

Zhejiang Huayou Cobalt Co., Ltd

Supplier Code of Conduct

I Introduction

The core value of Zhejiang Huayou Cobalt Co., Ltd. (hereinafter referred to as "Huayou Cobalt ", "Huayou", "the Company" or "us") is "integrity, innovation, responsibility, learning and passion". Huayou's mission is "to create value for customers and make contributions to the development of lithium power new energy industry".

When Huayou carries out its business, it always sets high standards for itself, including in the field of corporate social responsibility and compliance with relevant laws and regulations therein. Accordingly, we expect the same commitment from our suppliers. Our goal is to work with suppliers to ensure full compliance with the terms of this Code of Conduct. And suppliers apply these terms to suppliers who provide you with the products and services. For Huayou, we will consider these terms as part of our supplier selection, and we will actively monitor supplier compliance. Any violation of this Code may damage the business relationship between the Supplier and Huayou, or even lead to the termination of the business relationship between both parties.

Drawing on internationally recognized standards: the 10 Guidelines of the United Nations Global Compact, the Convention on the Rights of the Child, the Convention on Minimum Working Age, International Labor Standards, the United Nations Convention against Corruption, the ILO Safety and Health Implementation Guidelines, etc., the Guidelines outline Huayou's expectations and requirements for supplier behavior, as well as labor and human rights, health and safety Responsible conduct for environmental protection and ethics.

II Governance Structure and Responsibilities

As the highest responsible body, the Board of Directors approves and fully supports the implementation of this policy; The ESG and Sustainable Development Management Committee is responsible for the interpretation, guidance and continuous improvement of this policy, and for monitoring and guiding the implementation of the policy.

ESG, Sustainable Development Department and Procurement Center are responsible for the implementation of specific work items, integrating the management of supplier code of conduct into daily operation, and reporting the progress and effectiveness of work on a regular basis.

III Labor and Human Rights

1. Prohibition of Child Labor: Suppliers must employ employees at the minimum legal age required by local law. Apprenticeship programs in legal workplaces are permitted in compliance with laws and regulations.

2. Forced or Compulsory Labor: The Supplier may not use any form of forced or compulsory labor (such as forced, mortgaged, indentured, or involuntary prison labor). Employment is voluntary.

3. Working Hours: The Supplier shall comply with international conventions and local laws and regulations regarding working hours. Except in emergency or unusual circumstances, the weekly working hours including overtime shall not exceed 60 hours. Weekly work hours shall not exceed the maximum limits prescribed by local law. Employees should have at least one day off every seven days.

4. Wages and Benefits: The Supplier shall provide reasonable wages and benefits to its employees in accordance with local and national laws, including those relating to minimum wages, overtime and other compensation. All employees shall not be paid less than the statutory minimum wage.

5. Humane treatment: The Supplier shall not conduct harsh Feirendao behaviors such as sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal insult to employees; And shall not threaten to commit any such act. Disciplinary policies and procedures to support these requirements should be clearly established and communicated to employees.

6. Anti-Discrimination: Suppliers shall provide equal opportunities in recruitment, promotion, training, remuneration and benefits, and shall not discriminate against others on the basis of race, religious belief, age, nationality, sexual orientation, gender, gender identity and performance, marital status, pregnancy, political affiliation or disability. Employees or applicants must not be required to undergo a discriminatory medical examination.

7. Freedom of Association: To the extent permitted by law, the Supplier shall respect the right of workers to freely associate, participate in collective bargaining or take peaceful assembly in accordance with the law, shall not interfere with, obstruct or prohibit employees from forming or joining organizations, electing representatives, participating in collective bargaining and carrying out all lawful activities, and shall not discriminate or penalize workers on account of their participation or non-participation in any trade union or related organization.

IV Health and Safety

1. Occupational Safety: Suppliers shall identify, evaluate and eliminate safety hazards through reasonable engineering, process control and preventive maintenance. Employees should be provided with appropriate personal protective equipment relevant to their work and receive relevant training and instruction.

2. Emergency Management: Suppliers shall identify and evaluate emergency situations and incidents and minimize their impact by implementing emergency plans and response procedures, including: 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 shall minimize hazards to persons, the environment and property.

3. Work injuries and illnesses: Suppliers shall establish appropriate procedures and systems to prevent, manage, track, and report work injuries and illnesses, including provisions to: encourage employee reporting; Classify and record work-related injury and disease cases; Providing necessary medical services; Investigate the case and take corrective actions to eliminate the impact; Help employees get back to work.

4. Living Conditions: The Supplier shall provide clean toilet facilities, drinking water and clean food preparation, storage and dining facilities for its employees. Staff quarters provided by vendors or labor agents shall be kept clean and safe and shall be provided with appropriate emergency exits, hot bath water, adequate heating and ventilation, and reasonable private space for easy access.

5. Communication of health and safety information: The Supplier shall provide appropriate health and safety training to employees in their main language. Health and safety related information shall be prominently posted on site.

6. Machine Protection: The Supplier must perform a safety hazard assessment of production equipment and other machinery and provide and properly maintain physical guards, interlocks and barriers for machinery that may cause injury to employees.

7. Industrial hygiene: Chemical, biological and physical hazards to employees shall be identified, evaluated and controlled according to the principle of hierarchical control. Eliminate or control potential hazards through appropriate design, engineering and management controls. When hazards cannot be adequately controlled through these measures, employees should be equipped with and have access to appropriate, well-maintained personal protective equipment. The protection plan shall include risk education materials related to these hazards.

V Environment

1. Supplier shall comply with all environmental laws and regulations.

2. **Pollution Prevention and Resource Conservation:** All types of resource consumption and pollution (including water and energy) should be reduced and eliminated at source or through practices such as improved production, maintenance and facility processes, replacement of materials, resource conservation, material recycling and reuse, etc.
3. **Hazardous Materials Management:** Suppliers shall identify and control hazardous chemicals and other materials released into the environment to ensure their safe handling, transportation, storage, use, recycling or reuse and disposal.
4. Suppliers should protect the lives and health of your employees and neighbors, as well as the public involved due to the risks inherent in your processes and products.
5. **Control and treatment of wastewater and solid waste:** Suppliers shall monitor, control and treat wastewater and solid waste generated in operating, industrial processing and cleaning facilities as required prior to discharge or disposal.
6. **Gaseous emissions:** Suppliers shall identify, monitor, control and dispose of volatile organic chemicals, corrosive gases, particulates, ozone-depleting chemicals, combustion by-products and other exhaust gases generated in the course of their operations as required prior to emission.
7. **Material Restrictions:** Suppliers shall comply with applicable laws, regulations and customer requirements regarding the prohibition or restriction of certain substances (including recycling and disposal marks) in their products and in their manufacture.
8. **Energy consumption and greenhouse gas emissions:** Energy consumption shall be tracked and recorded at the plant and/or company level. It is recommended that suppliers give priority to renewable or low-carbon energy, take measures such as energy conservation, consumption reduction and recycling, and explore cost-effective ways to improve energy efficiency and minimize energy consumption.
9. **Climate response actions:** Suppliers shall establish and maintain a data management system for greenhouse gas emissions to report and disclose direct or indirect greenhouse gas emissions from production in accordance with internationally accepted standards or methods through regular collection and accounting. It is recommended that suppliers calculate and provide Huayou Cobalt with the company's product carbon footprint, that is, the carbon dioxide equivalent produced per unit of product, according to the greenhouse gas emission data of the whole life cycle of the product. It is recommended that suppliers formulate and implement greenhouse gas emission reduction targets and plans according to their own greenhouse gas emissions, regularly assess and review the completion of the plans, and report progress and results to Huayou Cobalt.

10. Biodiversity and land conservation: When purchasing raw materials and planning land use, suppliers should give priority to environmental standards and ecological impacts, analyze the potential impacts of projects or activities on biodiversity and land, and formulate corresponding ecological prevention and restoration compensation measures. Please refer to the Biodiversity Conservation and Land Use Policy, which complements this Code of Conduct, for specific requirements.

11. No deforestation commitment: Suppliers shall prohibit deforestation in all areas of their business, actively safeguard forest resources from encroachment, strengthen forest protection and reduce deforestation risks.

VI Ethics

1. Business Integrity: Suppliers shall adopt a zero-tolerance policy prohibiting any form of bribery, corruption, extortion and misappropriation of public funds. All business transactions should be transparent and accurately reflected in the participant's business accounts and records. Monitoring and enhanced procedures should be introduced to ensure compliance with anti-corruption laws.

2. Information Disclosure: Suppliers shall disclose information about their business activities, organizational structure, financial condition, labor, health and safety, and the environment in accordance with applicable regulations and major industry practices.

3. Community participation: Encourage suppliers to participate in community activities to promote the social and economic development of the community.

4. Identity protection and non-retaliation policy: Suppliers must establish an anonymous complaint mechanism to ensure confidentiality and anonymity of the identity of whistle-blower and prohibit retaliation.

5. Intellectual Property Protection: Suppliers shall respect intellectual property rights and shall not infringe or abuse others' intellectual property rights or use unauthorized or illegally acquired intellectual property rights. If the Supplier suffers losses or lawsuits due to infringement of intellectual property rights of others, the Supplier shall assume full responsibility and compensate for the losses.

6. Privacy protection: The Supplier is obliged to respect and protect the privacy of the Company and its third party customers, including but not limited to personal information, business data, financial information, etc., and shall not collect, use, store, transmit or disclose any private information irrelevant or beyond the scope of cooperation. Supplier shall assume full responsibility and indemnify Company for any loss or lawsuit that Supplier incurs as a

result of a breach of privacy.

7. Anti-monopoly and Anti-Competition Practices: Supplier shall comply with all applicable national and international antitrust and trade control regulations. Partners shall not monopolize the market or engage in unfair competition, either alone or jointly with other partners.

8. Conflicts of interest: The Supplier shall avoid any conflict of interest with Huayou Cobalt or Huayou Cobalt's employees that may affect its objective judgment or impartial behavior. If the supplier has relatives, equity cooperation, employment and other interests with the Company or its employees, he/she shall report to the Company at the first time and take corresponding measures according to the requirements of the Company.

9. Responsible Mineral Procurement: For specific requirements, please refer to the Supplier Standard for Responsible Mineral Procurement, a supplement to this Code of Conduct, which has been developed in full compliance with the China Guidelines for Responsible Supply Chain Management of Responsible Minerals and the OECD Guidelines for Responsible Supply Chain Management of Minerals from Conflict Affected and High Risk Areas, Third Edition.

VII Corporate Governance

1. Management responsibilities and obligations: The Supplier shall have a Social Responsibility (CSR) department or similar position, reporting directly to executive management, with responsibility and authority to manage the social and environmental compliance requirements of the business.

2. Risk Assessment and Management: Suppliers shall establish and maintain a system for identifying business-related labor rights and human rights, health and safety, environment, business ethics, and legal compliance risks, and implement appropriate procedures and controls to mitigate the identified risks.

3. Information communication: Suppliers should have a process to clearly and accurately communicate their performance, practices, policies and expectations to employees, sub-suppliers and customers.

4. Corrective Action Process: Suppliers shall have a process in place to take timely corrective actions for deficiencies or violations identified through internal and external audits, assessments, inspections, investigations or reviews.

VIII Supplementary Provisions

This document is effective as of the date of approval by the Board of Directors, and we will regularly refine and update the content to ensure that it meets the changing expectations of various stakeholders and adapts to changes in relevant guidelines and standards.