The Supplier Code of Conduct 2025

Contents

Foreword

Purpose

Principle

Scope of Implementation

1. **Scope of Implementation**

2. **Social Responsibility**

3. **Occupationa**

Foreword

Ganfeng Lithium Group Co., Ltd. and all of its subsidiaries (collectively referred to as “Ganfeng” or “We”) place high importance on corporate social responsibility, maintaining strict standards for cooperation with suppliers across governance, social, and environmental aspects. We promote the active participation and shared commitment of all parties involved to foster sustainable and responsible development.

The Code (as defined hereinafter) is developed based on generally accepted principles within the industry and the international community, complemented by Ganfeng’s management requirements for suppliers. We expect our suppliers to strictly comply with all applicable laws and regulations in all business activities and to fully implement the provisions of the Code. Suppliers should actively take measures to ensure compliance, thereby enhancing the Ganfeng’s overall reputation and generating greater mutual benefits.

We require our suppliers to uphold principles of responsibility towards the law, society, ethics, and the environment in their cooperation with Ganfeng. Additionally, we encourage suppliers to go beyond the minimum requirements of the Code in pursuit of continuous improvement and responsible business practices.

Ganfeng welcomes suppliers to adopt industry standards and best practices recognized nationally and internationally, continuously enhancing the competitiveness of their products and services. We conduct thorough assessments of supplier compliance with the Code. Any violations may jeopardize the cooperative relationship between the supplier and Ganfeng and could potentially result in the termination of our partnership.

Purpose

Ganfeng is committed to collaborating with its supply chain partners to build a green energy system. Through in-depth cooperation and coordinated development, we aim to create a green, healthy, and sustainable value chain. We expect our supply chain partners to strictly adhere to all applicable laws, regulations, international norms, and standards in areas such as social responsibility, occupational health and safety, environmental protection, compliance, business ethics, and responsible procurement.

We encourage our partners to continuously enhance their corporate social responsibility management capabilities and to promote business practices aligned with Ganfeng's core values: *Integrity and Transparency, Responsibility Fulfillment, Specialization and Efficiency, Innovation-Driven Development, and Win-Win Cooperation.*

To support this vision, Ganfeng has established *the Ganfeng Supplier Code of Conduct* (hereinafter referred to as the "Code"), which sets forth our fundamental requirements for supply chain partners across social responsibility, occupational health and safety, environmental protection, governance and business ethics, responsible purchase, product quality safety. The goal is to ensure the long-term sustainability of our supply chain and to achieve our shared development objectives.

Principle

The Code is an integral part of the signed agreement between G]et ʊ

Scope of Implementation

The Code applies to suppliers (and all affiliated entities) providing products and/or services to Ganfeng. The scope includes Ganfeng's joint manufacturers, partners in joint ventures, and all personnel engaged in providing labor or services for Ganfeng, such as employees, labor workers, apprentices, and foreign workers.

Business partners are responsible for conducting due diligence and ensuring that their upstream suppliers comply with the Code. This includes requiring upstream suppliers to share progress updates during the supplier selection process related to any products and/or services to be provided to Ganfeng.

1. Scope of Implementation

1.1 The supplier

managers), shareholders, parent company, subsidiaries, and branch offices, shall ensure that all business activities fully comply with the applicable laws and regulations of the countries and regions where the supplier and its affiliates operate. This obligation encompasses, but is not limited to, local, national, regional, and international laws, regulations, restrictions, or guidelines, as well as all relevant policies issued by Ganfeng. The supplier shall ensure that each employee has access to adequate legal information and relevant training to uphold these compliance requirements.

1.5 Ganfeng encourages our suppliers to establish and implement management systems according to relevant standards.

2. Social Responsibility

2.1 Ganfeng encourages the suppliers to establish and implement management systems according to relevant standards.

2.2 Child Labor and Young Workers

The supplier shall comply with all applicable laws and regulations concerning the minimum working age, adhere to the provisions of the *United Nations Convention on the Rights of the Child*, and strictly refrain from utilizing or supporting any form of child labor.

The supplier shall not employ individuals under the age of 16, except where such employment is permitted by national or local laws and is in accordance with the guidelines of *the International Labor Organization*.

The supplier shall establish management systems aligned with local regulations to safeguard the lawful rights and interests of minors. When employing workers aged 16 to under 18, the supplier must ensure that their working environment and working hours comply with applicable national and local laws. Additionally, the supplier shall guarantee that underage workers under 18 are not engaged in work that could endanger their health or safety.

The supplier shall maintain accurate records of student workers, conduct thorough due diligence on educational partners

substitution or change(s) allowed in the employment ag[illegible]ment upon [illegible] in the receiving country/region, unless these changes are made [illegible] law provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contract.

The supplier shall maintain documentation on all leaving workers. Employers, agents, and sub-agents shall not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Documentation may only be retained if required by local law, and at no time shall workers be denied access to their own documents.

The supplier shall not require employees to pay

unlawful discrimination. The supplier shall not permit any threatening, abusive, exploitative, or sexually harassing behavior, including posture, language, and physical contact, in the workplace, in the residence provided or managed by them, or in other premises.

The supplier shall neither support nor engage in discriminatory practices based on factors such as race or ethnicity, color, national origin, religion, physical disability, sex, sexual orientation, gender identity and expression, reproductive status, political affiliation, community membership, protected genetic information, marital status, age, or other characteristics. This applies to all aspects of employment, including hiring, compensation, training opportunities, promotion, dismissal, and retirement. The supplier shall respect employees of diverse races, ethnicities, and religious beliefs, and shall not interfere with their exercise

than 60 hours per week, including overtime. Under normal circumstances, employees shall have at least one day off every seven days, and overtime hours must not exceed national or local legal limits. In exceptional circumstances where working hours exceed these limits, the supplier shall promptly submit a written report to Ganfeng explaining the reasons for the overtime.

The supplier shall establish an effective control and compensation mechanism for overtime work, ensuring that overtime is voluntary and that employees' physical and mental health are safeguarded.

2.6 Wages and Benefits

The supplier shall pay wages and

interns and apprentices shall be paid at least the same level as those of entry-level employees performing equivalent or similar work.

2.7 Freedom of Associations and Collective Bargaining

The supplier shall comply with applicable laws and regulations, respect employees' rights to organize and join trade unions, workers' councils, or similar workers' organizations, engage in collective bargaining, and to choose not to participate in such activities.

The supplier shall ensure that union members, workers' representatives, and any employees participating in similar workers' organizations are not subject to discrimination, harassment, coercion, or retaliation due to their membership or involvement. Additionally, the relevant employee representatives shall be permitted to maintain contact with the employees they represent in the workplace.

The supplier shall establish a communication mechanism with employees, ensure regular dialogue with employees or their representatives, and maintain confidentiality measures for employee grievances. Employees and their representatives shall have the opportunity to communicate openly with management and to express their views and concerns regarding working conditions and management practices without fear of discrimination, harassment, coercion, or retaliation.

2.8 Local Communities and Human Rights

The Supplier shall respect the human rights outlined in *the UN Guiding Principles on Business and Human Rights* and identify, prevent, and mitigate any human rights impacts their operations might cause. If the supplier are involved in land use, resource development, or the construction and operation of production facilities, the supplier shall follow relevant legal procedures, communicate appropriately with local communities and affected groups, respect their legal rights (including local residents and indigenous peoples regarding land, water, and culture), and establish channels for handling community concerns.

al

...s th... ...sh and ... Mana...

...n wit... ...m... ...Oc... ...l Healt... ...y Mana...e...

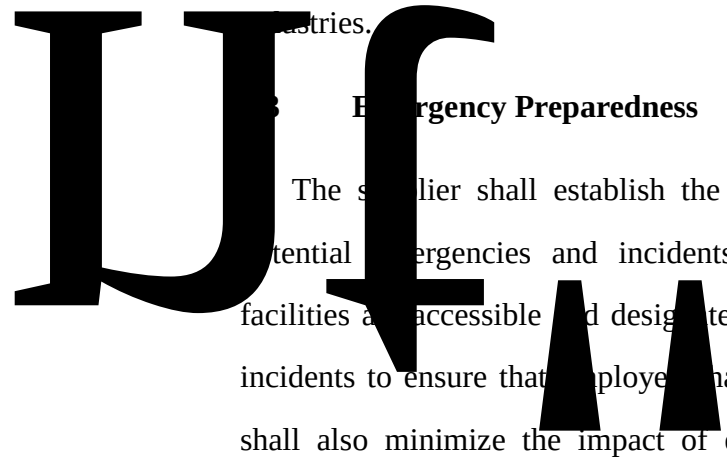
...y...

3.2 Occupational Health and Safety

The supplier shall obtain, maintain, and renew all required health and safety permits in accordance with applicable laws and regulations, and shall comply with the relevant provisions of such permits.

The supplier shall provide a safe and healthy working environment and minimize this environment through continuous and systematic monitoring of the health of employees and the working environment. The supplier shall also provide occupational health monitoring, regularly assess whether employees have suffered health impairment as a result of occupational exposures, and ensure that health protection programs shall be carried out on an ongoing basis with risk education materials related to the hazards to which employees are exposed in the workplace.

The supplier shall utilize control levels to identify, assess and mitigate potential health and safety hazards (including chemical, electrical, and other energy, fire, vehicle, fall hazards, etc.) that employees may encounter. In the



stries.

3.3 Emergency Preparedness

The supplier shall establish the necessary mechanisms to identify and assess potential emergencies and incidents. The supplier shall ensure that emergency facilities are accessible and designate personnel responsible for handling emergency incidents to ensure that employees have access to emergency services. The supplier shall also minimize the impact of emergencies by developing and implementing emergency response plans (including emergency reporting, employee evacuation, training and drills, fire alarm and extinguishing devices, safety exits and recovery plans, etc.). Emergency drills shall be conducted at least once a year, or in accordance with local requirements, whichever is more stringent.

3.4 Occupational Injury and Illness

The supplier shall establish the necessary mechanisms to identify, prevent, manage, track, and report work-related injuries and illnesses. The supplier shall also develop and implement corrective actions to eliminate or mitigate the impacts of such injuries and illnesses. This includes making provisions to encourage employees to report incidents, to classify and document cases of injury and illness, to provide necessary medical care, to investigate cases and take corrective action to eliminate their source of accidents, and to help employees return to work.

The supplier shall permit employees to voluntarily evacuate when they are confronted with imminent harm and shall not require them to return until the situation has been alleviated. Employees shall not be subject to any form of retaliation for exercising this right.

hygiene and safety regulations.

Suppliers that pm

4.3 Pollution Prevention and Resource Conservation

The supplier shall strictly comply with the relevant national, local, and industry environmental protection laws and regulations. The supplier shall enhance the management rules and regulations for wastewater, exhaust gas, and noise. Additionally, the supplier shall improve the treatment plan for sudden environmental pollution accidents.

The supplier shall endeavor to minimize

and shock absorption to reduce noise levels in compliance with the limits prescribed by law.

4.4 Waste disposal

The supplier shall establish mande

targets. The supplier shall promote energy-saving technological transformation projects and increase the use of clean energy. The supplier shall also carry out product carbon footprint accounting and supply chain emission reduction work.

Ganfeng has committed to reducing its Scope 1 and 2 greenhouse gas emissions by 42% by the year 2034, with a target of achieving a 60% reduction by the m

4.5.3 The supplier shall formulate scientific carbon reduction plans in stages:

(1) Capacity building period (2025-2027): The supplier is encouraged to formulate 5~10 year carbon reduction plans based on the Science Based Targets initiative (SBTi) or referring to Ganfeng's Scope 1 and 2 carbon reduction targets.

(2) Full implementation period (from 2028): The supplier must submit an approved carbon reduction plan. They are also required to provide Ganfeng with the progress of the previous year's emission reduction projects, the carbon emission reduction rate compared with the base year, and the current carbon reduction target achievement rate (actual emission reduction vs planning target) before the end of June each year.

4.5.4 Ganfeng proposes specific requirements for reporting carbon-related data, and the supplier shall cooperate. If it is necessary for a second party or a third party to conduct an on-site audit of the submitted data, the supplier shall also provide the necessary support and assistance.

4.5.5 In order to advance the carbon neutrality and zero-carbon product requirements of Ganfeng's offerings, the supplier shall communicate the low-carbon requirements of raw materials to their upstream suppliers and mandate them to take action in accordance with the carbon footprint emission structure of their products.

4.6 Water management

The supplier shall develop water management systems or procedures to identify and assess the abundance and scarcity of water resources in the places where they operate. The supplier shall also develop measures to combat the risks of water scarcity. The use and discharge of water resources in the place of operation should be legal and compliant. The supplier shall also take into account the recycling of water resources to save the use of water resources. The supplier shall routinely monitor the health of their wastewater treatment and control systems to ensure optimal performance and regulatory compliance.

4.7 Circular Economy

In order to achieve sustainable development and respond to global challenges such as climate change, resource scarcity, and environmental change, Ganfeng actively advocates the transformation of the supplier to a circular economy. Ganfeng prioritizes circularity in product design, selects eco-labels that are suitable for recycling goals, and refers to internationally recognized methodologies and disclosure guidelines to improve the transparency of recycling information disclosure. At the same time, Ganfeng supports the supplier in researching the latest trends in sustainable materials and recycling technologies for circular innovation.

4.8 Environmentally Friendly Product

The supplier shall identify, label, and manage chemicals, wastes, and other materials that are hazardous to humans or the environment. The supplier shall ensure that these hazardous substances are safely handled, moved, stored, used, recycled, or reused, and disposed of in an environmentally responsible manner. Hazardous waste data should be tracked and recorded to ensure compliance with relevant regulations and to facilitate proper management practices.

The supplier shall prioritize the use of non-hazardous materials in the production process. The supplier shall also prioritize non-polluting, less polluting, non-hazardous, and less harmful production processes, production equipment, and advanced operating methods. The supplier shall not use any production processes or production equipment that have been prohibited by applicable laws and regulations.

The supplier shall comply with all applicable laws and regulations and customer requirements regarding the prohibition or restriction of specific substances. Any raw materials, products, and services provided by the supplier shall comply with the requirements of all applicable laws, regulations, and standards regarding the process

such as *RoHS (Restriction of Hazardous Substances)* and *REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals)*, as well as the environmental protection regulations of target market countries and regions.

The production of all products by the supplier shall be lead-free and low-toxicity controlled, and meet the requirements of all applicable laws and regulations on chemical management and control of toxic and hazardous substances.

The supplier shall provide relevant test reports and system certificates to Ganfeng as required.

4.9 Biodiversity

The supplier shall strictly abide by relevant national laws and regulations and formulate biodiversity conservation systems and measures.

The supplier shall conduct risk identification and hidden danger investigation of animal resources, plant resources, and other biological impacts. The supplier shall continuously control their own business activities and reduce the negative impact on biodiversity.

5. Governance and Business Ethics

5.1 Ganfeng advocates the value of compliance management, and the supplier shall comply with all applicable laws and regulations in their business activities. On this basis, Ganfeng encourages the supplier to comply with high standards of international compliance rules, etc., and comprehensively identify and prevent compliance risks.

5.2 Anti-bribery/ Anti-corruption

The supplier shall comply with applicable anti-commercial bribery and anti-corruption requirements, including but not limited to the laws and regulations of the location where the supplier and their affiliates are located and/or where Ganfeng does business.

Supplier ... directly or indirectly provide, ... offer or agree to provide any financial or other benefits such as money, gift, service, or other payment to any company or individual, including Gaofeng's employees and its affiliates, third parties (including but not limited to Gaofeng's customers and government officials), in order to obtain, retain, or otherwise secure any improper advantages, so as to influence the conduct or decision-making of the recipient. The Supplier shall implement monitoring, record-keeping, and enforcement procedures to ensure compliance with anti-corruption laws.

In order to better ...

performance. The supplier shall not falsify records or misrepresent conditions or practices in the supply chain.

5.5 Export Cont

The supplier shall endeavor to refrain from any conduct that is intended to or causes to hinder, restrict, or distort free and fair competition. In particular, the supplier shall not enter into any agreements, resolutions, or other concerted actions with its competitors or potential competitors, cus¥

Subject or other third parties, and expenses for taking remedial measures.

The supplier shall respect and protect the privacy of employees. The supplier shall not snoop on employees' privacy, shall not collect excessive personal information of employees, shall properly manage and use employees' personal information, and shall prevent unauthorized disclosure and abuse.

6. Responsible Sourcing

6.1 Ganfeng encourages the supplier to refer to relevant standards, establish their own sustainable management system, and actively promote the practice of sustainable development in the whole supply chain.

6.2 Sustainable Supply Chain

Ganfeng encourages the supplier to establish sustainable development strategies and to practice sustainable development by formulating climate development strategies and conducting supply chain due diligence.

The supplier shall cooperate with Ganfeng's due diligence. At the same time, the supplier shall establish its own supply]rmula

7. Product Quality Safety

7.1 Ganfeng expects the supplier to invest more resources in paying attention to quality. The supplier shall comply with all applicable laws, regulations, and regulations on product quality and safety in China and the countries and regions where the supplier is located or the products and services are produced or rendered. The supplier shall meet recognized or contractually agreed quality requirements in order to provide products and services that consistently meet Ganfeng's needs, operate as intended, and are safe to use.

7.2 The supplier shall continuously carry out and implement activities that meet or exceed legal requirements in every link, including but not limited to research and development (R&D), planning, design, production, sales, and after-sales service, to ensure the safety of products and services. The supplier shall ensure that customers are provided with accurate, easy-to-understand, and conspicuously marked safety instructions and information. The product quality shall meet the mandatory requirements and standards of the state and industry. In the event of a safety incident, it shall be investigated immediately and appropriate measures shall be taken. If Ganfeng's requirements and standards are higher than the former, Ganfeng's requirements and standards shall apply.

8. Comprehensive Requirements

8.1 Without the consent of Ganfeng, the supplier shall not outsource the production of the products to be provided to Ganfeng. If outsourcing is approved by Ganfeng, the supplier shall ensure that outsourcer also complies with the Code.

8.2 The supplier shall ensure, in an appropriate manner, that their officers and relevant employees are aware of the requirements of the Code.

8.3 The supplier shall refer to the Code to manage their upstream suppliers. This includes incorporating the same or substantially the same requirements as the Code into the management of upstream suppliers as procurement requirements. This may include signing written commitments, certification standards, and

regular audits.

8.4 The supplier shall establish procedures to identify risks related to their operations in areas such as social responsibility, occupational health and safety, environmental protection, compliance and business ethics, and responsible sourcing in accordance with applicable laws and regulations, industry standards, customer requirements, the requirements of the Code and their own strategic needs. The supplier shall implement appropriate procedures to ensure compliance and risk control.

8.5 The supplier shall conduct regular internal audits and self-assessments to ensure compliance with laws and regulations and the requirements of the Code. The supplier shall formulate effective and adequate improvement plans for appropriate remediation and correction of compliance issues found through internal and external assessments, inspections, audits, etc., according to their nature and severity.

8.6 Ganfeng strives to ensure the transparency and traceability of its product supply chain, and the supplier shall provide all the support and cooperation that Ganfeng reasonably requires. The supplier shall cooperate to the best of their ability in providing supporting documentation related to the responsible sourcing of products and sustainable supply chains and properly keep records, including but not limited to the information on the origin of relevant raw materials and products, relevant supplier compliance procedures, due diligence questionnaires, and self-assessment questionnaires.

8.7 If Ganfeng requests an audit or if the relevant government authorities of the country or region where the business is conducted raise questions regarding the supplier’s product, or needs to carry out relevant investigations (including but not limited to the supply chain traceability work carried out on the supplier and its upstream-suppliers to confirm the quality of the products and raw materials used), the supplier shall provide comprehensive and timely cooperation in accordance with the law after receiving the notice from Ganfeng. This includes, but not limited to, assisting in truthfully replying to relevant questions and submitting

relevant supporting materials in Chinese and English within the time limit required by Ganfeng, and ensuring the authenticity, accuracy, and completeness of all data, information, or documents provided.

8.8 If the supplier receives any notice of violation or suspected violation of any relevant laws, regulations, or documents issued by other governments or organizations in the course of business, which may affect Ganfeng, it shall promptly notify Ganfeng in writing and provide necessary assistance. The supplier fully understands that the violation of such laws and regulations may lead to immediate suspension of performance or termination of any agreements between the parties and subject Ganfeng to administrative fines or other governmental penalties. The supplier shall indemnify, defend and hold harmless Ganfeng, its officers, directors, employees or agents from and against any and all losses, liabilities, damages, fines, penalties, costs and expenses (including reasonable attorneys' fee and court costs) arising out of or in connection to such supplier's violation.