



浙江路加新材料有限公司

2024 年矿产供应链尽责调查报告

Zhejiang Lujia New Materials Co., Ltd

2024 Mineral Supply Chain Due Diligence Report

近些年全球新能源汽车销量呈现持续增长状态。截至 2024 年，全球电动车总销量突破 1750 万辆，市场占有率进一步提高。近年来德国发布《供应链法》、欧盟发布《企业可持续性尽责调查指令》和《电池法》。这些法令的颁布使得企业在可持续发展和供应链尽责调查管理方面的表现也越来越受到各界的关注。企业需要执行的标准和要求也越来越严格。

In recent years, global sales of new energy vehicles have shown sustained growth. As of 2024, the total global sales of electric vehicles have exceeded 17.5 million units, further increasing market share. In recent years, Germany has issued the Supply Chain Law, the European Union has issued the Corporate Sustainability Due Diligence Directive, and the Battery Law. The promulgation of these laws has attracted increasing attention from all sectors regarding the performance of enterprises in sustainable development and supply chain due diligence management. The standards and requirements that enterprises need to implement are becoming increasingly strict.

1. 公司信息：

公司名称：浙江路加新材料有限公司（以下简称“路加”）

公司地址：浙江省台州市临海市头门港新区东海第三大道 11 号

本报告所涵盖的时期为 2023 年 12 月 1 日至 2024 年 11 月 30 日

Company Information:

Company Name: Zhejiang Lujia New Materials Co., Ltd (hereafter "LUJIA")

Company Address: No. 11, Donghai Third Avenue, Toumengang New District, Linhai City, Taizhou City, Zhejiang Province.

The period covered by this report is from December 1, 2023 to November 30th, 2024

2. 矿产供应链尽责调查管理政策和供应商行为准则

路加在《负责任的全球矿产供应链尽责调查政策》中增加了与环境保护和资源开采相关的风险管理，并在《供应商行为准则》中增加《联合国工商业与人权指导原则》和《联合国人权与安全自愿原则》。同时，路加依据《联合国世界人权宣言》、《国际劳工组织



关于工作中的基本原则和权利宣言》、联合国《工商业与人权指导原则》和《联合国全球契约》的规定，制定人权政策并尊重人权。

路加将尽责管理政策纳入到与供应商的商业合约或协议，或制定供应商行为守则，确认供应商遵守与企业尽责管理政策相一致的供应商政策。路加也将协助供应商进行能力建设，提升其尽责管理的绩效。如需开展步骤三的风险缓解措施，路加可与供应商合作制定风险管理计划。

路加致力于与直接供应商建立积极、长期的合作关系，以增加对这些供应商的影响力。路加制定并实施针对供应商的资格预审过程。在和供应商合作之前，对供应商的情况进行尽责管理评估以确定是否存在不利影响。如了解供应商未能满足尽责管理要求的障碍因素，并尽力合作消除这些障碍因素。

路加按照以下标准对矿产供应链实施尽责调查管理：

- 《经合组织受冲突影响和高风险地区矿产负责任供应链尽责调查指南经合组织》（第3版）
- 《中国负责任矿产供应链尽责管理指南》（第二版）
- 《联合国工商业与人权指导原则》
- 《联合国人权与安全自愿原则》
- 《企业识别和解决矿产供应链中最恶劣形式童工的实际行动》
- 《联合尽责调查标准》
- 《全金属尽责调查标准》

Mineral Supply Chain Due Diligence Management Policy & Supplier Code of Conduct

LUJIA has added risk management related to environmental protection and resource exploitation in the Responsible Global Mineral Supply Chain Due Diligence Policy, and added the United Nations Guiding Principles for Business and Human Rights and the United Nations Voluntary Principles for Human Rights and Safety to the Supplier Code of Conduct. At the same time, LUJIA formulates the Human Rights Policy and respects human rights in accordance with the United Nations Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles for Business and Human Rights, and the provisions of the United Nations Global Compact.

LUJIA will incorporate the responsible management policy into commercial contracts or agreements with suppliers, or establish a supplier code of conduct to confirm that suppliers comply with supplier policies that are consistent with the company's responsible management policy. LUJIA will also assist suppliers in capacity building to enhance their performance in responsible management. If risk mitigation measures for



step three are required, Lugar can collaborate with suppliers to develop a risk management plan.

LUJIA is committed to establishing positive and long-term partnerships with direct suppliers to increase influence over them. LUJIA develops and implements a pre-assessment process for suppliers. Before cooperating with suppliers, conduct a responsible management assessment of their situation to determine if there are any adverse effects. To understand the obstacles that prevent suppliers from meeting the requirements of responsible management, and to work together to eliminate these obstacles.

LUJIA implements due diligence management of the mineral supply chain in accordance with the following standards:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas OECD (version 3)
- Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (version 2)
- United Nations Guiding Principles for Business and Human Rights
- United Nations Voluntary Principles for Human Rights and Safety
- Practical Actions for Enterprises to Identify and Address the Worst Forms of Child Labour in the Mineral Supply Chain
- Joint Due Diligence Standard
- Full Metal Due Diligence Standard

3. 尽责管理框架

2020 年开始根据行业标准和下游客户要求，我们将镍钴合金纳入尽责调查管理体系，将镍钴合金供应链尽责调查管理范围。2024 年，我们根据《中国负责任矿产供应链尽责管理指南》（第二版）的要求开始更新完善尽责管理程序。

第一步：建立健全企业管理制度

2024 年路加正式成立负责任采购政策高级管理团队，负责公司的可持续发展战略，在路加负责任采购政策高级管理团队的指导下开展具体工作。同时路加公司的各部门共同参与路加的尽责管理工作。

路加制定了矿产供应链尽责调查管理的相关程序文件，并对路加内部所有相关员工进行了培训。同时，负责任采购政策高级管理团队收集国内外尽责调查相关新闻，并将其分享给相关部门，以提高路加尽责管理能力。

路加建立追溯性体系，确保原材料从进入公司到产品装运阶段的全过程可追溯性。

路加建立了库存制度，每月进行库存盘点。

路加每年第一季度会举行一次与矿产供应链尽责调查管理相关的管理评审，并输出管理评审报告。负责任采购政策高级管理团队会审查路加尽责调查管理体系建设的合理性和有效性以及尽责管理的绩效，提出改进建议，负责任采购政策高级管理团

队跟踪意见和建议的改进进展。该报告提交给负责任采购政策高级管理团队所有成员。

Step 1: Establish and improve the enterprise management system

In 2024, LUJIA officially established the Senior Management Team for Responsible Procurement Policy, responsible for the company's sustainable development strategy and carrying out specific work under the guidance of LUJIA's Senior Management Team for Responsible Procurement Policy. At the same time, all departments of LUJIA jointly participate in LUJIA's Due Diligence management. LUJIA has developed relevant procedural documents for mineral supply chain due diligence management and provided training to all relevant employees within LUJIA. At the same time, the responsible procurement policy senior management team collects domestic and international due diligence related news and shares it with relevant departments to enhance LUJIA's ability to manage due diligence. LUJIA establishes a traceability system to ensure the traceability of the entire process from the entry of raw materials into the company to the shipment of products. LUJIA established an inventory system and conducted monthly inventory checks. LUJIA holds a management review related to mineral supply chain due diligence management in the first quarter of each year and outputs a management review report. The senior management team of responsible procurement policy will review the rationality and effectiveness of LUJIA due diligence management system construction, as well as the performance of responsible management, and propose improvement suggestions. The senior management team of responsible procurement policy will track the progress of improvement based on the opinions and suggestions. This report is submitted to all members of the responsible procurement policy senior management team.

第二步：识别和评估供应链风险

路加对所有镍钴合金的供应商进行尽责调查管理。通过可靠的第三方信息、KYS 问卷、矿产资源调查、现场评估、申诉机制、客户反馈等定期收集供应商信息。根据往年的风险评估结果，每年至少收集一次低风险和高风险地区的供应商信息。2024 年，镍钴合金供应商的数据收集率为 83%。2025 年数据收集率目标为 100%。

依据手机的供应商采购信息和文件绘制供应链图。

从武装冲突、人权和政府治理三个方面，使用以下工具评估受冲突影响和高风险地区。

- 海德堡“全球冲突晴雨表”
- 联合国人权报告
- 脆弱国家指数



- CAHRA 欧盟冲突矿产法规清单
- 《多德-弗兰克法案》

根据对路加的 CAHRAS 识别结果, 澳大利亚和印度尼西亚来源的矿产均不存在“受冲突影响和高风险区域”警示信号。因此路加并不用对矿产的原产地进行现场评估。

负责任采购政策高级管理团队对路加目前的尽责管理进行风险识别, 发现路加的尽责管理存在以下风险。

1. 供应链供应链上仍然存在上游冶炼厂与矿山尽责管理体系建设不完善、尽责管理文件缺失, 尽责管理意识有待提升等问题。导致本公司与供应商收集供应链上相关交易单据仍存在缺失情况。鉴于原产地证和进口报关可以收集到, 清楚的了解原料原产地信息并可确认原产地并非 CAHRA 高风险地区。因此组织选择在因此企业选择在缓解风险的过程中继续交易。
2. 已针对供应商开展违反法律法规情况、制裁措施等风险的识别过程。但目前本公司应用评估的法律相关资源有限且未能建立矿产原产国的法律法规清单, 适用评价标准识别的充分性还应加强。由于本公司采购矿产的原产国并非 CAHRA 高风险地区。因此组织选择在因此企业选择在缓解风险的过程中继续交易。

Step 2: Identify and evaluate supply chain risks

LUJIA conducts due diligence management on all suppliers of nickel cobalt alloys. Regularly collect supplier information through reliable third-party information, KYS questionnaires, mineral resource surveys, on-site assessments, appeal mechanisms, customer feedback, and other means. According to the risk assessment results of previous years, collect supplier information from low-risk and high-risk areas at least once a year. In 2024, the data collection rate for nickel cobalt alloy suppliers is 83%. The target for data collection rate by 2025 is 100%.

Draw a supply chain diagram based on the supplier procurement information and documents of the mobile phone.

Use the following tools to assess conflict affected and high-risk areas from three aspects: armed conflict, human rights, and government governance.

- Heidelberg Global Conflict Barometer
- UN Human Rights Report
- Fragile States Index
- CAHRA List of EU Conflict Minerals Regulations
- The Dodd Frank Act

According to the CAHRAS identification results for LUJIA, there are no warning



signals of "conflict affected and high-risk areas" for minerals sourced from Australia and Indonesia. Therefore, LUJIA doesn't need to conduct an on-site assessment of the origin of the mineral.

The senior management team of responsible procurement policy identified risks in LUJIA's current responsible management and found the following risks in LUJIA's responsible management.

1. There are still problems in the upstream smelting plants and mines' responsible management system construction, lack of responsible management documents, and the need to improve responsible management awareness in the supply chain.

Resulting in missing transaction documents between our company and suppliers in the supply chain. Given that the certificate of origin and import customs declaration can be collected, a clear understanding of the origin information of the raw materials can be obtained, and it can be confirmed that the origin is not a high-risk CAHRA area. Therefore, the organization chooses to continue trading while the enterprise chooses to mitigate risks.

2. A process has been carried out to identify risks such as violations of laws and regulations and sanctions against suppliers. However, currently our company has limited legal resources for application evaluation and has not established a list of laws and regulations related to the country of origin of minerals. Therefore, the adequacy of identifying applicable evaluation standards should be strengthened. Due to the fact that the country of origin of the minerals purchased by our company is not a high-risk area in CAHRA. Therefore, the organization chooses to continue trading while the enterprise chooses to mitigate risks.

第三步：制定并实施针对已识别风险的应对政策

建立风险缓解对策表，以控制和跟踪供应商的人权和童工等尽责调查风险。定期与供应商沟通，跟踪风险进展，一旦发现风险朝着不可接受的方向发展，暂停或终止交易并向公司管理层报告。根据目前现场考察的结果，虽然我们没有发现供应链中直接员工存在严重的侵犯人权和童工风险，但我们将继续关注，并与供应商合作制定改进措施，建立健全尽责调查管理体系，提高意识，并定期跟进。针对第二步识别的风险，路加采取的风险减缓措施如下：

风险编号: 01/24 Risk number	风险等级: Risk Grade	低风险 Low Risk
风险描述 Risk Description:		
供应链供应链上仍然存在上游冶炼厂与矿山尽责管理体系建设不完善、尽责管理文件缺失，尽责管理意识有待提升等问题。导致本公司与供应商收集供应链上相关交易单据仍存在缺失情况。鉴于原产地证和进口报关可以收集到，清楚的了解原料原产地信息并可确认原产地并非 CAHRA 高风险地区。因此组织选择在因此企业选择在缓解风险的过程中继续交易。 There are still problems in the upstream smelting plants and mines' responsible management system construction, lack of responsible management documents, and the need to improve responsible management awareness in the supply chain. Resulting in missing transaction documents between our company and suppliers in the supply chain. Given that the certificate of origin and		

import customs declaration can be collected, a clear understanding of the origin information of the raw materials can be obtained, and it can be confirmed that the origin is not a high-risk CAHRA area. Therefore, the organization chooses to continue trading while the enterprise chooses to mitigate risks.	
制定风险减缓措施要求: Requirements for developing risk mitigation measures:	<p>组织应制定并实施风险减缓措施,以降低风险并持续满足《指南要求》。</p> <p>注:有效的风险减缓措施侧重于解决上述描述的特定事件,以及分析根本原因,并针对根本原因采取措施降低或消除此类风险。</p> <p>Organizations should develop and implement risk mitigation measures to reduce risks and continuously meet the requirements of the Guidelines.</p> <p>Note: Effective risk mitigation measures focus on addressing the specific events described above, analyzing the root causes, and taking measures to reduce or eliminate such risks based on the root causes.</p>
出现风险的根本原因分析: Root cause analysis:	<p>供应链中供应商并未全部接触过《中国矿产供应链尽责管理指南》或类似标准的审核。供应链中部分供应商缺乏尽责管理意识,并未建立起有效尽责管理体系,导致供应链中部分供应商追溯能力较弱。</p> <p>Not all suppliers in the supply chain have been audited according to the "China Mineral Supply Chain Responsible Management Guidelines" or similar standards. Some suppliers in the supply chain lack a sense of responsible management and have not established an effective responsible management system, resulting in weak traceability capabilities of some suppliers in the supply chain.</p>
风险减缓措施: Risk mitigation measures:	<ol style="list-style-type: none"> 1. 制定《供应商行为准则》,要求供应商要严格遵守。邮件形式通知各级供应商。 2. 针对尽责调查和原料可追溯的要求制定“采购协议的补充内容”,和既有供应商签订新版年度采购合同时增加“采购协议的补充内容”,确保供应商签订合同前可以充分了解组织尽责管理政策。 3. 针对未来新增供应商,公司要求全面评估供应商既有管理体系,评估合格后与新供应商签订包含“采购协议的补充内容”的年度采购合同。 4. 针对供应链中尽责管理能力不足的供应商,公司依据实际情况与供应商建立沟通渠道,并制定相应的培训计划增强其尽责管理的意识与能力。 <ol style="list-style-type: none"> 1. Develop a Supplier Code of Conduct, requiring suppliers to strictly comply with it. Notify suppliers at all levels via email. 2. In response to the requirements for due diligence and traceability of raw materials, develop "Supplementary Content to Procurement Agreement" and add "Supplementary Content to Procurement Agreement" when signing new annual procurement contracts with existing suppliers to ensure that suppliers can fully understand the organization's due diligence management policies before signing contracts. 3. For future new suppliers, the company requires a comprehensive

	<p>evaluation of the existing management system of the suppliers, and after passing the evaluation, an annual procurement contract containing "supplementary content of the procurement agreement" will be signed with the new suppliers.</p> <p>4. For suppliers with insufficient responsible management capabilities in the supply chain, the company establishes communication channels with suppliers based on actual situations and develops corresponding training plans to enhance their awareness and ability of responsible management.</p>
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风险编号: 02/24 Risk number	风险等级: Risk Grade	低风险 Low Risk
风险描述 Risk Description: <p>已针对供应商开展违反法律法规情况、制裁措施等风险的识别过程。但目前本公司应用评估的法律相关资源有限且未能建立矿产原产国的法律法规清单，适用评价标准识别的充分性还应加强。由于本公司采购矿产的原产国并非 CAHRA 高风险地区。因此组织选择在因此企业选择在缓解风险的过程中继续交易。</p> <p>A process has been carried out to identify risks such as violations of laws and regulations and sanctions against suppliers. However, currently our company has limited legal resources for application evaluation and has not established a list of laws and regulations related to the country of origin of minerals. Therefore, the adequacy of identifying applicable evaluation standards should be strengthened. Due to the fact that the country of origin of the minerals purchased by our company is not a high-risk area in CAHRA. Therefore, the organization chooses to continue trading while the enterprise chooses to mitigate risks.</p>		
制定风险减缓措施要求: Requirements for developing risk mitigation measures:	<p>组织应制定并实施风险减缓措施，以降低风险并持续满足《指南要求》。</p> <p>注：有效的风险减缓措施侧重于解决上述描述的特定事件，以及分析根本原因，并针对根本原因采取措施降低或消除此类风险。</p> <p>Organizations should develop and implement risk mitigation measures to reduce risks and continuously meet the requirements of the Guidelines.</p> <p>Note: Effective risk mitigation measures focus on addressing the specific events described above, analyzing the root causes, and taking measures to reduce or eliminate such risks based on the root causes.</p>	
出现风险的根本原因分析: Root cause analysis:	<p>公司内部仅从公开的国际公开网站（见 CAHRAS 识别控制程序中列出信息来源）了解原料原产国（印尼和澳大利亚）均为法律体系严禁且健全的国家。并未获得有效的途径和渠道去获得印尼和澳大利亚有哪些具体的法律法规。</p> <p>Internally, the company only learned from publicly available international public websites (as listed in the CAHRAS Identification Control Procedure) that the countries of origin of raw materials (Indonesia and Australia) are both legally prohibited and sound countries. There is no effective way or channel to obtain specific laws and regulations in Indonesia and Australia.</p>	

<p>风险减缓措施:</p> <p>Risk mitigation measures:</p>	<ol style="list-style-type: none"> 1. 公司依据实际情况与供应商建立沟通通道, 目标可以与矿山经营企业直接对话。 2. 通过国内行业协会或同行企业了解印尼和澳大利亚的相关法律法规体系, 并建立矿产国适用的法律法规清单。 3. 在法律法规信息无法全面收集的情况下考虑委托专业的认证或验证机构对矿山供应商进行相关的合法性评估或审核。 <ol style="list-style-type: none"> 1. The company establishes communication channels with suppliers based on actual situations, with the goal of directly engaging in dialogue with mining enterprises. 2. Understand the relevant legal and regulatory systems in Indonesia and Australia through domestic industry associations or peer enterprises, and establish a list of applicable laws and regulations in mineral producing countries. 3. In cases where comprehensive collection of legal and regulatory information is not possible, consider commissioning professional certification or verification agencies to conduct relevant legality assessments or audits of mining suppliers.
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第四步: 独立第三方评估和内部评估

路加已经邀请独立第三方机构对路加供应链进行尽责调查管理审核, 审核时间在 2025 年 1 月 21-22 日, 审核结束后, 路加将公布审核结果的摘要部分。

2025 年 1 月 6 日, 路加依据《中国矿产供应链尽责管理指南》(第二版 1)开展了内部评估工作, 内部评估报告已经公示在路加的官网上。

此外, 自 2020 起路加接受客户委托的第三方审核和客户亲自实施的第二方审核共计 6 次, 均顺利通过审核。

Step 4: Independent third-party evaluation and internal evaluation

LUJIA has invited an independent third-party organization to conduct a due diligence management audit of LUJIA's supply chain. The audit will take place on January 21-22, 2025. After the audit is completed, LUJIA will release a summary of the audit results.

On January 6, 2024 LUJIA conducted an internal evaluation in accordance with the "Guidelines for Responsible Management of China's Mineral Supply Chain" (Version 2), and the internal evaluation report has been published on LUJIA's official website.

In addition, since 2020, LUJIA has accepted a total of 6 third-party audits commissioned by clients and conducted by clients themselves, all of which have been successfully approved.

第五步: 报告尽责调查过程和结果



路加在自己的官方网站设立专门公开的通道公式路加尽责管理政策等，并定期更新并公开。相关文件公开链接：<http://zjlujia.cn/news.html>

截至 2024 年 12 月 31 日，路加公众申诉渠道尚未收到任何投诉。申诉或投诉渠道请参考：http://zjlujia.cn/news_company/36.html

Step 5: Report on the due diligence process and results

LUJIA has set up a dedicated public channel formula on his official website, as well as LUJIA's responsible management policies, which are regularly updated and made public. Related document public link: <http://zjlujia.cn/news.html>

As of December 31, 2024, the LUJIA public appeal channel has not received any complaints. Please refer to the following channels for appeals or complaints: http://zjlujia.cn/news_company/36.html

第六步：适时提供条件或合作开展补救

根据《指导意见》第二版的要求，路加增加了第 6 步的要求并在《补救识别控制程序》中明确补救要求，目前路加的评估时间段内没有出现需开展或合作开展补救措施的情况。路加会持续关注这一方面的变化并在适用时更新必要的补救措施。

Step 6: Provide timely conditions or cooperate to carry out remedial measures

According to the requirements of the second edition of the Guiding Opinions, LUJIA has added a requirement for step 6 and clarified the remedial requirements in the Remedial Identification Control Procedure. Currently, there have been no situations during LUJIA's evaluation period where remedial measures need to be taken or cooperated with. LUJIA will continue to monitor changes in this area and update necessary remedial measures when applicable.

4. 结语

2024 年是路加积极参与供应链尽责管理的关键一年。路加制定了关于负责任全球供应链的尽责管理政策和具体行动计划，供应链的尽责管理是其中的重要组成部分。接下来，我们将密切关注公司的战略规划，积极实施各项行动，为路加走向行业最佳实践打下坚实基础。

4. Conclusion

2024 is a crucial year for LUJIA to actively participate in responsible supply chain management. LUJIA has developed a responsible global supply chain due diligence management policy and specific action plan, of which supply chain due diligence management is an important component. Next, we will closely monitor the company's strategic planning and actively implement various actions to lay a solid foundation for LUJIA to move towards industry best practices.