

Labor rights protection policies

1. Purpose

Shanghai Shanshan New Materials Co., Ltd. is committed to continuously creating a safe, harmonious, equal, healthy, and inclusive working environment for its employees. The company complies with all laws and regulations related to labor rights protection, including but not limited to the Labor Law of the People's Republic of China, the Civil Code of the People's Republic of China, the Personal Information Protection Law of the People's Republic of China, and others. This policy is specially formulated based on the above relevant provisions and the company's actual situation. At the same time, the company will continue to pay attention to the dissemination of employee rights protection concepts and keep strengthening employee rights protection.

2. Scope of Application

This policy applies to Shanshan Anode Headquarters and all affiliated factories, as well as newly added bases later, including but not limited to: Shanghai Shanshan Technology Co., Ltd., Shanghai Shanshan New Materials Co., Ltd., Sichuan Shanshan New Materials Co., Ltd., Yunnan Shanshan New Materials Co., Ltd., Inner Mongolia Shanshan New Materials Co., Ltd., Inner Mongolia Shanshan Technology Co., Ltd., Ningbo Shanshan New Materials Technology Co., Ltd., Ningbo Shanshan Silicon-Based Materials Co., Ltd., Fujian Shanshan Technology Co., Ltd., etc.

3. Talent Utilization and Talent Philosophy

As a global leader in the research, development, and production of graphite for lithium battery anode materials, Shanshan Technology has always upheld the

corporate culture of "integrity, responsibility, innovation, and commitment." We firmly believe that talent is the core driving force behind enterprise development and the key to achieving new materials and new processes to drive the new energy revolution.

4. Prohibit forced labor and the employment of child labor

All recruitment activities must comply with the relevant laws and regulations of the country or region where the company is located. All work must be voluntary, and any form of deception or coercion is prohibited. No deposit or identity document confiscation is allowed. The company prohibits corporal punishment, body searches, restriction of personal freedom, and the use of violence or threats of forced labor. The company follows the principle of voluntary overtime and reasonably arranges working hours and intensity. All business partners must also comply with relevant regulations.

Shanshan Technology has adopted a zero-tolerance policy regarding child labor. We strictly prohibit hiring any employees under the age of 16. The company must communicate the policy prohibiting child labor to employees and stakeholders, verify applicants' age information during recruitment to ensure that children are properly protected from labor due to company recruitment, and identify suspicious employees through daily observation and communication.

The company has established child labor remedial procedures. Companies must regularly check for the employment of child laborers (workers under 16) and immediately remove them from their positions. Arrange occupational health checks; if problems are found, the company will bear the costs, and the child labor will be safely returned to the guardians, with the costs borne by the company.

5. Protection of underage employees, interns, and female employees

In principle, our company is not suitable for hiring underage workers. If underage workers are misused, the Shanghai headquarters and its affiliated factories must provide special protection for the employed underage workers. Management of underage workers should be conducted in accordance with relevant laws and regulations and registered management, with appropriate work arrangements. It is prohibited to assign minors to work that is toxic, hazardous, or subject to national level four labor intensity or other prohibited activities.

Shanshan Technology strictly abides by the Labor Law of the People's Republic of China, the Special Provisions on Labor Protection for Female Employees, and other Chinese laws and regulations, actively promotes gender equality and care for female employees, and strictly follows the Labor Protection Regulations. Shanshan Technology is committed to building a diverse and inclusive workplace, helping female employees overcome career development bottlenecks and enhance their representation in management through mentorship programs, leadership development, and mental health training programs.

Shanshan Technology places great importance on protecting interns' rights, ensuring they enjoy the same safe environment and dignity as regular employees. Provide interns with comprehensive pre-job training and occupational health and safety education.

By systematically protecting underage employees, interns, and female employees, not only can corporate legal responsibilities be fulfilled, but overall employee satisfaction and organizational resilience will also be enhanced, injecting momentum into the company's long-term sustainable development.

6. Work time management

Shanshan Technology strictly abides by national labor laws and regulations. The company will strictly follow national requirements, ensure employees' health and fully listen to their opinions, ensuring employees' right to rest and vacation, and safeguarding their physical and mental health.

7. Employee salary and benefits management

Shanshan Technology standardizes employee salary and benefits management, ensuring that salary payments comply with the principles of pay according to labor, fairness and justice, and unity of responsibilities and rights. The company is committed to implementing principles of fairness, openness, and impartiality, creating a favorable environment for career advancement.

8. Equal Employment and Anti-Harassment

Shanshan Technology strictly complies with the Labor Law of the People's Republic of China and other relevant laws and regulations, as well as those of overseas operations, and is committed to creating a friendly, inclusive, and harmonious working environment. We adhere to the principle of equal employment, maintain a zero-tolerance attitude toward any form of discrimination, and actively fulfill our social responsibilities by providing fair employment opportunities for veterans and people with disabilities.

During the recruitment process, Shanshan Technology consistently adheres to the principles of "openness and fairness." All job qualifications are open and transparent, with interview standards and procedures that are fair and rigorous. We treat applicants equally and recruit talent based on merit. We do not discriminate against any applicant based on age, disability, ethnicity, gender, marital status, nationality, political status, race, religion, sexual orientation, or whether they join a labor union.

Shanshan Technology firmly opposes any form of workplace harassment, including but not limited to sexual harassment, threats, intimidation, and similar behaviors. We have established a comprehensive anti-harassment mechanism, encouraging employees to report related issues promptly and committing to strict confidentiality of reported information to ensure every employee can work in a safe and respectful environment.

9. Freedom of association, negotiation management, and protection of whistleblowers

We clearly recognize and respect the rights of all employees to legally organize, participate in labor unions, and other legitimate associations to safeguard their legitimate rights and interests. The company is committed to never engaging in any form of discrimination, harassment, coercion, or retaliation against employees for joining or organizing legitimate groups, including unfair treatment in promotion, compensation, training, and other areas. We have established an equal consultation mechanism to support employees in collective negotiations with company management through elected representatives (or unions) on major matters affecting employees' vital interests, such as labor compensation, working hours, rest and leave, occupational safety and health, insurance benefits, and vocational skills training. The negotiation process follows the principles of mutual respect, equal consultation, honesty, and fair cooperation, aiming to balance the legitimate rights and interests of both parties and seek consensus. Once the collective bargaining agreement is reached, the company will ensure its effective execution.

We have established smooth communication and appeal channels. Employees and their representative organizations have the right to submit opinions, suggestions, or complaints to management regarding labor rights issues in accordance with laws, regulations, and company procedures. Shanshan Technology

solemnly promises to firmly protect any well-intentioned and fact-based inspections. The company has established a strict confidentiality system to ensure that the whistleblower's personal information (such as name, address, contact details, etc.) and the content of the report are not disclosed, and it is strictly forbidden to transfer related materials to the reported unit or individual.

10. Employee Learning and Development

Shanshan Technology advocates a culture of "continuous learning, growing together" and is committed to building a learning-oriented organization. We encourage employees to continuously improve their personal abilities through continuous learning and skill enhancement, thereby driving overall team effectiveness. Each year, the company conducts thorough research and develops multidimensional training programs covering management skills, professional skills, industry knowledge, and professional qualities, ensuring employees remain competitive in a rapidly changing industry.

11. Employee health management

Shanshan Technology always prioritizes employees' occupational health and safety, committed to providing a safe and healthy working environment for all employees to ensure their physical and mental well-being. We strictly comply with relevant national and local laws and regulations and refer to international standards to establish a comprehensive occupational health and safety management system. For example, regularly conducting safety inspections and risk assessments in the workplace, providing employees with necessary safety protection equipment, conducting safety operation training, offering annual health check-ups, and regularly holding mental health-themed events. Shanshan Technology will continue to focus on employees' occupational health and safety,

creating a safe, healthy, and caring work environment to help employees achieve physical and mental balance and sustainable development.

The final right of interpretation of this policy belongs to the Ministry of Human Resources.

Shanghai Shanshan New Materials Co., Ltd

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