

Supplier Code of Conduct

To all supplier partners:

Shanshan Technology is committed to becoming the "global leader in lithium battery anode materials," with the vision of "serving green energy and building a better life," working hand in hand with suppliers to promote responsible supply chain management and ensure we fulfill our environmental, social, and corporate governance responsibilities. This Supplier Code of Conduct (hereinafter referred to as the "Code") is based on internationally recognized sustainability principles and aims to jointly build a sustainable, transparent, and responsible supply chain system with supplier partners.

This Code of Conduct applies to suppliers (hereinafter collectively referred to as "Suppliers") who provide products and/or services to Shanghai Shanshan New Materials Co., Ltd. and/or its global subsidiaries and affiliates (hereinafter collectively referred to as "Shanshan Technology") and all their employees, including contract workers, temporary workers, student workers, apprentices, foreign laborers, direct employees, and other types of personnel.

This code outlines Shanshan Technology's expectations and requirements for suppliers in labor and human rights, health and safety, environment, business ethics, and corporate governance. To ensure suppliers conduct business with integrity and compliance, Shanshan Technology reserves the right to periodically conduct on-site inspections or third-party audits to assess supplier compliance. If any substantial violations are found, measures such as terminating cooperation or legal accountability may be taken.

We call on all suppliers to join hands with Shanshan Technology to jointly advance sustainable, transparent, and responsible global supply chain practices.

Shanghai Shanshan New Materials Co., Ltd

May 2025

1. Labor and Human Rights

Suppliers commit to safeguarding employees' human rights according to internationally recognized standards, and to giving them dignity and respect. Workers here include temporary workers, immigrants, apprentices, contractors, direct employees, and any other types of employees. Labor standards are as follows:

1.1 Forced Labor

Suppliers must not engage in any form of forced or compulsory labor, including but not limited to taking advantage of others, fraud, restricting freedom of movement, intimidation or threats, debt service, isolated confinement, physical and sexual violence, withholding identification documents, wage withholding, providing poor working and living conditions, excessive overtime, trafficking, or collateralizing or contractually binding labor. The company recognizes that employees' freedom of movement is not restricted, and that employees have the freedom to find employment and choose their careers.

1.2 Child labor and underage workers

Suppliers should not employ minors under the age of sixteen. When mistaken child labor recruitment is discovered, remedial measures that are stricter in international or local standards should be followed.

Suppliers employing underage employees aged sixteen or above but under eighteen must comply with relevant legal provisions regarding underage workers. Underage workers are not allowed to engage in work that may endanger their health or safety, including high-physical labor, overtime, night shifts, and work involving hazardous chemicals. Suppliers shall protect underage workers, student workers, and apprentices in accordance with applicable laws and regulations.

1.3 Working Hours

Suppliers must comply with all applicable laws and regulations related to working hours and rest within their country or region, ensuring employees' legal rights to voluntary overtime and rest and leave. Suppliers should ensure employees have at least one day off every seven days. Weekly working hours must not exceed the maximum limit stipulated by local laws.

1.4 Compensation and benefits

Suppliers must comply with local and national laws to provide reasonable wages and benefits to employees, including laws regarding minimum wage, overtime hours, and other compensation matters. Suppliers must pay employees compensation and benefits that are not lower than the local statutory minimum standard. Suppliers should provide employees with payslips and other evidence for timely wage payments.

1.5 Ethical Recruitment

Suppliers should provide employees with accurate and easy-to-understand information about basic working conditions before hiring, clearly clarifying their rights and obligations. Suppliers should not directly or indirectly charge employees any form of fees, recruitment fees, or deposits as prerequisites for obtaining the job. Unless required by law, suppliers should not require the retention of any form of employee identification (ID or other documents) or the destruction or denial of employee access to such documents as a condition of employment.

1.6 Discrimination and Harassment

Suppliers should commit to protecting employees from harassment and unlawful discrimination. Suppliers must not disadvantage or harass employees based on race, skin color, age, gender, gender identity, disability, pregnancy, religious beliefs, political affiliation, or membership in social organizations. Employees or candidates must not be required to undergo discriminatory medical examinations.

1.7 Freedom of Association and Collective Bargaining

Within the scope permitted by law, suppliers must not interfere with, obstruct, or prohibit employees from forming or joining various organizations, electing representatives, participating in collective bargaining, or conducting any lawful activities.

1.8 Diversity, Equity, and Inclusion

Suppliers should commit to promoting diversity, equity, and inclusion, prohibiting discrimination, ensuring equal opportunities, respecting differences, creating an inclusive work environment, and practicing DEI principles in their business practices.

1.9 Community Relations and Indigenous Protection

Suppliers should actively participate in the construction and development of their communities and take measures to reduce any negative impacts of their operations on local communities, including environmental, social, cultural, and other quality-of-life factors.

Suppliers should implement management systems that respect Indigenous rights, including freedom, prior information, and consent. Avoid adverse impacts on indigenous land, livelihoods, resources, and cultural heritage.

2. Health and safety

Suppliers must ensure compliance throughout the entire business process with all applicable occupational health and safety laws, regulations, and standards

applicable in their country or region, as well as the relevant terms stipulated in contracts, providing and maintaining healthy, safe, and reliable working conditions and environments for employees. Supplier health and safety standards are as follows:

2.1 Occupational safety

Suppliers should identify, assess, and eliminate safety hazards through reasonable engineering design, process control, and preventive maintenance. Employees should be provided with work-related and appropriate personal protective equipment, along with relevant training and guidance.

2.2 Emergency Preparedness

Suppliers should identify and assess emergencies and incidents, and minimize their impact by implementing emergency plans and response procedures, including but not limited to emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and suppression equipment, adequate exit facilities, and recovery plans. Such plans and procedures should minimize harm to people, the environment, and property as much as possible.

2.3 Work Injuries and Illnesses

Suppliers should establish appropriate procedures and systems to prevent risks that may lead to serious injury and/or chronic illness or death, including: provisions encouraging worker reporting; Classify and record injury and disease cases; Providing necessary treatment; Investigate cases and take corrective actions to eliminate their causes and encourage workers to return to their jobs.

2.4 Industrial hygiene

Suppliers should identify, assess, and control the impact of chemical, biological, and physical reagents on employees. Suppliers must adopt engineering or management measures to control excessive exposure to hazards. When these

methods cannot effectively control hazards, appropriate personal protective equipment programs must be implemented to protect employee health.

2.5 Physically demanding work

Suppliers should identify, assess, and control the impact of physically demanding work on employees, including manual handling of materials, repeated lifting of heavy objects, long standing, and highly repetitive or strenuous assembly tasks.

2.6 Machine Protection

Suppliers must conduct safety hazard assessments on production equipment and other machinery. Physical protective devices, interlocking devices, and barriers should be provided for machinery that may injure employees, and proper maintenance should be carried out.

2.7 Public Health, Food, and Accommodation

Suppliers should provide employees with clean restroom facilities, drinking water, and clean food preparation, storage, and dining facilities. Employee dormitories provided by suppliers should be kept clean and safe, with appropriate emergency exits, hot water for showers, adequate heating and ventilation, and well-designed private spaces for easy access.

2.8 Health and Safety Communication

Suppliers should provide employees with appropriate workplace health and safety training taught in the employee's primary language. Health and safety information should be clearly posted in the workplace.

3. Environment

Suppliers must comply with international environmental protection conventions and laws and regulations involved in their business activities, minimizing adverse impacts on communities, the environment, and natural resources as much as possible. The environmental standards are as follows:

3.1 Environmental Permits and Reporting

Suppliers must obtain, maintain, and update all necessary environmental permits, approval documents, and registration certificates, and comply with their operational and reporting requirements.

3.2 Energy Management and Greenhouse Gas Emissions

Suppliers should identify, manage, reduce, and responsibly control greenhouse gas (GHG) emissions from their operations. Suppliers should regularly quantify greenhouse gas emissions, set corresponding carbon footprint targets, and monitor implementation progress, improving energy efficiency and reducing emissions through energy saving, using clean energy, or other methods.

3.3 Resource Management

Suppliers should carry out resource management to improve resource utilization. Suppliers should adopt conservation and substitution measures, such as using renewable energy to replace traditional energy sources, reducing water and natural resource consumption. Suppliers should implement water resource management and conservation plans to record, classify, and monitor water resources, their use and discharge, seeking to protect water resources and control polluted channels.

3.4 Circular Economy

Suppliers should reduce and eliminate all types of resource consumption and pollution (including water and energy) at the source or through practices (such as improving production, maintenance, and facility processes, replacing materials, saving resources, material recycling, and reuse).

3.5 Pollutant and waste management

Emissions of volatile organic chemicals, aerosols, corrosives, dust, ozone-depleting chemicals, and combustion by-products generated during operations must undergo nature identification, routine monitoring, control, and treatment as

required before discharge. Suppliers should routinely monitor the performance of their exhaust emission control systems.

Suppliers should adopt a systematic approach to identifying, managing, reducing, and responsibly disposing of or recycling solid waste (non-hazardous substances). Before discharge or disposal, wastewater generated by operational activities, industrial processes, and sanitation facilities must be identified, monitored, controlled, and treated as required. In addition, measures should be taken to reduce wastewater generation. Suppliers should routinely monitor the performance of their wastewater treatment systems.

3.6 Management of chemicals, restricted substances, and hazardous substances

Suppliers ensure compliance with applicable laws for chemical and restricted substance management, avoiding the manufacture, trade, or use of chemicals and hazardous substances subject to international bans due to high toxicity to organisms, environmental persistence, or potential irreversible ecological impacts. Suppliers must identify and control chemicals and other materials released into the environment that pose hazards, ensuring their safe handling, transportation, storage, use, recycling or reuse, and disposal.

3.7 Biodiversity and ecosystem protection

Suppliers should strive to minimize negative impacts on the surrounding ecological environment throughout the entire production and operation process, making every effort to protect and improve the surrounding ecosystem.

3.8 Management of soil, air, and water quality

Suppliers regularly assess and reduce the adverse impacts of mining on soil, air, and water. Considering the conditions of surrounding soil, air, and water resources, adopt pollution prevention methods and technologies that are technically feasible, financially feasible, and practical, and strive to avoid, reduce, and control pollution.

4. Business ethics

Suppliers must operate legally and compliantly, and all commercial activities should uphold the highest standards of integrity. The business ethics standards are as follows:

4.1 Integrity in Business Practices and Anti-Corruption

The highest standards of integrity should be upheld in all business interactions. Suppliers should adopt a zero-tolerance policy, prohibiting any form of bribery, corruption, extortion, and embezzlement. All business transactions should be ensured to be transparent and accurately reflected in the supplier's business accounts and records. Supervision and enhanced procedures should be implemented to ensure compliance with anti-corruption laws.

4.2 No improper benefits

Suppliers must not promise, provide, grant, give, or accept bribes or other forms of improper or improper benefits. The prohibition covers proposing, providing, granting, giving, or accepting any valuable item, either directly or indirectly through a third party, in order to acquire or retain business, assigning business to anyone, or otherwise obtaining improper benefits.

4.3 Fair Competition and Anti-Monopoly

Suppliers should compete fairly and comply with laws and regulations related to antitrust and unfair competition. Partners must not engage in monopolistic market or unfair competition alone or with other partners.

4.4 Intellectual Property

Suppliers should respect intellectual property rights and ensure that they do not infringe on others' trade secrets and intellectual property rights in their daily operations.

4.5 Privacy Protection

Suppliers should commit to reasonable privacy expectations to protect the personal information of all business-related personnel, including suppliers, customers, consumers, and employees. Suppliers must comply with privacy and information security laws and regulations when collecting, storing, processing, transmitting, and sharing personal information.

4.6 Whistleblowers and whistleblower protection

Suppliers should establish anonymous complaint and reporting mechanisms to ensure the confidentiality and anonymity of whistleblowers, and prohibit retaliatory behavior.

4.7 Export controls and trade sanctions

Suppliers must comply with all relevant export control laws, regulations, and trade sanctions, earnestly fulfill their responsibilities and obligations, continuously enhance employees' awareness of trade compliance, and achieve trade compliance management and supervision across all business processes.

5. Corporate Governance

5.1 Management System

Suppliers shall adopt or establish management systems related to the scope of this Code to ensure compliance with applicable laws, regulations, and customer requirements related to the supplier's operations and products, comply with this Code, and identify and reduce operational risks related to this Code. This system should also promote continuous improvement. The management system should include the following elements: company external commitments, management accountability and accountability, updated legal requirements and customer requirements, risk assessment and risk management, improvement goals, training, communication, audits and evaluations, corrective action procedures, documentation and records, supplier responsibilities, and more.

5.2 Responsible Procurement

Suppliers should identify, assess, and mitigate environmental, social, and governance risks during procurement, actively comply with laws, regulations, and industry standards regarding environment, product quality, labor rights, safety, and business ethics, and integrate sustainable procurement into routine supply chain management to jointly build a responsible and sustainable supply chain.

Suppliers must comply with Shanshan Technology's "Responsible Mineral Supply Chain Due Diligence Policy," conduct due diligence on critical minerals such as natural graphite used in their supply chains, ensure compliant mineral sourcing, eliminate risks such as child labor (with strict risk controls), and ensure traceability, and ensure that "conflict minerals" are not procured, used, or sold from conflict countries or high-risk areas affected by conflict.

5.3 Information Disclosure

Suppliers disclose information regarding labor, health and safety, environmental practices, business activities, organizational structure, financial status, and performance in accordance with applicable regulations and major industry practices. Falsifying records or misreporting conditions or practices in the supply chain is not permitted.

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