, caring about their safety and health through various measures, and promoting talent development through incentives, guidance and training;

- 根据运营地法律法规要求，尊重员工自由结社和集体谈判的权力，支持员工参加社会团体和组织，并且在各产业基地实现工会和集体谈判协议覆盖率百分之百的目标。倘若有协会及/或工会代表员工行事，本公司承诺真诚地与其代表进行谈判。

According to the laws and regulations of the operational site, respecting the rights of employees to freedom of association and collective bargaining, supporting employees to participate in social groups and organizations, and achieving 100% coverage of labor unions and collective bargaining agreements across all industrial bases. If there are associations and/or trade unions acting on behalf of employees, the Company undertakes to negotiate in good faith with their representatives.

3.2.5 职业健康与安全

3.2.5 Occupational Health and Safety

中伟股份重视每一名员工的职业健康与安全，安全健康的工作场所是员工最基本的保障。为更好地推进健康与安全管理，积极维护健康与安全的工作环境，公司通过制度建设与落实、技能培训、安全意识提升、隐患排查和持续改进等多种手段持续推动体系的有效运行，切实保障员工的健康与安全。对此，中伟股份承诺：

CNGR values the occupational health and safety of every employee and recognizes that a safe and healthy workplace is the most fundamental protection for its employees. To better pursue health and safety management and actively maintain a healthy and safe working environment, CNGR continuously advances the effective operation of the management system through various means, including the establishment and implementation of policies, skills training, enhancement of safety awareness, hazard identification, and continuous improvement. This ensures the health and safety of its employees. In this regard, CNGR is committed to:

- 严格遵守经营活动所在国家和地区关于健康与安全的法律、准则及规章制度；
Strictly abiding by the laws, guidelines and rules and regulations on health and

safety in the country and region where the operational activities are carried out;

- 向供应商、承包商及合作伙伴有效传达公司职业健康与安全管理政策，要求其同样致力实施相关要求；

Effectively communicating the Company's occupational health and safety management policies to suppliers, contractors and partners, and requiring them to be equally committed to implementing relevant requirements;

- 在拟定、策划及进行所有业务活动之时，将健康与安全融入其中；

Integrating health and safety into the formulation, planning and conduct of all business activities;

- 设立基地安全管理目标，有效降低安全事故率；

Setting the safety management objectives of the base to effectively reduce the safety accident rate;

- 严格遵循运营地相关法律法规要求，参考相关行业标准和准则开展员工入职及年度体检；

Strictly following the relevant laws and regulations at its operation sites, and carrying out employment and annual physical examination for employees with reference to relevant industry standards and guidelines;

- 全面识别、评估并控制员工职业健康风险，制定详细的闭环风险管理流程及风险发生时的应对措施，定期监察表现；

Comprehensively identifying, assessing and controlling the occupational health risks of employees, formulating detailed closed-loop risk management processes and countermeasures when risks occur, and regularly monitoring the performance;

- 确保向员工及承包商等其他相关方组织进行健康与安全培训，并备有技术及资源以保障安全地进行一切作业活动；

Ensuring that health and safety training activities are organized for employees, contractors and other interested parties, and technology and resources are available to ensure that all operational activities are carried out safely;

- 实行安全事故责任追究制，制定健康安全主要绩效指标与相关业务主管、高级管理层等责任人的绩效薪酬相关联。

Implementing the accountability system for safety accidents, and involving the main

performance indicators of health and safety in the performance and salary of relevant business supervisors, senior management and other responsible persons.

3.2.6 负责任供应链

3.2.6 Responsible Supply Chain

中伟股份重视供应链的可持续性，力争以新能源材料行业领军企业的影响力，带动产业链的共同可持续发展，携手产业链上下游合作伙伴，努力提升和推动供应链的可持续发展管理，减少对环境和社会的不利影响。对此，中伟承诺：

Focusing on the sustainability of the supply chain, CNGR aims to leverage its influence as a leading enterprise in the new energy materials industry to promote the sustainability of the entire industry chain. By collaborating with upstream and downstream partners, CNGR strives to enhance and advance sustainability management within the supply chain, thereby reducing adverse impacts on the environment and society. In this regard, CNGR is committed to:

- 持续优化原料采购和使用过程，减少温室气体排放、水资源消耗、固废排放等环境影响，防范供应链中可能存在的社会风险，确保原料获取活动符合环境保护和社会责任要求。

Continuously optimizing the procurement and use of raw materials to reduce environmental impacts such as greenhouse gas emissions, water consumption, and solid waste generation. Prevent potential social risks in the supply chain and ensure that raw material sourcing activities comply with environmental protection and social responsibility requirements.

- 于可行范围内避免或减少采购一次性材料或产品使用，优先选择便于回收和循环利用的材料或产品；

Avoiding or reducing the procurement of disposable materials or products as much as possible and giving priority to recyclable materials or products;

- 积极推动循环利用，优先选用符合质量要求、来源可追溯的再生原材料，逐步提高再生原材料在生产中的使用比例。

Actively promoting circular utilization by giving priority to recycled raw materials that meet quality requirements and have traceable sources, and gradually increase

the proportion of recycled materials used in production.

- 严格遵守欧盟指令/法规/标准（ROHS指令、REACH法规、欧盟《包装及包装废弃物指令》等），优先采购和使用绿色材料和健康材料,优先;

Strictly abiding by EU Directives/Regulations/Standards (ROHS Directive, REACH Regulation, EU Packaging and Packaging Waste Directive, etc.), and prioritizing the procurement of green and healthy materials;

- 优先采购通过国际公认第三方认证的原料，如RMAP、IRMA等，逐步提高认证原材料在采购总量中的占比，并鼓励供应商取得相关认证或证明其符合等效标准。

Giving priority to sourcing raw materials certified by internationally recognized third-party certifications, such as RMAP and IRMA. Gradually increase the proportion of certified materials in total procurement, and encourage suppliers to obtain relevant certifications or demonstrate compliance with equivalent standards.

- 要求供应商及时更新内部不得低于国际标准的环境管理物质管理标准，完成并提交每年一次的原材料物质中限用物质监测结果;

Requiring suppliers to timely update their internal management standards for environment-related substances that are no less strict than international standards, complete and further submit the annual monitoring results of restricted substances in raw materials and substances;

- 向供应商传达中伟股份道德、廉洁、诚信、公平等原则，及公司其他可持续相关的要求和期望;

Informing the suppliers of the Company's principles of ethics, integrity, honesty and fairness, as well as other sustainability-related requirements and expectations of the Company;

- 遵守联合国全球契约，经济合作与发展组织（OECD）受冲突影响地区和高风险地区矿产供应链的尽职调查指导方针，及中国五矿化工进出口商会（CCCMC）等国际公约和行业倡议，开展矿产供应链尽责管理，包括建立矿产追溯制度等;

Observing the United Nations Global Compact, the Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas of the Organization for Economic Cooperation and Development (OECD),

and other international conventions and industry initiatives of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCC MC), and carrying out mineral supply chain due diligence management, including the establishment of mineral traceability systems;

- 要求供应商开展外部ESG审查，当发现不符合责任供应链政策要求的情况时，公司会调查此等事件以了解起因和来龙去脉，并采取适当行动；公司与供应商和利益相关者合作解决已发现的问题，并酌情减轻其实际或潜在的不利影响；
Requiring suppliers to conduct external ESG audits. When non-compliance with responsible supply chain policy requirements is identified, the Company will investigate such incidents to know the cause and effect and take appropriate actions; the Company works with suppliers and other stakeholders together to address identified issues and mitigate their actual or potential adverse impacts as appropriate;
- 如发现供应商无法或不愿在约定的时间框架内采取行动以证明其合规性，公司可能会审查我方与该供应商的持续合作关系，直至并包括终止聘用关系；
Reviewing our ongoing relationship with the supplier in case of the supplier's unwillingness or inability to take action to prove its compliance within the agreed time frame, until and including termination of employment;
- 参考SMETA、RBA等国际通用责任供应链审计标准，持续完善自身供应商ESG审核体系；
Continuously improving its own supplier ESG audit system based on international general audit standards for responsible supply chains such as SMETA and RBA;
- 积极与行业组织、非政府组织、学术机构及其他利益相关方合作，共同识别、采纳并推广原料可持续管理的最佳实践，实现多方共赢。
Actively collaborating with industry organizations, non-governmental organizations, academic institutions, and other stakeholders to jointly identify, adopt, and promote best practices in sustainable raw material management, aiming to achieve mutual benefits for all parties.
- 运用各项工具进行尽职调查过程，其中可能包括：现场检查，第三方核查，从包括官方、国际组织和公民社会在内的第三方来源获取信息，咨询有关专家，

以及查阅技术文献；

Utilizing various tools during the due diligence process, including on-site inspection, third-party verification, information acquisition from official and international organizations, civil society, and other third-party sources, consultation with relevant experts, and access to technical literature;

- 严格管控原材料来源，避免采购来自全球或国家重点生物多样性区域（如关键生物多样性区域、世界自然遗产地、法定保护区等）的矿产或其他原材料。通过原产地识别、风险筛查与现场核查等手段，确保供应链在生态敏感区内无不当活动。

Strictly controlling the sources of raw materials to avoid procuring minerals or other raw materials from areas of global or national biodiversity importance, such as Key Biodiversity Areas, World Natural Heritage Sites, and legally protected areas. Ensure that there are no improper activities within ecologically sensitive areas in the supply chain through measures such as origin identification, risk screening, and on-site verification.

- 对参与资源获取、采购、销售、贸易、承包、合同管理和其他相关职能的公司员工和供应商，在供应商风险管理框架内进行培训，包括环境、安全、职业健康等可持续相关内容；

Training employees and suppliers of the Company involved in resource acquisition, procurement, sales, trade, contracting, contract management, and other related functions within the framework of supplier risk management, including sustainability-related contents such as environment, safety and occupational health;

- 公司要求所有安保服务商遵守相关国家和地区法律法规，尊重所有相关方的人权。公司明确禁止安保人员实施暴力、歧视、骚扰或其他侵犯人权的行为。我们将通过尽职调查、合同条款、培训要求和定期审查等方式识别并降低安保服务相关的人权风险。如发现重大违规行为，公司有权暂停或终止合作。公司鼓励供应商建立内部申诉机制，并确保所有相关人员可获得安全、无惩罚的举报渠道。

Requiring all security service providers to comply with national and local laws, and to respect the human rights of all stakeholders. Any acts of violence, discrimination,

harassment, or other human rights abuses by security personnel are strictly prohibited. The company will identify and mitigate human rights risks related to security services through due diligence, contractual obligations, mandatory training, and regular reviews. In the case of serious violations, the company reserves the right to suspend or terminate the partnership. Providers are encouraged to establish internal grievance mechanisms and ensure access to safe, non-retaliatory reporting channels.

3.2.7 尾矿管理

3.2.7 Tailings Management

中伟股份严格遵守项目运营所在国法律法规要求，以及《全球尾矿管理行业标准》开展尾矿设施设计和管理。对此，中伟股份承诺：

CNGR strictly adheres to the legal and regulatory requirements of the countries where its projects operate, as well as the Global Tailings Management Industry Standards for the design and management of tailings facilities. In this regard, CNGR is committed to:

- 负责任地设计、建设、运行和关闭尾矿设施，包括全生命周期以及风险评估，并将社会、环境、当地经济和技术等多方面因素作为决策依据；
Taking responsibility for the full-life-cycle management and risk assessment of its tailings facilities from design, construction and operation to closure, with social, environmental, local economic and technical factors as the basis for decision-making;
- 为尾矿设施制定设计标准与安全审核计划，以最大限度降低尾矿设施全生命周期（包括闭库和闭库后）的风险，并与利益相关方和受影响方协商，识别、评价、管理与公司活动相关联的所有重大经济、公众健康、安全、社会、环境风险；
Formulating the design criteria and safety audit plans for tailings facilities to minimize risks throughout their life cycle (including closure and post-closure period), and identifying, evaluating and managing all significant economic, public health, safety, social and environmental risks associated with the Company's activities in consultation with its stakeholders and other affected parties;

- 尾矿设施的相关监测和监控流程由具有专业知识和经验的人员负责，定期检查设施的稳定性，并系统性地调查和报告异常情况；

Designating personnel with expertise and experience to be responsible for relevant monitoring and surveillance processes for tailings facilities, regularly check the stability of the facilities and systematically investigate and report anomalies;

- 建立尾矿设施破坏的应急响应计划、破坏修复计划与退役关闭计划，并提供充足资金；

Establishing an emergency response plan, damage repair plan, and closure plan in case of destruction of tailings facilities, and providing adequate funding;

- 提供相应的职业技术培训，评估参与或负责尾矿管理工作的人员能力；

Providing appropriate vocational and technical training to assess the competence of personnel involved in or responsible for tailings management;

- 及时、透明地披露尾矿设施的相关信息。

Making relevant information on tailings facilities public in a timely and transparent manner.

3.2.8 社区沟通与乡村振兴

3.2.8 Community Communication and Rural Revitalization

中伟股份关注在地社区及社会居民权益与福祉，积极承担企业社会责任反哺社会。对此，中伟股份承诺：

CNGR is attentive to the rights and welfare of local communities and residents, actively undertaking corporate social responsibility to give back to society. In this regard, CNGR is committed to:

- 严格遵守东道国关于人权及土著人民政策规定，遵看联合国粮食及农业组织权属治理指南《尊重自由自愿、事先知情的认可权：为政府、公司、非政府组织、当地居民和地方社区就征地问题提供实际指导》（简称FPIC）的要求，劳工组织《第169号公约》和《联合国土著人民权利宣言》，承认土著人民的个人和集体权益；

Strictly abiding by the host country's policies and regulations on human rights and indigenous peoples, following the tenure governance guidelines of the Food and

Agriculture Organization of the United Nations — Respecting Free, Prior and Informed Consent: Practical Guidance for Governments, Companies, NGOs, Indigenous Peoples and Local Communities in Relation to Land Acquisition (FPIC), ILO Convention No. 169 and the United Nations Declaration on the Rights of Indigenous Peoples, and acknowledging the individual and collective interests of indigenous peoples;

- 通过积极与社区原住民协商沟通，设计有利于土著人民的发展规划，并于勘探建设、运营及闭矿各阶段，定期与受影响土著人民社区保持联系，通过创新性的解决方案，实现地区繁荣、增强经济动能、有效缩小区域发展差距；

Designing development plans that benefit indigenous peoples by actively engaging in consultation and communication with indigenous communities, maintaining regular contact with affected indigenous communities during exploration, construction, operation, and mine closure phases, to achieve regional prosperity, enhance economic momentum and effectively reduce regional development gaps through innovative solutions;

- 鼓励土著人民和传统社区积极参与解决与公司活动有关的问题，包括对社区人口产生风险和/或影响，允许自由、事先和知情的协商和同意，并监测控制和/或缓解措施的遵守情况；

Encouraging the active participation of indigenous peoples and traditional communities in addressing issues related to corporate activities, including risks of and/or impacts on community populations, allowing free, prior and informed consultation and consent, and monitoring compliance with control and/or mitigation measures;

- 在项目全流程中，尽可能减少对当地社区的负面影响；

Minimizing negative impacts on local communities throughout the project;

- 将企业自身发展与社区发展紧密相连，通过构建中伟股份志愿服务体系，加强社区志愿服务能力，激励员工参与公益事业，出资改善当地交通、教育、健康、医疗等基础条件，策划工艺项目扶持弱势群体，以此对公司项目经营所在国家、区域和地方经济做出重大贡献。

Linking the Company's self-development closely with the communities'

development to enhance community volunteer capabilities, encouraging employee participation in public welfare initiatives, investing in improving local infrastructure such as transportation, education, healthcare, and medical services, and planning operational projects to support disadvantaged groups, thereby making a significant contribution to the economy of the countries, regions, and localities where its projects operate.

3.2.9 文化遗产

3.2.9 Cultural Heritage

中伟股份了解到采矿和其他形式的工业发展可能会对文化遗产造成深刻和不可逆的损害，我们深刻的认识到想保护文化遗产、尊重运营所在地社区权利的重要性。中伟股份致力于在尊重文化多样性和土著居民人口权利的基础上建立互惠互利的建设性关系，认识到他们与领土的不同关系，这不仅涉及物质和社会经济方面，还涉及文化和精神方面。对此，中伟股份承诺：

CNGR is deeply aware of the importance of protecting cultural heritage and respecting the rights of local communities where its projects operate, given that mining and other forms of industrial development may cause profound and irreversible damage to cultural heritage. CNGR is committed to establishing mutually beneficial and constructive relationships based on respect for cultural diversity and the rights of indigenous peoples. It also recognizes the unique relationship of indigenous peoples with their territory, which encompasses not only material and socio-economic aspects but also cultural and spiritual dimensions. In this regard, CNGR is committed to:

- 不在世界遗产区内或会对世界遗产区产生不利影响的区域开发项目，若公司考虑在世界遗产地的缓冲区或邻近区域开展勘探或采掘项目，将先行咨询外部专业机构组织；

Developing no projects at world heritage sites or areas that may cause adverse effects on world heritage sites. If the Company considers exploration or extraction projects in the buffer zone or adjacent areas of the world heritage sites, it will first consult with external professional organizations;

- 承认土著居民具有独特的文化、历史、语言、习俗和特征，尊重和促进土著人

民和传统社区的权利、文化、遗产和生计；

Recognizing the unique culture, history, language, customs and identity of indigenous peoples, and respecting and promoting the rights, culture, heritage and livelihoods of indigenous peoples and traditional communities;

- 与受影响社区合作，就保护重要文化遗产和为受影响社区提供公平结果的措施进行磋商，并记录双方接受的磋商流程和结果；

Consulting with affected communities on measures that aim to protect important cultural heritage and achieve fair outcomes for affected communities, and documenting the mutually accepted consultation process and results;

- 在开发新项目之前或者项目相关活动发生重大变化时，对文化遗产进行筛查，以查明拟议的相关建设活动对可复制、不可复制和重要文化遗产的风险和潜在影响。如果筛查显示在项目相关活动中可能涉及可复制、不可复制或重要文化遗产，则应评估潜在影响的性质和规模，并提出缓解措施，以避免、尽量减少、恢复或补偿不利影响。

Screening related cultural heritage to identify risks and potential impacts of proposed construction activities on irreproducible, reproducible and significant cultural heritage prior to the development of new projects or when significant changes occur in project-related activities. Where irreproducible, reproducible and significant cultural heritage may be involved in project-related activities according to screening, the nature and magnitude of potential impacts should be assessed and mitigation measures proposed to avoid, minimize, restore or compensate for adverse impacts.

3.3 管治

3.3 Governance

3.3.1 信息安全

3.3.1 Information Security

中伟股份充分尊重所有人（包括员工和客户）的隐私及个人资料。严格依照法律法规要求收集和使用客户信息，采取相应安全保护措施，尽力确保客户的数据及信息安全可控。一切的信息收集、使用、储存、分享和销毁等必须符合《网络安全法》《个人信

息安全规范》等运营所在地法律法规要求。对此，中伟股份承诺：

CNGR fully respects the privacy and personal data of all individuals, including employees and customers. It collects and uses customer information in strict accordance with laws and regulations, and implements appropriate security measures to ensure that customer data and information are secure and under control. All activities related to the collection, use, storage, sharing, and destruction of information must be made according to the requirements of applicable laws and regulations at its operation sites, including the Cybersecurity Law and Personal Information Security Specification. In this regard, CNGR is committed to:

- 持续优化信息安全管理体系，参考ISO/IEC 27001等国际标准，定期开展体系评估与更新，确保信息安全制度、流程和技术手段适应公司业务发展和外部风险环境变化。

Continuously optimizing the information security management system by referencing international standards such as ISO/IEC 27001. Regularly conducting system evaluations and updates to ensure that information security policies, procedures, and technical measures are aligned with the company's business development and the evolving external risk environment.

- 仅出于合法的目的，为满足业务需求而收集、使用和保留合理所需的个人资料，尽力避免收集无关的数据、信息；

Collecting, using and retaining reasonably necessary personal data only for legitimate purposes of business needs, and trying to avoid gathering irrelevant data and information;

- 在遵守法律法规的基础上，不将公司员工、客户或供应商机密信息或个人信息直接或间接分享给第三方；

Sharing no confidential or personal information of employees, customers or suppliers of the Company to third parties directly or indirectly in compliance with laws and regulations;

- 在处置（包括收集、使用、储存、分享和销毁等）员工、客户、供应商数据、信息时，依照当地法律获得相关方同意，并明确告知相关方，如何收集、使用、储存、分享和销毁信息，以及提供的访问、更新、控制和保护信息的方式；

Obtaining the consent of relevant parties in accordance with local laws when

disposing of (including collecting, using, storing, sharing and destroying, etc.) data and information of employees, customers and suppliers, and clearly informing relevant parties of how to collect, use, store, share and destroy information, and how to access, update, control and protect information;

- 通过实施多层次的安全控制，包括数据加密、访问权限管理、定期备份及数据生命周期管理，防止未经授权的访问、篡改或破坏，降低数据泄露和操作风险；确保正确地管理和保护公司、客户或供应商信息，并根据相关政策和程序负责任地使用相关系统或处理信息，保护数据安全，包括纸质信息和电子信息；

Implementing multi-layered security controls, including data encryption, access rights management, regular backups, and data lifecycle management, to prevent unauthorized access, tampering, or destruction. These measures reduce the risk of data breaches and operational errors, ensure proper management and protection of company, customer, and supplier information, and promote responsible use of systems and handling of information in accordance with relevant policies and procedures—covering both physical and electronic data.

- 仅授权用户可访问或修改敏感信息，所有权限的授予与变更须经过严格审批流程；

Only authorized users are permitted to access or modify sensitive information, and all permissions must be granted or changed through a strict approval process.

- 履行相关数据保留和销毁义务，根据法律、合规或业务需求保留公司信息，仅在达成所述目的所需的最少期限内保留数据、信息，除非需要延长保留期或受到相关法律法规的允许；在相关保留期届满后即销毁信息，尤其是个人资料；

Fulfilling the obligations for data retention and destruction, retaining the Company's information based on legal, compliant or business needs, and keeping the data and information only for the minimum period required to achieve the stated purpose, unless it is necessary to extend the retention period or permitted by relevant laws; destroying the information, especially personal data, after the expiration of the relevant retention period;

- 明确全体员工在信息安全方面的职责和行为规范，定期开展信息安全培训与考核，增强员工的信息保护意识，推动安全责任落实到各个岗位、各项业务流程

中。

Clearly defining the responsibilities and code of conduct for all employees regarding information security. Regularly conduct information security training and assessments to enhance employees' awareness of data protection, and ensure that security responsibilities are integrated into all job roles and business processes.

- 设立信息安全监测与响应机制，识别网络攻击、病毒入侵、系统漏洞等潜在威胁，并建立信息安全事件应急预案，快速处置信息安全事件。当发生信息安全紧急事件时，依照既定流程评估影响、控制损害，并及时向客户告知信息安全事件基本情况及可能的影响、已采取或将采取的处置措施、客户可自主防范和降低风险的建议、对客户的补救措施等；

Establishing an information security monitoring and response mechanism to identify potential threats such as cyberattacks, virus intrusions, and system vulnerabilities. Developing an emergency response plan for information security incidents to ensure rapid handling of such events. In the event of an information security emergency, follow established procedures to assess the impact, contain the damage, and promptly inform customers of the basic situation and possible effects of the incident, the measures taken or to be taken, recommendations for customers to independently prevent and mitigate risks, and any remediation actions offered to customers.

- 将信息安全要求纳入对供应商、承包商及其他第三方合作方的评估、签约与管理中，要求合作方建立相应的信息安全保障措施，确保其在为公司提供产品或服务过程中遵守数据保护和网络安全相关法规与公司政策。

Incorporate information security requirements into the evaluation, contracting, and management of suppliers, contractors, and other third-party partners. Require these partners to establish appropriate information security safeguards to ensure compliance with data protection and cybersecurity laws and company policies throughout the provision of products or services to the company.

- 严禁将客户信息、数据转移至收集和储存所在国之外，除相关法律法规有明确规定或获得了客户的明确授权。

Strictly forbidding to transfer of customer information and data to a country other

than that where they are collected and stored, unless explicitly stipulated by relevant laws and regulations or authorized by the customer.

3.3.2 商业道德与反贪腐管理

3.3.2 Business Ethics and Anti-corruption Management

中伟股份秉持“求实、创新、进取、共赢”的核心价值观，对任何腐败行为持零容忍态度，维持良好经营秩序，保障公司健康和可持续发展。对此，中伟股份承诺：

CNGR upholds the core values of Practicality, Innovation, Progress, and Win-Win. It maintains a zero-tolerance policy towards any form of corruption, ensuring a sound business environment and safeguarding the Company's healthy and sustainable development. In this regard, CNGR is committed to:

- 遵守运营所在地所有适用的法律法规及国际公约，建立廉洁合规体系；
Abiding by all applicable laws, regulations and international conventions at its operation sites, and establishing a system for integrity and compliance;
- 坚持抵制任何形式的商业贿赂及腐败行为，并提供有效的投诉举报渠道，鼓励知情举报违规行为，保护举报者信息与权益；
Standing against any form of commercial bribery and corruption, providing effective complaint and reporting channels, encouraging reporting violations, and protecting the information and rights and interests of the informants;
- 防范、调查、追究任何违反商业道德或涉及贪腐、贿赂等违规行为，根据调查结果严格落实责任，追求其法律责任，严惩不贷；
Preventing, investigating and holding accountable any violations of business ethics or violations involving corruption and bribery, strictly defining the violator's legal responsibilities according to the investigation results, and punishing he/she with due severity.
- 对业务过程中可能涉及的直接或间接给予、提供或授权疏通费等任何形式的贿赂、贪腐行为进行监控，并定期对相关监管程序进行评估和审计；
Monitoring any form of bribery and corruption that may be directly or indirectly involved in the business process, such as giving, offering or authorizing facilitation payments, and regularly evaluating and auditing relevant regulatory procedures;

- 定期通过多种渠道向员工、供应商等相关方进行反贪腐、反贿赂、反不正当竞争等方面的培训和宣传；

Regularly providing training and awareness programs on anti-corruption, anti-bribery, and anti-competitive practices to employees, suppliers, and other relevant stakeholders through various channels;

- 将反贪腐、反贿赂、反不正当竞争等要求纳入供应商准入和考核范围，严格要求供应商遵守相关规定。

Incorporating anti-corruption, anti-bribery, anti-unfair competition and other requirements into supplier access and assessment, and strictly requiring suppliers to abide by relevant regulations.

3.3.3 董事会多元化与独立性

3.3.3 Diversity and Independence of the Board of Directors

中伟股份深刻认识到董事会多元化及独立性对公司可持续发展的重要性。对此，中伟股份承诺：

CNGR keenly recognizes the significance of diversity and independence of the Board of Directors for its sustainability. In this regard, CNGR is committed to:

- 在设定董事会成员组合时，从多方面考虑董事会成员多元化，包括但不限于性别、年龄、文化及教育背景、种族、专业经验、专业技能、知识、服务任期等，以尽力引入更加多元化的董事成员。董事会将定期评估多元性目标的达成情况，并采取有效措施，确保多元性在董事会成员的选拔和任命过程中得到充分考虑；
Considering the diversity of the Board members from various aspects when setting the composition of the Board, including but not limited to gender, age, cultural and educational background, race, professional experience, professional skills, knowledge, and term of office, to make the composition of the Board more diversified. The Board will regularly assess the achievement of diversity objectives and take effective measures to ensure that diversity is fully considered in the selection and appointment of Board members;
- 公司独立董事占董事会成员的比例不得低于三分之一，且至少包括一名会计专业人士。被提名为独立非执行董事的候选人必须符合中国证监会在《关于在上

市公司建立独立董事制度的指导意见》中的相关要求，不在公司担任除董事外的其他职务，独立履行职责，不受公司主要股东、实际控制人或其他与公司存在厉害关系的单位或个人影响，并确保有足够的时间和精力有效地履行独立董事的职责；

The proportion of independent directors on the board shall not be less than one-third of the total board members, and must include at least one accounting professional. Ensuring that candidates nominated as independent non-executive directors meet the relevant requirements in the Guidance Opinions Regarding the Establishment of the Independent Director Systems in Listed Companies issued by CSRC, do not hold other positions in the Company except as directors, perform their duties independently, and are not affected by the Company's major shareholders, actual controllers or other units or individuals that have a stake in the Company, and have sufficient time and energy to effectively perform the duties as independent directors;

- 中伟股份董事会提名委员会将监察本政策的执行情况，并适时检讨本政策，以确保政策行之有效。

Designating the Nomination Committee of the Board of Directors of CNGR to supervise the implementation of the Policy and review it in due course to ensure its effectiveness.

3.3.4 薪酬与绩效

3.3.4 Remuneration and Performance

本公司高管人员薪酬严格按照董事会审核确定并经公司治理程序审议通过的方案进行支付，与公司经营业绩考核结果挂钩。

The remuneration of the Company's senior executives is strictly paid according to plans reviewed and approved by the Board of Directors and by the Company's governance procedures and is linked to their performance assessment results.

本公司构建了“经营考核与可持续发展考核”结合的高管薪酬考核制度。其中，经营考核包括盈利能力、资产质量、经营增长等经营指标。针对可持续发展考核，公司通过制定年度安全生产责任书，将EHS等责任目标纳入年度经营目标等方式，严格考核了高

管在“有毒排放和废弃物减排”、“水资源节约管理”、“碳减排”、“安全生产”、“职业健康”等议题的管理成果。同时，公司结合将短期激励与长期激励结合，强化高管人员履责责任，推动公司提升经营管理水平，促进公司持续健康发展。此外，在薪酬、奖金延期支付方面，本公司已建立了较为完善的薪酬、奖金递延支付机制。本公司高管人员薪酬严格按照《薪酬管理制度》执行。

CNGR has established a senior executive remuneration assessment system that combines operational assessment and sustainability assessment. The operational assessment includes performance indicators such as profitability, asset quality, and business growth. In terms of sustainability assessment, CNGR strictly assesses the management performance of senior executives on issues such as "toxic emissions and waste reduction", "water resource conservation management," "carbon emission reduction", "work safety," and "occupational health" by establishing an annual work safety responsibility statement and incorporating EHS objectives into annual operation objectives. At the same time, CNGR integrates short-term and long-term incentives to reinforce the accountability of senior executives, enhance the operational management level, and promote the Company's sustainable and healthy development. In addition, it has established a relatively sound mechanism for deferred payment of salaries and bonuses. CNGR shall pay salaries of senior executives in strict accordance with the Remuneration Management System.

相关制度文件

Policy Documents

文件名称 Document Title	内容简要描述 Summary
《薪酬管理制度》 Remuneration Management System	采用竞争性、差异化的薪酬激励策略，构建以“基础薪酬 + 年度绩效奖励 + 年度经营激励 + 股权激励 + 福利保障”的全面薪酬体系。 The Company adopts a competitive and differentiated remuneration incentive strategy, constructing a comprehensive remuneration system consisting of "base salary + annual performance bonus + annual operation incentive + equity incentive + welfare benefits".

	<p>基础薪酬作为高管履职的保障性薪酬，按月支付；年度绩效奖励与公司业绩、高管所在组织的组织绩效及其个人绩效挂钩，年底核算、次年（中国农历春节前）支付，其中组织绩效、个人绩效的目标责任书中包含 EHS 相关内容；年度经营激励与公司的存量、增量、超额利润情况挂钩，并考核高管的履职情况，其中 40%递延至次年发放；股权激励根据公司的战略发展、市值表现等因素择机实施，严格在上市公司的相关监管制度和规范指引下设计，并依法依规进行披露；福利保障包括交通、通讯、健康体检等内容。</p> <p>The base salary serves as a guaranteed pay for senior executives and is paid monthly. The annual performance bonus is linked to the Company's performance, the performance of the executive's department, and their individual performance, and is calculated at the end of the year with payment made before the next Chinese New Year. The targets for department and individual performance include relevant EHS objectives. The annual operation incentive is linked to the Company's existing, incremental, and excess profit situations, as well as to the executives' performance results, with 40% deferred for payment the following year. Equity incentives are implemented based on the Company's strategic development and market value performance, designed in compliance with relevant regulatory systems and guidelines for listed companies, and disclosed according to laws and regulations. Welfare benefits include allowances for transportation, communication, and health check-ups.</p>
<p>《年度经营激励政策细则》</p> <p>Rules of Annual Operation Incentive Policy</p>	<p>年度经营激励作为公司全面薪酬体系的重要组成部分，是完全浮动激励，与公司的存量、增量、超额利润情况挂钩，并考核高管的履职情况（履职情况包括目标责任书中 EHS 相关内容），且高管的激励比例与其他员工进行差异化，高管的比例更高；高管的年度经营激励的 40%将递延至次年发放。</p> <p>The annual operation incentive is a crucial component of the</p>

	<p>Company's comprehensive remuneration system and is a fully variable incentive linked to the Company's existing, incremental, and excess profit situations, as well as to the executives' performance results (including EHS-related indicators in the target responsibility statement). The incentive ratio for executives is differentiated from that of other employees, with a higher proportion allocated to executives. Additionally, 40% of the annual operation incentive for executives will be deferred for payment the following year.</p>
<p>《EHS 奖惩管理制度》 Management Regulations on EHS-related Rewards and Punishments</p>	<p>集团总裁每年年初与各单位第一责任人签订《安全生产责任书》；集团 EHS 部每季度跟踪、检查各单位 EHS 绩效完成情况。</p> <p>The Group President signs the Work Safety Responsibility Statement at the beginning of each year with the primary responsible persons of all units. The Group's EHS Department monitors and inspects the EHS performance of each unit on a quarterly basis.</p>
<p>《组织绩效考核制度》 Organizational Performance Appraisal System</p>	<p>考核指标包括：年度关键绩效指标 KPI 和年度重点工作两部分。年度关键绩效指标（KPI），主要考评各部门重要的、可量化的年度财务及管理指标；年度重点工作，考评各部门在落实公司战略、年度经营计划和重点项目过程中的工作完成情况。</p> <p>Indicators for performance appraisal include annual key performance indicators (KPIs) and annual priorities. Annual KPIs primarily evaluate important and quantifiable annual financial and management metrics for each department. Additionally, annual priorities evaluate each department's performance in implementing the Company's strategy, annual business plans, and key project execution.</p>

3.3.5 风险与合规管理

3.3.5 Risks and Compliance Management

中伟股份坚信风险与合规管理是企业可持续发展的基石。

CNGR firmly believes that risk and compliance management is the foundation for its

sustainability.

在股东大会下设监事会，董事会下设审计委员会，在公司层级设立监察委员会和审计监察中心，组成商业道德管理架构。审计委员会是负责商业道德内容的监督和审计工作的最高机构。同时，公司设立合规委员会，领导工商合规团队开展合规管理日常工作。委员会主任由公司董事长担任，成员由公司各中心、部门及其下属各分、子公司的负责人担任。合规委员会负责统筹协调合规管理工作，定期或不定期召开会议，研究解决重点问题或者提出建议；指导、监督和评价合规管理工作。合规委员会下设办公室，办公室与董事会办公室法务部合署办公，办公室主任由法务管理部负责人担任，成员由各单位合规管理员组成。形成企业风险与合规管理框架，以明确ESG风险管理权责，全面提升对公司ESG的监管和治理能力。

The Board of Supervisors is set up under the General Meeting of Shareholders, and the Audit Committee is set up under the Board of Directors. Additionally, the Company has established the Supervisory Committee and the Audit and Supervision Center at the corporate level, forming a management framework for business ethics. The Audit Committee is the apex body responsible for the supervision and audit of business ethics. At the same time, a Compliance Committee is set up to lead the industrial and commercial compliance team in carrying out routine compliance management activities. The Director of the Compliance Committee is the Company's chairman, while its members consist of the heads of various centers, departments, and their respective branches and subsidiaries within the Company. The Compliance Committee is responsible for the overall coordination of compliance management activities. It holds regular or ad-hoc meetings to research and address key issues or provide recommendations. The Committee also guides, supervises, and evaluates compliance management efforts. The Compliance Committee has an office, which is co-located with the Legal Department of the Board Office. The office director is the head of the Legal Management Department, and its members consist of compliance managers from various units. A corporate risk and compliance management framework has been established to clarify the roles and responsibilities in ESG risk management, thereby enhancing the Company's supervision and governance capabilities regarding ESG matters.

企业风险管理框架亦提供管治架构，以识别、评估及说明所有主要风险（包括但不限于财务风险、合规风险、运营风险、环境与社会风险等），并参考本公司的目标确保

风险控制在可接受的水平。其中识别、评估及管理风险的责任将由公司所有部门（即部门主管）及本公司业务单位（即业务单位高级管理层）的风险负责人持续共同承担。同时，公司建立与关键风险挂钩的绩效激励机制，将员工或管理层在特定风险领域的表现作为奖金或奖励发放的重要依据，激励措施将聚焦公司已识别的重点风险领域，如职业健康安全、合规治理、环境管理等。

The enterprise risk management framework also provides a governance structure to identify, assess, and disclose all major risks — including but not limited to financial, compliance, operational, environmental, and social risks—and ensures that risk controls align with the company's objectives to maintain risks at acceptable levels. The responsibility for risk identification, assessment, and management is continuously shared by all company departments (i.e., department heads) and risk officers within the business units (i.e., senior management of the business units). Meanwhile, the company has established performance incentive mechanisms linked to key risks, making employee or management performance in specific risk areas a significant basis for bonuses or rewards. These incentives focus on the company's identified key risk areas, such as occupational health and safety, compliance governance, and environmental management.

在开发新产品或服务时，将财务风险、法规风险、运营风险等纳入决策标准，作为立项和可行性评估的必要内容。所有新产品、新服务在进入市场前，完成一份正式的风险识别与评估报告，并提交至风控或审计部门审核。评估应基于公司统一制定的风险标准，确保对潜在问题做出预判，并制定相应的预防或缓解措施，防止因忽视关键风险而造成业务损失或合规问题。

When developing new products or services, incorporate financial risks, regulatory risks, operational risks, and other relevant factors into the decision-making criteria as essential components of project initiation and feasibility assessment. Before entering the market, all new products and services must complete a formal risk identification and assessment report, which is submitted to the risk control or audit department for review. The assessment should be based on the company's unified risk standards to ensure potential issues are anticipated and corresponding prevention or mitigation measures are formulated, thereby preventing business losses or compliance problems caused by overlooked key risks.

中伟股份持续、密切对企业ESG风险进行动态监管，对单项风险与整体流程和机制

进行不断审查和修订，定期评估重大变化，优化工作流程并完善风险管理架构，以确保公司ESG风险管理的合规和稳定。

CNGR continuously and closely monitors and controls ESG-related risks, and dynamically reviews and revises individual risks and overall processes and mechanisms. It also regularly evaluates significant changes, optimizes workflows, and enhances the risk management framework to ensure compliance and stability in its ESG risk management.

4 组织领导

4 Organizational Leadership

2023年12月，中伟股份将董事会战略委员会升级为战略与ESG委员会，由董事长任主任委员。战略与ESG委员会负责对公司 ESG 治理进行研究并提供决策咨询建议，对公司 ESG 战略和目标的工作实施进展进行检查，听取工作小组的工作汇报，并提出意见；对公司年度ESG 报告及其他ESG 相关信息披露进行审阅，确保ESG 报告及其他ESG 相关披露的完整性、准确性。未来，中伟股份将定期审视并调整组织架构，持续建立覆盖公司与子公司的完善可持续发展管理体系。

In December 2023, CNGR upgraded its Strategy Committee of the Board of Directors to the Strategy and ESG Committee, with the Chairman serving as the director. The Strategy and ESG Committee is responsible for researching the Company's ESG governance and providing decision-making recommendations. It monitors the implementation progress of the Company's ESG strategy and objectives, reviews reports from working groups, and provides feedback. Additionally, the Committee reviews the Company's annual ESG report and other ESG-related disclosures to ensure the completeness and accuracy of these reports and disclosures. In the future, CNGR will regularly review and adjust its organizational structure and make continuous efforts to establish a sound sustainability management system that encompasses the Company and its subsidiaries.

5 政策审阅与修订

5 Policy Review and Revision

本政策由董事会战略与ESG委员会于 2024年 3 月 22 日批准通过，于 2024年 12 月26 日重新修订并执行，倘若本政策因公司需求和 ESG 发展趋势而需作出必要的更

改，有关更改将提交至公司董事会战略与ESG委员会，以供其审阅，并应至少每三年一次呈予董事会战略与ESG委员会，以供其批核。

This policy was approved by the Board Strategy and ESG Committee on March 22, 2024, and was revised and implemented on December 26, 2024. Should any necessary amendments arise due to company needs or evolving ESG trends, such changes shall be submitted to the Board Strategy and ESG Committee for review. The policy shall also be presented to the Board Strategy and ESG Committee for approval at least once every three years.



CNGR 中伟