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The objective minerals of due diligence for CNGR:Nickel/Cobalt/Manganese/Lithium.

This Policy is applicable for CNGR Advanced Material Co.,LTD and all of its controlling subsidiaries.

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We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

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of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding risk management of public or private security forces:

[redacted]

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

[redacted]

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from 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 internationally recognized transparency standards.

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profit from, assis... ...th, or faci... ...e significa... ...dvers... ...pacts regarding a... ...ient soil, a... ...d water conditions, ...source fr... ...r be li... ...d to any party with ... ...oss violation of local laws and regulations. We will support or take actions to ev... ...ate periodically to minimi

While sourcing from or operating in high-risk areas, we will not profit from, assist with, facilitate, or source from, or be linked to any party that expropriates land illegally or without free, prior and informed consent, or fails to provide fair compensation and reasonable resettlement.

Regarding Risk Management of Environment, rights of indigenous peoples, Culture, Heritage, and Legally Protected Areas, land expropriation and resettlement:

23.

If we have proper reasons to believe that such a risk exists, we will immediately work with suppliers and other stakeholders to develop, adopt and implement risk management plans based on where the enterprise's specific position in the supply chain is. In order to prevent or mitigate the specific risks related to infringement of land rights, leading to significant adverse environmental impact or local cultural heritage damage. If the risk mitigation measures do not work, we will suspend or terminate our cooperation with upstream suppliers

Dissemination of the Policy:

The Company informs the supplier of this policy and asks the suppliers to communicate this policy to their upstream.

Policy update

We review and update our policies on an annual basis.

CNGR Advanced Material Co.,Ltd.

2026 8 6

August., 6th, 2026

The vision of CNGR Advanced Material Co., Ltd. and all of its controlling subsidiaries (hereafter “CNGR” or “we” or “us”) is “A Global Leading Innovator for Battery Materials and Solutions”. The mission of CNGR is “Materials to Perfection”.

ESG

CNGR is committed to a sustainable development path that combines economic success with environmental

Multinational Enterprises and Social Policies

(k) OECD Due Diligence Guidelines for Responsible Business Practices

Suppliers shall not use any form of forced or compulsory labor, includ

abnormity, the working time per week should not exceed 60 hours, including overtime work. Working hours in a week shall not exceed the limit of local law. Employees should be allowed at least one day off per seven-day week.

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5. Wage and Benefit: supplier shall provide its employees reasonable wage and benefit according to the local and national laws and

Use of Public or Priva[illegible] [illegible] [illegible]ces:Supp[illegible] [illegible] follow the Voluntar[illegible] [illegible]nciples on Security and [illegible]man Rights and ens[illegible] [illegible] any [illegible] public or [illegible] [illegible]urity forces are used [illegible] for preventive and [illegible]ensive purposes, and [illegible]all not fa[illegible] [illegible]rticipate [illegible]uman rights abuses. Supp[illegible]rs shall provide security forces with tr[illegible] [illegible]rights risk identification a[illegible] mitigation, establish a code of conduct [illegible] monitoring mechanisms, and prohibit the use of excessive force. In the event of [illegible]y abuse, unlawful interference, or acts threatening community safety, suppliers [illegible] immediately investigate and take corrective actions, and terminate the cooper[illegible] [illegible]essary.

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2. Emergency Preparedness: Suppliers shall identify and assess potential emergency situations and events, and implement emergency plans and response procedures to minimize their impact, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property at the greatest extent.

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3. Occupational Injury and Illness: Supplier shall have procedures and systems in place to prevent, manage, track and report occupational injury and illness, including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

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4. Living Conditions: Supplier shall provide workers with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provide

public involving from inherent risk from processes and products.

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5. Control and Disposal of Wastewater and Solid Waste: For the wastewater and solid waste which are generated during the operation, manufacturing, and facility cleaning, supplier shall monitor, control and treat them according to the requirement before being discharged or disposed.

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6. Air Emissions: according to relevant requirements, supplier shall identify, monitor, control and treat the VOCs, corrosive gases, particulates, Ozone-depleting chemicals and Combustion by-products which are generated by the manufacturing process before discharging.

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7. Restrictions: Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

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[redacted]

9.Biodiversity conservation: Suppliers should follow the mitigation hierarchy principles of "avoid", "reduce", "restore" and "compensate" in their business activities to manage biodiversity impacts and reduce disturbances to biodiversity.

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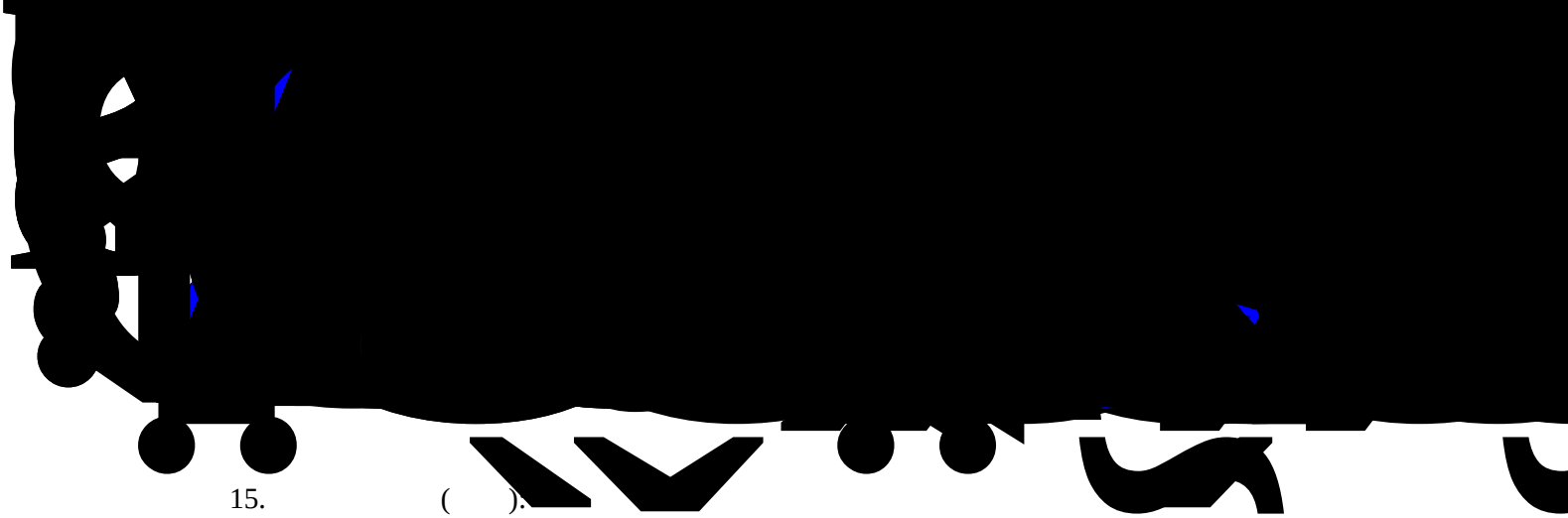
12. [illegible] shall [illegible] assess the potential risks of their operational activities to soil health and stability, develop and implement soil protection and ecological restoration plans to ensure that disturbed land is restored to its original topography and ecological functions (including [illegible] soil cover, among others). Additionally, they must identify potentially affected land users, rights holders, and other relevant stakeholders. In cases of soil contamination not caused by their own operations, suppliers shall be required to conduct due diligence, carry out remediation according to plan, and regularly report progress to competent authorities or the public. For any other significant soil or land risks identified during assessment, suppliers must develop adaptive management plans and implement effective risk control and mitigation measures.

13. [illegible]



15. ( ).

15.Mineral waste Management (Tailing):Suppliers shall develop a mineral waste management plan with endorsement from stakeholders,and engage independent third parties to assess the safety of tailing dams and storage facilities,while establishing dedicated emerted

all forms of bribery, money laundering, terrorist financing,corruption, extortion and embezzlement. All business dealings should be transparently performed and accurately reflected on Participant’s business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

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2. Disclosure of Information: Supplier shall disclose the information regarding its business activities, structure, financial status, labor, health and safety, and environmental practices according to applicable laws and prevailing industry practices.

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3.Community Engagement: Supplier is encouraged to join the community activities to promote social and economic development.

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4.Local community Community health,safety and development Suppliers shall establish a community impact assessment mechanism to identify the social and environmental impacts of their operations, and disclose the assessment results. They shall develop a community development plan that meets local needs, establish grievance channels to protect residents rights and interests, and adopt measures to prevent and mitigate negative impacts through regular communication and consultation, jointly promoting sustainable socio-economic benefits.

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5.Identity Protection and Non-retaliation: Supplier shall establish an anonymous complaint mechanism to ensure the confidentiality, anonymity of whistle blower is protected, and prohibit retaliation.

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violation of tax laws and regulations shall be immediately corrected, and the supplier shall bear corresponding responsibilities.

1 ESG

1. Management Responsibilities and Obligations: supplier shall set up a ESG Department or similar position that reports directly to executive management who has the responsibility and authority to manage social and environmental compliance requirements for the business.

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2. Risk Assessment and Management: Supplier shall develop and maintain a procedure to identify the risks in labor and human rights, health and safety, environmental, business ethics, and legal compliance associated with its operations; implement appropriate procedur Â ɜ

We expect your commitment and we hold on together to contribute to the sustainable development of the corporate supply chain.

CNGR Advanced Material Co.,Ltd.

2026 8 6

August, 6th, 2026

CNGR expects all upstream suppliers (including mining companies, smelters, traders, and recyclers) to align with the commitments set forth in this Policy and actively take the following actions:

1.

OECD

Adopt Policies Aligned with International Standards: Establish or enhance their own responsible supply chain due diligence policies, which shall at a minimum meet the requirements of the OECD Guidance, the Chinese Guidance.

2. ESG

Risk Identification and Management: Establish effective systems for ESG risk identification, assessment, and management, and conduct due diligence on a regular basis.

3.

ESG

Transparency and Traceability: Cooperate with CNGR in supply chain traceability, providing accurate and complete information regarding mineral sources, processing activities, and related ESG risk management.

4.

Capacity Building and Improvement: Actively participate in capacity building activities, continuously improve due diligence management systems, and take effective measures to prevent and mitigate identified risks.

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Actively participate in independent third-party audits.

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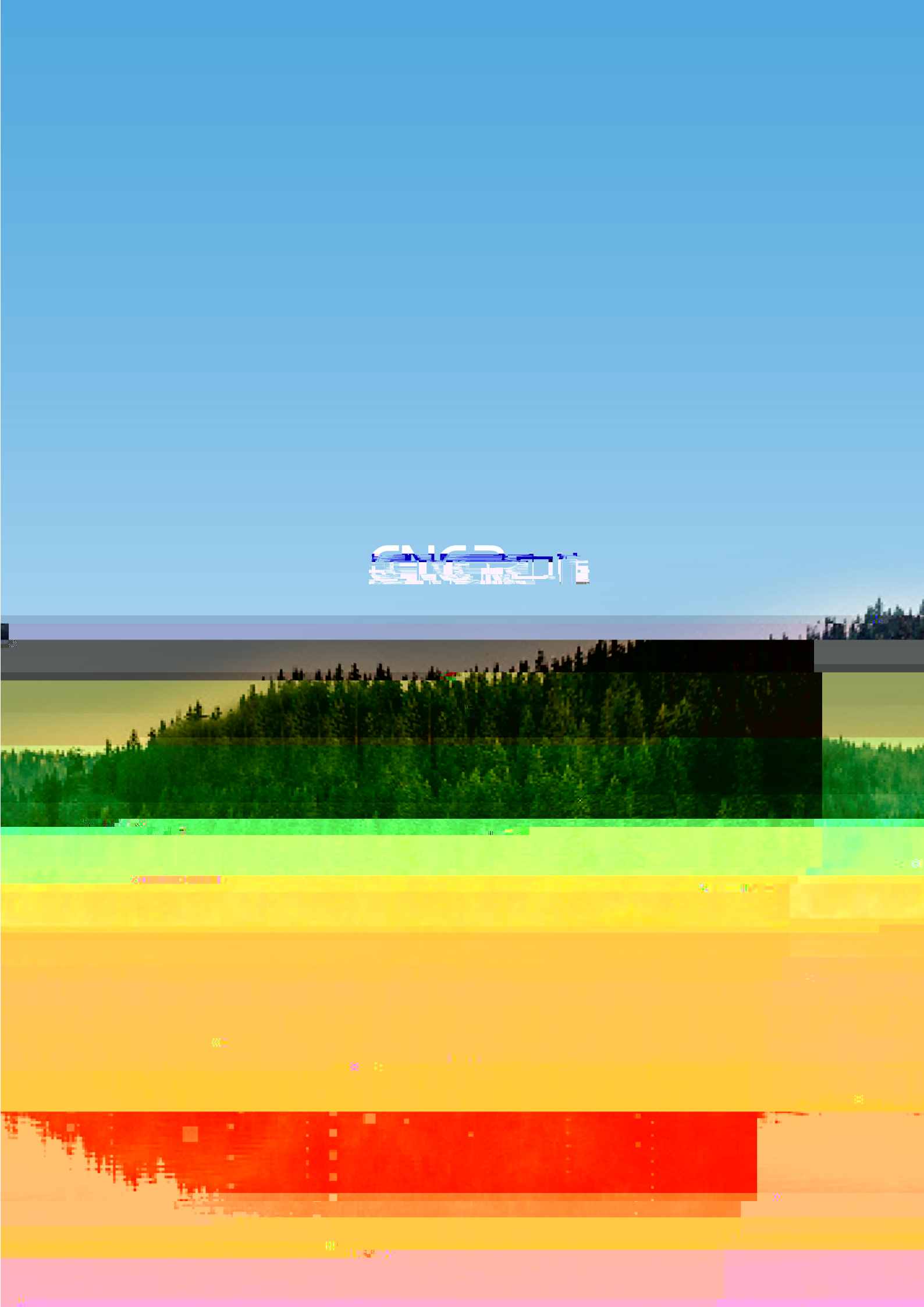
Cascade Requirements: Communicate this Policy or substantially similar policies to their upstream suppliers, ensuring that responsible sourcing commitments are cascaded throughout the supply chain.