

Guangdong Jiana Energy Technology Co., Ltd.

Supplier Code of Conduct

Guangdong Jiana Energy Technology Co., Ltd. (hereinafter referred to as “Jiana Energy”) develops the *Supplier Code of Conduct* (hereinafter referred to as “the Code”) with the aim of cooperating with its partners in preventing and solving social and environmental risks in supply chains, promoting the solution of relevant social and environmental problems actively and making contributions to the achievement of sustainable development.

Instructions

- The Code is applicable to all cobalt raw material and product suppliers of Jiana Energy and aims at helping all suppliers and partners understand and abide by the responsible and sustainable supply chain standards advocated by Jiana Energy.
- “**Fundamental requirements**” refer to relevant requirements of the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains* and help better meet the requirements of the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* of the Organization for Economic Cooperation and Development, *UN Principle of Business and Human Rights*, relevant conventions of the International Labor Organization and other international standards, with the purpose of preventing and solving social and environmental risks in supply chains. We expect Jiana Energy and all suppliers to meet those requirements.
- “**Encouraging suggestions**” are standards of conduct which are higher than fundamental requirements and Jiana Energy suggests suppliers make efforts to implement, and they help suppliers and Jiana Energy promote the solution of social and environmental problems and make contributions to sustainable development.
- Jiana Energy states that it will abide by the Code and wants all its suppliers to make a statement to support the Code; meanwhile it suggests its suppliers convey the Code to their suppliers and it will assist its suppliers in making efforts to meet the requirements of the Code.
- In case of any difference in understanding of the Code among different language versions, the Chinese version shall prevail.
- Jiana Energy will review and revise the Code regularly and seek for expectations and opinions of interested parties periodically.

Jiana Energy believes that compliance, ethical operation and transparency is the foundation of business success. Therefore, in various activities such as exploitation, transportation, transaction, processing and export of cobalt raw materials, especially when carrying out the above activities in conflict affected and high risk areas, Jiana Energy hopes all suppliers (hereinafter referred to as “the company”) commit to meeting the following “fundamental requirements” and make efforts in the direction of implementing the standards of “encouraging suggestions”.

Part 1: Human Rights and Labor Rights and Interests

1. Serious Violations of Human Rights

Fundamental requirements: In the exploitation, transaction, processing and export of cobalt raw materials and other business activities, the company neither tolerates nor support, directly or indirectly in any way, the following behaviors: Any form of torture, violence, inhumanity and degrading treatment; any form of forced or compulsory labor, including any form of human trafficking, bonded labor and prison labor; other serious violations and abuses of human rights; war crimes, crimes against humanity, genocide crimes or other serious violations of the international humanitarian law.

Encouraging suggestions: Considering the complexity and arduousness of serious violations of human rights, the company shall strengthen the cooperation with interested parties, understand risk roots and situations, carry out the due diligence management of human rights, develop appropriate remedial measures or solutions and promote the systematic solution of risks.

2. Child Labor

Fundamental requirements: Do not use child labor, especially the worst form of child labor. The minimum age of employment shall be in accordance with the legal provisions of the country of residence or the provisions of No. 138 convention of the International Labor Organization on the minimum working age, whichever is higher. The company shall take active and effective actions to prevent children under the age of 18 from engaging in mining or underwater operations, hazardous machinery and tool operations, overload handling and types of work exposed to hazardous substances. Avoid hindering children from accepting compulsory education and vocational education or causing injuries to children's health, safety and morals.

Encouraging suggestions: The company shall strengthen the cooperation with upstream and downstream firms, government sectors and other interested parties, have a deep understanding of the social and cultural root of child labor, develop remedial actions for child labor and promote the systematic solution of the problem of child labor, and in such process, the company shall give special consideration of the special situation of girls.

3. Forced or Compulsory Labor

Fundamental requirements: The Company promises to oppose forced labor and human trafficking according to the requirements of laws and regulations, and it will not allow to threaten or force anyone to engage in all involuntary work or services by means of any punishment. Except for clear opposition to bonded labor, prison labor and coerced labor, the company acknowledges that employees' freedom of movements is not restricted and employees have the freedom to obtain employment and select jobs. The company will not request employees to keep the "deposit" or identity documents in the company.

Encouraging suggestions: The company operating in a country or region lack of the governance capacity and having more immigrants may conduct a dialogue with the local trade union and

government to promote the solution of problems and shall carefully use a labor intermediary organization involving transnational labor or seriously review the cooperative relationship with the organization.

4. Support of Non-state Armed Groups and Private Security Forces

Fundamental requirements: In the exploitation, transportation, transaction, processing and export of cobalt raw materials and other business activities, the company will not provide financial, logistical and equipment support for non-state armed groups directly or indirectly, including the following illegal acts or activities: Illegal control of the mining area, or control of transportation routes, mineral resources trading areas and upstream behavior subjects in the supply chain in other ways; illegal taxation, extortion or resources plunder at the entrance or in the transportation route of the mineral area or at the mineral resources trading area; illegal taxation or extortion against intermediaries, export enterprises or international traders.

Encouraging suggestions: Where applicable, the company is suggested meeting the above requirements and conveying the requirements to interested parties at the source of cobalt ores to identify and prevent relevant risks.

5. Bribery, Money Laundering and Taxes

Fundamental requirements: The company does not offer, promise, give or seek any bribe and it resists bribery. It will not commit bribery to conceal or forge the place of origin of mineral resources and make a false report of the taxes, expenses and royalties to be paid to the government for exploitation, transaction, processing, transportation and export of mineral resources.

The company shall prevent bribery behaviors in all business activities and transactions, including the bribery behaviors of agents and other third parties, and develop a standard and approval procedure for giving and receiving gifts.

The company shall take effective measures to prevent getting involved in money laundering or terrorist financing. It shall ensure to pay to the government all legal taxes, expenses and royalties related to the exploitation, transaction and export of mineral resources.

In transactions involving cobalt, companies do not use cash as a settlement method.

Encouraging suggestions: The company shall strengthen purchasing, bidding and tendering and sales systems and increase transparency of transactions.

6. Working Hours

Fundamental requirements: The company shall take active measures to avoid working hours' violation of the requirements of laws and regulations. Working hours (including overtime) of each week shall meet the provisions of laws of the host country, conventions or collective bargaining agreements of the International Labor Organization and providing more protection for employees. As the minimum standard, the company shall ensure at least one day off every seven days; overtime shall be voluntary and total working hours in any 7-day period shall not exceed 60 hours.

Encouraging suggestions: The company may improve production efficiency and reduce overtime and working hours as far as possible by strengthening production management and improving equipment crafts and employee skills. When the company receives rush orders and the customer changes the order requirements at the last minute, the company shall consider the negative impact on working hours.

7. Wages and Benefits

Fundamental requirements: The company shall provide employees with wages and benefits according to legal provisions and contract requirements of the country and region where it is located, and especially pay wages in cash, in full amount and on time. The minimum wage paid by the company to employees shall be in accordance with the higher level determined in provisions on the national legal level, industrial level or collective bargaining agreements.

Details of wages in various page periods shall be provided in written form.

Encouraging suggestions: When developing the wage and benefits system, the company shall consider and reflect the demands of employees and their family members, pay employees the labor remuneration enough to make a decent living and develop a plan to ensure the synchronous growth of employee compensation and benefits and corporate profits.

8. Discrimination

Fundamental requirements: Employees shall be respected. In employment, remuneration, accepting training, promotion, terminating labor relations or retirement, employees shall not be discriminated based on gender or sexual orientation, race, color, age, marital status, pregnancy, religion, nationality, disease or disability. No employee shall be insulted or physically punished or harassed or abused physically, sexually, psychologically or verbally. Such respect shall be distinguished from the protection and support of vulnerable groups.

Encouraging suggestions: The company shall contact the local community, trade union, government and social organization, understand the native culture and social norm as well as the culture, religion and traditional custom of minorities, women and families, and promote the inclusiveness and diversity of corporate culture.

9. Freedom of Association and Collective Bargaining

Fundamental requirements: The company shall confer rights to employees according to laws of the country and region where it is located, and respect the right of employees to voluntarily select to joint and organize a trade union and the right of collective bargaining.

Encouraging suggestions: The company shall take into account the institutional background of different countries and regions, understand the local trade union institution and communicate with the local or regional trade union.

10. Safety and Protection:

Fundamental requirements: The company shall realize that the role of public or private security forces in the mineral area and surrounding area and along the transportation route in high risk areas is to protect rights and interests according to law only, including protecting miners, maintaining the safety of equipment and facilities and protecting the legal operation and transportation routes in mineral areas from illegal interference.

The company shall support or take measures not to hire public or private security forces confirmed of having seriously violated human rights, and meanwhile, develop cooperation with the local government, international organization and civil society organization and avoid or minimize the adverse impact of public or private security forces hired by the company on the local community or vulnerable groups.

Encouraging suggestions:

In high risk areas or areas where the government is less able to maintain stability and security, the company shall consider communicating with the local community and vulnerable groups to convey safety knowledge. The company shall consider cooperating with the local government, to promote the transformation from small mines and manual mining to formal economy and improve the community living environment and diversified economic income.

Part 2: Health and Safety

1. Occupational Health and Safety

Fundamental requirements: The company shall ensure safety in workplace and make efforts to provide a clean and safe work environment, to prevent its employees from contacting hazardous machinery, equipment or substances in the circumstances of not guaranteeing safety. The company shall provide employees with appropriate personal protective equipment related to the work, and carry out relevant training and guidance.

Encouraging suggestions: The company shall take into account the demands of different kinds of employees such as female employees, pregnant employees and young workers (in the scope of legal types of work) and ensure the health and safety of employees. It shall consider enhancing the health and safety awareness of employees through regular training and putting up posters. It shall also improve the safety standard of equipment and technology and reduce risks.

2. Industrial Injury and Disease

Fundamental requirements: The company shall respect the requirements of laws and regulations and not rescind the labor contract with any worker suffering from injuries in the factory or during work. It shall develop an appropriate procedure and system to prevent, manage, track and report any industrial injury and disease.

Encouraging suggestions: If multiple casualties or work-related accidents arousing social concern are involved, the company shall notify the related government department within 24 hours.

3. Machinery and Equipment Protection

Fundamental requirements:

The company shall conduct safety hazard assessment on production equipment and other machinery, provide physical protective devices, interlocking devices and screens for the machinery that may cause injuries to employees, and conduct maintenance accurately.

Encouraging suggestions: The company shall carry out routine machinery and equipment operation training. If necessary, it shall install monitoring devices for machinery and equipment to understand the operating condition and risk of failure in real time.

4. Small Scale Mining and Manual Mining

Fundamental requirements: If this articles applies, the company shall take active measures, give full play to its own influence, and participate in industrial projects individually or collectively to be committed to continuously improving the conditions for small scale mining and manual mining and provide employees with necessary health and safety protection equipment.

Encouraging suggestions:

The company shall be committed to improving the operating mode of small scale mining and manual mining, gradually upgrading the mining equipment technology, and minimize employees' direct contact of hazardous mining machinery and chemicals.

5. Living Conditions

Fundamental requirements:

The company shall strive to provide employees with clean bathroom facilities, drinking water and food. In the employee dormitory provided by the company or labor agency, personal safety shall be kept.

Encouraging suggestions: The company shall understand the personal living, health and nutrition conditions of employees and meet the employees' demands for living space and nutrition gradually.

6. Crisis Management and Response

Fundamental requirements: The company shall identify possible crisis in the project and develop a crisis response mechanism and plan to reduce negative effects on the society and environment.

Encouraging suggestions:

The company shall carry out root analysis on the accident, and establish an accident file retention system. The company is encouraged to publicize the accident report and accident root analysis result to Jiana Energy.

Part 3 Community Rights and Interests

1. Immigrants and Natives

Fundamental requirements:

If this article applies, the company shall have legal documents and permissions for project construction or expansion according to the requirements of laws and regulations. In the expansion or new project activities, the company shall strive to avoid or minimize involuntary resettlement. If the rights and interests of natives are involved, the enterprise shall fully respect the natives' freedom and prior and informed consent right.

Encouraging suggestions: The company shall understand the natives' expectations at the early, middle and late stage of a project and strive for the natives' support and participation. It shall develop a livelihood recovery plan in the initial phase of the project, establish a reasonable mechanism of appealing and protect the legitimate rights and interests of appellants.

2. Community Health and Safety

Fundamental requirements:

If this article applies, the company shall take full consideration the health and safety risks caused by mineral site selection, exploitation and transportation to the community and residents, safeguard the community members' right to be informed and strive to mitigate risks.

Encouraging suggestions: The community shall publicize the effect data of water, atmosphere and solid wastes in real time. It shall open communication channels, understand emotions and opinions of the community and the public and promote the degree of trust in the local community.

Part 4: Ecological and Environmental Protection

1. Toxic and Hazardous Substances

Fundamental requirements:

The company shall identify and control chemical substances and other materials that will cause danger when being released into the environment and ensure that those substances are disposed of, transported, stored, used and treated safely.

Encouraging suggestions: The company shall use safer and more environmentally friendly chemicals to replace traditional toxic and hazardous chemicals. It shall replace the traditional technology with a safer and more environmentally friendly production technology. It shall use chemicals that have been subject to green certification.

2. Resource and Energy Utilization

Fundamental requirements:

The company shall respect the requirements of laws and regulations, take good care of the environment and save resources and energy. It shall reduce and eliminate unnecessary resource consumption at the source or through practice.

Encouraging suggestions: The company shall develop an energy saving and emission reduction plan to improve the energy management efficiency. It shall use renewable energy, calculate the total amount of carbon emission and develop an environmental information report; understand and adopt the internationally accepted energy and resource management initiatives, standards and tools.

Part 5: Code of Ethics

1. Responsible Purchasing

Fundamental requirements:

The company shall identify the effects of its purchase of cobalt raw materials and/or intermediate products on the society and environment, pay special attention to the risk of human rights in cobalt raw materials from the conflict affected and high risk area, and take effective measures to reduce the negative effects of supply chains.

Encouraging suggestions: The company shall identify systematic risks at state level of the source of cobalt raw materials, and understand the effects of national development level and governance capacity on the above risks. It shall understand the risk of child labor and occupational health and safety caused by different operating modes for big, small and medium mines and manual mining. The company shall review its purchasing practice and supplier performance regularly.

2. Fair Operation and Commercial Integrity

Fundamental requirements:

If this article applies, the company shall take active measures to prevent any form of bribery, corruption, extortion and embezzlement at the entrance and exit and in transportation routes of the mineral area, and in mineral resources trading areas and any other links. All business transactions shall be reflected in business accounts and records accurately.

Encouraging suggestions: The company shall develop cooperation with the local social organization and existing supervisory mechanism and reduce the possibility of bribery and corruption by means of supervision, taking photos and camera shooting.

Part 6: Management Implementation Mechanism

1. Undertaking and Statement

Fundamental requirements:

The company shall make a public statement to support the Code and undertake to abide by the provisions of the Code.

Encouraging suggestions: The company shall make public the actions taken to meet the above requirements and encourage suppliers to support the Code.

2. Management System

Fundamental requirements:

The company shall understand the significance of an appropriate management system to carrying out the responsible practice of cobalt purchasing, take active measures and reflect the due diligence management of cobalt resources in the company's operation management.

Encouraging suggestions: The company shall establish a cobalt supply chain due diligence management system and conduct regular self-assessment on the effectiveness of the management system. It shall establish a supply chain tracking system and a due diligence management information system.

3. Risk Identification, Prevention and Mitigation

Fundamental requirements:

The company shall strive to identify, prevent and mitigate the risks of labor and human rights, health and safety.

Encouraging suggestions: The company shall communicate with the social organization, local government, trade union, labor organization and industrial expert, identify and assess risks systematically, classify and grade risks and develop a risk mitigation time planning. The company shall establish a risk early warning system and review the risk identification procedure and prevention and mitigation measures regularly.

4. Assessment and Audit

Fundamental requirements:

The company shall strength the self-assessment and management review capacity of supply chain risks.

Encouraging suggestions: The company shall publicize the self-assessment result, third-party audit result and corrective actions, and participate in the industrial action plan actively.

5. Information Transfer and Communication

Fundamental requirements:

The company shall make clear and transfer enterprise polices and compliance performance information to employees, suppliers and customers accurately to increase transparency.

Encouraging suggestions: The company shall prepare a cobalt supply chain due diligence management progress report or a social responsibility report and disclose the improvement



performance regularly. Where appropriate, the company shall consider publicizing relevant information to the society.

Jiana Energy Supplier

Statement

As a supplier of Jiana Energy, we acknowledge that business success is based on the value of compliance, ethical operation and transparency.

We are willing to take active measures to grow and develop with Jiana Energy, and hereby undertake to abide by “fundamental requirements” in the *Supplier Code of Conduct* and be committed to the implementation of relevant standards in “encouraging suggestions”. We are willing to accept, implement and cooperate with the working mechanism set for the above purpose.

Company name (official seal):

Company representative (signature):

Place and date of signature:

Note: Please sign this Statement and return it to Jiana Energy in 5 working days. Thanks for your understanding and support.

Contact of Jiana Energy: Victor Email: CSR@jiana.com