

Responsible Sourcing Due Diligence Report 2025

瑞浦兰钧

2025 年度尽职调查报告

February 2026

Driving a Sustainable Future

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1. Introduction

介绍

REPT BATTERO Energy Co., Ltd. ("REPT BATTERO" or "the Company"), as a core enterprise of Tsingshan Industrial Group in the new energy sector, specializes in the R&D and manufacturing of power and energy storage batteries. By deeply integrating Tsingshan Group's resource advantages in upstream minerals such as nickel and cobalt, the Company has built a highly resilient vertically integrated supply chain system. On this basis, REPT BATTERO places great emphasis on supply chain compliance management, committing to ensuring that raw material procurement adheres to international environmental and social responsibility standards, while establishing a traceability system. The Company also implements the concept of lifecycle green manufacturing, enhancing product energy efficiency and cycle life through technological innovation, and actively deploys battery recycling and cascade utilization. Through responsible supply chain and circular economy practices, REPT BATTERO drives the sustainable development of the new energy industry.

瑞浦兰钧能源股份有限公司（“瑞浦兰钧”，“公司”）作为青山实业在新能源领域的核心企业，专注于动力与储能电池的研发制造。公司深度整合青山集团在镍、钴等上游矿产的资源优势，构建了极具韧性的垂直供应链体系。在此基础上，瑞浦兰钧高度重视供应链合规管理，致力于确保原材料采购符合国际环境与社会责任标准，并建立可追溯体系。公司同时贯彻全生命周期绿色制造理念，通过技术创新提升产品能效与循环寿命，积极布局电池回收与梯次利用，以负责的供应链与循环经济实践，驱动新能源产业的可持续发展。

2. Purpose and Scope

目标和范围

This report outlines the work undertaken by REPT BATTERO in 2025 regarding the responsible sourcing of key cathode and anode materials (lithium, aluminum, and graphite). To effectively manage risks associated with the extraction, processing, transportation, and trade of these critical materials, REPT BATTERO consistently adheres to the internationally recognized due diligence framework—the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Due Diligence Guidance")—and systematically implements supply chain due diligence.

Based on this, this Responsible Minerals Due Diligence Report ("the Report") aims to provide a detailed explanation of REPT BATTERO's supply chain due diligence practices executed in 2025, in accordance with the OECD Due Diligence Guidance. Through this disclosure, the company expects to strengthen partnerships by demonstrating supply chain compliance capabilities and to showcase its alignment with the good practices and expectations of external stakeholders regarding responsible sourcing in the supply chain.

本报告阐述了瑞浦兰钧 2025 年在主要正极与负极材料（锂、铝和石墨）的负责任采购方面所开展的工作。为有效管理与这些关键材料的开采、加工、运输及贸易相关的风险，瑞浦兰钧持续遵循国际公认的尽职调查框架——经济合作与发展组织《冲突影响和高风险地区矿产负责任供应链尽职调查指南》（简称“OECD 尽职调查指南”），并系统实施供应链尽职调查。

基于此，本《负责任矿产尽职调查报告》（简称“报告”）旨在依据 OECD 尽职调查指南，详细说明瑞浦兰钧在 2025 年所执行的供应链尽职调查实践。通过此项披露，公司期望通过展现供应链合规能力，加强与业务伙伴的合作关系，并展现我们符合外部利益相关者对供应链负责任采购的良好实践与期待。

3. Progress of Responsible Sourcing Supply Chain Due Diligence Management

负责任采购与供应链尽职调查管理进展

3.1 Consistently advancing and improving responsible minerals due diligence system.

持续不断的践行和完善负责任矿产尽职调查管理体系

REPT BATTERO has consistently regarded responsible sourcing as a core element of its sustainable development strategy. Since 2023, in accordance with international standards such as the OECD Due Diligence Guidance for Responsible Supply Chains and the EU Regulation concerning batteries and waste batteries (EUBR, (EU) 2023/1542), the Company has systematically developed its Responsible Sourcing Policy and the Control Procedure for Due Diligence in the Responsible Mineral Supply Chain. In 2024, this was complemented by the implementation of a Supplier Code of Conduct, establishing strict standards for mineral procurement, labor rights, and environmental protection. The relevant clauses have been incorporated into the legally binding Procurement Framework Agreement, ensuring the construction of a compliance management system across the entire supply chain through signing confirmation and performance mechanisms. In response to the upgrading of global market regulations and customers' ESG requirements, the Company continuously optimizes its management system and strengthens supply chain transparency. In 2025, a special due diligence initiative was carried out focusing on three key materials: lithium, aluminum, and graphite. By combining origin traceability with third-party audits, we ensure that the entire supply chain process meets the requirements for human rights protection and conflict minerals avoidance.

瑞浦兰钧将负责任采购始终作为可持续发展战略的核心环节。自 2023 年起，我们依据 OECD《负责任供应链尽职调查指南》、《欧盟电池与废旧电池法规》(EUBR, (EU) 2023/1542) 等国际标准，系统性构建《负责任采购政策》、《负责任矿产供应链尽职调查控制程序》，并于 2024 年配套实施《供应商行为准则》，对矿产采购、劳工权益及环境保护等环节设立严格标准。相关条款已纳入具有法律约束力的《采购框架协议》，通过签署确认与履约机制构建全供应链合规管理体系。为应对全球市场法规升级与客户 ESG 要求，公司持续优化管理体

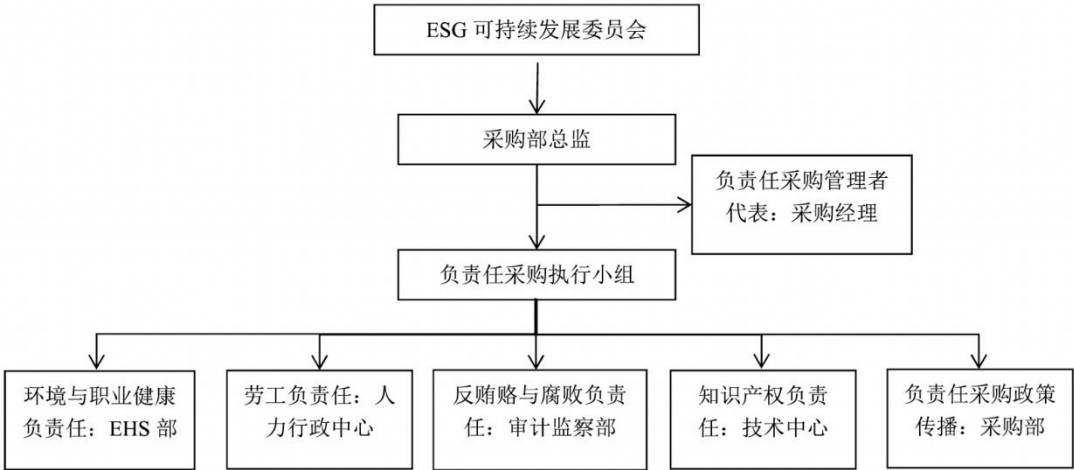
系，强化供应链透明度建设。2025 年重点针对锂、铝、石墨三大关键材料实施专项尽调，通过原产地追溯与第三方审核相结合的方式，确保供应链全流程符合人权保障及冲突矿产规避要求。

The Company's due diligence system is overseen and guided by the ESG Sustainable Development Committee, with the Procurement Department and its subordinate execution team responsible for specific implementation and coordination. Relying on cross-departmental professional division of labor, a closed-loop management process is achieved: the Environment, Health & Safety Department; the Human Resources Administrative Center; the Audit & Supervision Department; and the Technology Center respectively assist the Procurement Department in supplier reviews focusing on four key dimensions: environment & safety, labor rights, anti-bribery, and intellectual property. This framework features clearly defined responsibilities and efficient coordination, forming a complete management loop from policy formulation and execution to evaluation. It systematically identifies and mitigates ESG risks in the supply chain, ensuring that procurement activities align with the company's sustainable development strategy.

公司尽职调查体系由 ESG 可持续发展委员会统筹指导，采购部及下设执行小组负责具体推动与协调，并依托跨部门专业分工实现闭环管理：环境与、人力资源行政中心、审计监察部与技术中心，分别协助采购部专项负责环境与安全、劳工权益、反贿赂及知识产权四大维度的供应商审查。该架构权责清晰、协同高效，从政策、执行到评估形成完整管理回路，系统性地识别与防范供应链 ESG 风险，确保采购活动符合公司可持续发展战略。

The ESG Sustainable Development Committee, serving as the top-level governance body, is responsible for reviewing and formulating the company's sustainable development and responsible sourcing strategies, supervising and guiding their effective implementation, and approving relevant major policies and risk assessment results. The Procurement Department is responsible for overall coordination and supplier management; the EHS Department specifically evaluates environmental compliance and safety in production; the Human Resources Administrative Center audits labor rights and human rights protections; the Audit and Supervision Department investigates the anti-corruption system and business integrity; and the Technology Center assesses the legality of intellectual property and technology sources. These departments collaborate through the execution team, forming a synergistic closed loop from risk identification to audit response, ensuring that all links in the supply chain comply with ESG standards.

ESG 可持续发展委员会作为顶层治理机构，负责审议制定公司可持续发展与负责任采购战略，监督指导其有效实施，并审定相关重大政策与风险评估结果。采购部负责整体协调与供应商管理；EHS 部专项评估环境合规与安全生产；人力资源行政中心审核劳工权益与人权保障；审计监察部调查反腐败体系与商业诚信；技术中心则评估知识产权与技术来源合法性。各部门通过执行小组联动，形成从风险识别到审核应对的协同闭环，确保供应链全环节符合 ESG 标准。



This architecture not only establishes REPT BATTERO's risk control system but also deeply integrates sustainable development into procurement decisions and the entire supplier collaboration lifecycle through normalized cross-departmental joint meetings and information sharing mechanisms. In practice, the Company promotes internal ESG capacity building and cultural transmission by organizing at least one ESG training session annually, while encouraging supply chain partners to jointly enhance compliance and management levels. This facilitates an evolution from risk defense to value co-creation, continuously consolidating the Company's long-term competitiveness in the field of responsible supply chains. Additionally, in November 2025, the Company completed training for relevant business departments, further strengthening their understanding and practical implementation of related responsibilities.

该架构不仅构建了瑞浦兰钧的风险管控体系，更通过常态化的跨部门联席会议与信息共享机制，将可持续发展深度融入采购决策与供应商合作全周期。其在实践中通过每年安排至少一次 ESG 培训，促进了内部 ESG 能力建设与文化传导，并推动供应链伙伴共同提升合规与管理水平，实现了从风险防御到价值共创的演进，持续巩固公司在负责任供应链领域的长期竞争力。同时，于 2025 年 11 月完成 2025 年度对相关业务部门的培训，进一步加强各部门对相关业务的理解与实践。

To establish a sustainable battery ecosystem, REPT BATTERO implemented the SAP system in January 2026 to manage all procurement data, complemented by the Warehouse Management System (WMS) to trace material sources. We recognize that it is crucial to expand the scope of supply chain risk management to include not only direct relationships with tier-1 suppliers but also the extended supply chain, including Nth-tier suppliers, thereby enhancing overall traceability.

为了建立可持续的电池生态系统，瑞浦兰钧于 2026 年 1 月实施了 SAP 系统，以管理所有采购数据，并配合仓库管理系统（WMS）追踪材料来源。我们认识到，扩大供应链风险管理的范围至关重要，不仅要包括与一级供应商的直接关系，还要涵盖延伸的供应链，包括 N 级供应商，从而增强整体可追溯性。

By systematically implementing the Supplier Code of Conduct, REPT BATTERO acquires key supplier data (Know Your Supplier, KYS), evaluates the qualifications of cathode and anode material manufacturers and refiners, and conducts full-link supply chain traceability audits to ensure a robust chain of custody. On this basis, the Company will establish regular communication between suppliers and stakeholders to deepen collaborative governance. For key raw material supply chains, REPT BATTERO implements focused management, ensuring both regulatory compliance in operations and significantly enhancing the supply chain's market adaptability and sustainable development resilience.

瑞浦兰钧通过系统实施《供应商行为准则》，掌握供应商（KYS）关键数据，评估正负极材料制造商及精炼商资质，并执行供应链全链路可追溯性审查，确保监管链的稳健。在此基础上，公司将同步建立供应商与利益相关方常态化沟通，深化协同治理。针对关键原材料供应链，瑞浦兰钧实施重点管控，既保障运营中的法规合规性，又显著增强了供应链的市场适应性与可持续发展韧性。

In 2025, REPT BATTERO officially launched its annual supply chain due diligence management audit, led by the Procurement Department. This audit was independently organized and implemented by the company, aiming to systematically assess the effectiveness of existing supplier management processes. Based on the audit results, the Qualified Supplier List is dynamically updated to ensure that all suppliers on the list meet the company's basic admission standards concerning responsible sourcing, compliance management, and sustainable development.

2025年，瑞浦兰钧由采购部门牵头，正式启动年度供应链尽职调查管理审计工作。此次审计由公司自主组织实施，旨在系统评估现有供应商管理流程的有效性，并依据审计结果动态更新《合格供应商清单》，确保清单内供应商符合公司在负责任采购、合规经营及可持续发展方面的基本准入标准。

In 2025, targeting its tier-1 supplier base, the company prioritized 20 key suppliers for due diligence information verification, based on dimensions such as the strategic importance of material types and potential risks. By distributing and collecting KYS (Know Your Supplier) questionnaires, REPT BATTERO systematically gathered foundational information regarding suppliers' corporate qualifications, supply chain transparency, and responsible practices. The questionnaire design strictly aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the EU Regulation concerning batteries and waste batteries (EUBR, (EU) 2023/1542). The topics comprehensively cover key areas such as carbon management and climate action, human rights protection and labor rights, and occupational health and safety management. This aims to comprehensively evaluate suppliers' risk control capabilities and compliance performance from the multiple perspectives of Environment, Social, and Governance (ESG). The successful implementation of this questionnaire survey has provided robust data support and a decision-making foundation for subsequent in-depth supplier audits, tiered risk management, and targeted capacity building initiatives.

针对一级供应商群体，公司基于物料类型的战略重要性及潜在风险等维度，重点筛选出 20 家关键供应商开展尽职调查信息核验。通过定向发放并回收 KYS（Know Your Supplier）调查问卷，瑞浦兰钧系统采集了供应商在企业资质、供应链透明度及负责任实践等方面的基础信息。问卷设计严格对标经济合作与发展组织（OECD）《冲突影响和高风险地区矿产负责任供应链尽职调查指南》、欧盟电池与废旧电池法规（EUBR, (EU) 2023/1542），议题设置全面覆盖碳管理与气候行动、人权保护与劳工权益、职业健康与安全管理等关键领域，旨在从环境、社会与治理（ESG）多重视角综合评估供应商的风险管控能力与合规表现。本次问卷调查的顺利实施，为后续开展深度供应商审核、风险分级管理及专项能力建设提供了坚实的数据支撑与决策依据

To strengthen communication and cooperation with key stakeholders—including affected areas, upstream and downstream enterprises in the supply chain, government authorities, non-governmental organizations, media, and other relevant parties—we have established a transparent and open supply chain management grievance and communication mechanism. This mechanism has been fully communicated during the supplier admission and collaboration processes to ensure that all relevant parties are aware of and can access the grievance channels. Additionally, both internal and external stakeholders have the option to report any violations occurring during transactions anonymously. We are committed to continuously enhancing supply chain governance capabilities through ongoing dialogue and consultation.

为加强关键利益相关方的沟通与合作，包括受影响地区、供应链上下游企业、政府部门、非政府组织、媒体及其他相关方，我们建立并公开透明的供应链管理申诉与沟通机制。该机制在供应商准入及合作过程中均进行了充分沟通，确保相关方了解并能够使用申诉渠道。同时，内外部利益相关方可选择匿名方式举报交易过程中的任何违规行为。我们致力于通过持续对话与磋商，推动供应链治理能力的不断提升。

During the reporting period, no complaints were received through the below established public communication channels.

在报告期内，下述已建立的公开沟通渠道未收到任何投诉。

Channels for complaints and reports 投诉举报渠道：

Email 邮箱：sustainability@reptbattero.com

Address: No. 205, Binhai 6th Road, Wenzhou Bay New Area, Longwan District, Wenzhou City, Zhejiang Province

邮寄地址：浙江省温州市龙湾区温州湾新区滨海六路 205 号

3.2 Identify and Evaluate Supply Chain Risks

供应链风险识别与评估

In 2025, REPT BATTERO conducted due diligence system and ESG information collection, as well as supply chain traceability, for 20 key suppliers. Among these, due diligence and tier-1 supply chain verification were carried out on four of them. During this process, a total of 21 independent suppliers across one country were identified, involving the supply chains for lithium, aluminum, and graphite. No significant issues were identified concerning the following key risks.

在 2025 年度，瑞浦兰钧针对 20 家重点供应商进行了尽职调查体系及 ESG 的信息收集及供应链追溯。并对其中的 4 家进行了尽职调查及一级供应链验证。在此过程中，识别出跨 1 个国家共计 21 家独立供应商，涉及锂、铝和石墨的供应链。针对以下关键风险，未发现重大问题。

Risks	Details
Serious abuses associated with the extraction, transport or trade of minerals	Torture, cruel, inhuman and degrading treatment 虐待、残忍、不人道和有辱人格的待遇
	Forced or compulsory labor 强迫或强制劳动
	Child Labor 童工
	Sexual Violence 性暴力
	War crimes or other violation of international humanitarian law, crimes against humanity or genocide 战争罪或违背其他国际人道法，危害人类罪或种族灭绝
Direct or indirect support to non-state armed groups	-
Direct or indirect support to private / public security forces	-
Bribery and fraudulent misrepresentation of the origin of minerals	Money-laundering 洗钱
	No payment of taxes, fees and royalties to governments 未向政府支付税费、费用和特许权使用费
Environment, climate and human health, considering direct, indirect and cumulative effects 环境、气候与人类健康，包括直接、间接及累积影响	Air 空气
	Water 水
	Soil 土壤
	Biodiversity 生物多样性
	Hazardous substances 有害性物质
	Noise and Vibration 噪音与振动
Plant safety 安全性	

	Energy use 能源使用
	Waste and residues 废弃物和残留物
Human rights, labour rights and industrial relations 人权、劳工权利与劳资关系	Occupational health and safety 职业健康与安全
	Discrimination 歧视
	Trade and freedoms 贸易与自由
Community life 社区生活	Indigenous people 土著人民

3.3 Risk Mitigation

风险缓解

In the 2025 supply chain due diligence management audit project, 100% of suppliers developed reasonable and feasible corrective action plans based on the audit results, and follow-ups were conducted on the suppliers' rectification efforts. Additionally, selected suppliers were audited on the implementation status and evidence of their corrective action plans, all of whom demonstrated steady progress, reflecting their active efforts in continuously improving compliance gaps.

在 2025 年度供应链尽职调查管理审计项目中，100%的供应商根据审计结果制定了合理且可行的纠正措施计划，并针对供应商的整改进行了跟进。此外，部分供应商被选中对纠正措施计划的实施情况和证据实施审核，均表现出稳定的进展，体现了他们在持续改进合规性差距方面的积极努力。

3.4 Independent Third-Party Assessment and Audit

独立第三方评估与审核

REPT BATTERO actively collaborates with suppliers to promote their attainment of industry certifications related to responsible sourcing, aiming to meet stakeholder expectations for compliance and transparency while aligning with internal objectives. Among these efforts, 10 suppliers in REPT BATTERO's supply chain have achieved compliance with the RMAP standards. This achievement demonstrates the effectiveness of collaborative governance within the supply chain ecosystem, leveraging third-party audits and RMAP certification to achieve enhanced transparency and improved compliance levels, ultimately realizing shared value for all parties involved. Additionally, during 2025, REPT BATTERO underwent and facilitated two third-party audits commissioned by customers and developed corrective action plans based on the findings identified during these audits.

瑞浦兰钧积极与供应商合作，推动其通过与负责任采购相关的行业认证，旨在满足利益相关方对合规性和透明度的期望，同时与内部目标保持一致。其中，瑞浦兰钧供应链中已有 10 余家供应商符合 RMAP 标准。该成果彰显供应链生态伙伴协同共治效能，借力第三方审计与 RMAP 认证实现透明度升级及合规水平跃升，最终达成多

方价值共享。另外，瑞浦兰钧在 2025 期间共接受并配合完成 2 次客户委托的第三方审核，并针对审核发现的问题点制定了整改计划。

3.5 Publicly Report

公开报告

REPT BATTERO's annual ESG report is published in April each year, detailing the company's efforts and achievements in supply chain due diligence management. The 2025 ESG report has been released on our website (<https://www.reptbattero.com/esg-sustainability>). We sincerely invite all stakeholders to visit the website to learn about our actions in responsible sourcing and supply chain management over the past year, as well as the systematic plans we have developed to meet customer needs and comply with relevant regulations.

瑞浦兰钧年度 ESG 报告于每年的 4 月发布，其中介绍了瑞浦兰钧在供应链尽职调查管理方面的努力与成就，2025 年 ESG 报告已在网站上发布 (<https://www.reptbattero.com/esg-sustainability>)。我们诚邀各位利益相关方访问网站，了解我们过去一年在负责任采购和供应链管理方面采取的行动，以及我们为满足客户需求及遵守相关法规所制定的系统化计划。

4. Areas of Strategic Focus

未来关注的领域

REPT BATTERO will continue to deepen its strategic commitment to responsible sourcing. Building upon our existing practices, we will systematically integrate key findings from risk assessments, focus on improving our due diligence management system, and establish a multi-dimensional, full-lifecycle supply chain review mechanism. To address compliance requirements such as the EU Battery Regulation and the Corporate Sustainability Due Diligence Directive, the company will establish a dedicated management team to ensure that mineral supply chain management fully complies with international responsible sourcing standards. Concurrently, we will continue to advance our supplier audit program, gradually expanding coverage based on existing efforts. By building an industry risk co-governance platform that integrates upstream and downstream enterprises, industry associations, third-party organizations, and other stakeholders, we will promote information sharing and collaborative governance, guiding partners to jointly enhance supply chain transparency and risk response capabilities.

瑞浦兰钧将持续深化对负责任采购的战略承诺。我们将在现有实践基础上，系统性地整合风险评估的核心发现，着力完善尽职调查管理体系，并构建覆盖多维度、全周期的供应链审查机制。为应对欧盟《电池法规》及《企业可持续发展尽职调查指令》等合规要求，公司将设立专项管理小组，确保矿产供应链管理全面符合国际责任采

购标准。与此同时，我们将持续推进供应商审核计划，在现有基础上逐步扩大覆盖范围，并通过构建行业风险共治平台，整合上下游企业、行业协会及第三方机构等多方力量，推动信息共享与协同治理，引导合作伙伴共同提升供应链透明度与风险应对能力。

The minerals currently covered by this report are lithium, aluminum, and graphite. In the future, REPT BATTERO plans to gradually expand the scope of disclosure and explore full lifecycle traceability mechanisms to further enhance supply chain transparency, responding to the expectations for information from investors, customers, and the public regarding responsible sourcing.

本报告目前涵盖的矿产范围为锂、铝和石墨。未来，瑞浦兰钧计划逐步扩大披露范围，并探索全生命周期追溯机制，以进一步提升供应链透明度，回应投资者、客户及社会公众对负责任采购的信息期待。

Meanwhile, to ensure that all employees deeply understand and fulfill the company's commitment to responsible sourcing, we will carry out internally and externally coordinated special training programs across various business units, promoting the effective implementation of corporate strategy and operational policies. As a key initiative for 2026, REPT BATTERO will continue to advance supply chain audits and build a systematic, sustainable supply chain management system to deepen the implementation of its responsible sourcing strategy. In this process, supplier capacity building will become a crucial link. Through targeted training, we will ensure that partners closely align with our sustainable development philosophy and jointly promote the responsible transformation of the supply chain.

同时，为确保全体员工深入理解并落实公司在负责任采购领域的承诺，我们将面向各业务单元开展协同内外的专项培训，推动企业战略与运营方针的有效贯彻。作为 2026 年的重点举措，瑞浦兰钧将持续推进供应链审核，构建系统化、可持续的供应链管理体系，以深化负责任采购战略的实施。在此过程中，供应商能力建设将成为关键环节，我们将通过针对性培训，确保合作伙伴与我司的可持续发展理念深度契合，共同推进供应链的负责任转型。