

浙江吉利控股集团有限公司

可持续供应链尽职调查管理政策

Zhejiang Geely Holding Group Co., Ltd.

Sustainable Supply Chain Due Diligence

Management Policy

第一部分 序言

Part I Preface

1. 背景 Background

随着贸易全球化进程的持续深化，浙江吉利控股集团有限公司（以下简称“吉利控股集团”“集团”或“我们”）将供应链的可持续性与稳定性上升为吉利控股集团可持续发展战略的核心要务之一。

As the trend of global trade integration continues to deepen, Zhejiang Geely Holding Group Co., Ltd. (hereinafter referred to as “Geely Holding”, “the Group”, or “we”) elevated the sustainability and stability of the supply chain as one of Geely Holding’s core sustainable development strategy.

2. 编制依据 Basis for Preparation

为推进供应链绿色转型并深化企业社会责任实践，吉利控股集团参照《经合组织负责任商业行为尽责管理指南》《经济合作与发展组织关于来自受冲突影响和高风险地区的矿石的负责任供应链尽职调查指南》及《国际人权公约》等权威性指南，对照《欧盟电池法规》（“EUBR”）《欧盟零毁林条例》（“EUDR”）等前沿立

法要求，结合集团业务情况，制定并实施一套以风险为导向的可持续供应链尽职调查管理机制，致力于协同合作伙伴共同实现全链路环境与社会风险的动态管控。

To promote the green transition of supply chain and strengthen corporate social responsibility practices, Geely Holding has established a systematic sustainable supply chain due diligence management framework based on international standards. This framework not only draws on authoritative guidelines such as the *OECD Due Diligence Guidance for Responsible Business Conduct*, the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, and the *International Bill of Human Rights*, but also maintains alignment with cutting-edge regulatory requirements such as the new *EU Battery Regulation (2023/1542)* (“EUBR”) and the *Regulation (EU) 2023/1115 on Deforestation-free Products* (“EUDR”). Tailored to Geely Holding’s own operational context, this risk-based supply chain management mechanism enables dynamic monitoring and control of environmental and social risks across the entire supply chain in collaboration with partners.

3. 适用范围 Scope of Application

《可持续供应链尽职调查管理政策》（以下简称“政策”）适用于吉利控股集团及所属子集团/分子公司。我们希望所有业务伙伴（包括但不限于供应商、制造商、承包商及价值链上的相关实体）在与吉利控股集团开展业务时，以符合本政策原则和价值观的方式行事。

This *Sustainable Supply Chain Due Diligence Management Policy* (hereinafter referred to as this “Policy”) applies to Geely Holding and its subsidiaries and branches. We expect all business partners—including but not limited to suppliers, manufacturers, contractors, and related entities across our value chain—to conduct business with Geely Holding in accordance with the principles and values set forth in this Policy.

4. 价值与目标 Values and Objectives

吉利控股集团倡导在经济、环境和社会维度创造可持续企业价值，秉持“与人、产业、社会共享发展”的理念。我们致力于将负责任商业实践融入运营与价值链全流程，并积极倡导与供应商等利益相关方保持开放透明的沟通与协作，共建可持续

商业生态，提升全价值链的可持续发展绩效。

Geely Holding advocates for creating sustainable corporate value across economic, environmental, and social dimensions, upholding the philosophy of “sharing development with people, industries, and society”. We strive to embed responsible business practices throughout our operations and value chain, actively advocate for and engage in communicating and working openly and transparently with our suppliers and other stakeholders, and aim to build a sustainable business ecosystem to improve sustainability performance across the entire value chain.

5. 挑战与协作 Challenges and Collaboration

作为整车制造供应链体系中的下游主体，吉利控股集团深知可持续供应链管理所面临的多维挑战，其核心在于尽职调查管理机制的有效运行需依托上游合作伙伴的深度协同配合。在此过程中，我们始终秉持生态共建者的角色定位，致力于通过技术标准共研、管理经验共享、绿色金融协同等创新模式，推动全球汽车产业价值链的韧性提升与价值创造。

As a downstream entity within the automotive manufacturing supply chain, Geely Holding deeply understands the multifaceted challenges of sustainable supply chain management. The core challenge lies in ensuring the effective implementation of due diligence mechanisms, which requires close collaboration and coordination with upstream partners. Throughout this process, we position ourselves as an ecosystem co-creator, committed to enhancing the resilience and value creation of the global automotive industry value chain through innovative models such as joint development of technical standards, sharing of management experience, and green finance initiatives.

基于此认知，我们着力构建产业协同网络：一方面，通过搭建跨行业对话平台促进知识共享与能力共建，在供应链全链路中强化责任共担机制；另一方面，以开放创新理念突破传统合作模式，不仅深化与产业链伙伴的战略协作，更积极联动全球产学研机构，共同推进以可持续发展理念为内核、智能技术革新为驱动、新能源应用创新为支撑、新型材料研发为突破的未来出行生态体系建设。

Based on this understanding, we strive to build an industry collaboration network. We foster knowledge sharing and capacity building across the supply chain by through cross-industry dialogue platforms, strengthening shared responsibility mechanisms. Guided by open innovation principles, we transform conventional approaches to cooperation — deepening strategic partnerships across the industry chain while actively engaging global industry-academia-research collaboration. Together, we advance the development of a future mobility ecosystem anchored in sustainability, driven by intelligent technology, powered by new energy applications, and accelerated through new material innovations.

第二部分 我们的承诺

Part II Our Commitments

6. 供应链 ESG 管理承诺 Commitments to Supply Chain ESG Management

作为一家负责任的全球化企业，吉利控股集团持续贡献于联合国 2030 可持续发展目标的达成，并积极践行《联合国全球契约》十项原则。我们参照《经合组织负责任商业行为尽责管理指南》建立涵盖所有重大 ESG 议题及各供应链层级的负责任商业尽职调查管理流程，包括识别与评估潜在和实际的可持续风险，采取预防和缓释措施降低不利影响，持续跟踪与监控改进效果，及时披露相关信息并与利益相关方沟通，推动价值链的透明度和追溯性提升，以可持续的方式开展商业活动。我们旨在以负责任的方式采购和使用原材料，要求直接供应商签署《吉利供应商行为准则》，推动将相关规定传达至其他上游供应商，并进一步要求和鼓励供应商切实践行《吉利供应商行为准则》要求，持续提升其在可持续发展领域的实践水平和绩效表现。该《吉利供应商行为准则》对供应商在工作环境与人权、健康与安全、商业道德、环境保护、冲突矿产等方面提出了明确要求，吉利控股集团致力于通过与供应商协作，逐步构建安全、透明且可持续的供应链管理体系。

As a responsible global enterprise, Geely Holding continually contributes to the achievement of the United Nations 2030 Sustainable Development Goals and actively upholds the *Ten Principles of the United Nations Global Compact*. With reference to the *OECD Due Diligence Guidance for Responsible Business Conduct*, we have established a

responsible business due diligence process covering all ESG material issues and across all tiers of our supply chain. It includes identifying and assessing potential and actual sustainability risks, implementing preventive and mitigating measures to reduce adverse impacts, continuously monitoring, and tracking corrective results, disclosing relevant information in a timely manner, and engaging with stakeholders to enhance value chain transparency and traceability, and conducting business sustainably. We aim to procure and use raw materials responsibly, requiring our direct suppliers to sign the *Geely Supplier Code of Conduct* and to promote the dissemination of our principles to other upstream suppliers. We further require and encourage suppliers to effectively implement the *Geely Supplier Code of Conduct*'s requirements and continuously improve their sustainability practices and performance. The *Geely Supplier Code of Conduct* sets clear requirements for suppliers in the areas of working conditions and human rights, health and safety, business ethics, environmental protection, conflict minerals etc.. Geely Holding is dedicated to collaborating with suppliers to progressively build a safe, transparent, and sustainable supply chain management system.

工作环境与人权。吉利控股集团反对任何形式的强迫劳动、奴役及人口贩运，杜绝雇用童工并坚决反对任何使用童工的行为，尊重员工依法自由结社和集体协商的权利。严禁性骚扰与其他工作场所骚扰、虐待及暴力，推动形成和谐、包容、平等的工作环境。我们反对一切歧视，尊重和支持妇女、儿童、移徙工人、残障人士、原住民/土著的权益。我们鼓励供应商遵循适用的法律法规和当地市场条件、生活水平为员工提供公平的薪酬与福利、带薪休假与健康保障。

Working Conditions and Human Rights. Geely Holding is against any form of forced labor, slavery, or human trafficking. We prohibit the employment of child labor and firmly oppose any use of child labor. We respect employees' legal rights to freedom of association and collective bargaining. We strictly prohibit sexual harassment and other workplace harassment, abuse, or violence, and we promote the creation of a harmonious, inclusive, and equitable workplace. We oppose all forms of discrimination and respect and support the rights of women, children, migrant workers, persons with disabilities, and indigenous peoples. We encourage suppliers to comply with applicable laws and

regulations and to provide employees with fair wages and benefits, paid leave, and health protection consistent with local market conditions and living standards.

健康与安全。吉利控股集团承诺遵守生产和经营所在地所有适用的健康和安全相关法律法规，致力于为员工创造安全的工作环境，确保生产设施安全防护，保障工作条件符合员工及劳工的健康要求。

Health and Safety. Geely Holding is committed to complying with all applicable health and safety laws and regulations in the locations where they operate and produce. We are dedicated to creating safe working environments, ensuring protective measures in production facilities, and maintaining working conditions that safeguard the health and well-being of employees and workers.

商业道德。我们在业务经营中坚持诚实守信、合规经营的理念，遵守反腐败、反贿赂、反洗钱、反垄断与反不正当竞争等法律法规，对腐败、贿赂及洗钱等行为采取零容忍态度。

Business Ethics. We uphold the principles of integrity and compliance in all business operations, complying with laws and regulations on anti-corruption, anti-bribery, anti-money laundering, anti-monopoly, and fair competition. We adopt a zero-tolerance approach toward corruption, bribery, and money laundering.

环境保护。吉利控股集团遵守所适用的环境保护相关法律法规及国际准则，并要求供应商满足环境合规要求，推动供应商主动减少污染物（包括但不限于大气污染物、废水、噪声）、废弃物（包括但不限于一般废弃物、危险废弃物及危险化学品等）及碳排放，保护及节约自然资源（包括但不限于森林、水及土地）及能源的利用，避免破坏生态环境及生物多样性，减少产品、服务以及相关业务活动对环境造成的影响。

Environmental Conservation. Geely Holding complies with applicable environmental protection laws, regulations, and international standards, and requires that its suppliers meet environmental compliance requirements. We promote suppliers to proactively reduce pollutants (including but not limited to air pollutants, wastewater, and

noise), waste (including but not limited to general waste, hazardous waste, and hazardous chemicals) as well as carbon emissions to protect and conserve natural resources (including but not limited to forests, water, and land) and energy, to avoid damaging ecosystems and biodiversity, and to minimize the environmental impacts of their products, services, and related business activities.

冲突矿产。吉利控股集团承诺在全球供应链中主动识别并消除使用直接或间接资助武装冲突、侵犯人权（包括强迫劳动、童工）或破坏环境的矿产。我们参照《联合国全球契约》十项原则、中国五矿化工进出口商会（“CCCMC”）发布的《中国矿产供应链尽责管理指南》（第二版）、《经济合作与发展组织关于来自受冲突影响和高风险地区的矿石的负责任供应链尽职调查指南》、负责任的矿产倡议（“RMI”）、《欧盟冲突矿产法规》及《多德-弗兰克华尔街改革和消费者保护法》等法规及倡议，主动识别并消除采购来自刚果（金）及其周边国家非法武装控制矿区的 3TG（锡、钽、钨、金）等矿产原料。同时，我们优先选择供应链符合以下标准的供应商：原料来源的冶炼厂/精炼厂已通过 RMI 独立认证，及/或矿区/矿山已通过负责任采矿保证倡议（“IRMA”）的独立认证。

Conflict Minerals. Geely Holding is committed to proactively identifying and then eliminating the use of minerals in its global supply chain that directly or indirectly finance armed conflict, violate human rights (including forced labor and child labor), or harm the environment. Taking references from the *Ten Principles of the United Nations Global Compact*, the *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)* published by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (“CCCMC”), the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, the *Responsible Minerals Initiative* (“RMI ”), the *EU Conflict Minerals Regulation (Regulation (EU) 2017/821)* , and the *Dodd-Frank Wall Street Reform and Consumer Protection Act*, we proactively identify and then eliminate the procurement of 3TG minerals (tin, tantalum, tungsten, and gold) etc. from mines in the Democratic Republic of the Congo and its surrounding countries controlled by illegal armed groups.

We also prioritize to suppliers whose supply chains meet the following criteria: the

smelters/refineries supplying the raw materials have been audited and certified by the RMI, and/or the mining sites have completed independent verification under the *Initiative for the Responsible Mining Assurance* (“IRMA”).

负责任矿物追溯。吉利控股集团致力于通过加强与供应商及其他业务伙伴合作等方式，持续提升冲突矿物以及拓展矿物（例如：镍、钴、锂、云母、天然石墨、锰、钢、铝、铜等）的供应链透明度与可追踪性。吉利控股集团已建立流程并使用区块链等数字化工具，可追溯相关矿物至开采点。

Responsible Mineral Traceability. Geely Holding is dedicated to the continuous enhancement of supply chain transparency and traceability for conflict minerals and extended minerals (e.g., nickel, cobalt, lithium, mica, natural graphite, manganese, steel, aluminum, and copper) by means such as strengthening collaboration with suppliers and other business partners. Geely Holding has implemented processes and adopted digital tools like blockchain to trace these minerals back to their origin.

电池供应链。吉利控股集团对照 EUBR 等相关要求，致力于与供应商及其他业务伙伴合力共建透明、可持续的电池关键原材料供应链。我们在相关文件中（如：《吉利供应商行为准则》等）要求供应商主动识别并消除使用有较高潜在环境和社会风险的关键电池原材料（包括钴、锂、镍、天然石墨及上述物质组成的化合物），以防止/减轻关键电池原材料在开采、加工以及交易过程中对环境和社会造成的不利影响，并需积极配合我们针对电池供应链开展尽职调查。

Battery Supply Chains. Geely Holding, in alignment with requirements of EUBR, aims to work jointly with its suppliers and other business partners, to build a transparent and sustainable battery supply chain for critical raw materials. In our relevant documents (such as the *Geely Supplier Code of Conduct etc.*), we require our suppliers to proactively identify and then eliminate the use of the critical battery raw materials (including cobalt, lithium, nickel, natural graphite, and compounds derived from these substances) with high potential environmental and social risks. Through these efforts, we aim to prevent and mitigate adverse impacts from extraction, processing and trading activities on both society

and the environment. Suppliers are also expected to actively cooperate with our battery supply chain due diligence initiatives.

零毁林供应链。吉利控股集团深识保护全球森林资源对于减缓气候变化和发展可持续消费模式的重要意义。为积极响应 EUDR 要求，吉利控股集团已建立零毁林供应链管理体系，致力于推动使用天然橡胶、木材、皮革等零部件原材料的供应商采购不涉及毁林、森林退化或非法土地转和其他较高潜在风险的行为的原材料，并积极配合我们针对零毁林相关供应链开展尽职调查。吉利控股集团承诺在项目开发中优先避开森林区域，必要时进行生态修复，持续加强与供应商的沟通和协作。

Deforestation-Free Supply Chains. Geely Holding fully acknowledges the critical importance of protecting global forest resources to mitigate climate change and foster sustainable consumption models. In active response to the EUDR requirements, we have established a deforestation-free supply chain management system. We are dedicated to promoting the procurement from suppliers, which involved in the use of natural rubber, wood, leather, and other raw materials, are not linked to deforestation, forest degradation, illegal land conversion, or other high-risk practices. These suppliers are also required to cooperate with our deforestation-related supply chain due diligence. Geely Holding pledges to prioritize avoiding forested areas during project development, conduct ecological restoration where necessary, and continuously strengthen communication and collaboration with suppliers.

第三部分 我们的行动

Part III Our Actions

7. 尽职调查管理体系 Due Diligence Management System

吉利控股集团已建立尽职调查管理体系，并定期实施供应链尽职调查，致力于保护环境、人权和社会福祉做出积极贡献。

Geely Holding has established a comprehensive due diligence management system, performing regularly supply chain due diligence to actively contribute to environmental conservation, the protection of human rights, and the fostering of social welfare.

- (1) **建立尽职调查管理体系。**我们致力于将负责任的商业行为融入吉利控股集团的政策与管理体系。为此，我们制定了《吉利供应商行为准则》等管理政策，明确我们在环境保护、劳工和人权保护、冲突矿产等方面的承诺和要求。吉利控股集团内部定期向高级管理层汇报尽职调查管理成果，确保高层积极参与负责任商业行为的监督和推进。

Establishing a due diligence management system. We are committed to embedding responsible business conduct into Geely Holding's policies and management systems. To this end, we have formulated management policies such as the *Geely Supplier Code of Conduct* which clarify our commitments and requirements regarding environmental protection, labor and human rights, and conflict minerals. Geely Holding's internal teams regularly report due diligence management performance to senior management to ensure their active oversight and promotion of responsible business practices.

- (2) **风险识别与评估。**我们通过供应商可持续调查问卷、现场可持续审核、内外部风险因子数据库扫描等方法，多措并举地识别和评估供应商在生产和运营环节由于业务活动带来的实际和潜在的可持续风险，特别是对环境和社会的不利影响。我们定期对风险识别与评估的方法进行审阅和回顾，并及时优化调整措施，保障风险识别与评估机制有效运行。

Risk identification and assessment. We employ multiple approaches—including supplier sustainability questionnaires, on-site sustainability audits, internal and external risk factor database scans—to identify and assess actual and potential sustainable risks arising from suppliers' production and operational activities, particularly adverse impacts on the environment and society. We regularly review our risk identification and assessment methodologies and promptly optimize and adjust measure to ensure the effective operate of the risk identification and assessment mechanism.

- (3) **风险预防与缓释。**基于已识别的供应链相关风险，我们将及时发起供应商整

改，要求供应商限期消除、防范和减轻已识别的实际和潜在不利影响，推动供应商的现场生产活动符合环境和社会相关标准，整改结果作为供应商差异化管理和可持续评价的重要依据之一，通过全生命周期供应商管理手段推动供应链可持续水平的持续提升。

Risk prevention and mitigation. Based on identified supply chain-related risks, we will promptly initiate supplier rectification, requiring suppliers to eliminate, prevent, or mitigate the identified actual and potential adverse impacts within specified timeframes to ensure suppliers on-site operations comply with environmental and social related standards. We use the rectification outcomes as one of our key criteria for differentiated supplier management and sustainability evaluations, driving continuous improvement of supply chain sustainability through lifecycle supplier management.

- (4) **跟踪实施情况与结果。**我们将持续跟踪行动计划的实施情况和结果，确保措施的有效性和持续改进。我们建立监测机制，每季度收集和分析尽职调查工作的实施情况，包括内部审计、外部审核和利益相关方反馈等信息，不断调整和优化尽职调查管理实践，确保纠正措施的有效性和持续推进。

Tracking implementation progress and results. We continuously monitor the implementation and outcomes of action plans to ensure the effectiveness and ongoing improvement of measures. We have established a monitoring mechanism to collect and analyze the implementation status of due diligence efforts on a quarterly basis—including internal audits, external assessments, and stakeholder feedback—to continually refine and optimize our due diligence management practices, ensuring the effectiveness and sustained progress of corrective actions.

- (5) **对风险管理过程和结果进行沟通和报告。**我们将汇总分析并公开披露供应商尽职调查进展和结果，提升供应链管理的透明度。我们利用吉利控股集团网站、社交媒体、供应商大会和新闻发布会等渠道，分享尽职调查管理的进展和计划，增强利益相关方的信任和支持。同时，吉利控股集团公开披露申诉渠道，收集相关方对供应链可持续风险和突发事件的意见和反馈，确保风险

管理的及时性和全面性。

Communication and reporting of risk management processes and results. We consolidate and publicly disclose the progress and results of supplier due diligence to enhance supply chain transparency. We use channels such as the Geely Holding's website, social media, supplier conferences, and press releases to share progress and plans related to responsible business practices, strengthening stakeholder trust and support. At the same time, Geely Holding has established open grievance channels to collect stakeholders' opinions and feedback on supply chain sustainability risks and incidents, ensuring the timeliness and comprehensiveness of risk management.

- (6) **开展合作与补救。**我们在面临突发的严重风险时，将在高级管理层的决策支持下与利益相关方合作开展补救措施，确保受损方得到及时和有效的补偿。我们将在必要时给予支持并投入资源开展补救措施，同时对补救措施的实施情况进行持续跟进和披露，确保补救效果的落地性和长效性。

Collaboration and remediation. When facing sudden severe risks, we will, under the decision-making support of senior management, collaborate with stakeholders to carry out remediation measures to ensure affected parties receive timely and effective compensation. We will, when necessary, provide supports and allocate the required resources to implement remediation measures. Meanwhile, we will continuously follow up on their progress, and disclose implementation status to ensure the effectiveness and long-term impact of remediation efforts.

8. 申诉与举报 **Grievance and Reporting**

吉利控股集团鼓励所有合作伙伴以及其他利益相关方通过恰当渠道进行咨询、举报与申诉。如果您发现任何与本政策规定相违背的情形，或对本政策有您的意见或问题，可通过 coc@geely.com 联系我们。吉利控股集团接受各利益相关方监督，并保证对对申诉、举报人的身份严格保密。

Geely Holding encourages all business partners and other stakeholders to submit inquiries, reports, and grievances through appropriate channels. If you identify any

violations of the Policy or have feedbacks or inquiries regarding this Policy, please contact us via email at coc@geely.com. Geely Holding accepts supervision from all stakeholders and keep the identity of complainants and whistleblowers strictly confidential.

9. 回顾与进展 Review and Progress

吉利控股集团定期监察本政策的执行情况，按需检讨本政策，并计划在年度可持续发展报告、年度尽职调查报告中披露相关工作的进展和绩效。本政策的解释权归吉利控股集团所有。

Geely Holding will regularly monitor the implementation of this Policy, review it as necessary, and disclose the progress and performance of related efforts in its annual sustainability report and annual due diligence report. The right of interpretation of this Policy rests with Geely Holding.

10. 语言说明 Language

本政策以简体中文和英文两种文字书就。在两种文本理解发生歧义时，应以简体中文文本为准。

This Policy is available in both Simplified Chinese and English. In case of any discrepancies, the Simplified Chinese version shall prevail.