

不毁林、不转化森林供应链监控政策

一、引言

广州天赐高新材料股份有限公司（以下简称“天赐”或“公司”）以“绿色化学成就低碳美丽生活”为使命，致力于成为国际化一流的绿色化学运营企业。公司在《供应商行为准则》中已明确要求供应商在其管理过程中推行“无泥炭、无毁林、无剥削”（NDPE）政策。为进一步落实这一承诺，加强对供应链毁林风险的监控与管理，特制定本《不毁林、不转化森林供应链监控政策》（以下简称“本政策”）。

二、适用范围

本政策适用于与广州天赐高新材料股份有限公司及其分子公司（简称天赐）合作的供应商，供应商有义务在约定的期限内采取所有相关且必要的行动和措施，以确保尽可能地遵守本准则。天赐将积极推动所有供应商遵守本政策或同等政策要求。

三、对供应商的要求

3.1 不毁林与不转化承诺

供应商应承诺自身不砍伐高碳储量或高保护价值地区的森林，不干扰泥炭地层，不进行任何形式的毁林和自然生态系统转化行为。

供应商应承诺不采购来自以下情形的林产品或相关商品：

- (1) 涉及非法采伐或非法贸易活动；
- (2) 来自遭受毁林、退化或转为非林地用途的森林及其他自然生态系统；
- (3) 来自高保护价值（HCV）地区或高碳储量（HCS）森林，除非该区域已通过国际公认的可持续认证；
- (4) 涉及与森林相关的社会冲突，包括侵犯传统权利；
- (5) 违反劳工权利及国际劳工组织定义的基本原则与权利。
- (6) 供应商应禁止以焚烧形式进行土地清理或开发新的种植。

3.2 供应链尽职调查

供应商应建立并实施系统的尽职调查程序，对所有高风险原材料按其来源地进行毁林风险评估。尽职调查应包括以下三个核心步骤：

- (1) 信息收集：收集供应链信息，包括产品描述、供应商身份、生产地地理位置、生产日期及合法性证明等；
- (2) 风险评估：根据生产地的毁林风险等级进行评估；
- (3) 风险缓解：对识别出的非可忽略风险采取有效的管控与缓解措施。

供应商仅可使用经评估为低风险的来源，对识别出的风险应采取有效管控措施。

3.3 可追溯性要求

供应商应建立覆盖采购、生产、销售全流程的材料核算与追溯体系，确保来源清晰可查。

对于具有毁林风险的商品，供应商应能够提供：

- (1) 产品的基础信息（品名、规格、数量）；
- (2) 生产地的地理位置信息；
- (3) 供应链传递的完整证据链；

(4) 合法生产的相关证明文件。

供应商应完整保存所有与供应链可追溯性和合规性相关的记录至少五年，并应天赐要求及时提供。供应商应积极应用数字化工具和新技术，提升供应链透明度与管理效能。

3.4 可持续认证

天赐鼓励供应商优先采购已获得国际公认可持续认证的商品，包括但不限于：

- (1) 森林管理委员会（FSC）认证
- (2) 森林认证体系认可计划（PEFC）认证
- (3) 可持续棕榈油圆桌倡议组织（RSPO）认证
- (4) 负责任大豆圆桌协会（RTRS）认证
- (5) 其他同等效力的可持续认证

供应商应承诺逐步提高经可靠认证的可持续来源产品在其供应中的比例。

3.5 合规与记录保存

供应商应遵守产品来源国与使用国所有相关法律法规，包括森林保护、环境保护、贸易、海关等领域的规定。

四、监控机制

4.1 供应商风险评估

天赐将根据以下因素对供应商进行毁林风险等级划分，对高风险供应商，天赐将实施更为严格的监控措施：

- (1) 供应商所供应商品的风险属性（是否属于高风险商品）；
- (2) 原材料来源地的毁林风险等级；
- (3) 供应商的认证状态及可追溯能力；
- (4) 供应商过往的合规记录。

4.2 信息披露与报告

供应商应按天赐要求定期报告以下信息并定期评估供应商政策执行情况，并持续寻求改进：

- (1) 所供应商品的来源地信息；
- (2) 供应链可追溯性进展情况；
- (3) 可持续认证的获得与维持情况；
- (4) 毁林风险的识别与管控情况。

4.3 现场审核与验证

天赐保留对供应商进行现场审核的权利，包括但不限于：

- (1) 对供应商的生产设施和原材料来源地进行实地考察；
- (2) 核查供应商的供应链追溯体系及记录；
- (3) 验证供应商所提供信息的真实性与准确性。
- (4) 天赐可委托第三方独立机构对供应商进行审核与验证。

五、违规处理

对于违反本政策要求的供应商，天赐将视情节严重程度采取以下措施：

- (1) 警告与整改通知：对首次违规或情节较轻的供应商，发出书面警告并要求在指定期限内完成整改；

(2) 暂停合作：对未能在规定期限内完成整改或情节较严重的供应商，暂停新的采购订单；

(3) 终止合作：对存在严重毁林行为、拒绝配合调查或多次违规拒不整改的供应商，终止合作关系并将其从合格供应商名单中移除；

法律追究：对因供应商毁林行为导致天赐面临法律风险或声誉损失的，保留追究法律责任的权利。

本政策自发布之日起生效。

制定本行为准则参考以下资料：

- 《联合国工商企业与人权指导原则》
- 《世界人权宣言》
- 《联合国全球契约》
- 国际劳工组织关于劳工的四项基本原则
- NDPE（不毁林、不开发泥炭地、不剥削劳动）框架
- 《欧盟零毁林法案》（EUDR）相关要求（欧盟法规 2023/1115 及修订案 2025/2650）
- FSC 森林认证体系相关标准

No Deforestation & No Forest Conversion Supply Chain Monitoring Policy

I. Introduction

Guangzhou Tinci Materials Technology Co., Ltd. (hereinafter referred to as “Tinci” or the “Company”) adheres to the mission of “Green Chemistry for a Low-Carbon & Beautiful Life” and strives to become a world-class international green chemical enterprise. The Company has clearly required suppliers to implement the NDPE (No Deforestation, No Peat, No Exploitation) policy in its Supplier Code of Conduct. To further deliver on this commitment and strengthen monitoring and management of deforestation risks across the supply chain, this *No Deforestation & No Forest Conversion Supply Chain Monitoring Policy* (hereinafter referred to as this Policy) is formulated.

II. Scope of Application

This Policy applies to all suppliers cooperating with Guangzhou Tinci Materials Technology Co., Ltd. and its subsidiaries (collectively “Tinci”). Suppliers are obligated to take all relevant and necessary actions and measures within the agreed timeframes to ensure maximum compliance with this Code. Tinci will actively promote compliance with this Policy or equivalent requirements among all suppliers.

III. Requirements for Suppliers

3.1 Commitment to No Deforestation and No Conversion

Suppliers shall commit to refraining from logging forests with high carbon stocks or high conservation value, disturbing peatlands, and engaging in any form of deforestation or natural ecosystem conversion activities.

Suppliers shall commit not to procure forest products or related commodities originating from any of the following scenarios:

- Involving illegal logging or illegal trade activities;
- Derived from forests and other natural ecosystems subject to deforestation, degradation, or conversion to non-forest land uses;
- Located in High Conservation Value (HCV) areas or High Carbon Stock (HCS) forests, unless such areas hold internationally recognized sustainable certifications;
- Associated with forest-related social conflicts, including violations of indigenous and traditional rights;
- In breach of labor rights and the fundamental principles and rights defined by the International Labour Organization.

Suppliers shall ban land clearing via burning or the development of new plantations through burning.

3.2 Supply Chain Due Diligence

Suppliers shall establish and implement systematic due diligence procedures to conduct deforestation risk assessments for all high-risk raw materials by place of origin. Due diligence shall cover three core steps:

1. Information Collection: Gather supply chain information including product descriptions, supplier identities, geographic locations of production sites, production dates, legality certificates, etc.
2. Risk Assessment: Carry out assessments based on the deforestation risk rating of production locations.
3. Risk Mitigation: Implement effective control and mitigation measures for non-negligible risks identified.

Suppliers may only use sources assessed as low-risk and shall deploy effective control measures for any identified risks.

3.3 Traceability Requirements

Suppliers shall establish a full-process material accounting and traceability system covering procurement, production and sales to guarantee clear and verifiable origins.

For commodities carrying deforestation risks, suppliers shall be able to provide:

- Basic product information (name, specifications, quantity);
- Geographic location information of production sites;
- Complete chains of evidence transmitted across the supply chain;
- Relevant certification documents proving legal production.

Suppliers shall retain all records related to supply chain traceability and compliance for a minimum of five years and promptly provide such records upon Tinci's request. Suppliers shall actively adopt digital tools and new technologies to boost supply chain transparency and management efficiency.

3.4 Sustainable Certification

Tinci encourages suppliers to prioritize purchasing commodities with internationally recognized sustainable certifications, including but not limited to:

- Forest Stewardship Council (FSC) Certification
- Programme for the Endorsement of Forest Certification (PEFC)
- Roundtable on Sustainable Palm Oil (RSPO)
- Round Table on Responsible Soy Association (RTRS)
- Other sustainable certifications of equivalent validity

Suppliers shall commit to gradually raising the proportion of products sourced from reliably certified sustainable origins in their supplies.

3.5 Compliance and Record-Keeping

Suppliers shall abide by all applicable laws and regulations of the product origin country and destination country, covering forest protection, environmental protection, trade, customs and other relevant fields.

IV. Monitoring Mechanisms

4.1 Supplier Risk Assessment

Tinci shall classify suppliers by deforestation risk tier based on the following factors, and impose stricter monitoring measures on high-risk suppliers:

- Risk attributes of commodities supplied by the supplier (whether classified as high-risk commodities);
- Deforestation risk rating of raw material origins;
- Supplier's certification status and traceability capacity;
- Supplier's historical compliance records.

4.2 Information Disclosure and Reporting

Suppliers shall regularly submit the following information as required by Tinci, and conduct periodic evaluations on Policy implementation with continuous improvement as the objective:

- Origin information of supplied commodities;
- Progress of supply chain traceability implementation;
- Acquisition and maintenance status of sustainable certifications;
- Identification and control of deforestation risks.

4.3 On-site Audit and Verification

Tinci reserves the right to conduct on-site audits of suppliers, including but not limited to:

- Field visits to suppliers' production facilities and raw material origins;
- Inspection of suppliers' supply chain traceability systems and records;
- Verification of the authenticity and accuracy of information provided by suppliers.

Tinci may entrust independent third-party institutions to conduct audits and verification of suppliers.

V. Sanctions for Non-Compliance

For suppliers violating the requirements of this Policy, Tinci shall adopt the following measures based on the severity of violations:

1. Written Warning and Rectification Notice: Issue a formal written warning to suppliers with initial or minor violations, requiring rectification within a specified timeframe.
2. Suspension of Cooperation: Suspend new purchase orders for suppliers that fail to complete rectification within the required timeframe or commit moderately serious violations.
3. Termination of Cooperation: Terminate cooperation and remove suppliers from the qualified supplier list for those involved in severe deforestation activities, refusal to cooperate with investigations, or repeated violations with no rectification.

4. Legal Liability Pursuit: Reserve the right to pursue legal liabilities if suppliers' deforestation acts expose Tinci to legal risks or reputational damage.

This Policy shall take effect upon release.

Reference Documents for Formulating this Code of Conduct

- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- United Nations Global Compact
- Four Fundamental Principles and Rights at Work of the International Labour Organization
- NDPE (No Deforestation, No Peat Development, No Labour Exploitation) Framework
- Requirements under the EU Deforestation-free Products Regulation (EUDR) (Regulation (EU) 2023/1115 and Amendment 2025/2650)
- Relevant Standards of the FSC Forest Certification System