

长电科技环境物质管理承诺

JCET Environmental-related Substance Management Commitment

一、Overview 概述

江苏长电科技股份有限公司(以下简称“长电科技”“公司”或“我们”)以环境物质管理为基本要求,按照“以人为本,综合治理,全面保障健康安全;节能降耗,清洁生产,预防和控制环境污染;诚信守法,持续改进,同创安全绿色长电”的环境物质管理方针,承诺预防污染、保护环境和人身健康安全,并将环境物质管控视为最基本的合规义务。为此,公司制定《环境物质管理承诺》(以下简称“本承诺”),确保公司提供的产品符合环境物质减免相关法律法规、标准指令以及客户的要求。

JCET Group Co., Ltd. (hereinafter referred to as 'JCET', 'the Company', or 'we') takes environmental-related substance management as a basic requirement, and in accordance with the environmental-related substance management policy of 'People-oriented, comprehensive management and control, full protection of health and safety; Energy saving and consumption reduction, clean production, prevention and control of environmental pollution; Integrity and law-abiding, continuous improvement, create a safe and green JCET together', commits to preventing pollution, protecting the environment and human health and safety, and regards environmental-related substance control as the most basic compliance obligation. So the Company has formulated the 'Environmental-related Substance Management Commitment' (hereinafter referred to as 'this Commitment') to ensure that the products provided by the Company comply with relevant laws, regulations, standards, directives, and customer requirements for the reduction and exemption of environmental-related substances.

二、Scope of Application 适用范围

本承诺适用于公司及所有工厂与运营单位的内部生产过程、新产品开发及所有供应商及相关合作伙伴,管控范围覆盖从原辅料、外协加工品、制程品到成品(包括包装)的全物料链条。

This Commitment applies to the Company and all internal production processes of all factories and operating units, new product development, and all suppliers and related partners. The control scope covers the entire material chain from raw and auxiliary materials, outsourced processed products, in-process products to finished products (including packaging).

三、Environmental-related Substance Control Commitment 环境物质管控承诺

长电科技制定了《环境物质管理手册》等规范,并设立了环境物质管理体系和组织,确保对产品生产全过程环境物质的有效管控。基于已建立的制度与组织保障,为明确有关环境物质管控的未来行动方向,公司郑重做出如下承诺:

JCET has formulated specifications such as the 'HSF Management Manual' and established an environmental-related substance management system and organization to ensure effective control of environmental-related substances throughout the entire product production process. Based on the established system and organizational guarantees, in order to clarify the future action direction for environmental-related substance control, the Company hereby makes the following commitments:

1. Compliance Standards 合规标准

公司严格执行以下国内、国际法律法规要求:

The Company strictly implements the following domestic and international laws and regulations requirements:

国内 Domestic	◆ 电器电子产品有害物质限制使用管理办法 Measures for the Administration of the Restriction of Hazardous Substances in Electrical and Electronic Products ◆ GB 26572-2025 电器电子产品有害物质限制使用要求 GB 26572-2025 Requirements for the Restriction of Hazardous Substances in Electrical and Electronic Products ◆ GBT 30512-2014 汽车禁用物质要求等相关法律法规 GBT 30512-2014 Requirements for Prohibited Substances in Automobiles and other relevant laws and regulations
国际 International	◆ RoHS 电子电气设备中限制使用某些有害物质指令 RoHS Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment ◆ REACH 化学品的注册授权评估和限制法规 REACH Regulation on the registration, evaluation, authorization and restriction of chemicals ◆ POPs 持久性有机污染物法规 POPs Regulation on Persistent Organic Pollutants ◆ ODS 消耗臭氧层物质法规 ODS Regulation on Ozone Depleting Substances ◆ PPWR 包装和包装废弃物法规 PPWR Regulation on Packaging and Packaging Waste ◆ ELV 报废汽车指令 ELV Directive on End-of-Life Vehicles ◆ GADSL 全球汽车申报物质清单等相关法律法规 GADSL Global Automotive Declarable Substance List and other relevant laws and regulations

2. Phasing out toxic and hazardous substances 逐步淘汰有毒有害物质

公司建立《环境管理物质技术标准》将环境物质分为三个管理等级：

The Company has established the 'Environment-Related Substances Management Standard' and divides environmental-related substances into three management levels:

- ◆ 1级：对应物质及其相应用途立即禁止使用（包括不超过规定限值）；
Level 1: The corresponding substances and their uses are immediately prohibited (including not exceeding specified limits);
- ◆ 2级：对应物质及其相应用途按照规定期限，到期之日起升级为1级；
Level 2: The corresponding substances and their uses are upgraded to Level 1 from the expiration date according to the specified deadline;
- ◆ 3级：现阶段不规定禁止使用的目标日期，但是指定了希望努力完全废除使用的物质以及其用途，因此需要掌握使用状况并积极考虑削减。当判断可以导入其代替的零部件、开发新材料和代替技术时自发减少使用，并在法规要求时上升为2级或1级管理。
Level 3: At present, no target date for prohibition is specified, but substances and their uses for which

efforts to completely eliminate are designated, therefore it is necessary to grasp the usage status and actively consider reduction. When it is judged that substitute parts, new materials, and alternative technologies can be introduced, use will be voluntarily reduced, and will be upgraded to Level 2 or Level 1 management when required by regulations.

公司承诺：

The Company commits to:

- ◆ 对1级环境物质实现全面禁止；
Achieve a complete ban on Level 1 environmental-related substances;
- ◆ 对2级环境物质按照规定期限完成淘汰；
Complete the phase-out of Level 2 environmental-related substances within the specified deadlines;
- ◆ 持续跟踪最新法规要求逐步减少3级环境物质的使用。
Continuously track the latest regulatory requirements and gradually reduce the use of Level 3 environmental-related substances.

3. Substitution of toxic and hazardous substances 替代有毒有害物质

对被列入法律法规淘汰时间表的相关环境物质，按照法规规定期限完成替代或消减；对列入公司《环境管理物质技术标准》的2级物质，依据升级计划实施对应替代。当外部法规或客户要求更新时，公司将在规定期限内完成符合性调整。

For relevant environmental-related substances listed in the phase-out schedule of laws and regulations, complete substitution or reduction within the deadlines specified by regulations; for Level 2 substances listed in the Company's 'Environment-Related Substances Management Standard', implement corresponding substitution according to the upgrade plan. When external regulations or customer requirements are updated, the Company will complete compliance adjustments within the specified deadlines.

4. R&D substitution and switching 研发替代和切换

公司在新产品研发、开发与工艺设计阶段，在设计中禁止使用相关法律法规明确禁用的环境物质，优先选用绿色环保材料；在材料替代可行的前提下，逐步推动绿色无卤材料替代传统常规材料。公司将持续投入研发资源用于绿色环保材料应用及工艺优化，推动产品环境性能提升。

During the R&D, development and process design stages of new products, the Company prohibits the use of environmental-related substances explicitly banned by relevant laws and regulations in design, and prioritizes the selection of green and environmentally friendly materials; on the premise that material substitution is feasible, gradually promote the substitution of traditional conventional materials with green halogen-free materials. The Company will continue to invest R&D resources in the application of green environmentally friendly materials and process optimization to promote the improvement of product environmental performance.

5. Information Disclosure and Transparency 信息披露与透明度

公司将在年度ESG报告或公司官方网站披露相关管理实践和进展情况。披露内容包括但不限于：

The Company will disclose relevant management practices and progress in its annual ESG report or on the Company's official website. The disclosure content includes but is not limited to:

- ◆ 环境物质管理体系的建设与运行情况;
Construction and operation of the environmental-related substance management system;
- ◆ 供应链环境物质风险管理措施;
Supply chain environmental-related substance risk management measures;
- ◆ 冲突矿产尽职调查实施情况及结果;
Implementation and results of conflict minerals due diligence;
- ◆ 重大环境合规风险及处置情况（如有）。
Major environmental compliance risks and their handling (if any).

公司将根据适用法规要求及信息重要性原则，持续完善披露内容。

The company will continuously improve its disclosure content based on applicable regulatory requirements and the principle of information importance.

6. Industry Cooperation 行业合作

长电科技承诺建立开放的合作机制，与第三方咨询服务机构、检测实验室、供应商、客户、行业协会及科研机构等相关方开展联合研究与应用项目，聚焦于环境物质替代品的选择，以及相关标准与规范的共同制定。

JCET commits to establishing an open cooperation mechanism, conducting joint research and application projects with third-party consulting service institutions, testing laboratories, suppliers, customers, industry associations, and scientific research institutions, focusing on the selection of environmentally friendly substance substitutes and the joint formulation of relevant criteria and specifications.

本文件在公司官方网站公开发布。公司将根据适用法律法规变化、行业发展趋势及自身管理实践，适时评估并更新相关内容。

This file is publicly released on the company's official website. The company will evaluate and update relevant content in a timely manner based on changes in applicable laws and regulations, industry development trends, and its own management practices.

江苏长电科技股份有限公司

JCET Group Co., Ltd.

2026年8月

August 2026