
Ordnung des Beschwerdeverfahrens im Rahmen von Lieferkettensorgfaltspflichtengesetz (LkSG)

Version 1.0, gültig ab 20. Dezember 2024

Beschreibung	Dokumentieren	Link
Deutsch	Ordnung des Beschwerdeverfahrens im Rahmen von LkSG	DE Link

Language	Document	Link
English	Rules of procedure for the complaints procedure under the German Supply Chain Due Diligence Act (LkSG)	EN Link

语言	文档	链接
中文	德国供应链尽职调查法申诉程序规则(LkSG)	CN Link

**Rules of procedure for the complaints
procedure under the German Supply
Chain Due Diligence Act
(Lieferkettensorgfaltspflichtengesetz,
LkSG)**

Version 1.0, effective from December 20, 2024

I. Objective

At CATL Germany¹, we place high value on human rights and environmental risk management. We are committed to meeting our obligations under the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*, LkSG), including taking steps to prevent or minimize human rights or environmental risks, and addressing any violations of human rights or environmental obligations. More information on this can be found in our LkSG Human Rights Policy (*Grundsatzklärung*)

[https://www.catl.com/de/uploads/1/file/public/202412/20241224142354_twsce3raea.pdf].

To support this commitment, CATL Germany has established a complaint procedure as described in this document (“**Rules of Procedure**”). Its objective is to ensure that CATL Germany is promptly informed of any potential risks or violations related to human rights or the environment as defined by the LkSG. This enables us to take appropriate preventive and remedial measures to avoid any adverse impact on the individuals involved, e.g., our employees, society at large, and the environment. Additionally, we utilize the insights gained from this process to continuously enhance our risk management.

II. Subject of a complaint

This complaint procedure aims to protect against human rights and environmental risks, as well as to handle violations within CATL Germany’s own business area and supply chain. It encompasses, among other things, the following topics:

- The use of child labor and failure to protect young workers;
- Forced labor and modern slavery;
- Disregard for occupational health and safety;
- Disregard for freedom of association and the right to collective bargaining;
- Unjustified unequal treatment in employment;
- Withholding a living wage;
- Violation of the rights of local communities and indigenous peoples;
- Unlawful violation of land rights and prohibition of forced evictions;
- Violating the prohibition of commissioning or using private/public security forces that may cause harm to life and limb and/or other impairments due to a lack of instruction or control;
- Actions that lead to detrimental soil changes, water pollution, air pollution, harmful noise emissions, or excessive water consumption. Such actions may significantly harm the natural foundations necessary for food preservation and production, deny access to clean and safe drinking water, render sanitation facilities ineffective, and harm human health;
- Violation of the Minamata Convention regarding the production of items containing mercury, the use of mercury and mercury compounds in manufacturing processes, and the unlawful disposal of mercury waste;
- Violation of the Stockholm Convention regarding the manufacture and use of chemicals known as "persistent organic pollutants", as well as the treatment, collection, storage, and disposal of wastes;

¹ Companies considered part of CATL Germany for the purposes of these rules of procedure include the companies established in Germany by Contemporary Amperex Technology Co., Ltd. including but not limited to: CATL Thuringia AG, CATL Operation Services Thuringia GmbH, CATL Thuringia Trust GmbH, and all future companies to be established in which these companies directly or indirectly hold at least 50% of the shares.

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- Violation of the Basel Convention regarding the import or export of hazardous wastes and other refuse.

III. Complaint Procedure

1. Who can raise a complaint?

Anyone, including employees of CATL Germany and external third parties (e.g., employees of direct or indirect suppliers, residents near CATL Germany's site) or any other affected individuals and their representatives ("**whistleblower**") can submit a complaint regarding human rights or certain environmental risks or violations occurring in CATL Germany's own business area or along its supply chain, as defined by the LkSG. The complaint procedure applies to both internal and external matters. This includes the interests of CATL Germany's own employees as well as those of third parties, such as suppliers, entities entrusted by CATL Germany, and other individuals affected by the business activities of CATL Germany. CATL Germany will never charge any fees for disclosing complaints and hints.

2. Identity protection – anonymity

CATL Germany takes precautions to ensure the confidentiality of the identity of whistleblowers and to protect the personal data provided. All information is processed according to the principle of confidentiality and in compliance with data protection regulations. The identity of the whistleblowers is protected and used internally only as necessary, but it will not be disclosed to any third parties who are not involved in the investigation or bound by confidentiality. Irrespective of this identity protection, whistleblowers have the option to submit suspected cases anonymously if preferred. No personal data, such as contact details, is required for anonymous submitting.

3. Complaint channels

The following channels are available for submitting complaints:

- Via email directly to catl-eu-lksg@catl.com;
- Whistleblower can be addressed to supervisors and management;
- Whistleblower can also be sent by post or internal post to the following address:

*Contemporary Amperex Technology Thuringia AG
CATL Operation Service Thuringia GmbH & Co. KG
CATL Thuringia Trust GmbH
Addressee: CPA Department
Address: Robert Bosch Street 1, 99310 Arnstadt, Germany*

Whistleblowers can submit complaints 24 hours a day in German, English, Chinese, and other languages. The objective is to achieve the most efficient and appropriate resolution of cases, while ensuring anonymity and preventing third parties from gaining knowledge of the details. If the whistleblower believes that the above channels cannot guarantee anonymity or help the person handling the complaint to understand the details, we encourage the whistleblower to use other complaint channels to submit information.

4. How the complaint procedure works

The individuals responsible for processing the complaints and assessing the details are experienced staff dedicated to impartial action (“**Communications Specialist**”). They perform their tasks independently and objectively, without receiving instructions, and are bound to confidentiality.

Step 1: Confirmation of receipt and initial assessment

The whistleblower will receive a confirmation of receipt within 7 working days. After receiving the complaint, the Communications Specialist will assess whether it falls within the scope of the complaint procedure and whether the report is both substantiated and relevant. A complaint is considered substantiated when it provides detailed and plausible information about a potential incident, enabling further investigation. If the assessment identifies a risk related to LkSG in our own business area or supply chain, it is considered relevant. If the case is rejected because it does not match the aforementioned criteria, the individual who submitted it will be notified.

Step 2: Complaint investigation and factual appraisal

If the details provided are insufficient for an examination, the Communications Specialist may contact the whistleblower to request further information. If necessary, the Communications Specialist will involve other relevant departments within CATL Germany during the investigation, taking into account confidentiality, as information is generally only shared in anonymized form and on a need-to-know basis. Should the available fact-based information be insufficient, or if the Communications Specialist concludes that there is neither a risk nor a violation of a legal interest protected under the LkSG, the case will be closed.

CATL Germany reserves the right to offer an amicable dispute resolution procedure at any stage of the complaint procedure.

Step 3: Appropriate actions

If the investigation concludes that there are substantiated human rights and/or certain environmental risks or violations at CATL Germany or in the supply chain, appropriate follow-up measures, such as preventive and remedial actions, will be initiated. These measures may include disciplinary action against employees who contributed to violations of the provisions specified in the LkSG, and/or temporary suspension or termination of relationships with suppliers.

Step 4: Communication of results

The handling time for a complaint varies significantly depending on the specifics of the case, ranging from a few days to several months, based on its complexity. Nonetheless, CATL Germany aims to address and resolve complaints as promptly and efficiently as possible. The whistleblower will be informed of the results of the procedure or, if applicable, the reasons for discontinuing it, within a reasonable timeframe. This feedback is generally provided within three months of confirmation of receipt of the complaint. However, when providing feedback, conflicting, legally protected interests of other parties and entities must also be considered.

IV. Protection of the whistleblower against discrimination or punishment

CATL Germany will use all available means within its control to protect whistleblowers from adverse treatment and reprisals resulting from a complaint. This includes protection of the whistleblower, among others, through measures to preserve anonymity and through the independent

Communications Specialist. CATL Germany will not tolerate any discrimination, intimidation, or other actions taken against whistleblowers.

V. Contact

If you have any questions in connection with these Rules of Procedure, please contact

catl-eu-lksg@catl.com

德国供应链尽职调查法
申诉程序规则
(Lieferkettensorgfaltspflichtengesetz,
LkSG)

版本 1.0, 自 2024 年 12 月 20 日生效

一、目的

作为 CATL 德国公司¹，我们高度重视人权和环境风险管理，坚定履行德国《企业供应链尽职调查法》（Lieferkettensorgfaltspflichtengesetz, LkSG）下的尽职调查义务，包括采取措施防止或尽量减少人权或环境风险，或制止违反人权或环境义务的行为。有关这方面的更多信息，请参阅我们的 LkSG 人权政策声明 [https://www.catl.com/de/uploads/1/file/public/202412/20241224142354_twsce3raea.pdf]。

为了支持这一承诺，CATL 德国公司建立了本文件中所述的申诉程序（“**程序规则**”）。其目标是确保 CATL 德国公司能及时获悉与 LkSG 定义的人权或环境相关的任何潜在风险或侵权行为。这使我们能够采取适当的预防和补救措施，以避免对相关个人产生不利影响，例如我们的员工、整个社会以及环境。此外，我们利用在此过程中获得的见解不断加强我们的风险管理。

二、申诉主题

本申诉程序旨在防范人权和环境风险，并处理 CATL 德国公司自身经营领域和供应链中的违规行为。它包括以下主题：

- 使用童工和未能保护青年工人
- 涉及强迫劳动、奴役的情形
- 忽视职业健康和安全
- 忽视结社自由和集体谈判权
- 涉及就业不合理不平等待遇
- 涉及扣留生活工资
- 涉及侵犯当地社区和土著居民权利
- 非法侵犯土地权和强迫驱逐
- 违反禁止委托或使用私人/公共安全部队的规定，继而因缺乏指导或控制而造成身心伤害和/或其他损伤
- 造成有害土壤变化、水污染、空气污染、有害噪声排放或者过量用水等行为，导致严重损害食品保存和生产的自然基础、无法获得清洁和安全的饮用水、损毁卫生设施以致无法使用和危害人体健康等情形。
- 违反《水俣公约》的行为，违规生产含汞物品，违规在生产过程中使用汞和汞化合物，违规处理汞废物；
- 违反《斯德哥尔摩公约》的行为，违规生产和使用被称为“持久性有机污染物”的化学品以及违规处理、收集、储存和处置废物；
- 违反《巴塞尔公约》的行为，违规进口或出口危险废物和其他废物。

¹ 就本申诉规则而言，CATL 德国公司是指宁德时代新能源科技股份有限公司在德国设立的公司，包括但不限于：德国时代新能源科技（图林根）股份有限公司，宁德时代运营服务（图林根）有限两合公司，宁德时代信托（图林根）有限公司以及这些公司直接或间接持有至少 50% 股份的所有未来拟设立的公司。

三、申诉程序

1. 谁可以提出申诉?

任何人，包括 CATL 德国公司和外部第三方的员工（例如直接或间接供应商的员工、CATL 德国公司附近的居民）或任何其他受影响的个人及其代表（“申诉人”）都可以提交有关人权或某些环境风险的申诉。根据 LkSG 的定义，这些申诉可以涉及发生在 CATL 德国公司自身经营领域或其供应链上的违规行为。申诉程序适用于内部和外部事务。这包括 CATL 德国公司员工的利益以及第三方的利益，例如供应商、CATL 德国公司委托的实体以及受 CATL 德国公司业务活动影响的其他个人的利益。CATL 德国公司绝不会因披露申诉和举报而收取任何费用。

2. 身份保护 – 匿名

CATL 德国公司会采取预防措施，确保申诉人的身份将在必要时受到保护并仅用于内部使用。所有信息均按照保密原则并遵守数据保护法规进行处理。申诉人的身份将在必要时受到保护并仅用于内部使用，但不会透露给任何未参与调查或不受保密约束的第三方。无论这种身份保护如何，申诉人都可以选择匿名举报可疑案件（如果愿意）。匿名申诉不需要提供联系方式等任何个人数据。

3. 申诉渠道

您可以通过以下渠道提出申诉：

- 通过电子邮件直接发送至 catl-eu-lksg@catl.com;
- 向主管和管理层提出申诉;
- 通过邮寄或内部邮件发送至以下地址：

德国时代新能源科技（图林根）股份有限公司

宁德时代运营服务（图林根）有限两合公司

宁德时代信托（图林根）有限公司

收件人：CPA 部门

地址：罗伯特博世大街 1 号 99310，阿恩施塔特，德国

申诉人可以在任何时间以德文、英文、中文等多种语言提交申诉。为更有效和更适当地解决申诉案件，并确保申诉过程中保持匿名的同时让处理申诉的人员尽可能地了解申诉详情。如果申诉人认为上述渠道无法保证匿名性或帮助处理申诉的人员了解详情，我们鼓励申诉人使用其他申诉渠道提交申诉信息。

4. 申诉程序的运作模式

CATL 德国公司安排了经验丰富的工作人员（“**沟通专员**”）负责处理申诉和评估细节。一方面，他们会致力于公正处理申诉；另一方面，他们会独立客观地执行任务，并有保密义务，不受任何指示。

第 1 步： 确认收悉及初步评估

申诉人会在 7 个工作日内收到申诉收据确认书。收到申诉后，沟通专员将评估其是否属于申诉程序范围，并评估申诉是否属实和相关。如果申诉提供了有关潜在事件的详细且可信的信息，并有助于进一步调查，则该申诉被视为属实。如果评估发现我们自身经营领域或供应链中存在与 LkSG 相关的风险情形，则视为相关。如果申诉因不符合上述标准而被拒绝，提交申诉的申诉人将收到通知。

第 2 步： 申诉调查和事实评估

如果申诉人提供的详细信息不足以支持进一步审查，沟通专员可能会联系申诉人要求提供详细的信息。如有必要，沟通专员将在调查期间邀请 CATL 德国公司内的其他相关部门参与，但过程中会基于保密的要求，按照匿名形式和最小化原则提供所需的必要信息。如果现有的基于事实的信息不足，或者沟通专员认为不存在风险或违反 LkSG 保护的合法利益的情况，则该申诉案件将结案。

CATL 德国公司保留在申诉程序的任何阶段提供友好争议解决程序的权利。

第 3 步： 适当的行动

如果调查结论证明 CATL 德国公司自身或其供应链中存在确凿的人权和/或某些环境风险或违规行为，CATL 德国公司将采取适当的后续措施，如预防和补救措施。这些措施可能包括对违反 LkSG 规定的员工采取纪律处分，和/或暂时或永久中止与供应商的合作关系等。

第 4 步： 结果沟通

根据申诉案件的复杂程度，处理的时间可能从几天到几个月不等。尽管如此，CATL 德国公司的目标是尽可能迅速有效地处理和解决申诉。在合理的时间范围内，申诉人将被告知程序的结果或(如适用)中止程序的原因。上述反馈一般在确认收到申诉后的三个月内提供。不过，在提供反馈时，我们还必须考虑到其他各方和实体受法律保护的利益和冲突等情况。

四、 保护申诉人免受歧视或惩罚

CATL 德国公司将在其控制范围内使用一切可用手段，保护申诉人不因申诉而受到不利待遇或报复。这包括通过匿名措施和独立的沟通专员保护申诉人。

CATL 德国公司不会容忍对申诉人的任何歧视、恐吓或其他不当行为。

五、 联系方式

如果您对本议事规则有任何疑问，请联系 catl-eu-lksg@catl.com