



DMEGC

横店集团东磁股份有限公司

Hengdian Group DMEGC Magnetics Co., Ltd.

负责任采购政策

Responsible Procurement Policy

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横店集团东磁股份有限公司（以下简称“公司”或“横店东磁”）作为一家“磁材+新能源”双轮驱动发展的国家技术创新示范企业，始终致力于推动清洁能源和生产的发展。

Hengdian Group DMEGC Magnetics Co., Ltd. (hereinafter referred to as "the Company" or "DMEGC"), as a national technology innovation demonstration enterprise driven by the dual development of "magnetic materials + new energy", has always been committed to promoting the development of clean energy and production.

为了推动公司的可持续发展事业，横店东磁将可持续采购原则纳入公司发展政策和指导方针中，致力于利用可持续采购的影响力来支持具有良好环境、社会与管治（ESG）属性以及企业社会责任（CSR）属性的采购行动，希望与供应商携手共建可持续供应链，以此鼓励更多供应商关注和提供可持续的材料与服务。我们根据国内和国际通行的可持续发展相关准则制订本政策，以持续提升我们的可持续供应链管理水平和。

In order to promote the Company's sustainable development, DMEGC has incorporated sustainable procurement principles into the Company's development policies and guidelines, and is dedicated to leveraging the influence of sustainable procurement to support procurement actions with good environmental, social and governance (ESG) attributes and corporate social responsibility (CSR) attributes. We hope to work with suppliers to build a sustainable supply chain, thereby encouraging more suppliers to pay attention to and provide sustainable materials and services. This policy is formulated based on domestic and international sustainable development standards to continuously improve our sustainable supply chain management level.

一、政策目的 I. Goals

本政策旨在明确公司在可持续供应链管理与负责任采购实践方面的承诺和行动框架，为公司执行相关的具体实践提供指南。

This policy aims to clarify the Company's commitment and action framework in sustainable supply chain management and responsible procurement practices, and to provide guidance for the Company to implement relevant specific practices.

二、政策适用范围 II. Scope

该政策适用于横店东磁及其子公司的全体员工、供应商和工程承包商，**同时我们也提倡和推动上游供应商采取同类责任的采购行为。**

This policy applies to all employees, suppliers and engineering contractors of DMEGC and its subsidiaries. **At the same time, we also advocate and encourage our upstream suppliers to adopt similar responsible procurement practices.**

三、公司治理和责任分配 III. Governance and Responsibility

为确保公司高效落实可持续采购原则，我们已建立权责清晰、相互配合的可持续采购与供应链管理架构，共同推动公司可持续采购发展目标实现。

To ensure that the Company effectively implements the sustainable procurement principles, we have established a sustainable procurement and supply chain management structure with clear responsibilities and mutual coordination to jointly promote the realization of the Company's sustainable procurement development goals.

公司采购管理部负责具体执行可持续采购工作，落实供应链 CSR 风险评估，将 ESG 标准分步融入供应商准入、评估与现场审核等全生命周期管理中，以确保供应链体系建设符合公司制度与目标要求，**并定期将本政策的执行情况报告给公司 ESG 工作小组，受战略与 ESG 委员会监督。公司采购管理部主要职责包括：**

- 1) 制订公司的采购管理制度，并监督落实情况；
- 2) 负责供应链安全管理；
- 3) 负责供应商准入、考核评价，核心供应商的考核指标应加入 ESG 核心指标；



- 4) 规范供应商行为准则（包括人权、冲突矿物管理、有害物质使用等）
- 5) 对核心产品进行原材料和产品溯源和碳足迹管理；
- 6) 定期或不定期组织供应商培训和审核等；
- 7) 赋能供应商相关案例及绩效情况；
- 8) 识别可持续供应链建设风险，并针对风险制订计划和目标。

Procurement Management Department is **responsible** for implementing specific sustainable procurement work, conducting supply chain CSR risk assessment, and integrating ESG standards into the full life cycle management of supplier access, assessment and on-site audits in steps to ensure that the construction of the supply chain system meets the Company's policies and requirements, **and regularly reporting on the policy's execution to the Company's ESG working group, overseen by the Strategy and ESG Committee.** The main responsibilities for Procurement Management Department include:

- 1) Formulate the Company's procurement management system and supervise its implementation;
- 2) Responsible for supply chain security management;
- 3) Responsible for supplier access, assessment and evaluation. The assessment indicators of core suppliers should include ESG core indicators;
- 4) Standardize supplier codes of conduct (including human rights, conflict mineral management, use of hazardous substances, etc.)
- 5) Carbon footprint management for core products;
- 6) Organize supplier training and audits regularly or irregularly;
- 7) Empowering suppliers related cases and performance;
- 8) Identify risks in building sustainable supply chain and develop plans and goals to address these risks.



四、政策内容 IV. Policy Content

公司采购管理部应协同各事业部或子公司以负责任的行为标准与供应商开展合作，不断降低商务采购各环节的环境与社会风险，积极推动供应商在产品安全与品质、劳工权利、安全环保、商业道德等方面遵循较高的标准，从而共同打造负责任的供应链、提升全价值链的可持续发展能力。

The Procurement Management Department should work with each business unit or subsidiary to cooperate with suppliers based on responsible code of conduct, continuously reduce environmental and social risks in all aspects of business procurement, and actively promote suppliers to follow higher standards in product safety and quality, labor standards, safety and environmental protection, and business ethics, so as to jointly build a responsible supply chain and enhance the sustainable development capabilities of the entire value chain.

4.1 可持续采购 Sustainable Procurement

公司将不断推进可持续采购理念与供应商日常管理充分融合，确保将 ESG 相关因素纳入核心供应商管理的每一环节。我们将结合全球可持续发展动态和日常管理经验开展供应商社会责任风险分析，以预先掌握供应链环境或社会风险，并在供应商管理工作中针对性加强监督和审核。

The Company will continue to promote the integration of sustainable procurement concepts with daily supplier management, ensuring that ESG elements are incorporated into every aspect of core supplier management. We will conduct supplier social responsibility risk analysis based on global sustainable development trends and daily management experience to grasp supply chain environmental or social risks in advance, and strengthen supervision and review in supplier management based on risk assessment.

公司积极将环境或社会表现纳入供应商准入条件、绩效考核与现场审核中，将优先与 ESG



审核记录良好或经第三方权威机构认证的供应商建立合作，以激励在环境和社会方面表现出色的供应商，同时通过日常沟通、审核、建议等方式帮助提升其可持续绩效。公司会对主要供应商进行考评，考评内容涵盖环境、社会、治理及品质、价格、交期、服务等维度，并依据权重和得分对供应商进行分层管理，对综合得分高的供应商，会在同等条件下考虑提高采购占比。

The Company actively incorporates environmental or social performance into supplier access conditions, performance appraisals and on-site audits. The Company will prioritize cooperation with suppliers with good ESG audit records or those certified by third-party authoritative organizations to incentivize suppliers with outstanding environmental and social performance. At the same time, we help suppliers improve their sustainable performance through daily communication, audits, suggestions, etc. The Company will evaluate major suppliers, covering dimensions such as environment, society, governance, quality, price, delivery, and service, and manage suppliers in layers based on weights and scores. For suppliers with high comprehensive scores, the Company will consider increasing the proportion of procurement under the same conditions.

公司需持续加强采购团队的可持续意识建设，定期或不定期组织采购员开展 ESG 学习培训，要求采购员学习可持续采购原则和操作规范，积极落实供应商管理全周期中的 ESG 标准，并在采购员的绩效考核指标中逐步纳入可持续采购要素，从内部管理维度持续提升公司可持续采购水平。

The Company needs to continuously strengthen the sustainable awareness building of the procurement team, organize buyers to carry out ESG training regularly or irregularly, require buyers to learn sustainable procurement principles and operating specifications, actively implement ESG standards in the entire cycle of supplier management, and integrated sustainable procurement elements into the performance evaluation indicators of buyers in steps, and continuously improve the Company's sustainable procurement level from the

internal management dimension.

4.2 环境保护 Environment Conservation

公司将原材料全生命周期环境影响纳入评估范围，同等条件下优先选择低能耗、低污染的原料品类，拒绝从国家或全球重要生物多样性保护区域采购原材料。同时，公司积极寻求能提供绿色低碳材料或服务的供应商并与其保持合作。公司将环境合规资质作为供应商准入的重要条件之一，敦促供应商严格遵守国家或地方污染物排放标准，逐步实施并扩大供应商环境审核。

The company includes the environmental impact of the entire life cycle of raw materials in its assessment scope, and gives priority to low-energy consumption and low-pollution raw materials under the same conditions, and refuses to purchase raw materials from nationally or globally important biodiversity protection areas. Meanwhile, the Company actively seeks suppliers who can provide green and low-carbon materials or services and maintains cooperation with them. The Company regards environmental compliance qualifications as one of the important conditions for supplier access, urges suppliers to strictly comply with national or local pollutant emission standards, and gradually implements and expands supplier environmental audits.

公司也致力于在采购环节推动循环经济，鼓励使用可回收、可再生和环境友好的原材料，逐步提升再生材料（二次材料）采购量，寻求降低资源依赖的可行方案。同时，公司协同供应链合作伙伴，推动采购和物流环节的包材回收，资源再生，识别提升物料循环利用率的机会，推动价值链的循环经济实践。

The company is also committed to promoting the circular economy in its procurement processes by encouraging the use of recyclable, renewable, and environmentally friendly raw materials. It aims to gradually increase the procurement of recycled materials (secondary materials) and explore feasible solutions to reduce resource dependence. Additionally, the



company collaborates with supply chain partners to advance the recovery of packaging materials in procurement and logistics, promote resource regeneration, identify opportunities to enhance material circularity, and drive the implementation of circular economy practices across the value chain.

4.3 劳工及人权 Labor and Human Rights

公司敦促供应商遵守劳动与人权方面的法律法规，推动供应商努力打造透明、平等、安全、多元化的职场环境。为激励遵守社会道德标准的供应商，公司将优先考虑取得 SA8000 社会责任标准体系认证的供应商进行合作。公司持续推进供应商多元化建设，鼓励供应商构建平等包容的工作环境，努力寻求向女性、残疾人所有的企业的采购可能性。

The Company urges suppliers to comply with labor and human rights laws and regulations, and encourages suppliers to create a transparent, equal, safe and diverse workplace environment. In order to motivate suppliers to comply with social ethical standards, the Company will give priority to cooperating with suppliers who have obtained the SA8000 certification. The Company continues to promote supplier diversity, encourages suppliers to build an equal and inclusive working environment, and strives to explore procurement possibilities from businesses owned by women and people with disabilities.

4.4 冲突矿产 Conflict Minerals

公司不支持也不使用冲突矿产。冲突矿产（Conflict Minerals）指来自于受冲突影响、或高风险地区（CAHRAs）的锡（Tin）、钨（Tungsten）、钽（Tantalum）、金（Gold）等四种金属（简称“3TG”）；同时，公司也会关注钴（Cobalt）、钯（Palladium）等金属矿产及云母、硅等其他类别矿产。公司确保公司所使用的钽(Ta)、锡(Sn)、金(Au)、钨(W)、钴（Co）、钯（Pd）、云母（mica）、硅（silicon）等矿产均非来自于受冲突影响和或高风险地区（CAHRAs），公司亦督促公司的供货商伙伴全力避免使用这些冲突矿产，以期改善冲突矿产



议题所带来之冲击。公司将逐步完善供应链冲突矿产尽职调查追溯系统，设立冲突矿产相关沟通渠道和投诉机制，以便各相关方就受冲突影响和高风险地区的采矿、贸易、处理和出口情况进行沟通和发表意见。

The Company neither supports nor uses conflict minerals. **Conflict Minerals refer to four metals—tin, tungsten, tantalum, and gold (collectively known as "3TG")—that originate from conflict-affected and/or high-risk areas (CAHRAs).** The company also pays attention to other metal minerals such as cobalt and palladium, as well as other types of minerals such as mica and silicon. DMEGC ensures that metals such as tantalum (Ta), tin (Sn), gold (Au), tungsten (W), cobalt (Co), palladium (Pd), mica and silicon are not mined in conflict areas in **CAHRAs regions**. The Company also urges its suppliers to avoid using these conflict minerals in order to mitigate negative impact of conflict mineral issues. The Company will gradually improve the supply chain conflict mineral due diligence traceability system and establish conflict mineral-related communication channels and complaint mechanisms, in order to enable all relevant parties to communicate and express their opinions on mining, trade, processing and export in conflict-affected and high-risk areas.

具体冲突矿产的相关要求与实践请见《冲突矿产政策》。

For further detailed requirements and practices related to conflict minerals, please refer to the *Conflict Minerals Policy*.

五、举报渠道 V. Reporting Channel

在可持续采购与供应链管理议题上，公司接受各利益相关方的监督，并鼓励任何利益相关方向本公司进行相关风险的反馈和举报，举报渠道为：

On the issue of sustainable procurement and supply chain management, the Company accepts supervision from all stakeholders and encourages any stakeholder to provide feedback



and report related risks to the Company. The reporting channels are:

Tel: 0579-86588022

Email: jcb@dmegc.com.cn

Website: www.chinadmegc.com

六、政策修订 VI. Annex

本政策已经通过公司内部审批并实施，并由董事会定期或不定期审阅，以确保该政策与公司可持续发展战略和方向一致，符合集团现状及各利益相关方期望。本政策最终解释权归公司办公室所有。公司保留以任何理由随时修订、更改或废止本政策的权利，并在必要时予以修订。

本政策未尽事宜，按有关法律、法规、规范性文件执行。

本政策自颁布之日起生效。

This policy has been approved and implemented by the Company, and will be reviewed by the Board regularly or irregularly to ensure that the policy is consistent with the Company's sustainable development strategy and direction, and meets the group's current situation and the expectations of all stakeholders. The final right of interpretation of this policy belongs to the General Manager Office. The Company reserves the right to amend, change or abolish this policy at any time for any reason, and amend it when necessary.

Matters not covered in this policy shall be implemented in accordance with relevant laws, regulations and normative documents.

This policy shall take effect from the date of promulgation.

横店集团东磁股份有限公司

Hengdian Group DMEGC Magnetics Co., Ltd.

2026年1月14日

14th January 2026