

Ganzhou Tengyuan Cobalt New Material Co.,Ltd. (hereinafter referred to as "The Company" or "We") recogn[illegible] that a responsiblfe



Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct as well as the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. The company commits to conducting due diligence management of mineral metals (cobalt, nickel, lithium, copper) involved in its operations in accordance with this policy. The policy aims to identify and manage the following risks in supply chain operations:

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The company recognizes that the role of public or private security forces at the extraction sites and/or surrounding areas and/or along transportation routes at high-risk areas should be solely to protect rights and interests in accordance with the law, including providing security to workers, maintaining equipment and facilities, protecting the extraction site or transportation routes from interference with legitimate extraction and trade.

The company commits not to provide 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.

The company commits that any cooperation with public or private security forces in the supply chain will follow the Voluntary Principles on Security and Human Rights. For public or private security forces, we will support or take measures using screening policies to ensure that individuals or security forces with known records of serious human rights violations are not employed. Meanwhile, we will engage with local authorities, international organizations and civil society organizations to avoid or minimize the adverse impacts on local communities or vulnerable groups due to the employment of public or private security forces.

Regarding risk management of public or private security forces:

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, 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 from the adoption of the risk management plan.

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

The company prohibits bribery in all business practices and transactions,including those of agents and other third parties.The company will set standards and approval procedures with respect to the offer or acceptance of gifts; and uses the greatest efforts to promote responsible business practices with all business partners.

The company commits to take effective measures to prevent the involvement in money laundering or financing of terrorism. The company will ensure that all legal taxes, fees and royalties related to the mineral resources extraction, trade and export are paid to the government.

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).



Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and roy



Where we have reasonable grounds to believe that a counterparty ma[illegible]s, or is linked to, conditions that seriously threaten personal safety and occupational h[illegible] we will require it to develop and implement a measurable corrective and improvement [illegible] with defined targets and timelines, and we will monitor its progress. We will pursue improvement while maintaining the business relationship; where no measurable improvement is achieved within the agreed timeframe, we will suspend trade and, where necessary, discontinue engagement with that counterparty.

Where occupational health and safety conditions are life-threatening, or amount to serious abuses such as cruel, inhuman or degrading treatment, we will immediately suspend or discontinue engagement upon identifying a reasonable risk, without applying the time-bound remediation process set out above.

Non-discrimination and Freedom of Association

We commit to non-discrimination in hiring and employing employees, without any prejudice based on race, religion, age, nationality, sexual orientation, gender, gender identity and expression, marital status, pregnancy, political affiliation, or disability.

We ensure that, within the bounds of the law, we do not interfere, obstruct, or prohibit employees from forming or joining various organizations, electing representative[illegible]



During procurement or production operations, we will not profit from, assist

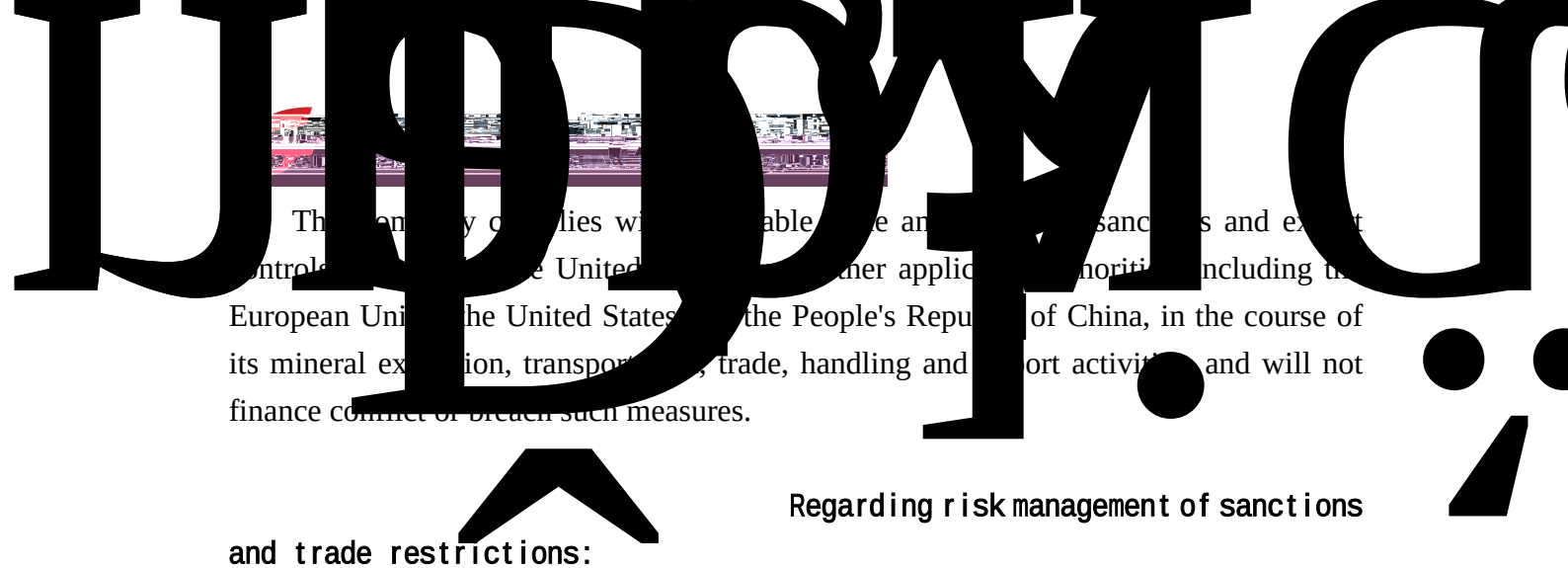


e do not participate in, tolerate, or profit from the exploitation of resources from [illegible] and indigenous peoples has not been obtained, a legal title, lease, concession, or license has been obtained illegally , or national laws have been violated

Community Development We are committed to protecting and supporting the development of local communities.

Respecting Culture, Heritage Protection and Legally Protected Areas

We do not participate in, tolerate, or profit from extracting or sourcing resources from mining operations where the culture and heritage of local and indigenous peoples have not been respected and protected, or where the traditional cultures and heritage of local peoples have been harmed.



The company complies with applicable sanctions and export controls imposed by the United Nations, and other applicable authorities including the European Union, the United States and the People's Republic of China, in the course of its mineral exploration, transportation, trade, handling and export activities, and will not finance conflict or breach such measures.

Regarding risk management of sanctions and trade restrictions:

Where we have reasonable grounds to believe t"de



Design and implement a strategy to mitigate identified risks;

Carry out independent third-party audit in the supply chain;

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