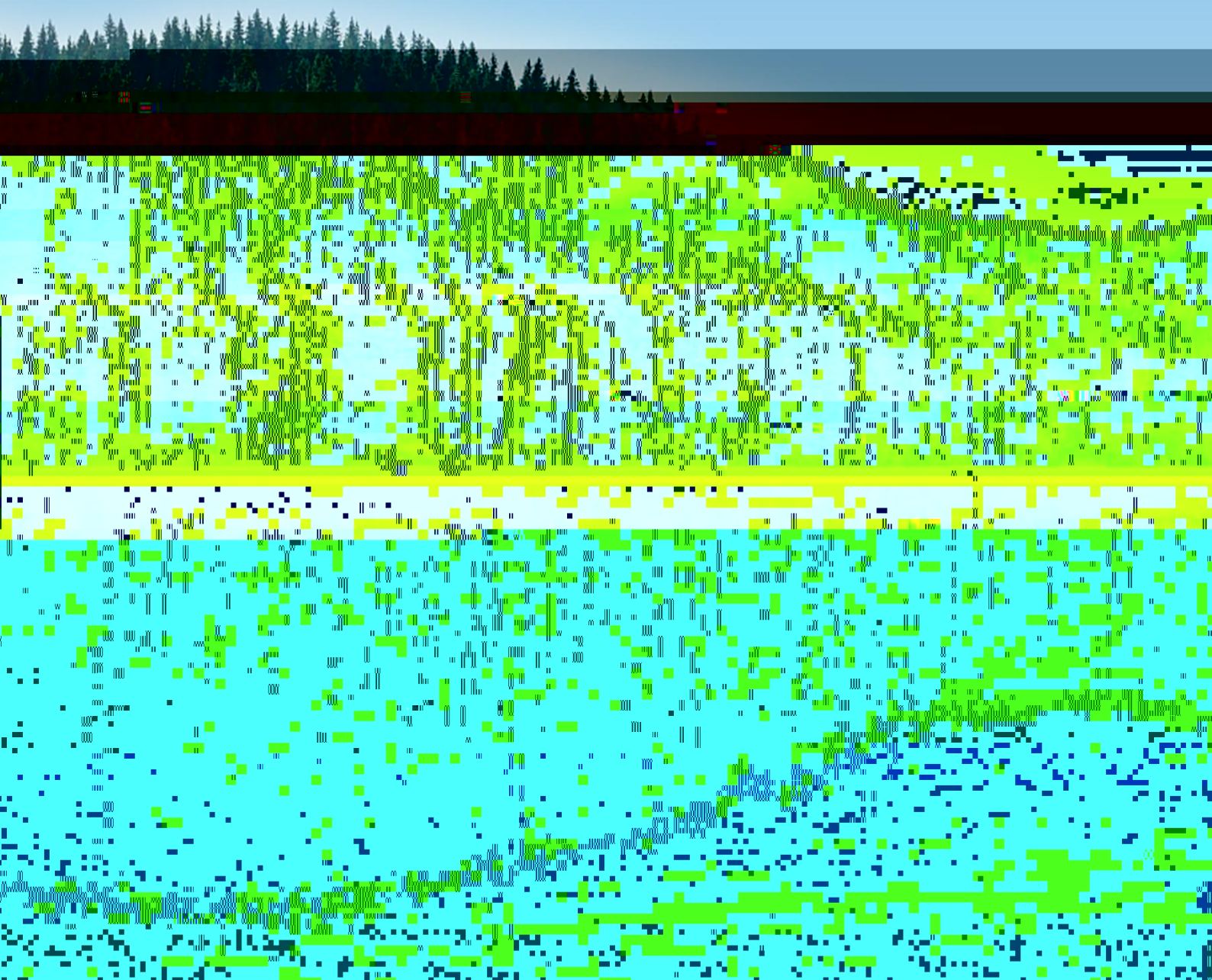


Stand 2026 05

Stand May 2026



As the global new energy vehicle and power battery industries rapidly develop, countries are contin

Background

China's Foreign Trade Law, the Law of Industrial Commercial Enterprises, and the Law of Administrative Disputes. In 2008, the Ministry of Commerce issued Order No. 834, which stipulated that foreign-invested enterprises must comply with the relevant administrative regulations on supply chain security in China. The Foreign Trade Law was revised and passed on December 27, 2025, and came into effect on March 1, 2026; The "Regulations on the Management of Network Data Security" came into effect on January 1, 2025, imposing more obligations such as cybersecurity, data security, and personal information protection.

On the one hand, the Chinese government has been strengthening its regulatory framework for foreign-invested enterprises, particularly in the areas of supply chain security and data protection. This is reflected in the revised Foreign Trade Law and the new Regulations on the Management of Network Data Security, which impose more stringent obligations on foreign-invested enterprises regarding cybersecurity, data security, and personal information protection.

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On the other hand, the Chinese government has been strengthening its regulatory framework for foreign-invested enterprises, particularly in the areas of supply chain security and data protection. This is reflected in the revised Foreign Trade Law and the new Regulations on the Management of Network Data Security, which impose more stringent obligations on foreign-invested enterprises regarding cybersecurity, data security, and personal information protection.

Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition) - referred to as the Chinese Guidelines

- 3 IO
UN Guiding Principles on Business and Human Rights
- 3 IO
UN Voluntary Principles on Security and Human Rights
- 3 IO
Practical Actions for Identifying and Addressing the Worst Forms of Child Labor in Mineral Supply Chains
- 3 IO
All Metal Due Diligence Standards

2024 3 OECD IO 3 IO

可持续发展办公室
Sustainability Office

印尼大区

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The company has formulated relevant procedural documents for responsible management of the mineral supply chain, and has conducted specialized training on responsible management for all members within the organizational structure as well as supply chain partners, aiming to enhance the popularity of responsible management and ensure the effective implementation of the system.

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The company has established a supply chain control and transparency system for traceability management. The company collects information such as the country and region of origin of raw materials, names and addresses of upstream participants, transportation routes and methods, product names and types of minerals or metals, and other information of direct suppliers and other known upstream companies, while avoiding cash transactions whenever possible. The company has established an internal control system to ensure traceability throughout the entire process, from raw material entry to finished product shipment. Additionally, the company has established an inventory management system, conducting monthly inventory checks.

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The company has established the Social Responsibility Complaint Management Process and manages complaints according to the requirements of this process. For the complaint channels, please refer to:

<http://www.cngrgf.com.cn/shzr.html>

transparency or information disclosure requirements set or endorsed by the government of the host country, such as the principles and standards outlined in the Extractive Industries Transparency Initiative (EITI). These have been stated in the "Responsible Mineral Supply Chain Due Diligence Management Policy & Suppliers Code of Conduct". The company has requested the upstream suppliers to comply with the EITI requirements and received a positive response from the suppliers.

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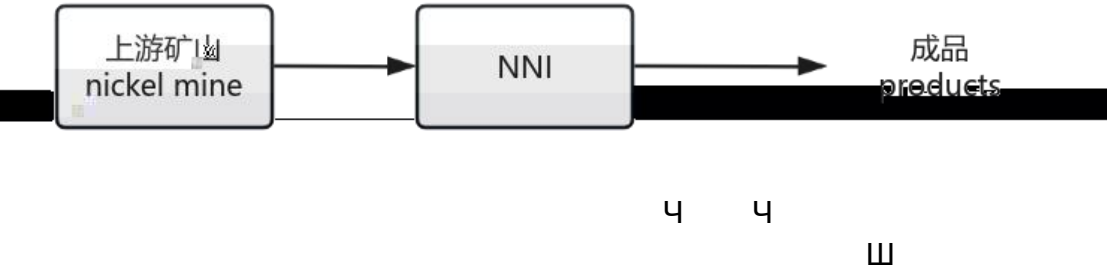
All documents related to due diligence management are retained by the company for over ten years.

5.2

4 4 4 4 KYS 4 100%

Implement due diligence management for all nickel suppliers. Regularly collect relevant information about suppliers through reliable third-party data, KYS questionnaires, mineral sourcing investigations, on-site assessments, grievance mechanisms, customer feedback, etc. During this reporting period, the coverage rate of the information collection targets for nickel suppliers reached 100%.

Based on the above information, draw a supply chain map:



Based on the above information, draw the supply chain map, and assess the impact of conflict and high-risk areas in mineral source regions from three aspects: armed conflict, human rights, and government governance, based on the following tools:

- Tools to be used:
- Heidelberg "Global Conflict Barometer"
 - Corruption Index

- Human Development Index
- CAHRA
- EU Conflict Minerals Regulation CAHRA List
- Dodd-Frank Act
- 4 4 OFAC 4

United Nations sanctions list, The EU sanctions list and the US OFAC sanctions list, sanctions lists of countries where companies and suppliers are located

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The nickel ores do not fall into the category of high-risk materials, so there is no need to conduct on-site evaluations of the suppliers.

and Dev

The company adopts the following strategies to manage the identified risks: (1) Continue trading during the process of reducing risks; (2) If the company suspend trading during the process of reducing risks; (3) If the efforts to reduce risks fail, or if the enterprise has reasons to believe that it is impossible to reduce risks, or if the effect of reducing risks is unacceptable, then terminate the relationship with the supplier.

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According to the current risk assessment results, we have taken the measure of doing the transaction. although there is no serious risk of human rights violations and child labor among direct employees in our supply chain, we will keep an eye on it and actively promote it. We will strengthen the management and collection of chain of custody documents for upstream mines, and strengthen the supervision and management of mines.

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During the reporting period , the company's publicly announced complaint channels have not received any complaints related to non-compliance with responsible management of the mineral supply chain, human rights violations, safety production, or environmental violations. Complaint handling: 0 cases.

5.6

GNOME