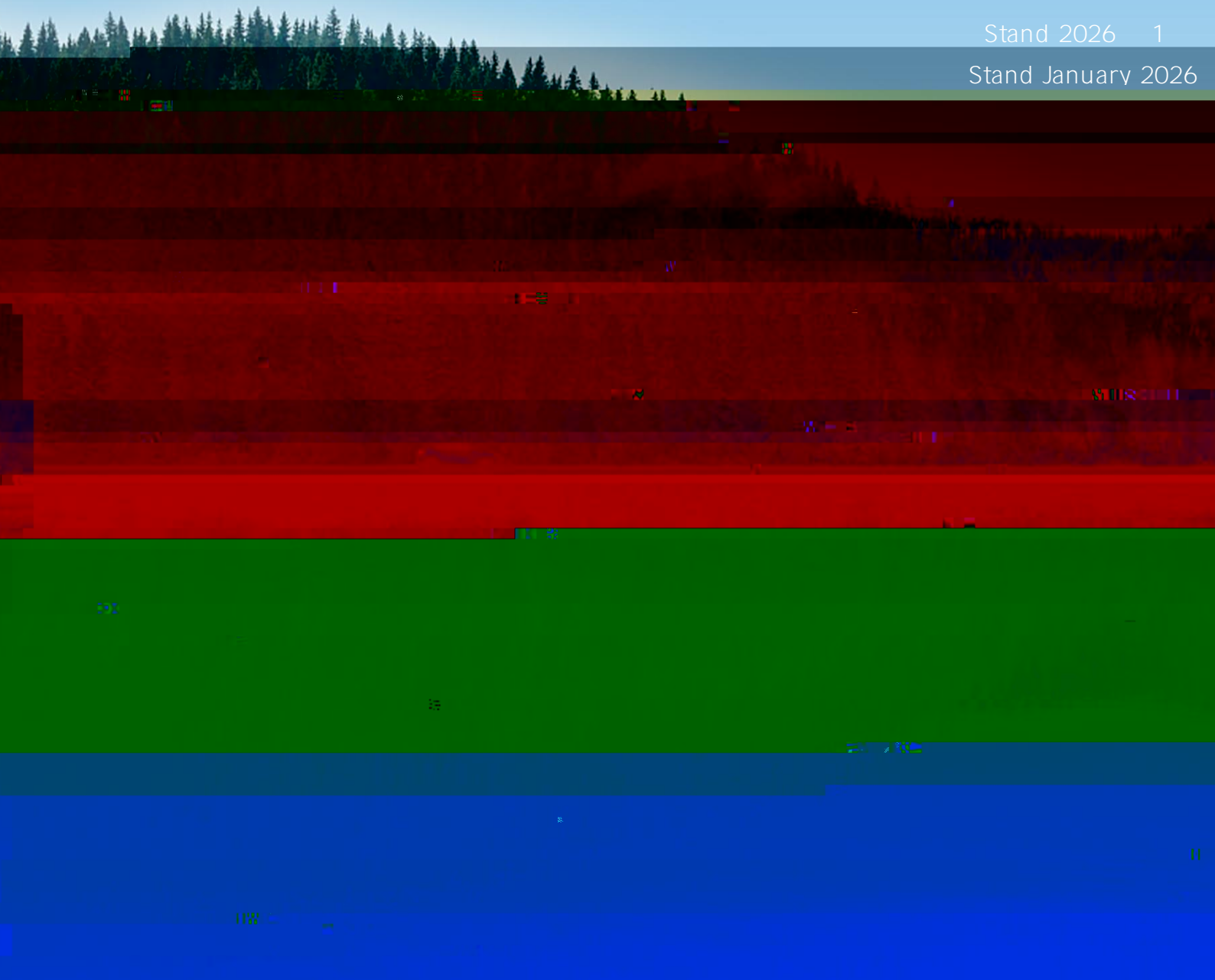




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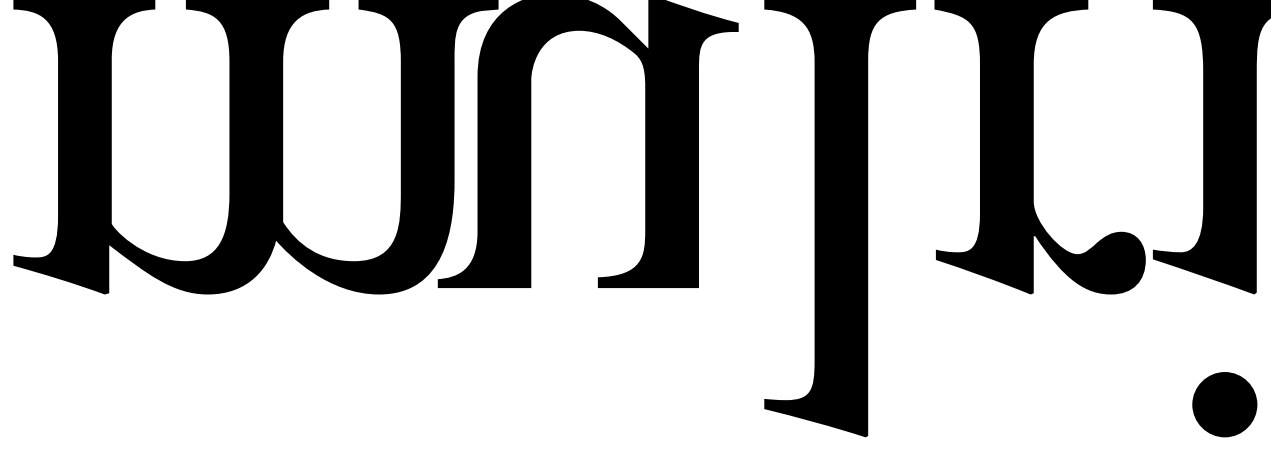
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“ The vision of CNGR Advanced Material Co., Ltd. and all of its controlling subsidiaries (hereafter “CNGR” or “we” or “us”) is “A Global Leading Innovator for Battery Materials and Solutions”. The mission of CNGR is “Materials to Perfection”.

CNGR is committed to a sustainable development path that combines economic success with environmental protection and social responsibility to meet the current and future social needs of our customers. Our goal is to work with our suppliers to ensure full compliance with these items set in this , as they in turn apply those to their own suppliers who provide goods and services to them. For CNGR, we will consider these items in our selection of suppliers and will actively monitor their compliance. Any violation of the Code of Conduct may damage the business relationships between suppliers and CNGR, and even lead to the termination of business relationship.

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This Code of Conduct refers to internationally recognized standards:

- (a) The Ten guidelines of the United Nations Global Compact;
- (b) United Nations Environment Programme guideline for the assessment of the cycle of social claims for products;
- (b) The Convention on Biological Diversity, in particular d~~eliberate~~ voluntary guidelines for impact assessments covering all aspects of biological diversity;
- (d) The United Nations Paris Agreement;
- (e) The eight basic conventions of the International Labour Organization, as defined in the Declaration on Fundamental Principles and Rights at Work;
- (f) Declaration on Fundamental Principles and Rights at Work of the International Labour Organization
- (g) The International Persons Bill, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- (h) United Nations Guiding Principles on Business and Human Rights
- (i) OECD Guidelines for Transnational Enterprises
- (j) International Labour Organization

- (l) OECD Due Diligence Guidelines for Responsible Sourcing for Ores and Minerals in conflict-affected and high-risk Regions
  - (m) Convention on the Rights of the Child
  - (n) Minimum Working Age Convention
  - (o) United Nations Convention against Corruption
  - (p) Responsible minerals assurance process Supply Chain Due Diligence Plus
  - (q) EU Batteries Regulation
- and etc. It summarizes the expectation and requirement of CNGR on its suppliers' behaviors and responsible behaviors including labor and human rights, health and safety, environment protection and ethics.

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1. No Child Labor: the employee hired by the supplier shall meet the minimal age required by the local laws and regulations. Apprenticeship programs at legal workplace conforming to laws and regulations are allowed.

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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 should be within the limit of local law. Employees should be allowed at least one day of rest per week.

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**Wage and Benefit:** supplier shall provide a reasonable wage and benefit according to the local and national standards.

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**PROHIBITED**  
**WORKS**

Use of Public or Private Security Forces: Suppliers shall follow the Voluntary Principles on Security and Human Rights and ensure that any hired public or private security forces are used only for preventive and defensive purposes, and shall not participate in human rights abuses. Suppliers shall provide security forces with human rights risk identification and mitigation, establish a code of conduct and monitoring mechanisms, and prohibit the use of excessive force. In the event of any abuse, unlawful interference, or acts threatening community safety, suppliers shall immediately investigate and take corrective actions, and terminate the cooperation if necessary.

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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Living Conditions: Supplier shall provide workers with ready access to clean toilet facilities, clean water, sanitary and prepared storage, and other facilities.  
Worker dormitories;

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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. ~~MSDS~~ 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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operations. At the same time, suppliers shall explore cost-effective ways to reduce the impact of their operations and minimize energy consumption and greenhouse gas emissions. Suppliers shall establish regular verification mechanisms for the effectiveness of carbon footprint reduction measures and set up a regular tracking and reporting mechanism to ensure the achievement of carbon targets and emission reduction.

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. Environmental suppliers shall systematically 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 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 are 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.

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%" Circular economy Suppliers shall prioritize the use of recycled materials in manufacturing processes to minimize reliance on non-renewable resources,reduce emissions,and lessen environmental impacts from waste disposal.

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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 emergency response protocols.

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accurately reflected on the company's financial statements and  
enforcement procedures to ensure compliance with  
anti-corruption laws.

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.

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

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

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ESG

1. Management Responsibilities and Obligations: supplier shall set up a ESG Department or similar position thbiiiiiiiiiiiDM

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 1 1

January, 1st, 2026









# CACTUS

