

Responsible Mineral Supply Chain

Due Diligence Policy

Shanghai Shanshan Technology Co., Ltd. (hereinafter referred to as “Shanshan Technology”, “we”, or “the Company”) recognizes the risks of significant adverse impacts that may arise from mining, trading, processing, and exporting activities in high-risk areas, and that we have the obligation to respect human rights and do not cause negative impacts to society. Shanshan Technology is committed to adopting the relevant policies of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCC MC) “Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains” (Second Edition) (hereinafter “China Guidelines”) and the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” (Third Edition) (hereinafter “OECD Guidance”), and to incorporating these into contracts or agreements with suppliers.

This policy provides reference for conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user. The scope of application covers the mineral supply chains of Shanshan Technology and all its wholly-owned subsidiaries.

The Company consistently upholds ethical sourcing, commits not to use mineral resources from conflict regions, and explicitly requires suppliers not to use mineral resources from conflict regions or those that violate Company policy. The Company undertakes not to engage in any activities that would finance conflict. Shanshan complies with relevant United Nations sanctions resolutions, and domestic laws implementing such resolutions. To this end, the Company is committed to identifying and managing the following risks in responsible mineral supply chain practices:

I. Regarding Child Labor

When procuring or conducting business activities in high-risk areas, we will not employ, benefit from, assist, or facilitate the employment of children below the minimum working age as stipulated by the host country’s laws or regulations, nor have any association with such employment. If the host country has no relevant laws or regulations, the minimum working age is 16.

If we have reasonable grounds to believe that such risk exists—i.e., upstream suppliers are sourcing from or are associated with parties employing child labor—we will immediately suspend or terminate cooperation with such suppliers.

II. Regarding Serious Abuses Associated with the Extraction, Transport or Trade of Minerals

While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

2.1 The worst forms of child labor (i.e., work environments likely to harm the health, safety, or morals of children);

2.2 Any forms of torture, cruel, inhuman and degrading treatment;

2.3 Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;

2.4 Other gross human rights violations and abuses such as widespread sexual violence;

2.5 War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined.

III. Regarding Direct or Indirect Support to Non-State Armed Groups

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

3.1 Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

3.2 Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;

3.3 Illegally tax or extort intermediaries, export companies or international traders.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined above.

IV. Regarding Public or Private Security Forces

We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 1, where we identify that such a reasonable risk exists. In such

cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months of the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 4 and 5, we will respond in the same vein.

V. Regarding Bribery and Fraudulent Misrepresentation of the Origin of Minerals

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

VI. Regarding Environmental Protection

When procuring or producing in high-risk areas, we will not provide benefits, assistance, or convenience to any party that causes significant adverse impacts on surrounding soil, air, water, or other seriously violates relevant with local laws and regulations, nor will we source from or be associated with such parties. We will support or take measures to regularly assess and reduce the adverse impacts of mining on soil, air, and water.

VII. Regarding Occupational Health and Safety

When procuring or producing in high-risk areas, we will not benefit from, assist, or facilitate any party that provides life-threatening occupational health and safety conditions for its direct or indirect employees or any personnel at production sites, nor will we source from or be associated with such parties.

If we have reasonable grounds to believe that upstream suppliers are sourcing from or are associated with any party providing life-threatening occupational health and safety conditions, we will immediately terminate or suspend cooperation with such suppliers.

This policy is publicly available on the Company's official website, and the Company requires suppliers to convey this policy to their upstream partners, ensures that no human rights violations or conflict advocacy occur within the supply chain. The Company also calls on all upstream and downstream enterprises in the supply chain to comply with relevant legal requirements, assume liability of responsible sourcing, and build a safe, stable, transparent, and sustainable supply chain.

The final right of interpretation of this policy belongs to the Supply Chain Department.

Shanghai Shanshan New Material Co., Ltd.

Effective Date: June 2025

