

山东玲珑轮胎股份有限公司
可持续供应链管理手册

CSR Manual

**Sustainable Supply Chain Management
Manual of Shandong LingLong Tyre Co., Ltd**

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引言

Introduction

企业通过尊重和保护员工、居民、消费者等利益相关者的权利，能够为创造环境和社会价值做出贡献，进而实现可持续发展目标（SDGs）。同时，这些努力还有助于企业在中长期内维护和改善与商业伙伴及其他利益相关者的信任关系，从而提升自身的企业价值。

By respecting and protecting the rights of stakeholders—including employees, local communities, and consumers—companies can contribute to creating environmental and social value, ultimately supporting the achievement of the Sustainable Development Goals (SDGs). At the same time, these efforts help build and strengthen long-term trust with business partners and other stakeholders, enhancing the Company's overall value in the process.

山东玲珑轮胎股份有限公司始终秉持“为员工创造机会，为客户创造价值，为股东创造利润，为社会创造财富”的价值观，践行“传承玲珑力量、共筑美好社会”的可持续发展理念。商业伙伴是作为我们实现经营理念的重要战略协同方，我们期待通过携手解决环境与社会问题，共同推动更美好社会的建设。为此，特制定本手册以明确合作方向。同时，玲珑轮胎自身的可持续发展表现请参阅年度可持续发展报告¹。

Shandong LingLong Tyre consistently upholds the values of creating opportunities for employees, creating value for customers, generating profits for shareholders, and creating wealth for society. The Company embraces the sustainable development philosophy of inheriting LingLong's strength and building a better society together. Business partners are key strategic collaborators in realizing our business vision. We look forward to working together to tackle environmental and social issues and jointly contribute to the creation of a better society. To this end, we have developed this manual to outline the direction of our collaboration. Meanwhile, for information on Linglong Tyre's own sustainable development performance, please refer to the annual Sustainability Report.

¹ 中文版报告请见链接：[社会责任报告 企业社会责任 玲珑轮胎 | 官方网站](#)

For the English version of the report, please see the link: [Policy Statement Social Responsibility Linglong Tire official website \(Stock Code: 601966\)](#)

手册读者

Readers of Manual

本手册适用于山东玲珑轮胎股份有限公司及其国内和境外所有附属公司。本手册主要面向山东玲珑轮胎股份有限公司（以下简称“玲珑轮胎”“本公司”“公司”或“我们”）的直接供应商及其他商业伙伴（包括分包商与间接供应商）。同时，手册内容也可供其他利益相关者查阅参考。

This manual applies to Shandong LingLong Tyre Co., Ltd. and all its domestic and overseas subsidiaries. It is primarily intended for the direct suppliers and other business partners (including sub-suppliers and indirect suppliers) of Shandong LingLong Tyre Co., Ltd. (hereinafter referred to as "LingLong Tyre," "the Company," or "we"). Additionally, the contents of this manual are also available for reference by other stakeholders.

手册目的

Purpose of Manual

玲珑轮胎制定本手册旨在实现以下三个目的：

LingLong Tyre has developed this manual to achieve the following three purposes:

1. 政策透明化：系统介绍我们的可持续发展方法论与供应链管理体系，帮助商业伙伴深入理解公司的政策导向与实践成果；

Policy transparency: This manual is designed to systematically introduce our sustainable development methodology and supply chain management system, helping business partners gain a deeper understanding of the Company's policy direction and practical achievements;

2. 协同共建：明确传递公司在可持续发展领域的核心要求，推动商业伙伴在业务合作中形成战略协同；

Collaborative co-construction: This manual is designed to clearly communicate the Company's core requirements in the field of sustainable development, promoting strategic alignment with business partners in the course of cooperation.

3. 能力赋能：提供涵盖可持续发展议题背景、挑战及解决方案的实用指南，助力合作伙伴提升可持续实践能力。

Capability empowerment: This manual is designed to provide practical guidelines covering the background, challenges and solutions of sustainable development issues to help partners improve their sustainable practice capabilities.

我们期待本手册成为推动可持续供应链管理升级的有效工具。

We hope this manual will serve as an effective tool for promoting the upgrade of sustainable supply chain management.

手册审计规范

Specifications for Manual Review

审计频次：公司每年对可持续供应链管理手册进行审计。通过定期审议与更新，及时识别供应链中的潜在风险，确保可持续供应链管理体系的有效性和适应性。

Review frequency: The Company conducts an annual review of the Sustainable Supply Chain Management Manual. Through regular reviews and updates, potential risks in the supply chain are promptly identified, ensuring the effectiveness and adaptability of the sustainable supply chain management system.

审计流程：管理层主导下，由 ESG 处牵头，协同供应商管理部门、品牌处、工会等部门，依据供应链管理委员会的决策，每年对《玲珑轮胎可持续供应链管理手册》进行更新。更新后的手册将提报供应链委员会进行决策，供应链委员会的决策直接向可持续发展委员会成员汇报，保障手册内容与公司可持续发展战略及实际运营需求紧密贴合。

Review process: Led by the management level, the ESG department takes the lead, collaborating with supplier management, branding, union, and other relevant departments. In accordance with the decisions made by the Supply Chain Management Committee, the *Sustainable Supply Chain Management Manual of LingLong Tyre* is updated annually. The updated manual will then be submitted to the Supply Chain Committee for decision-making. The decisions of the Supply Chain Committee are directly reported to the members of the Sustainable Development Committee, ensuring that the content of the manual aligns closely with the Company's sustainable development strategy and operational needs.

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摘要

Executive Summary

该手册旨在系统介绍公司可持续发展方法论与供应链管理体系，明确合作方向，推动商业伙伴在业务合作中形成战略协同，助力合作伙伴提升可持续实践能力。

手册指出，在全球对人权与环境议题关注度提升的背景下，企业需系统评估现有应对措施的有效性并持续优化。玲珑轮胎将国际准则与区域性法规的合规实践纳入重点考量，构建人权保障与绿色发展的协同机制。

手册明确了“决策层—管理层—执行层”的管治架构，供应链管理涵盖七类直接供应商及间接供应商，制定了一系列制度文件，构建了覆盖“政策宣导—风险识别—持续监测—整改提升”的全周期管理体系，通过严格的供应商准入机制、持续监测、风险补救等措施，推动供应链可持续发展。

此外，手册还提供了国家和行业风险评估、SAQ (Self-Assessment Questionnaire)等管理工具，对中小型企业开展可持续发展提供了建议。

This manual is aiming to systematically introduce the company's sustainable development methodology and supply chain management system, clarify the cooperation direction, promote strategic collaboration with business partners in business cooperation, and help partners improve their sustainable practice capabilities.

The manual points out that against the backdrop of increased global attention to human rights and environmental issues, enterprises need to systematically assess the effectiveness of existing response measures and continuously optimize them. LingLong Tyre incorporates compliance practices with international norms and regional regulations into key considerations, and builds a collaborative mechanism for human rights protection and green development.

The manual defines a governance structure of "decision-making level - management level - execution level". The supply chain management covers seven categories of direct suppliers and indirect suppliers, formulates a series of institutional documents, and constructs a full-cycle management system covering "policy advocacy - risk identification - continuous monitoring - rectification and improvement". It promotes the sustainable development of the supply chain through strict supplier access mechanisms, continuous monitoring, risk remediation and other

measures.

In addition, the manual also provides management tools such as country and industry risk assessment and SAQ (Self-Assessment Questionnaire), and offers suggestions for small and medium-sized enterprises to carry out sustainable development.

第一章 玲珑轮胎可持续供应链管理的重要性

CHAPTER I Importance of Sustainable Supply Chain Management of LingLong Tyre

(一) 应对人权与环境问题的重要性

(I) Importance of Addressing Human Rights and Environmental Issues

当前，全球对人权与环境议题的关注度显著提升，特别是在欧洲等地相继出台强制性尽责调查法规的背景下，企业所需关注的人权与环境责任范围正持续扩大。如今，人权议题已不仅涉及公司内部员工权益，更延伸至商业伙伴、社区民众等广泛利益相关方；环境责任也不再局限于企业运营所在地，而是贯穿包括基础设施建设、原材料采购等全业务环节。

Currently, global attention to human rights and environmental issues has significantly increased, especially against the backdrop of mandatory due diligence regulations introduced in Europe and other regions. The scope of human rights and environmental responsibilities that companies need to address continues to expand. Today, human rights issues not only involve the rights and interests of internal employees but also extend to a wide range of stakeholders, including business partners and community members along the total supply chain. Environmental responsibilities are no longer confined to the locations where companies operate but span all business operations, including infrastructure construction and raw material procurement.

基于这一趋势，公司必须充分认识到：我们不仅需要解决自身运营直接产生的人权与环境影响，还应积极管理由供应链及其他商业关系所间接引发的相关风险。因此，系统评估现有应对措施的有效性并持续优化，已成为当前的重要任务。

Amid this trend, the Company must fully recognize that we not only need to address the direct human rights and environmental impacts arising from our operations but also proactively manage the related risks indirectly triggered by our supply chain and other business relationships. Therefore, systematically assessing the effectiveness of existing measures and continuously optimizing them has become a critical task.

(二) 人权与环境问题方面国际规范和准则的形成

(II) Formulation of International Norms and Guidelines on Human Rights and Environmental Issues

在全球供应链治理体系加速建设的背景下，国际社会对人权与环境议题的规范要求日益

严苛，企业亟需通过强化供应链的合规管理和可持续性建设以顺应这一趋势。作为一家具有全球视野的轮胎制造企业，玲珑轮胎将国际准则与区域性法规的合规实践纳入重点考量，以供应链为切入点，构建人权保障与绿色发展的协同机制，为全球可持续发展树立行业标杆。

Against the backdrop of the accelerated construction of global supply chain governance systems, international standards for human rights and environmental issues are becoming increasingly stringent. Companies must urgently enhance compliance management and sustainability efforts within their supply chains to keep pace with this trend. As a Tyre manufacturer with a global perspective, LingLong Tyre integrates compliance with international standards and regional regulations into its core strategy. By focusing on the supply chain, the Company aims to build a collaborative mechanism for human rights protection and green development, setting an industry benchmark for global sustainable development.

1. 国际规范

International Norms

1.1 《联合国工商企业与人权指导原则》²

United Nations Guiding Principles on Business and Human Rights

2011年，联合国人权理事会针对全球商业活动对利益相关方负面影响日益加剧的关切，正式通过《联合国工商企业与人权指导原则》（以下简称“《联合国指导原则》”）。该原则明确指出，不论企业在供应链中的地位、国籍、行业、业务范围和规模如何，所有工商企业有责任尊重人权。企业应尊重的人权指的是国际公认的人权，可理解为《世界人权宣言》³中定义的基本人权以及《国际劳工组织（ILO）关于工作中基本原则和权利宣言》⁴中规定的基

² 《联合国工商企业与人权指导原则》：原文链接 [GuidingPrinciplesBusinessHR_EN.pdf](#)，中文链接 [1146528_Int_CHI_signa.pdf](#)。

Guiding Principles on Business and Human Rights of the United Nations: Original text link: [GuidingPrinciplesBusinessHR_EN.pdf](#), Chinese version link: [1146528_Int_CHI_signa.pdf](#).

³ 《世界人权宣言》：原文链接 [OHCHR | Universal Declaration of Human Rights - English](#)，中文链接 [人权高专办 | 《世界人权宣言》——中文（普通话）](#)。

The Universal Declaration of Human Rights: The original link to the English version on the OHCHR website [OHCHR | Universal Declaration of Human Rights - English](#), the link to the Chinese version on the OHCHR website [OHCHR | Universal Declaration of Human Rights - Chinese \(Mandarin\)](#).

⁴ 《国际劳工组织（ILO）关于工作中基本原则和权利宣言》：原文链接 [ILO_1998_Declaration_EN.pdf](#)，中文链接 [wcms_652158.pdf](#)。The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work: original link: [ILO_1998_Declaration_EN.pdf](#), Chinese link: [wcms_652158.pdf](#).

本权利。为履行尊重人权的责任,企业可通过制定相关政策承诺、开展人权尽责调查(“Human Rights Due Diligence, HRDD”)和负面影响补救程序,评估和解决其活动对利益相关者人权的负面影响。并且,企业不仅要通过自身的运营消除对人权的负面影响,还应通过供应链等商业关系间接预防或解决这些问题。

In 2011, in response to growing concerns over the adverse impact of global business activities on stakeholders, the United Nations Human Rights Council officially adopted the *UN Guiding Principles on Business and Human Rights* (hereinafter referred to as the "*UN Guiding Principles*"). These principles clearly state that regardless of the Company's position in the supply chain, nationality, industry, business scope, or size, all businesses take the responsibility to respect human rights. The human rights that businesses must respect refer to internationally recognized human rights, which can be understood as the basic human rights defined in the *Universal Declaration of Human Rights* and the fundamental rights outlined in the *International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work*. To fulfill their responsibility to respect human rights, businesses can commit by developing relevant policies, conducting human rights due diligence ("HRDD"), implementing procedures to remedy negative impacts, and, assessing and addressing the adverse effects of their activities on stakeholders' human rights. Furthermore, businesses are not only required to eliminate negative impacts on human rights through their own operations, but should also prevent or address such issues indirectly through supply chains and other business relationships.

1.2 《经合组织跨国负责任商业行为准则》⁵

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

《联合国指导原则》中的人权尽责调查要素和供应链风险管理要素被纳入经济合作与发展组织(OECD)发布的《经合组织跨国负责任商业行为准则》(以下简称“《跨国行为准则》”)。在人权、环境和其他可持续发展问题领域,《跨国行为准则》要求企业需通过供

⁵ 《经合组织跨国企业负责任商业行为准则》:原文链接 [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD](#), 中文链接 [经合组织跨国企业负责任商业行为准则 | OECD](#)。

OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: original link: [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD](#), Chinese link: [经合组织跨国企业负责任商业行为准则 | OECD](#)。

应链和其他商业关系履行尽责调查 (Due Diligence, DD)，通常称为“人权与环境尽责调查”。

The elements of human rights due diligence and supply chain risk management in the *UN Guiding Principles* have been incorporated into the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct* (hereinafter referred to as the "*MNE Guidelines*"), published by the Organization for Economic Co-operation and Development (OECD). In the areas of human rights, the environment, and other sustainable development issues, the *MNE Guidelines* require businesses to conduct due diligence (“DD”) through their supply chains and other business relationships, commonly referred to as "human rights and environmental due diligence."

2018 年，经合组织进一步发布《经合组织负责任商业行为尽责管理指南》⁶（以下简称“《尽责管理指南》”），细化《跨国行为准则》的尽责调查内容，并提出了实施尽责调查的基本要素和管理过程。《尽责管理指南》提出六步管理过程，包括将负责任商业行为融入政策与管理体系、识别与评估运营供应链和业务关系中的不利影响、终止防范或减轻不利影响、跟踪实施情况与结果、沟通如何消除影响和适时开展合作进行补救。

In 2018, the OECD further issued the *OECD Due Diligence Guidance for Responsible Business Conduct* (hereinafter referred to as the "*Due Diligence Guidance*"), which refines the due diligence content of the *MNE Guidelines* and outlines the basic elements and management process for implementing due diligence. The *Due Diligence Guidance* proposes a six-step management process, including integrating responsible business conduct into policies and management systems, identifying and assessing adverse impacts in operational supply chains and business relationships, preventing or mitigating adverse impacts, tracking implementation and results, communicating how impacts are addressed, and collaborating for remedy when necessary.

1.3 《国际劳工组织跨国企业和社会政策三方原则宣言》⁷

⁶ 《经合组织负责任商业行为尽责管理指南》：原文链接 [OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf](#)，中文链接 [due diligencebro——Chinese20190920A](#)。OECD Due Diligence Guidance for Responsible Business Conduct: original link: [OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf](#), Chinese link: [due diligencebro——Chinese20190920A](#)

⁷ 《关于多国企业和社会政策的三方原则宣言》：原文链接 [Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#)，中文链接 [wcms_579898.pdf](#)。International Labour Organization: Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy: original link: [Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy](#), Chinese link: [wcms_579898.pdf](#)

International Labour Organization: Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy

《联合国指导原则》中的人权尽责调查要素也被纳入 2022 年经国际劳工组织（ILO）修正的《关于多国企业和社会政策的三方原则宣言》（以下简称“《跨国企业宣言》”），以确定、预防、减轻与国际公认的人权有关的实际和潜在的不利影响。《跨国企业宣言》鼓励公司通过供应链等商业关系，推动实现体面劳动的目标，即在自由、公平、安全和具有人类尊严的条件下，促进男女劳动者获得生产性就业机会。

The human rights due diligence elements in the *UN Guiding Principles* have also been incorporated into the 2022 revision of the *Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy* (hereinafter referred to as the "*MNE Declaration*"), as amended by the International Labour Organization (ILO). This revision aims to identify, prevent, and mitigate actual and potential adverse impacts arising from internationally recognized human rights. The *MNE Declaration* encourages companies to promote the achievement of decent work through supply chains and other business relationships, thereby advancing the goal of ensuring men and women workers have access to productive employment opportunities under conditions of freedom, equity, safety, and human dignity.

1.4 可持续发展目标（SDGs）

Sustainable Development Goals (SDGs)

基于“不让任何人掉队”的承诺，《2030 年可持续发展议程》⁸明确 17 项可持续发展目标，旨在通过系统性变革实现所有人的基本权利与长期福祉。该议程指出企业作为经济社会发展的关键主体，也应通过供应链管理、技术创新和治理机制优化等行动，承担与其商业活动相匹配的社会责任。尊重人权是可持续发展目标所有目标的底层逻辑，基于《联合国指导原则》为框架的人权尽职调查制度，被视为企业参与可持续发展目标的基本责任。

Based on the commitment to leaving no one behind, the *2030 Agenda for Sustainable Development* outlines 17 Sustainable Development Goals (SDGs), aimed at achieving the fundamental rights and long-term well-being of all individuals through systemic transformation.

⁸ 《2030 年可持续发展议程》：原文链接 [Document Viewer](#)，中文链接 [Document Viewer](#)。

The 2030 Agenda for Sustainable Development: original link: [Document Viewer](#), Chinese link: [Document Viewer](#)

The agenda emphasizes that businesses, as key actors in economic and social development, should also take on social responsibilities that align with their commercial activities, through actions such as supply chain management, technological innovation, and governance optimization. Respecting human rights is the underlying logic for all the SDGs, and the human rights due diligence framework, grounded in the *UN Guiding Principles*, is regarded as a fundamental responsibility for businesses in contributing to achieving these goals.

2. 不同国家和地区的规则制定及影响

Regulations in Different Countries and Regions and the Influence

世界各国和地区的供应链相关法规：受《联合国指导原则》等关于人权与环境尽责调查国际规范的推动，欧美国家近年来已形成以供应链管理为核心的强制性法律框架，要求企业对其供应链实施和/或披露人权与环境尽责调查。这些法规包括但不限于欧盟《非财务报告指令》⁹（2014 年通过）、英国《现代奴隶制法案》¹⁰（2015 年通过）、法国《公司尽责调查法》¹¹（2017 年通过）、澳大利亚《现代奴隶制法案》¹²（2018 年通过，2024 年修订）、荷兰《童工尽责调查法案》¹³（2019 年通过）、德国《供应链尽责调查法案》¹⁴（2021 年通过）以及《欧盟冲突矿产法规》¹⁵（2021 年生效）。2023 年 6 月 29 日，欧盟《零毁林法案》（EU Deforestation-free Regulation，简称 EUDR）¹⁶正式生效，该法案将产品范围从林产品

⁹ 《非财务报告指令》：[Non-financial Reporting Directive](#)。Non-financial Reporting Directive: [Non-financial Reporting Directive](#)

¹⁰ 《现代奴隶制法案》：[Modern Slavery Act](#)。Modern Slavery Act: [Modern Slavery Act](#)

¹¹ 《公司尽责调查法》：[french-corporate-duty-of-vigilance-law-faq-1.pdf](#)。

Corporate Duty of Vigilance Law: [french-corporate-duty-of-vigilance-law-faq-1.pdf](#)。

¹² 《现代奴隶制法案》：[Federal Register of Legislation - Modern Slavery Act 2018](#)。

Federal Register of Legislation Modern Slavery Act: [Federal Register of Legislation - Modern Slavery Act 2018](#)。

¹³ 《童工尽责调查法案》：[Staatsblad 2019, 401 | Overheid.nl > Officiële bekendmakingen](#)。

Child Labor Due Diligence Act: [Staatsblad 2019, 401 | Overheid.nl > Officiële bekendmakingen](#)。

¹⁴ 《供应链尽责调查法案》：[LkSG - nichtamtliches Inhaltsverzeichnis](#)。

Supply Chain Due Diligence Act: [LkSG - nichtamtliches Inhaltsverzeichnis](#)。

¹⁵ 《欧盟冲突矿产法规》：[REGULATION \(EU\) 2017/ 821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - of 17 May 2017](#)

Conflict Minerals Regulation: [REGULATION \(EU\) 2017/ 821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - of 17 May 2017](#)。

¹⁶ 《零毁林法案》：[Regulation - 2023/1115 - EN - EUR-Lex](#)

Deforestation Regulation [Regulation - 2023/1115 - EN - EUR-Lex](#)

拓展至农产品，涵盖牛、可可、咖啡、棕榈油、橡胶、大豆和木材及其衍生产品，要求运营商和贸易商进行尽职调查，追溯至原产地地块的地理坐标信息，以证明产品未造成毁林及森林退化，微型和小型企业在 2026 年 6 月 30 日起强制执行。2024 年 3 月 15 日，欧盟理事会批准《企业可持续发展尽职调查指令》(Corporate Sustainability Due Diligence Directive, 以下称“CSDDD”)¹⁷，要求企业对其活动、子公司及供应链中的负面人权和环境影响负责，最早于 2027 年实施；同年 11 月 19 日，理事会通过《欧盟市场禁止强迫劳动产品条例》(Regulation on Prohibiting Products Made with Forced Labour on the Union Market)¹⁸，该条例已于 2024 年 12 月 12 日在欧盟官方公报正式生效，并将于 2027 年 12 月 13 日开始全面实施，三年内逐步禁止强迫劳动产品进入欧盟市场。即使公司未被直接纳入法规管辖范围，但作为供应链管理的一部分，商业伙伴也可能要求其对相关法规做出回应。因此，公司需要在整个供应链中开展人权和环境尽责调查，以避免货物被禁运。

Supply chain-related regulations in countries and regions around the world: Driven by international standards on human rights and environmental due diligence such as the *UN Guiding Principles*, Western states, and regions have recently established mandatory legal frameworks centered on supply chain management, requiring businesses to implement and/or disclose human rights and environmental due diligence across their supply chains. These regulations include but are not limited to, the EU *Non-financial Reporting Directive* (adopted in 2014), the UK *Modern Slavery Act* (adopted in 2015), the French *Corporate Duty of Vigilance Law* (adopted in 2017), the Australian *Federal Register of Legislation Modern Slavery Act* (adopted in 2018, revised in 2024), the Dutch *Child Labor Due Diligence Act* adopted in (adopted in 2019), the Germany *Supply Chain Due Diligence Act* (adopted in 2021), and the EU *Conflict Minerals Regulation* (effective in 2021). On June 29, 2023, the *EU Deforestation Regulation* (EUDR) officially came into effect, expanding the scope of products covered from timber products to agricultural commodities, including cattle, cocoa, coffee, palm oil, rubber, soy, and timber, and their derivatives. The regulation requires operators and traders to conduct due diligence, trace back to the geographical

¹⁷ 《企业可持续发展尽责调查指令》：[Corporate-Sustainability-Due-Diligence-and-amending-Directive.pdf](#)
Corporate Sustainability Due Diligence Directive:

[Corporate-Sustainability-Due-Diligence-and-amending-Directive.pdf](#).

¹⁸ 《欧盟市场禁止强迫劳动产品条例》：[Regulation - EU - 2024/3015 - EN - EUR-Lex](#)
EU Regulation on Prohibiting Products Made with Forced Labor on the Union Market

coordinates of the original plots of land, and prove that the products have not contributed to deforestation or forest degradation. Micro and small enterprises will be subject to enforcement starting June 30, 2026. On March 15, 2024, the EU Council approved the *Corporate Sustainability Due Diligence Directive* (CSDDD), which requires companies to take responsibility for negative human rights and environmental impacts in their activities, subsidiaries, and supply chains, with implementation set to begin as early as 2027. On November 19, 2024, the Council also passed the *EU Regulation on Prohibiting Products Made with Forced Labor on the Union Market*, which officially came into force on December 12, 2024. It will be fully implemented by December 13, 2027, gradually banning forced labor products from entering the EU market over a three-year period. Even if non-regulated entities are not directly within the scope of these regulations, their commercial partners may require compliance as part of supply chain management. Therefore, companies need to carry out human rights and environmental due diligence throughout their supply chains to prevent goods from being embargoed.

ESG 投资和可持续金融的扩张：考虑将环境、社会和治理因素纳入考量的 ESG 投资和可持续金融正在不断发展。机构投资者和金融机构在做出投资和融资决策时，越来越多地从企业活动是否有助于解决社会和环境可持续性、是否能在中长期内将社会转变为可持续发展形态的角度，评估被投资和借款的公司。由于机构投资者和金融机构尤其重视人权和环境问题，企业需要在这些方面迅速采取行动。

Expansion of ESG investing and sustainable finance: ESG investing and sustainable finance, which take environmental, social, and governance factors into account, are continuing to evolve. Institutional investors and financial institutions are increasingly evaluating companies not only based on their financial performance, but also from the perspective of whether their activities contribute to solving social and environmental sustainability issues, and whether they can transform society into a sustainable model over the medium to long term. Given that institutional investors and financial institutions place significant emphasis on human rights and environmental issues, companies must take prompt action in these areas.

(三) 我们对尊重人权和相应环境标准的承诺

(III) Our Commitment to Human Rights and Corresponding Environmental Standards

玲珑轮胎作为具有全球竞争力的行业领导者，致力于满足客户、股东和员工的期待，始终秉持诚信合规的原则开展经营活动。我们坚守最高的道德标准，并期望合作伙伴在相互交易与合作中以此为基础，将其作为维持合作的标准。因此，我们期望合作伙伴的行为符合道德规范、诚实守信，并遵守所有适用的法律法规。若未能做到，将产生不利后果，包括可能终止与玲珑轮胎的业务和合作关系。在我们开展业务的所有地区，遵守所有适用的法律法规（包括人权和环境标准）是玲珑轮胎的原则和政策。

As a globally competitive industry leader, LingLong Tyre is committed to meeting the expectations of its customers, shareholders, and employees, and conducts its business with unwavering integrity and compliance. We uphold the highest ethical standards and expect our business partners to do the same, using these principles as the foundation for all transactions and collaborations. We expect our partners to act ethically, with honesty and integrity, and to comply with all applicable laws and regulations. Failure to do so may result in adverse consequences, including the possible termination of business and partnership ties with LingLong Tyre. In every region where we operate, compliance with all applicable laws and regulations—including those related to human rights and environmental standards—is a core principle and policy of LingLong Tyre.

第二章 玲珑轮胎供应链可持续发展管理

CHAPTER II Supply Chain Sustainable Development Management of LingLong Tyre

(一) 玲珑轮胎可持续供应链管理架构

(I) Sustainable Supply Chain Management Framework of LingLong Tyre

玲珑轮胎致力于将可持续发展理念深度融入供应链管理。我们持续优化供应链管理架构，明确“决策层—管理层—执行层”的管治架构，完善监督与汇报机制，确保供应链管理工作的高效实施。

LingLong Tyre is committed to deeply embedding the concept of sustainability into its supply chain management. We continuously refine our supply chain management structure by clearly defining a governance framework that spans the decision-making, management, and execution levels, while strengthening oversight and reporting mechanisms to ensure the efficient

implementation of supply chain initiatives.

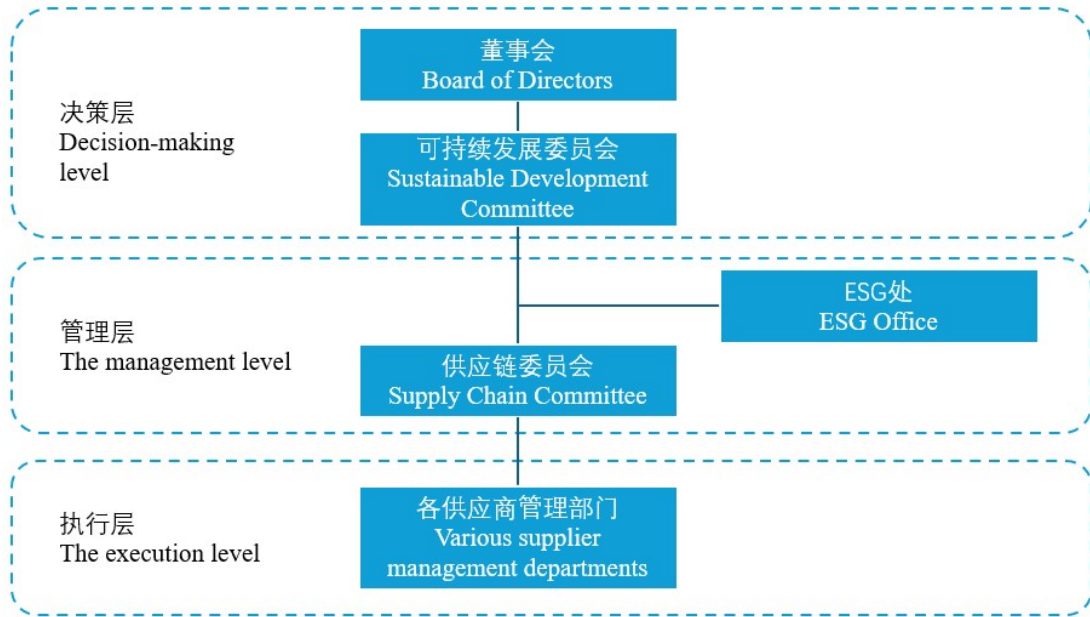


图 玲珑轮胎供应链管理架构对外披露

Figure: Disclosure of LingLong Tyre Supply Chain Management Structure

层级 Level	职责 Responsibility
决策层 Decision-making level	董事会为供应链管理的最高决策机构。董事会下设的可持续发展委员会负责决策可持续发展相关重大事项。 The Board of Directors is the highest decision-making body for supply chain management. The Sustainability Committee under the Board is responsible for making decisions on major issues related to sustainability.
管理层 The management level	可持续发展委员会下设供应链委员会作为供应链管理的主要统筹及监管机构，负责供应商管理风险管控及可持续管理监督。 The Supply Chain Committee under the Sustainability Committee is the main coordinator and supervisory body of supply chain management, which is responsible for supplier management risk control and sustainability management supervision.
执行层	各供应商管理部门负责按照要求对其供应商实施管理。

The execution level	Each supplier management department is responsible for managing its suppliers in accordance with the requirements.
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图 玲珑轮胎供应链管理架构

Figure: Supply Chain Management Structure of LingLong Tyre

(二) 玲珑轮胎供应链管理范围

(II) Supply Chain Management Scope of LingLong Tyre

玲珑轮胎的供应链管理涵盖七类 **直接供应商**¹⁹（包括原材料、基建、设备、物流、备件模具、总务、IT 等核心领域）及由其延伸的 **间接供应商**²⁰，其中对基建类直接供应商的分包活动实施穿透式管理，将其分包商²¹统一纳入合规管控范围，并要求直接供应商通过合同约定与定期审查，确保 **间接供应商** 遵守人权、环境及劳动合规标准，形成"一级管控+代管延伸"的嵌套式合规管理体系，全面覆盖从采购源头到终端交付的全链路治理。

LingLong Tyre's supply chain management covers seven types of direct suppliers (including raw materials, infrastructure, equipment, logistics, spare parts and molds, general affairs, IT and other core areas) and indirect suppliers extended by them. Among them, the subcontracting activities of direct infrastructure suppliers are managed through penetration, and their sub-suppliers are unified into the scope of compliance control. Direct suppliers are required to ensure that indirect suppliers abide by human rights, environment and labor compliance standards through contractual agreement and regular review, forming a multi-tiered compliance management system.

¹⁹ 直接供应商是商品或服务供应合同的一方，其供应对于制造公司产品或提供和使用有关服务是必要的。

A direct supplier is a party to a contract for the supply of goods or services, the supply of which is necessary for the manufacture of the Company's products or for the provision and use of the services in question.

²⁰ 间接供应商是指任何非直接供应商的企业，其供应对于制造该企业的产品或提供和使用有关服务是必要的。

An indirect supplier refers to any enterprise that is not a direct supplier whose supply is necessary for the manufacture of the enterprise's products or the provision and use of the services in question.

²¹ 分包商 (sub supplier) 是指在项目或供应链中，从总承包商 (或主要供应商) 那里承接部分工程、服务或货物供应任务的实体。

A sub-supplier refers to an entity that undertakes part of the project, service or goods supply task from the general contractor (or main supplier) in a project or supply chain.

(三) 玲珑轮胎的可持续供应链管理政策

(III) Sustainable Supply Chain Management Policy of Linglong Tyre

玲珑轮胎以可持续发展为核心的供应商管理体系，制定了《供应商可持续发展管理规定》《供应商行为守则》《供应商人权和环境舆情监测操作手册》《供应商人权和环境风险补救细则》《举报管理政策声明》等一系列制度文件，系统规范供应商准入、风险管理等要求，旨在构建负责任的全球供应链网络。

With sustainability at its core, LingLong Tyre has established a supplier management system supported by a comprehensive set of policy documents, including *Supplier Sustainability Management Regulation*, *Supplier Code of Conduct*, *Operations Manual for the Human Rights and Environment-related Public Opinion Monitoring of Suppliers*, *Remedy Rules for Human Rights and Environment-Related Risks in Suppliers*, and *Statement on the Management Policy of Reports of Regulations Violations*. These frameworks set clear standards for suppliers' access and risk management, aiming to build a responsible and globally integrated supply chain network.

1. 《Q/LL-M-SP-004-2025 供应商可持续发展管理规定》

Q/LL-M-SP-004-2025 Supplier Sustainability Management Regulation

《Q/LL-M-SP-004-2025 供应商可持续发展管理规定》作为玲珑轮胎供应商可持续风险管理的核心总领文件，全面涵盖了供应商管理的各个重要环节。该规定适用于供应商及分包商的各项工作，详细规范了从潜在供应商的筛选、风险评估、合格供应商的日常管理（贸易合规、例行检查、舆情监测、第三方评估、突发事件审核），直至供应链追溯和投诉处理等完整流程。这为推动可持续风险管理、构建绿色、安全且透明的供应链提供了关键指引与坚实支撑。

The Q/LL-M-SP-004-2025 Supplier Sustainability Management Regulation serves as the core document for sustainable risk management within LingLong Tyre's supplier network. It comprehensively covers all key aspects of supplier oversight and applies to both suppliers and subcontractors. The regulations provide detailed guidance on the entire process—from screening potential suppliers and conducting risk assessments to the daily management of approved suppliers, including trade compliance, routine inspections, public opinion monitoring, third-party evaluations, and emergency reviews. It also outlines procedures for supply chain traceability and grievance handling. This framework plays a critical role in advancing sustainable risk management and building a green,

safe, and transparent supply chain.

2. 《Q/LL-M-H-11-2024 供应商行为守则》

Q/LL-M-H-11-2024 Supplier Code of Conduct

《供应商行为守则》概述了玲珑轮胎在公司管理、工作条件与人权、健康和​​安全、商业道德、环境、供应商管理、负责任的采购等方面的原则，以及与这些原则相关的实施方面对供应商关系的要求和期望。

The *Supplier Code of Conduct* outlines LingLong Tyre's core principles in areas such as corporate governance, working conditions and human rights, health and safety, business ethics, environmental protection, supplier management, and responsible sourcing. It also details the corresponding expectations and requirements for suppliers in relation to these principles and their implementation.



《供应商行为守则》：<https://www.LingLong.cn>

Supplier Code of Conduct: <https://www.LingLong.cn>

《供应商人权和环境舆情监测操作手册》

Operations Manual for the Human Rights and Environment-related Public Opinion Monitoring of Suppliers

为预防和应对玲珑轮胎供应商在人权和环境方面可能引发的负面舆情事件，玲珑轮胎制定了《供应商人权和环境舆情监测操作手册》，建立高效的供应商舆情监测、评估、风险事件应对机制，保护公司声誉和公众关系。

To prevent and respond to potential negative public opinion incidents related to human rights and environmental issues involving LingLong Tyre's suppliers, the Company has formulated the *Operations Manual for the Human Rights and Environment-related Public Opinion Monitoring of Suppliers*. This manual establishes an efficient mechanism for public opinion monitoring, assessing, and responding to supplier-related reputational risks, safeguarding the Company's image and public relations.

3. 《Q/LL-M-SP-012-2024 供应商人权和环境风险补救细则》

Q/LL-M-SP-012-2024 Remedy Rules for Human Rights and Environment-Related Risks in Suppliers

《供应商人权和环境风险补救细则》的核心内容包括供应商人权和环境风险识别、补救

流程、责任分工以及监督机制，并明确了在发现供应商存在风险时的具体补救措施，旨在通过系统化的管理流程，及时纠正供应商的风险行为，维护企业声誉和供应链的长期稳定。具体内容见“（三）供应商改进与发展”章节。

The core contents of the *Supplier Human Rights and Environmental Risk Remediation Rules* include the identification of supplier human rights and environmental risks, remediation process, division of responsibilities and supervision mechanism, and clarify the specific remedial measures when suppliers have risks, aiming to correct suppliers' risk behaviors in a timely manner through systematic management process, so as to maintain corporate reputation and long-term stability of supply chain. For details, please refer to the chapter "(III) Supplier Improvement and Development".

4. 《举报管理政策声明》

Statement on the Management Policy of Reports of Regulations Violations

玲珑轮胎制定《举报管理政策声明》，鼓励员工及相关方通过正规途径举报违法违规行为，营造廉洁的工作环境。该声明明确举报渠道，包括举报邮箱、电话、APP 平台及书面邮寄，支持实名或匿名举报。

公司接收多种语言的举报信息，并在必要时进行翻译。举报处理由专业工作小组负责，秉持公正、独立原则，严格保密。处理流程包括确认回执、初步评估、深入调查、采取措施及结果告知。公司承诺保护举报人信息安全，反对打击报复行为，并对违规者进行严肃处理。

Linglong Tyre has established the *Statement on the Management Policy of Reports of Regulations Violations* to encourage employees and relevant stakeholders to report illegal or non-compliant behavior through official channels, fostering a transparent and ethical work environment. The statement clearly outlines the available reporting channels, including a designated email address, telephone hotline, mobile app platform, and written submissions by mail. Both identified and anonymous reports are accepted.

Linglong Tyre accepts reports in multiple languages and will arrange translations when necessary. A dedicated professional team is responsible for handling reports, and adhering to principles of fairness, independence, and strict confidentiality. The reporting process includes confirmation of receipt, preliminary assessment, in-depth investigation, corrective actions, and communication of outcomes. The Company is committed to protecting whistleblower

confidentiality, strictly prohibits retaliation, and will take disciplinary action against any individuals found in violation.

表：举报渠道

Table: Complaint Channels

举 报 邮 箱 E-mail	jiwei@linglong.cn (全球) (global), llie_admin@linglong.cn (欧洲玲珑) (European Linglong)
举 报 APP Reportin g APP	
举 报 链 接 Reportin g link	中文版地址 Chinese URL link: https://coach-vehicle-uat-1313990257.cos.ap-beijing.myqcloud.com/Questionnaire/index.html#/ 英文版地址 English URL link: https://coach-vehicle-uat-1313990257.cos.ap-beijing.myqcloud.com/Questionnaire-en/index.html
举 报 电 话 Supplier reportin g telephon e	00865358252643(或 05358242643)(全球) (Global) 0668169476(欧洲) (Europe) 038109088(泰国) (Thailand) *号码能否接通可能受到来电者供应商的限制 *Access to this number may be restricted by the caller's provider
书 面 邮 寄 Post	地址及收件人：山东省招远市金龙路 777 号纪委监委办公室收；Avenija Linglong No. 1, 23000 Zrenjanin, Administrative Office Address and Recipient: Discipline Inspection Office, 777 Jinlong Road, Zhaoyuan,

	Shandong Province; Avenija Linglong No. 1, 23000 Zrenjanin, Administrative Office
举 报 邮 箱 Reportin g mailbox	<p>举报信箱设在各单位，由专人定期开锁处理。</p> <p>Reporting mailboxes are located in each department and are regularly checked by appropriate personnel.</p>



《山东玲珑轮胎股份有限公司举报管理政策声明》

Statement on the Management Policy of Reports of Regulations Violations of Shandong LingLong Tyre Co., Ltd.

CN: https://www.LingLong.cn/Upload/202502/20250213155020_1612.pdf

EN: [Microsoft Word Shandong LingLong Tyre Co., Ltd. Complaint Management Policy Statement Declassified\).](#)

《玲珑国际欧洲有限公司（LLIE）举报管理政策声明》

LingLong International Europe Limited (LLIE) Statement on the Management Policy of Reports of Regulations Violations

https://www.LingLong.cn/Upload/202504/20250409144329_6093.pdf

5. 《商业道德管理政策声明》

Business Ethics Management Policy Statement

玲珑轮胎制定《商业道德管理政策声明》，要求所有供应商遵守公司的反腐败政策，以公平、公正、公开的原则下进行业务活动，保护双方合法权益。

LingLong Tyre has formulated the *Business Ethics Management Policy Statement*, which requires all suppliers to abide by the Company's anti-corruption policies, conduct business activities under the principles of fairness, justice and openness, and protect the legitimate rights and interests of both parties.



《山东玲珑轮胎股份有限公司商业道德管理政策声明》：

Business Ethics Management Policy Statement of Shandong LingLong Tyre Co., Ltd.:

CN: https://www.LingLong.cn/Upload/202312/20231229114418_6493.pdf

EN: https://en.LingLong.cn/Upload/202312/20231229135206_8818.pdf

6. 《气候环境政策》

Climate and Environmental Policy

玲珑轮胎制定《气候环境政策》，鼓励所有供应商遵守公司的气候环境政策，有效地管理和应对气候变化风险。

LingLong Tyre has formulated the *Climate and Environmental Policy* to encourage all suppliers to comply with the Company's climate and environmental policies and effectively manage and respond to climate change risks.



《山东玲珑轮胎股份有限公司气候环境政策》：

Climate and Environmental Policy of Shandong LingLong Tyre Co., Ltd.:

CN: https://www.LingLong.cn/Upload/202310/20231009112341_6562.pdf

EN: https://en.LingLong.cn/Upload/202310/20231010141636_7732.pdf

7. 《EUDR 符合声明》

EUDR Compliance Statement

玲珑轮胎制定《EUDR 符合声明》，公司致力于消除森林砍伐和非法生产与供应链相关的产品相关的天然胶，以符合欧盟森林砍伐法规(EUDR)的要求。

LingLong Tyre has formulated the *EUDR Compliance Statement*, and the Company is committed to eliminating deforestation and illegal production of natural rubber associated with the supply chains used in the products placed on EU market, to comply with the EU Deforestation Regulation (EUDR) requirements.



《EUDR 符合声明》：

EUDR Compliance Statement:

CN: https://www.LingLong.cn/Upload/202504/20250416094742_8893.pdf

EN: https://en.LingLong.cn/Upload/202504/20250416094851_0099.pdf

(四) 玲珑轮胎的供应链管理流程

(IV) Supply Chain Management Process of LingLong Tyre

为应对轮胎行业供应链中潜藏的劳工权益、环境合规风险，公司构建了一套覆盖“政策宣导—风险识别—持续监测—整改提升”的全周期管理体系，旨在实现从原材料到终端产品的价值链可持续发展。

To address potential labor rights and environmental compliance risks within the Tyre industry supply chain, the Company has established a comprehensive end-to-end management system covering the entire cycle of “policy advocacy – risk identification – ongoing monitoring – corrective improvement”. This system is designed to enable sustainable development across the entire value chain, from raw materials to end products.

政策宣导。玲珑轮胎制定《供应商可持续发展管理规定》《供应商行为守则》等一系列制度文件，向供应商传递对人权、环境等的硬性标准，规范供应商行为，防控相关风险，推动供应链可持续发展。

Policy advocacy: Linglong Tyre has established a series of regulatory documents, including the *Supplier Sustainability Management Regulation* and the *Supplier Code of Conduct*, to communicate strict standards on human rights, the environment, and other key areas to suppliers. These documents regulate supplier behavior, mitigate related risks, and drive the sustainable development of the supply chain.

风险识别。公司在甄选供应商时，秉持诚信与公正的原则，通过合规资质审查、固有风险评估、特定风险评估等多维度审核，确保供应商准入的合规性与稳健性。流程涵盖资质能力、贸易合规、国家行业风险、舆情监测及现场审计等环节，依据风险等级动态管理供应商。

Risk identification: When selecting suppliers, Linglong Tyre adheres to the principles of integrity and fairness. The Company conducts multi-dimensional reviews, including compliance qualification checks, inherent risk assessments, and specific risk evaluations, to ensure the compliance and stability of suppliers access. The process covers aspects such as qualification capabilities, trade compliance, country and industry risks, public opinion monitoring, and on-site reviews, with suppliers being dynamically managed based on their risk levels.

持续监测。供应商监测工作流程是确保供应商在可持续性方面持续符合公司要求的重要环节，旨在降低供应链风险并促进持续改进。

Continuous monitoring: The supplier monitoring workflow is an important part of ensuring that suppliers continue to meet Company requirements in terms of sustainability, aiming to reduce supply chain risks and promote continuous improvement.

整改提升。公司围绕供应商整改与提升开展多项工作。建立投诉管理机制，多渠道接收投诉并及时处理；针对人权和环境风险要求供应商整改；对不合规供应商启动退出程序；为供应商提供涵盖多领域的定制化培训，提升其合规与可持续发展能力，维护供应链稳定。

Rectification and improvement: The Company has implemented multiple initiatives focused on supplier corrective actions and improvement. It has established a complaint management system that receives complaints through multiple channels and handles them promptly. For human rights and environmental risks, suppliers are required to take corrective actions. Non-compliant suppliers are subject to an exit process. Additionally, the Company provides customized training covering multiple areas to enhance suppliers' compliance and sustainability capabilities, ensuring the stability of the supply chain.

通过全周期闭环管理，公司强化供应链韧性，推动价值链可持续及供应链稳固，实现企业社会责任与商业价值的有机统一。

Through full-cycle closed-loop management, the Company strengthens supply chain resilience, promotes value chain sustainability and supply chain stability, and realizes the organic unity of corporate social responsibility and commercial value.

第三章 玲珑轮胎供应链可持续发展管理活动

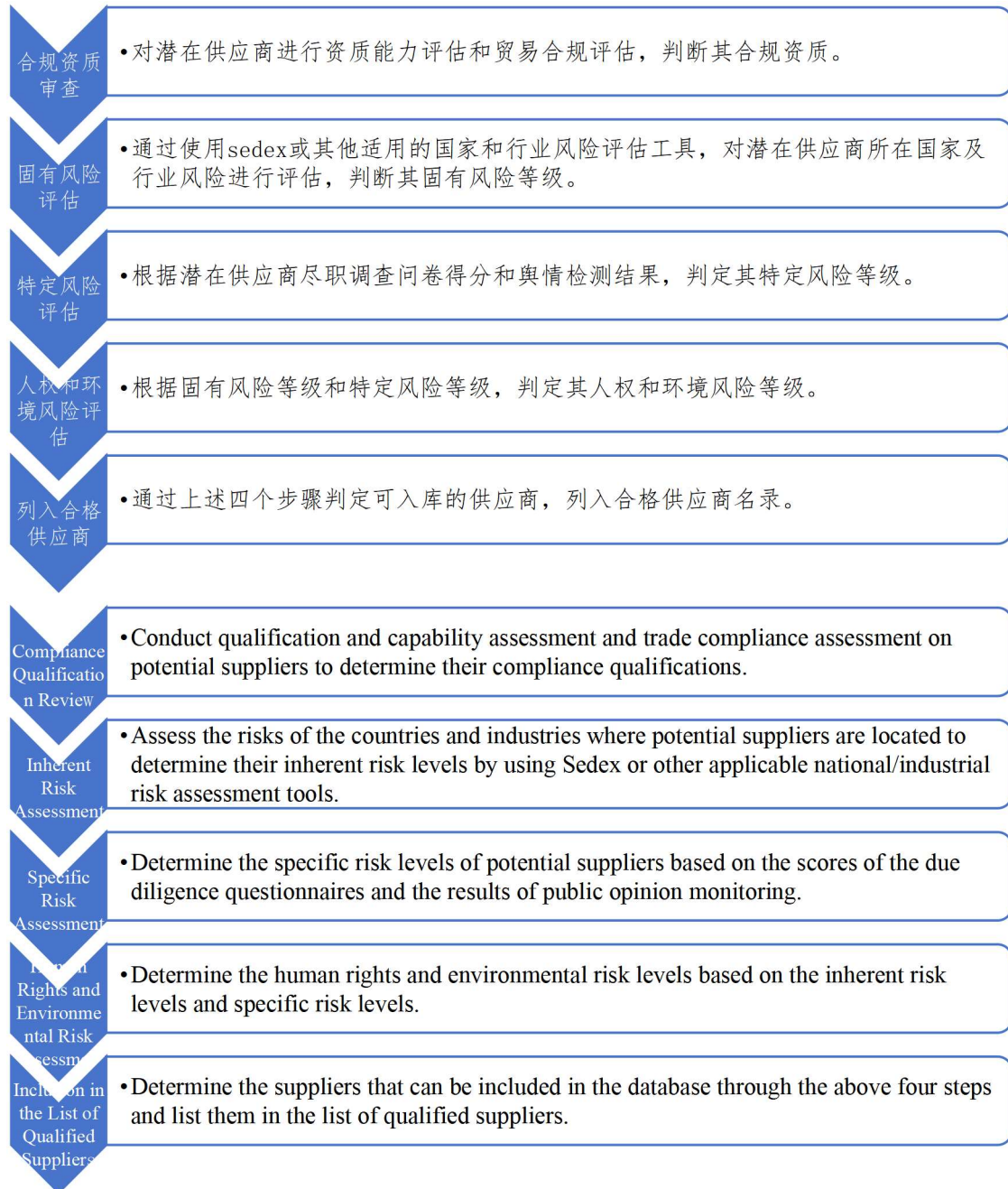
CHAPTER III Supply Chain Sustainability Management Activities of LingLong Tyre

(一) 供应商准入/风险分析 Suppliers Onboarding / Risk Analyze

公司建立了严格的供应商准入机制，从资质审核到动态评估全流程把控。供应商准入包含以下五个步骤，即合规资质审查、固有风险评估、特定风险评估、人权和环境风险评估和列入合格供应商。

The Company has established a strict supplier onboarding process, controlling the entire process from qualification review to dynamic evaluation. The supplier onboarding process includes the following five steps: compliance qualification review, inherent risk assessment, specific risk

assessment, human rights and environmental risk assessment, and inclusion in the list of qualified suppliers.



1. 合规资质审查

Compliance qualification review

公司对潜在供应商的合规资质审查包括资质能力评估和贸易合规评估。

The Company's compliance qualification review of potential suppliers includes qualification and

capability assessment and trade compliance assessment.

在资质能力评估中，公司采购部门向潜在供应商发放准入通知，要求其通过 SRM 系统阅读《供应商行为守则》承诺书签订，并提交《供应商资质能力审核清单》所列供应商资质文件（如营业执照、质量认证等）。供应商资质能力评估结果符合要求的为低风险，不符合要求的为高风险。

In the qualification and capability assessment, the Company's procurement department issues an admission notice to potential suppliers, requiring them to review and sign the *Supplier Code of Conduct* commitment letter through the SRM system, and submit the supplier qualification documents listed in the *Supplier Qualification and Capability Review Checklist* (such as business license, quality certifications, etc.). Suppliers whose qualification capability assessment results meet the requirements are classified as low-risk, while those who do not meet the requirements are classified as high-risk.

在贸易合规评估中，公司采购部门通过公开途径对供应商贸易合规情况进行核查。如：制裁实体清单、冲突矿物、武装冲突等。供应商贸易合规评估结果通过为低风险，不通过为高风险。

In the trade compliance assessment, the Company's procurement department verifies the supplier's trade compliance through public channels, such as checking sanction lists, conflict minerals, armed conflicts, and other relevant factors. Suppliers who pass the trade compliance assessment are classified as low-risk, while those who do not pass are classified as high-risk.

例如，公司对潜在供应商 A 进行合规资质审查，需通知其阅读、签订《供应商行为守则》承诺书，并提交相关资质文件。同时，公司通过公开途径，调查供应商 A 的贸易合规情况。当供应商 A 资质能力评估结果和贸易合规评估结果为低风险时，供应商 A 通过合规资质审查。

For example, when the Company conducts a compliance and qualification review of a potential supplier A, it is required to notify the supplier to review and sign the *Supplier Code of Conduct* commitment letter and submit the relevant qualification documents. At the same time, the Company investigates supplier A's trade compliance through public channels. When the results of supplier A's qualification and capability assessment, and trade compliance assessment are both low-risk, supplier A passes the compliance qualification review.

2. 固有风险评估

Inherent risk assessment

公司对供应商开展固有风险评估,即公司对供应商所在国家及行业风险进行系统性评估。针对尚未建立采购关系的国家,公司需查询专业的风险评估工具,量化分析得到供应商固有风险评估分数及风险等级(即高风险、中风险、低风险)。

The Company conducts an inherent risk assessment of suppliers, which involves systematically evaluating the risks associated with the supplier's country and industry. For countries without existing procurement relationships, the Company must consult specialized risk assessment tools to quantify and analyze the inherent risk score and risk level of the supplier (i.e., high-risk, medium-risk, low-risk).

例如,对于通过合规资质审查的供应商 A,公司继续对其开展固有风险评估,通过查询风险评估工具得到供应商 A 所在国家和行业的评分及等级。当供应商 A 所在国家风险等级和所在行业风险等级均为低风险时,供应商 A 的固有风险等级即为低风险。

For example, for supplier A who has passed the compliance and qualification review, the Company proceeds with an inherent risk assessment. By consulting risk assessment tools, the Company obtains the risk score and level of the country and industry where supplier A operates. If both the risk levels of the country and industry where supplier A is located are classified as low-risk, the inherent risk level of supplier A will be considered low-risk.

固有风险评分=国家风险评分(1到6分)+行业评分(0到4分)+“高风险特征”评分(0到2分)

Inherent risk score = country risk score (1 to 6) + industry score (0 to 4) + “high-risk characteristics” score (0 to 2)

固有风险的评分范围是1到10分,评分会被划分为不同类别,即:高风险(6.0-10.0分);中风险(4.0-5.9分);低风险(0-3.9分)

The score range of inherent risk is 1 to 10, and the score will be divided into different categories, namely: high-risk (6.0-10.0 points); medium-risk (4.0-5.9 scores); low-risk (0-3.9 score)

图: 供应商固有风险分数及等级

Figure: Supplier inherent risk score and grade

3. 特定风险评估

Specific risk assessment

特定风险评估包括供应商尽职调查问卷（SAQ）评估和供应商舆情监测结果评估。

Specific risk assessments include the assessment of the supplier due diligence questionnaire (Supplier Assessment Questionnaire, SAQ) and the assessment of supplier public opinion monitoring results.

在 SAQ 评估中，公司要求潜在供应商完成 SAQ 评估并提交相关文件。公司供应商管理部门对供应商提交的 SAQ 材料进行评审，并计算出供应商 SAQ 的最终得分。SAQ 是根据《玲珑轮胎负责任供应链风险识别清单》中的风险项制定而成，问卷对每个提问项进行赋值，最终得分=提问项实际得分总和/提问项赋值总和*100。根据供应商 SAQ 最终得分，公司将供应商分为高风险、中风险、低风险。

In the SAQ assessment, the Company requires potential suppliers to complete the SAQ and submit the relevant documents. The supplier management department reviews the SAQ materials submitted by the supplier and calculates the supplier's final SAQ score. The SAQ is based on the risk items in the *Responsible Supply Chain Risk Identification List of Linglong Tyre*. Each question in the questionnaire is assigned a value, and the final score is calculated as follows: Final SAQ score = (Total actual score of all questions) / (Total value of all questions) * 100. Based on the final SAQ score, the Company classifies suppliers into high-risk, medium-risk, and low-risk categories.

表：供应商根据 SAQ 的判定结果

Table: Supplier's judgment results according to SAQ

等级	符合率
GRADE	COMPLIANCE RATE
低风险	≥80%
LOW-RISK	≥80%
中风险	60%≤符合率<80%
MEDIUM-RISK	60%≤ compliance rate < 80%
高风险	<60%
HIGH-RISK	<60%

注：对于属于小微企业、年度采购金额低于同类产品采购额 1%、属于大宗商品类原材料贸易商的供应商，使用供应商尽职调查问卷 SAQ1.1 进行评估。小微企业定义见“（五）中小型企业（SMEs）注意事项”

Note: For suppliers who are small and micro enterprises, whose annual purchase amount is less than 1% of the purchase amount of similar products, and who are traders of raw materials for bulk commodities, the supplier due diligence questionnaire SAQ1.1 is used for evaluation. For the definition of small and micro enterprises, please refer to "V) Notes for Small and Medium-sized Enterprises (SMEs) "

在舆情监测中，公司根据《供应商人权和环境舆情监测操作手册》对潜在供应商的人权和环境舆情风险等级进行判定。根据判定结果，公司将供应商舆情风险等级分为高风险、中风险、低风险。

In public opinion monitoring, the Company determines the risk level of human rights and environmental public opinion of potential suppliers according to the *Operations Manual for the Human Rights and Environment-related Public Opinion Monitoring of Suppliers*. According to the judgment results, the Company classifies supplier public opinion risk levels into high-risk, medium-risk and low-risk.

结合潜在供应商的 SAQ 风险等级和舆情监测结果等级，公司依据“供应商特定风险等级矩阵”，得到供应商的特定风险等级。

Based on the SAQ risk level of potential suppliers and the level of public opinion monitoring results, the Company obtained the specific risk level of suppliers based on the "Supplier Specific Risk Level Matrix".

表：供应商特定风险等级矩阵

Table: Supplier Specific Risk Level Matrix

特定风险等级 Specific Risk Level	SAQ 风险等级 SAQ Risk Level		
舆情监测结果等级 Media Screening Results Level (MSRL)	高风险 high-risk	中风险 medium-risk	低风险 low-risk

高风险 high-risk	高风险 high-risk	高风险 high-risk	高风险 high-risk
中风险 medium-risk	高风险 high-risk	中风险 medium-risk	中风险 medium-risk
低风险 low-risk	高风险 high-risk	中风险 medium-risk	低风险 low-risk

例如，供应商 SAQ 符合率达 85%，即 SAQ 评估为低风险；同时，供应商 A 的舆情风险等级为低风险。根据“供应商特定风险等级矩阵”，可判定供应商 A 特定风险等级为低风险。For example, the supplier's SAQ compliance rate reaches 85%, that is, the SAQ assessment is low-risk; at the same time, the public opinion risk level of supplier A is low-risk. According to the "Supplier Specific Risk Level Matrix", the specific risk level of Supplier A can be judged to be low-risk.

4. 人权和环境风险评估

Human rights and environmental risk assessment

潜在供应商的人权和环境风险级别由 2 部分决定，即特定风险等级和固有风险等级。公司以“供应商人权环境风险等级矩阵”为依据，将供应商分为高风险潜在供应商、中风险潜在供应商和低风险潜在供应商，管理原则如下：

The human rights and environmental risk level of potential suppliers is determined by two parts, namely, specific risk level and inherent risk level. Based on the "Supplier Human Rights and Environmental Risk Level Matrix", the Company classifies suppliers into high-risk potential suppliers, medium-risk potential suppliers and low-risk potential suppliers. The management principles are as follows:

表：供应商人权环境风险等级矩阵

Table: Supplier Human Rights and Environmental Risk Level Matrix

供应商人权环境风险等级 Supplier Human Rights and Environmental Risk Level	特定风险等级 Specific Risk Level		
固有风险等级 Inherent Risk Level	高风险 high-risk	中 风 险 medium-risk	低风险 low-risk

供应商人权环境风险等级 Supplier Human Rights and Environmental Risk Level	特定风险等级 Specific Risk Level		
固有风险等级 Inherent Risk Level	高风险 high-risk	中 风 险 medium-risk	低风险 low-risk
高风险 high-risk	高风险潜在供应商 High-risk Potential Supplier	中风险潜在供应商 Medium-risk Potential Supplier	中风险潜在供应商 Medium-risk Potential Supplier
中风险 medium-risk	高风险潜在供应商 High-risk Potential Supplier	中风险潜在供应商 Medium-risk Potential Supplier	中风险潜在供应商 Medium-risk Potential Supplier
低风险 low-risk	高风险潜在供应商 High-risk Potential Supplier	中风险潜在供应商 Medium-risk Potential Supplier	低风险潜在供应商 Low-risk Potential Supplier

1) 高风险潜在供应商：原则上应淘汰，不与合作。但如果其存在不可替代性，则应要求其对于 SAQ 中的不符合项或舆情监测中的高风险舆情对应风险项进行限期整改。整改完成后对其进行现场审计，且现场审计符合率 $\geq 80\%$ 后，才能被列入合格供应商，后续应列为高风险供应商管理。

High-risk potential suppliers: In principle, they should be eliminated and not engaged in cooperation. However, if they are deemed indispensable, they should be required to rectify the non-compliant items in the SAQ or the high-risk issues identified in the public opinion monitoring within a specified period. After the rectification is completed, a site review should be conducted, and the supplier can only be included as an eligible supplier if the review compliance rate is $\geq 80\%$. Subsequently, the supplier should be subject to high-risk supplier to be managed.

2) 中风险潜在供应商：应要求其对于 SAQ 中的不符合项（如有）或舆情监测中的中风险舆情（如有）对应风险项进行限期整改。

Medium-risk potential suppliers: They should be required to rectify any non-compliant items in the SAQ (if applicable) or address any medium-risk issues identified in the public opinion monitoring (if applicable) within a specified period.

- a) 整改完成后，若未达到现场审计门槛，则后续列为中风险供应商管理。

After the rectification, if the supplier fails to meet the on-site review criteria, it will be classified as a medium-risk supplier to be managed.

- b) 若达到现场审计门槛，则要对其进行现场审计。

If the supplier meet the on-site review criteria, it will be conducted by on-site review.

- 现场审计符合率 $\geq 80\%$ 后，后续列为中风险供应商管理。

If the on-site review compliance rate is $\geq 80\%$, the supplier will subsequently be managed as a medium-risk supplier.

- 现场审计 $60\% \leq$ 符合率 $< 80\%$ ，且限期整改完成后，后续列为中风险供应商管理。

If the on-site review compliance rate is between 60% and 80%, and the supplier completes the required corrective actions within the deadline, they will also be managed as a medium-risk supplier.

- 现场审计符合率 $< 60\%$ 的，原则上应淘汰，不与合作；但如果其存在不可替代性，则应要求其进行限期整改，整改完成后对其进行二次现场审计，现场审计符合率 $\geq 80\%$ 后，才能被列入合格供应商，后续应列为高风险供应商管理。

If the on-site review compliance rate is below 60%, the supplier should, in principle, be disqualified and not engaged. However, if the supplier is deemed irreplaceable, they must complete corrective actions within a set timeframe and undergo a second on-site review. Only if the follow-up review compliance rate reaches $\geq 80\%$ can the supplier be approved and subsequently managed as a high-risk supplier.

- 3) 低风险潜在供应商：通过可持续性审查判定为低风险潜在供应商的，后续列为低风险供应商管理。

Low-risk potential suppliers: The suppliers identified as low-risk through the sustainability assessment will be managed as low-risk suppliers.

5. 列入合格供应商

Inclusion in the list of qualified suppliers

基于上述四个步骤的审核流程，公司将对供应商批准或淘汰的结果做出最终判定。通过审核的供应商需签订合规协议，需经公司领导审批通过后列入合格供应商名录。

Based on the above four-step review process, the Company will make the final judgment on the results of supplier approval or elimination. Suppliers who pass the review need to sign a compliance agreement, which needs to be approved by the Company leaders before being included in the list of qualified suppliers.

(二) 供应商监测

Supplier Monitoring

供应商监测工作流程是确保供应商在可持续性方面持续符合公司要求的重要环节，旨在降低供应链风险并促进持续改进。

The supplier monitoring workflow is a critical component in ensuring that suppliers continuously meet Linglong Tyre's sustainability requirements. It is designed to mitigate supply chain risks and drive ongoing improvement.

合规审查：玲珑轮胎要求所有活跃的合格供应商必须签订合规协议²²，并定期接受贸易合规核查，核查结果以制裁清单筛查报告形式呈现。

Compliance review: LingLong Tyre requires all active qualified suppliers to enter into compliance agreements and regularly undergo trade compliance verification, and the verification results are presented in the form of sanctions list screening reports.

舆情监测：供应商舆情监测根据《供应商人权和环境舆情监测操作手册》进行管理，高风险供应商需每半年提交一次第三方评估报告，并在三方评估期之外每月进行一次舆情排查；中风险供应商则每季度排查一次。

Public opinion monitoring: Supplier public opinion monitoring is managed according to the *Operations Manual for the Human Rights and Environment-related Public Opinion Monitoring of Suppliers*. High-risk suppliers are required to submit third-party assessment reports every six months, and conduct public opinion investigations once a month outside the tripartite assessment period; Medium-risk suppliers are checked quarterly.

SAQ 评审：供应商的例行检查通过 SAQ 文件评审进行，评审频次视供应商风险等级而

²² 合规协议更新后需重新签订。

The compliance agreement needs to be re-signed after it is updated.

定。高风险和中风险供应商还需接受现场审核，若发现不合规现象，将向供应商发出书面整改清单，要求限期整改，并使用《人权/环境评审表》进行现场检查。

SAQ review: Routine inspections of suppliers are conducted through reviews of SAQ documentation, with the frequency of reviews determined by the supplier's risk level. High-risk and medium-risk suppliers are also subject to on-site reviews. If any non-compliance issues are identified, a written corrective action list will be issued to the supplier with a set deadline for rectification, and follow-up on-site inspections will be conducted using the *Human Rights/Environmental Assessment Form*.

现场检查：供应商现场检查频次视供应商风险等级、采购金额而定。现场检查的评价标准根据符合率分为三个等级：通过（ $\geq 80\%$ ）、有条件通过（ $60\% \leq \text{符合率} < 80\%$ ）和不通过（ $< 60\%$ ）。整改后验证符合率低于 80% 的供应商将被取消合格供应商资质并终止合作关系。

On-site inspection: The frequency of on-site inspections for suppliers is determined based on their risk level and procurement volume. Inspection results are categorized into three grades according to the compliance rate: Pass ($\geq 80\%$), Conditional Pass ($60\% \leq \text{compliance rate} < 80\%$), and Fail ($< 60\%$). Suppliers whose compliance rate remains below 80% after corrective actions are verified will have their qualified supplier status revoked and their business relationship with Linglong Tyre terminated.

合格供应商分类管理 Classified Management of Qualified Suppliers				
	低风险供应商 Low-risk suppliers	中风险供应商 Medium-risk suppliers	高风险供应商 High-risk suppliers	涉及文档 Documents involved
基础管理 Basic management		签订合规协议 Sign Compliance Agreement		合规协议 Compliance Agreement
		贸易合规核查 Trade compliance verification		
突发事件稽核 Emergency Audits		高风险事件申诉机制 Appeal mechanism for high-risk events		
媒体监测 Media screening		每季度自行排查一次 Conduct self-inspections once a quarter	每半年提交三方评估报告 Submit a third-party evaluation report every six months. 三方评估期之外，每月自行排查一次 Conduct self-inspections once a month beyond the period of the third-party evaluation.	供应商人权和环境舆情监测操作手册 Operations Manual for the Human Rights and Environment-Related Public Opinion Monitoring of Suppliers
SAQ	供应商提交SAQ (每3年一次) Conduct SAQ once 3 years	供应商提交SAQ (每年一次) Conduct SAQ once a year	供应商提交SAQ (每6个月一次) Conduct SAQ once every six months	供应商尽职调查问卷 Supplier Due Diligence Questionnaire
现场审核 Conduct on-site audits		*在前次现场审核中出现严重项指标，每半年进行现场检查 If major items emerged in the previous on - site audit, conduct on - site inspections every six months **在前次现场审核中出现一般项指标超15个，每一年进行现场检查 If over 15 general items exceed standards in the previous on - site audit, conduct on - site inspections annually. 其余中风险供应商仅在出现风险事件时进行现场审核 For the remaining medium-risk suppliers, on-site audits shall be conducted only when risk incidents occur.	审核频次为每季度一次 Audit quarterly	人权环境评审表 Human Rights and Environment Review Form
第三方评估 Third-Party Assessments			审核频次为每年一次 Annual audits	

注释:

*中风险供应商中，在前次现场审核中出现严重项指标，每半年进行现场检查

**中风险供应商中，在前次现场审核中出现一般项指标超15个，每一年进行现场检查

Notes:

* For medium - risk suppliers with major item indicators identified in the previous on - site audit, on - site inspections shall be carried out every six months.

** For medium - risk suppliers with more than 15 general item indicators identified in the previous on - site audit, on - site inspections shall be carried out once a year.

图：供应商分级管理

Figure: Tiered management of suppliers

不同风险等级的供应商管理原则具体如下：

The supplier management principles of different risk levels are as follows:

高风险供应商 High-risk suppliers	每半年提交一次舆情监测第三方评估报告；每月进行一次舆情监测排查。 Submit a third-party evaluation report of public opinion monitoring every six months; Conduct public opinion monitoring and investigation once a month.
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	<p>每半年提交一次 SAQ。</p> <p>Submit the SAQ semi-annually.</p> <p>每季度进行一次现场审核；每年进行一次第三方现场审核。</p> <p>On-site reviews are conducted quarterly; A third-party on-site audit is conducted annually.</p> <p>发现高风险事件后，需在 12 小时内提供情况说明，24 小时内采取遏制措施，48 小时内制定整改措施，并在 1 个月内完成整改；或玲珑认可的其他期限内完成改进并提交整改证据。</p> <p>After high-risk events are found, information explanation should be provided within 12 hours, containment measures should be taken within 24 hours, rectification measures should be formulated within 48 hours, and rectification should be completed within 1 month; Or complete the improvement and submit the rectification evidence within other time limit approved by LingLong.</p>
<p>中风险供应商</p> <p>Medium-risk suppliers</p>	<p>每季度进行一次舆情监测排查。</p> <p>Conduct public opinion monitoring and investigation every quarter.</p> <p>每年提交一次 SAQ。</p> <p>The SAQ is submitted annually.</p> <p>现场审核频次视前一次现场审核的发现项严重程度而定。</p> <p>The frequency of on-site reviews depends on the severity of the findings of the previous on-site review.</p> <p>对于现有问题（如有）需在 1 周内提交整改计划，并在 2 个月内完成整改。</p> <p>For existing problems (if any), a rectification plan should be submitted within 1 week, and the rectification should be completed within 2 months.</p>
<p>低风险供应商</p> <p>Low-risk suppliers</p>	<p>每三年提交一次 SAQ。</p> <p>Submit the SAQ every three years.</p> <p>对于现有问题（如有）需在 1 周内制定整改措施，并在 1 个月内完</p>

	<p>成整改。</p> <p>For existing problems (if any), rectification measures should be formulated within 1 week and rectification should be completed within 1 month.</p>
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(三) 供应商改进与发展

Supplier Improvement and Development

1. 沟通机制

Communication mechanism

公司建立了完善的供应商沟通机制，包括面向供应商的 SRM（供应商关系管理）平台及举报渠道，确保沟通透明高效。

The Company has established a comprehensive supplier communication mechanism, including an SRM (Supplier Relationship Management) platform and reporting channels for suppliers, thus ensuring transparent and efficient communication.

中文官网：<https://www.LingLong.cn/>

Chinese official website: <https://www.LingLong.cn>

英文官网：<https://en.LingLong.cn/>

English official website: <https://en.LingLong.cn>

2. 风险补救 Risk Remedy

公司定期监测玲珑轮胎供应商的人权和环境风险，一旦获悉公司的直接供应商即将或已经违反上述人权或环境相关义务，公司将立即（在获悉后的 2 天内）采取适当补救措施，防止或终止违规行为，或减轻违规程度。信息获取的渠道包括但不限于：投诉举报、舆情监测、现场审计、尽职调查问卷、供应商自行上报。

The Company regularly monitors the human rights and environmental risks of Linglong Tyre's suppliers. Once informed of the fact that a direct supplier is about to or has already violated the above human rights or environment-related obligations, Linglong Tyre will immediately (within 2 days after being notified) take appropriate remedial measures to prevent or terminate the violation or to mitigate its impact. Channels for obtaining such information include but are not limited to, complaints and reports, public opinion monitoring,

on-site reviews, the due diligence questionnaire, and self-reporting by suppliers.

采取何种适当措施取决于特定案例的主要情况,如即将发生或实际发生的违规行为的类型和严重程度,以及对公司影响的大小。根据特定案例的主要情况,可以考虑采取以下措施:

The appropriate measures to be taken depend on the general circumstances of the specific case, such as the type and severity of the imminent or actual violation and the extent of its impact on the Company. Depending on the general circumstances of the specific case, the following measures may be taken:

- 1) 如果违规行为即将发生,公司会凭借在保护人员、环境和资产免受技术风险方面的多年经验和专业知识,与相关供应商以及利益相关方(如适用)合作,共同制订避免或阻止违规行为发生的解决方案。

In the event of an impending violation, the Company will draw upon its extensive experience and expertise in safeguarding personnel, the environment, and assets against technical risks to work in partnership with the relevant supplier and, where applicable, stakeholders, to formulate preventive or deterrent measures.

- 2) 如果违规行为已实际发生,公司要求供应商在7日内制定具有针对性的纠正行动计划,以有效终止或减轻该行为。必要时,公司将提供相应的支持与协助。同时,公司将对规定时间内该方案的实施情况进行核查。

For a violation that has already occurred, the Company mandates that the supplier formulate a specific corrective action plan within seven (7) days to effectively terminate or remediate the identified conduct. If necessary, the Company will provide appropriate support and assistance. Meanwhile, the Company will verify the implementation of the plan within the specified timeframe.

公司将随时评估是否有必要与其他公司的合作,以增加对违规方施加影响的可能性,同时防止直接供应商违规对公司经营业务持续性的影响。

The Company will continuously assess whether it is necessary to establish partnerships with other companies to increase the potential impact on the violating party while also preventing the violation by any direct supplier from affecting the continuity of the Company's operations.

公司将根据直接供应商风险补救的结果,决定是否暂时中止供应关系,最严重时可以终止业务关系。终止业务关系的情况包括但不限于:(1)极其严重的违法行为;(2)在规定

时间到期后，未实施整改措施或已实施的整改措施未能起到补救作用。

Based on the results of the direct supplier's risk remediation, the Company will decide whether to temporarily suspend the supply relationship or even terminate the business relationship in the most severe cases, which include, but are not limited to, (1) extremely serious illegal actions and (2) failure to implement rectification measures or failure of the implemented rectification measures to remedy the situation within the specified timeframe.

如果公司确凿获悉间接供应商出现违反人权或环境相关义务的迹象，且该迹象经公司内部分析得以确认，公司相关负责的职能部门将根据违规迹象可能发生的行为类型和严重程度，以及对公司影响的大小，要求直接供应商从上述措施清单中采取适当的补救措施。

If the Company is informed through reliable sources of any indication of an indirect supplier violating human rights or environment-related obligations, and the indication is verified through internal analysis, the responsible functional department will require the direct supplier to take appropriate remedial measures from the above list of measures according to the type and severity of the potential practice indicated and its impact on the Company. Channels for obtaining such information include, but are not limited to, complaints and reports as well as self-reporting by direct suppliers.

3. 退出机制

Exit mechanism

玲珑轮胎定期对供应商开展可持续审核，并设立整改机制，为供应商提出改善建议。对整改不符合要求或拒绝整改的供应商，公司有权减少订货或取消其供应商资格。

Linglong Tyre conducts regular sustainability reviews of its suppliers and has established a corrective action mechanism to provide improvement recommendations. For suppliers that fail to meet corrective requirements or refuse to make improvements, the Company reserves the right to reduce orders or revoke their supplier qualification.

4. 供应商培训

Suppliers training

玲珑轮胎为供应商提供全面的培训计划，内容涵盖社会责任、环境保护、职业健康与安全等关键领域。培训包括法律法规解读、行业最佳实践分享以及内部管理优化等，旨在提升供应商的合规意识和可持续发展能力。公司根据供应商的具体需求，提供定制化的培训课程，

确保培训内容与供应商的发展目标相契合。合格供应商的审核标准与潜在供应商一致，供应商进入玲珑轮胎生产现场时，各责任单位需对外来人员进行合规培训，并保留培训资料及照片，以确保培训效果的可追溯性。

Linglong Tyre offers comprehensive training programs for its suppliers, covering key areas such as social responsibility, environmental protection, and occupational health and safety. The training includes interpretation of relevant laws and regulations, sharing of industry best practices, and guidance on internal management optimization, with the goal of enhancing suppliers' compliance awareness and sustainability capabilities. Customized training sessions are provided based on the specific needs of each supplier to ensure alignment with their development goals. The review standards for qualified suppliers are consistent with those for potential suppliers. When suppliers enter Linglong Tyre's production facilities, each responsible unit must provide compliance training to external personnel and retain related training materials and photos to ensure traceability of training effectiveness.

5. 可持续供应链管理指标

Sustainable Supply Chain Management Indicators

为确保供应链可持续绩效的持续提升，并有效管控供应商 ESG 风险，玲珑轮胎制定了一系列管理指标，用于追踪供应链可持续表现，包括：

To ensure continuous improvement in supply chain sustainability performance and effectively manage supplier ESG risks, Linglong Tire has established a set of KPIs to monitor sustainable supply chain performance, including:

序号 No.	管理指标 Management Indicators
1	供应商现场审核计划完成率 Completion rate of supplier site audit program
2	《合规承诺函》签订率 ²³

²³ 《合规承诺函》的内容包括廉洁诚信/信息保密/社会责任，其中社会责任包括人权保护/环境保护/供应链溯源/供应链审计等要求。供应商签订协议代表供应商需遵守相应的条款

The content of the "Anti-bribery Agreement" includes integrity and honesty, information

序号	管理指标
No.	Management Indicators
	Signing rate of the Anti-bribery Agreement
3	面向供应商的可持续供应链培训覆盖率 Training coverage rate for suppliers on sustainable supply chain practices
4	供应商人权和环境风险评估完成率 Completion rate of human rights and environmental risk assessments for suppliers
5	《供应商行为准则》签署率 Signatory rate of the Supplier Code of Conduct
6	SAQ response rate SAQ 回复率
7	所有运营地区内已经过可持续采购培训的采购员百分比 Percentage of purchasers who have received sustainable procurement training in all regions

(四) 供应商紧急事件处理

Supplier Emergency Handling

1. 事件发生与初步评估

Event occurrence and preliminary evaluation

当供应商发生紧急事件（如安全事故、环境污染、劳资纠纷等）时，供应商需在事件发生后的 12 小时内向玲珑轮胎报告。玲珑轮胎接收报告的部门（如供应商管理部门或应急响应小组）在收到报告后，立即启动初步风险评估，判断事件的严重性和可能的影响范围。

In the event of an emergency involving a supplier, such as a safety incident, environmental pollution, or labor dispute, the supplier is required to report the incident to Linglong Tyre within

_____ confidentiality, and social responsibility. The social responsibility requirements encompass human rights protection, environmental protection, supply chain traceability, supply chain audits, and other related provisions. By signing the agreement, the supplier commits to complying with the corresponding terms.

12 hours of its occurrence. Upon receiving the report, the relevant department at Linglong Tyre (such as the supplier management department or the emergency response team) will immediately initiate a preliminary risk assessment to determine the severity of the incident and its potential impact.

2. 现场评估与决策

On-site assessment and decision-making

根据初步评估结果，若事件可能对玲珑轮胎运营或品牌声誉造成重大影响，玲珑轮胎将在 48 小时内安排相关人员进入供应商现场进行详细评估。

Based on the preliminary assessment, if the incident is deemed likely to have a significant impact on Linglong Tyre's operations or brand reputation, Linglong Tyre will arrange for relevant personnel to conduct an on-site detailed assessment at the supplier's location within 48 hours.

3. 报告与沟通

Reporting and communication

若现场评估确认事件存在高风险，玲珑轮胎的销售部门需在 7 日内向客户进行汇报，确保客户了解事件情况及可能的影响。同时，玲珑轮胎将与供应商共同制定详细的整改计划，明确整改措施、责任人和完成时间表。

If the on-site assessment confirms that the incident poses a high-risk, Linglong Tyre's sales department must report the incident to customers within seven days to ensure they are informed of the situation and any potential impacts. At the same time, Linglong Tyre will work with the supplier to develop a detailed corrective action plan, clearly defining the corrective measures, responsible parties, and completion timeline.

4. 整改措施与跟踪

Corrective measures and tracking

供应商需按照整改计划立即执行，玲珑轮胎将定期跟踪整改进度，并根据需要提供技术支持和培训。若整改不力或未达到要求，玲珑轮胎将暂停与供应商的合作，直至问题得到解决。

The supplier must immediately implement the corrective action plan. Linglong Tyre will regularly track the progress of the corrective actions and provide technical support and training as needed. If the corrective actions are insufficient or do not meet the required standards, Linglong Tyre will

suspend its cooperation with the supplier until the issues are resolved.

5. 记录与存档

Recording and filing

所有紧急事件的处理过程和结果将详细记录并存档，包括事件报告、现场评估报告、整改计划及执行情况等，作为后续评估和决策的依据。

The entire process and outcome of handling all emergency incidents will be thoroughly documented and archived, including the incident report, on-site assessment report, corrective action plan, and execution status. This documentation will serve as the basis for subsequent evaluations and decision-making.

(五) 中小型企业 (SMEs) 注意事项

V) Notes for Small and Medium-sized Enterprises (SMEs)

在玲珑轮胎的可持续供应链管理体系中，中小微企业 (SMEs) 的定义如下：

- 1) 微型企业：在其资产负债表日，不超过以下三项标准中至少两项限额的企业：
 - a) 资产负债表总额：350,000 欧元；
 - b) 净营业额：700,000 欧元；
 - c) 本财政年度的平均员工人数：10 人。
- 2) 小型企业：在其资产负债表日，不超过以下三项标准中至少两项限额的企业：
 - a) 资产负债表总额：4,000,000 欧元；
 - b) 净营业额：8,000,000 欧元；
 - c) 本财政年度的平均员工人数：50 人。

In Linglong Tyre's sustainable supply chain management system, the definition of small, medium and micro-enterprises (SMEs) is as follows:

- 1) A micro enterprise is defined as an enterprise that does not exceed the limits of at least two of the following three criteria as of its balance sheet date:
 - a) Total amount of the balance sheet: 350,000 euros;
 - b) Net turnover: 700,000 euros;
 - c) Average number of employees in the current fiscal year: 10 persons.
- 2) A small enterprise refers to an enterprise that does not exceed the limits of at least two of the following three criteria as of its balance sheet date:

- a) Total amount of the balance sheet: 4,000,000 euros;
- b) Net turnover: 8,000,000 euros;
- c) Average number of employees in the current fiscal year: 50 persons.

对于中小型企业开展可持续发展的建议：

Recommendations for sustainable development of small and medium-sized enterprises:

1) 管理层的领导作用

The leadership role of the management

人权意识的提升：管理层应积极引导员工提升人权保护意识，确保公司在业务活动中尊重人权。管理层通过系统性制定与执行落实人权政策，在企业日常运营中有效确立道德治理框架。

Enhancement of human rights awareness: The management should actively guide employees to enhance their awareness of human rights protection and ensure that the Company respects human rights in its business activities. Through the systematic formulation and implementation of human rights policies, the management should establish an ethical governance framework in the daily operation of the enterprise.

环境问题的解决：管理层应在解决环境问题方面发挥领导作用，推动公司采取环保措施，减少对环境的影响。通过制定可持续发展目标，并将其纳入公司战略规划，管理层可以为公司的发展方向提供清晰的指引。

Resolution of environmental issues: The management should play a leading role in addressing environmental issues, driving the Company to implement environmental protection measures and reduce its impact on the environment. By setting sustainable development goals and incorporating them into the Company's strategic planning, the management can provide clear direction for the Company's development.

文化影响：管理层的行动和决策将对其他管理人员和员工产生重要影响，进而塑造整个企业文化。管理层应通过持续的沟通和培训，确保全体员工理解并支持公司的可持续发展战略。

Cultural influence: The actions and decisions of the management will have a significant impact on other managers and employees, shaping the overall corporate culture. Management should ensure continuous communication and training to ensure that all employees understand and support the

Company's sustainable development strategy.

持续沟通：管理层应不断向员工传达公司在人权和环境问题上的立场，确保全体员工明确公司的可持续发展目标和要求。

Continuous communication: The management should continuously communicate the Company's stance on human rights and environmental issues to employees, ensuring that all staff are clear about the Company's sustainable development goals and requirements.

2) 基于风险的管理措施

Risk-based management measures

风险识别与评估：鉴于资源有限，中小型企业应专注于识别和评估与公司业务活动和供应链相关的人权和环境负面影响。通过定期进行风险评估，公司可以明确潜在问题的严重程度，并制定相应的应对措施。

Risk identification and assessment: Given limited resources, small and medium-sized enterprises should focus on identifying and assessing the negative human rights and environmental impacts related to their business activities and supply chains. By conducting regular risk assessments, the Company can determine the severity of potential issues and develop corresponding response measures.

资源分配：根据风险评估结果，公司将有限的人力和资金资源集中用于解决高风险领域。这种基于风险的方法不仅可以提高资源利用效率，还可以确保公司在可持续发展方面取得实质性进展。

Resource allocation: Based on the results of the risk assessment, the Company will focus its limited human and financial resources on addressing high-risk areas. This risk-based approach not only improves resource efficiency but also ensures that the Company makes tangible progress in sustainability.

持续评估：持续和定期的风险评估是基于风险方法的先决条件。公司应建立一套有效的风险监测机制，及时发现和应对新出现的风险，确保可持续发展措施的有效性和适应性。

Continuous assessment: Continuous and regular risk assessments are a prerequisite for a risk-based approach. The Company should establish an effective risk monitoring mechanism to promptly identify and address emerging risks, ensuring the effectiveness and adaptability of sustainability measures.

3) 外部资源的利用

Utilization of external resources

外部支持：由于内部资源有限，中小型企业应积极寻求外部资源的支持。这包括与行业组织、专业咨询机构合作，获取有关可持续供应链管理的最佳实践和专业知识。

External support: As internal resources are limited, small and medium-sized enterprises should actively seek the support of external resources. This includes working with industry organizations, and professional advisory bodies to access best practices and expertise on sustainable supply chain management.

信息共享：公司应充分利用玲珑轮胎提供的可持续供应链管理手册，从中获取有关可持续发展的实用信息和工具。通过与玲珑轮胎的紧密合作，公司可以更好地理解和实施可持续发展要求，提升自身的可持续发展能力。

Information sharing: The Company should fully utilize the sustainable supply chain management handbook provided by Linglong Tyre to obtain practical information and tools related to sustainability. By working closely with Linglong Tyre, the Company can better understand and implement sustainability requirements, enhancing its own sustainability capabilities.

附录

Appendix

1. 术语解释

Explanation of terms

- 1) **可持续供应链**: 在商品和服务的采购、生产及分销过程中, 纳入环境、社会与财务考量因素的实践方式。涵盖从原材料获取到最终产品处置的全流程, 目标是降低业务运营对环境和社会的负面影响, 同时保障效率与可靠性。

Sustainable Supply Chain: The practice of incorporating environmental, social, and financial considerations into the procurement, production, and distribution of goods and services. It covers the entire process from raw material sourcing to the disposal of final products, with the goal of reducing the negative environmental and social impacts of business operations while ensuring efficiency and reliability.

- 2) **可持续发展委员会**: 山东玲珑轮胎股份有限公司的可持续发展委员会。

Sustainable Development Committee: The Sustainable Development Committee of Shandong LingLong Tyre Co., Ltd.

- 3) **ESG**: 环境、社会和公司治理 (Environmental、Social and Governance) 的缩写。

ESG: Abbreviation for Environmental, Social and Governance (Environmental, Social and Governance).

- 4) **人权与环境尽职调查**: 是企业针对供应链中潜在的人权侵犯和环境负面影响, 进行识别、评估、预防、减轻及补救的系统性过程。

Human Rights and Environmental Due Diligence: It is a systematic process through which companies identify, assess, prevent, mitigate, and remedy potential human rights violations and negative environmental impacts within their supply chain.

- 5) **直接供应商**: 是商品或服务供应合同的一方, 其供应对于制造公司产品或提供和使用有关服务是必要的。

Direct Supplier: It refers to one party in a goods or services supply contract, whose supply is essential for the manufacturing Company's products or for providing and using related services.

- 6) **间接供应商:** 是指任何非直接供应商的企业, 其供应对于制造该企业的产品或提供和使用有关服务是必要的。

Indirect Supplier: It refers to any business that is not a direct supplier but whose supply is essential for the manufacturing of the Company's products or for providing and using related services.

- 7) **分包商:** 是指在项目或供应链中, 从总承包商(或主要供应商)那里承接部分工程、服务或货物供应任务的实体。

Sub-supplier: It refers to entities that undertake part of the project, services, or goods supply tasks from the general contractor (or primary supplier) in a project or supply chain.

- 8) **供应商人权和环境舆情:** 供应商人权舆情指围绕供应商在劳工雇佣(包括但不限于雇佣童工、强迫劳动、薪酬待遇不公、工作环境恶劣、歧视用工等方面)所引发的社会舆论动态, 涵盖来自员工、消费者、社会组织、媒体等各方的评价、投诉、报道等信息反馈。供应商环境舆情是指因供应商生产运营活动对周边生态环境造成影响(如废气废水违规排放、能源过度消耗、资源不合理开发、有害物质处理不当等问题)而在公众领域引发的各类舆论反应, 包括新闻曝光、社区居民反馈、环保组织监督等多种形式的舆情信息。

Human Rights and Environment-Related Public Opinion of Suppliers: Supplier human rights public opinion refers to the social discourse surrounding labor employment practices at suppliers, including but not limited to issues like child labor, forced labor, unequal pay, poor working conditions, and employment discrimination. This encompasses feedback from employees, consumers, social organizations, media, and other stakeholders, including evaluations, complaints, and reports. Environment-related public opinion of suppliers refers to the public reactions triggered by the supplier's production and operational activities that negatively impact the surrounding ecological environment. These issues might include illegal emissions of waste gases and wastewater, excessive energy consumption, unreasonable resource development, and improper disposal of hazardous substances. Public opinion on these issues can be reflected in various forms, including media coverage, community feedback, and environmental

organization oversight.

- 9) **人权和环境风险：**人权风险是指企业活动或供应链环节中，可能对个体或群体的基本权利造成侵害的潜在威胁，包括但不限于强迫劳动、雇佣童工、歧视、侵犯员工权益、社区居民权益受损等。环境风险是指企业运营及供应链活动对自然环境产生负面影响的可能性，涵盖环境污染、生态破坏、资源过度消耗等方面。

Human Rights and Environmental Risks: Human rights risk refers to the potential threat of violating individuals' or groups' fundamental rights within business activities or supply chain processes. This includes, but is not limited to, forced labor, child labor, discrimination, violations of employee rights, and harm to the rights of local communities. Environmental risk refers to the potential negative impacts of a Company's operations and supply chain activities on the natural environment. This encompasses environmental pollution, ecological damage, excessive resource consumption, and other related issues.

- 10) **固有风险：**将供应商所在国家和行业的风险归类为固有风险。

Inherent Risk: The risks associated with the country and industry where the supplier is located are classified as inherent risks.

- 11) **特定风险：**将供应商尽职调查问卷（SAQ）分数和人权环境舆情监测结果等级所反映的风险，称为特定风险。

Specific Risk: The risks reflected by the scores of the Supplier Due Diligence Questionnaire (SAQ) and the levels of media screening results regarding the human rights environment of the supplier are referred to as specific risks.

2. 参考标准 Reference standards

- 1) RSCI-Assessment-Standard Requirements
- 2) Lieferkettensorgfaltspflichtengesetz, LkSG²⁴
- 3) Identifying, weighting and prioritizing risks—Guidance on conducting a risk analysis as required by the German Supply Chain Due Diligence Act 'Lieferkettensorgfaltspflichtengesetz' or 'LkSG'²⁵

²⁴ [LkSG - nichtamtliches Inhaltsverzeichnis](#)

²⁵ [BAFA - Homepage - Identifying, weighting and prioritizing risks](#)

- 4) Corporate Sustainability Due Diligence Directive²⁶

²⁶ [Directive - EU - 2024/1760 - EN - EUR-Lex](#)