

广东佳纳能源科技有限公司

供应链尽责管理政策

Guangdong Jiana Energy Technology Co.,Ltd.

Due Diligence Policy for Responsible Supply Chain

Guangdong Jiana Energy Technology Co.,Ltd. (hereinafter refer to as “The company” or “We”) recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals such as cobalt, nickel, and manganese from high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to adverse impacts to society. Therefore, the company commits to adopt the recommendations of the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Chinese Guidance), published by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Edition by the OECD (OECD Guidance), formulate our “Due Diligence Policy for Responsible Supply Chain” (here in after refer to as “Policy”), and carry out relevant work according to the Five-Step Framework of due diligence in the guide. This Policy is applicable for Guangdong Jiana Energy Technology Co.,Ltd and all of its controlling subsidiaries.

广东佳纳能源科技有限公司（以下简称“我们”）认识到，钴、镍、锰等矿产原料开采、交易、处理、出口等经营活动过程中可能产生重大的社会和环境风险，并认识到公司有尊重人权、消除和管控相关风险的责任。为此，我们承诺采纳中国五矿化工进出口商会（CCCMC）发布的《中国负责任矿产供应链尽责管理指南》，与经济合作与发展组织（OECD）发布的《关于来自受冲突影响和高风险区域的矿石的负责任供应链尽责管理指南》的相关内容，制定本公司“供应链尽责管理政策”（以下简称“政策”），并根据指南中的尽责管理五步法开展相关工作。本政策适用于广东佳纳能源科技有限公司及其所有控股子公司。

The company promises to identify and manage the following risks in supply chain operation practices: 公司承诺在供应链运营实践中识别和管理以下风险:

一、*Serious violations of human rights* 严重侵犯人权的行为

While mining, trading, processing, exporting and other operating activities with the raw material, the company neither tolerate nor in anyway directly or indirectly support the following acts: 在开展原料开采、交易、处理、出口等经营活动中, 我们既不容忍, 也不以任何方式获利于、助长、协助或便利任何一方实施:

1、 any forms of torture, cruel, inhuman and degrading treatment; 任何形式的酷刑、残暴、不人道和有辱人格的待遇;

2、 any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace; 任何形式的强迫或强制劳动, 强迫或强制劳动是指以惩罚相威胁, 强迫任何人从事的非本人自愿提供的劳动或服务;

3、 the worst forms of child labour; 童工, 尤其是最恶劣形式的童工;

4、 other gross human rights violations and abuses such as widespread sexual violence; 其他严重侵犯和践踏人权的行为;

5、 War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide. 战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

Risk mitigation 降低风险:

If we have reasonable grounds to believe that the upstream supplier purchases from or is associated with any party who has committed serious human rights violations, we will immediately suspend or discontinue engagement with that supplier. 如果我们有合理理由认为上游供应商从有严重侵犯人权行为的任 何一方采购或与之存在关联， 我们将立即中止或中断与该供应商的合作。

二、Non-state armed group 非国家武装团体

While mining, trading, processing, exporting and other operating activities with the raw material, the company not directly or indirectly provide funds, logistics and equipment support to non-state armed groups. Include the following illegal acts or activities: 我们在原料开采、运输、交易、处理及出口等经营活动中，不会直接或间接为非国家武装团体提供资金、后勤及设备支持，包括以下非法行为或活动：

- 1、 illegally control mine sites or otherwise control transportation routes, points; 非法控制矿区，或以其他方式对运输路线、矿产资源交易地以及供应链的上游行为主体进行控制；
- 2、 illegally tax or extort money or minerals resources at points of access to mine sites, along transportation routes or at points where minerals are traded; 在矿区入口、矿区运输路线、矿产资源交易地等进行非法征税、勒索钱财或掠夺资源；
- 3、 illegally tax or extort intermediaries, export companies or international traders. 对中间商、出口企业或国际贸易商非法征税或勒索。

Risk mitigation 降低风险:

If we have reasonable grounds to believe that the upstream supplier purchases from or is associated with any party that provides direct or indirect support to non-state-owned organized armed groups, we will immediately suspend or discontinue engagement with that supplier. 如果我们有合理理由认为上游供应商从向非国有有组织武装团体提供直接或间接支持的任何一方进行采购或与之在关联，我们将立即中止或中断与该供应商的合作。

三、Public or private security forces

公共或私人安全武装

The company recognized that the role of public or private security forces at the mine sites and surrounding areas and 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. 我们认识到，高风险区域的矿区及周边地区、运输道路沿线的公共或私人安全武装的作用仅是依法保障权益，包括保护矿工、维护设备和设施安全、保护矿区合法运营及运输路线不受非法干扰。

The company promise individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired. The company engage with local authorities, international organizations and civil society organizations to avoid or minimize the adverse effects to local community or vulnerable groups. 我们承诺，支持或采取措施不予录用已确认实施过严重侵犯人权行为的公共或私人安全武装，同时与当地政府、国际组织和民间组织开展合作，避免或最

大限度地降低本公司雇佣的公共或私人安全武装给当地社区或弱势群体带来的不利影响。

Risk mitigation 降低风险:

We will immediately develop, adopt, and implement risk management plans with suppliers and other stakeholders based on our specific location in the supply chain to prevent or reduce the risk of providing direct or indirect support to public or private security forces. These security forces will illegally control mining sites, transportation routes, and upstream participants in the supply chain, illegally levy taxes or extort money or mineral resources at the entrance of mining sites, transportation routes, or mineral trading points, or illegally levy taxes or extort intermediaries, export companies, or international traders. Therefore, we have reason to believe that there is a risk. In this case, if the risk management plan becomes ineffective after six months of implementation, we will suspend or discontinue engagement with the supplier. 我们将根据在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。这些安全武装非法控制矿址、运输路线和供应链上游参与方，在矿址入口、运输线路或矿产交易点非法征税或勒索钱财或矿产资源，或对中间商、出口公司或国际贸易商非法征税或勒索，我们有理由认为存在风险。在此情况下，如果风险管理计划实施六个月未奏效，我们将中止或中断与供应商的合作。

四、*Bribery, money laundering and payment of taxes* 腐败、洗钱和向政府支付的各项费用

The company will never provide, 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. 我们不提供、承诺、给予或索要任何贿赂，并且抵制索贿。不为掩盖或伪造矿产资源原产地，虚报矿产资源开采、交易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿。

The company promise to preventing bribery in all business activities and transactions, including bribery by agents and other third parties, set standards and procedures about giving and receiving gifts. 我们承诺，防止一切业务活动和交易中的贿赂行为，包括代理方和其他第三方的贿赂行为，为馈赠、收受礼物制定标准与审批程序。

The company promises to take effective measures to prevent money laundering or terrorist financing. We will ensure that all legal taxes, fees and royalties relating to mining, trading and export of mineral resources shall be paid to the government. 我们承诺采取有效措施，防止卷入洗钱或为恐怖主义融资。我们将确保向政府支付所有与矿产资源开采、交易、出口相关的合法税收、费用和特许费，并承诺根据企业在供应链上所处位置，对此类支付进行披露。

Risk mitigation 降低风险

Based on the specific location of the enterprise in the supply chain, we promise to cooperate with suppliers, central or local governments, international organizations, civil society, and affected third parties as appropriate, in order to improve or track performance by taking measurable measures within a reasonable time frame to prevent

or reduce adverse impact risks. If the risk reduction measures fail to work, we will suspend or discontinue engagement with upstream suppliers. 根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将中止或中断与上游供应商的合作。

五、Environmental protection, nature resource mining, cultural heritage protection, and ASM

环境保护、资源开采、文化和遗产保护以及小规模采矿

While sourcing from, or operating in high-risk areas, we will not profit from, assist with, source from, facilitate, or be linked to any party whose business activities exercise significant adverse impacts on ambient soil, air and water, or acts in gross violation of local laws and regulations. We will support the efforts or make assessment periodically to minimize the adverse impacts of extraction on soil, air and water. 在高风险地区进行采购或生产时，我们不会获利于、协助、便利于任何给周围土壤、空气和水造成重大不利影响，严重违反当地相关法律法规的一方，也不会从该方采购或与之有关联。

We do not participate in, tolerate, or profit from the exploitation of resources on land or territory where the free, prior and informed consent of local and indigenous people has not been obtained, or a legal title, lease, concession, or license has been obtained illegally, or national law have been violated. 我们不参与、不容忍、也不受益于在未事先获得当地人和土著人自由、预先知情同意，或在非法获得法定所有权、租赁权、特许权或许可证或违反当地法律的土地或领土开采资源。

We do not participate in, tolerate or benefit from any mining operations that damage the cultural heritage of local and indigenous peoples, nor do we participate in mining operations that pose a threat to the prominent universal value of these heritage sites within legally protected areas. 我们不参与、不容忍、也不受益于任何有损当地人和土著人文化遗产的采矿作业，以及在法定保护区进行的采矿作业，以及由此给这些遗产的突出普遍价值造成威胁。

We concern about forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous chemicals and other risks that may cause significant environmental impact related with artisanal or small-scale miners, seeking to establish legal production relationship with them in mining areas. 我们特别关注与手采矿或小规模采矿商相关的强迫劳动、童工、不安全工作条件、不受控危险化学品使用和会产生其他重大环境影响的风险，寻求与开采区的手采矿或小规模采矿商建立合法合规的生产关系。

Risk mitigation 降低风险

If we have reasonable reasons to believe that such risks exist, we will immediately develop, adopt, and implement risk management plans with suppliers and other stakeholders based on the specific location of the enterprise in the supply chain, in order to prevent or reduce specific risks related to land rights infringement, significant adverse environmental impacts, or small-scale miners. 如果我们有合理理由认为存在此类风险，我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低侵害土地权利、引发重大不利环境影响或与小作坊或小规模采矿商相关的具体风险。

六、Occupational health and safety

人身安全与职业健康

The company promise while engaging in material mining, transporting, trading, processing, exporting and other business in high-risk areas, we will not directly or indirectly support, participation and association of any serious threat to personal safety and serious occupation health behaviors. 公司承诺，在从事原料开采、运输、交易、处理及出口等经营活动中，不会直接或间接支持、参与和关联任何存在严重威胁人身安全和严重职业健康的行为。

The company promises to take effective measures to keep physical and mental health of employees, contractors and other parties in the work, prevent the improper working conditions, including unsafe buildings, chemicals and machinery to cause health damage, and improve the working environment. 公司承诺，将采取有效措施，保持员工、承包方和其他相关方在工作中的身心健康，防止由于不当的工作条件，包括不安全的建筑、化学品和机械设备等造成健康伤害，并持续改善工作环境。

Adhere to the principle of continuous improvement, the company commits to incorporate the policy into the company management system and functions of the relevant departments, and also included in the contract or agreement signed with suppliers. For suppliers, we assess risks according to our risk management process, and purchase according to the responsible sourcing management process. For each transaction, we will strictly review the corresponding documents and keep records. We have set up a complaint channel to listen to opinions widely and continue to improve. The company also promises to abide by the relevant UN sanctions resolutions and strengthen communication and cooperation with the whole industry and related stakeholders, widely disseminate the policy, and take this opportunity continue to improve the company's supply chain

responsible management capabilities. 公司将本着持续改进的原则，将该政策融入公司管理体系及各相关部门职责，纳入与供应商的合同或协议之中。对于供应商，我们会根据我们的风险管理流程评估风险，并根据尽责采购管理流程进行采购，对于每笔交易会严格审查对应文件并保留记录。我们设立了申诉渠道广泛听取意见并持续改善。公司同时承诺遵守联合国相关制裁决议，并加强同行业及有关利益相关方的沟通与合作，广泛传播该政策，并籍此持续提高公司的供应链尽责管理能力。

This policy shall enter into force on the date of promulgation.
该政策自发布之日起生效。

Guangdong Jiana Energy Technology Co., Ltd.

广东佳纳能源科技有限公司

2023 年 7 月