“ ” “ ” “ ”

“ OECD ”
“ ” Regulation (EU) 2017/821 - 1502

Shanghai Shanshan New Material Co., Ltd. (hereinafter referred to as “Shanshan Technology”,“we”, or “the Company”) recognizes the risk that conducting mineral mining, trading, processing, and export activities in conflict-affected and high-risk areas may give rise to significant negative impacts,as well as our obligation to respect human rights, not to aggravate conflicts, and not to exert adverse environmental and social effects. Shanshan Technology is committed to adopting and widely disseminating the relevant contents of the (Third Edition) (hereinafter referred to as the “OECD Guidance”), the (Second Edition) (hereinafter referred to as the “China Guidelines”), the (Regulation (EU) 2017/821) and Section 1502 of the US , and incorporating such provisions into the contracts or agreements signed with our suppliers.

This policy provides reference for conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user. This policy applies to the natural graphite and other mineral supply chains of Shanghai Shanshan New Materials Co., Ltd. and all its subsidiaries and affiliated companies.

The Company has established an organizational framework for responsible mineral due diligence. Under the guidance and supervision of the Sustainable Supply Chain Management Committee, a Management Representative for Responsible Sourcing & Supply Chain Due Diligence has been appointed. The Corporate Supply Chain Department takes the lead in executing specific initiatives, with coordination and collaboration from other relevant departments, to jointly advance the practice of responsible mineral procurement.

The Company consistently upholds ethical sourcing, commits not to use mineral resources from conflict regions, and explicitly requires suppliers not to use mineral resources from conflict regions or those that violate Company policy. The Company undertakes not to engage in any activities that would finance conflict. Shanshan complies with relevant United Nations sanctions resolutions, and domestic laws implementing such resolutions.

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When procuring or conducting business activities in high-risk areas, we will not employ, benefit from, assist, or facilitate the employment of children below the minimum working age as stipulated by the host country's laws or regulations, nor have any association with such employment. If the host country has no relevant laws or regulations, the minimum working age is 16.

Other gross human rights violations and abuses such as widespread sexual violence;

2.5

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;

2.6

Any act of forcing another person to work by means of violence, threat or restriction of personal freedom;

2.7

Any act of disrespecting employees or discriminating against them on the grounds of gender or sexual orientation, race, skin color, age, marital status, pregnancy status, religion, nationality, illness or disability;

2.8

Any act that interferes with employees' freedom to form trade unions, as well as their freedoms of collective association and collective bargaining.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined.

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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:

3.1

Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;

3.2

Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;

3.3

Illegally tax or extort intermediaries, export companies or international traders.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined above.

We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

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We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure 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.

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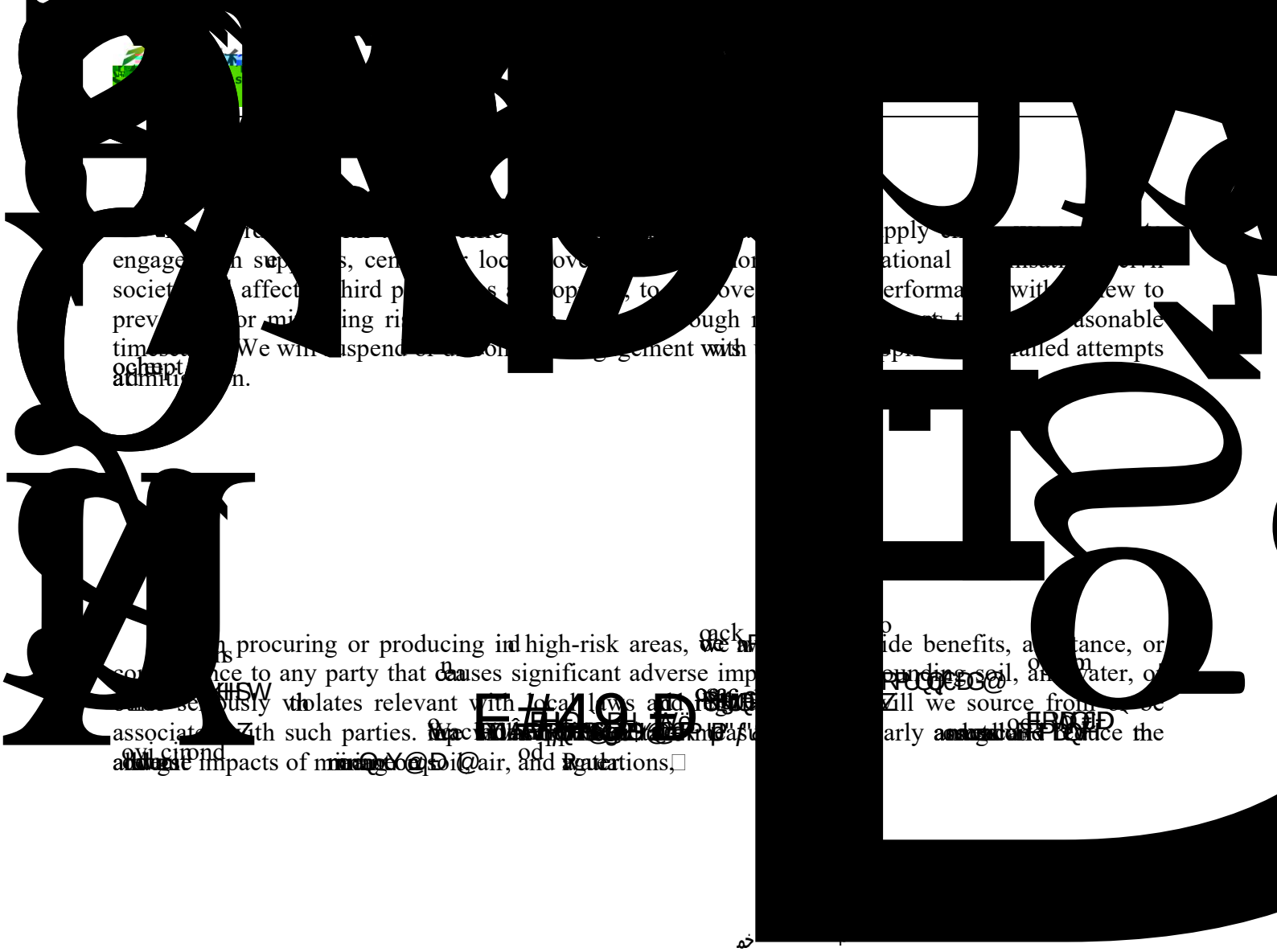
In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 1, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 4 and 5, we will respond in the same vein.

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

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.

EITI

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and 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 the principles set forth under the Extractive Industry Transparency Initiative (EITI).



If we have reasonable grounds to believe that upstream suppliers are sourcing from or are associated with any party providing life-threatening occupational health and safety conditions, we will immediately terminate or suspend cooperation with such suppliers.

This policy is publicly available on the Company's official website, and the Company requires suppliers to convey this policy to their upstream partners, ensures that no human rights violations or conflict advocacy occur within the supply chain. The Company also calls on all upstream and downstream enterprises in the supply chain to comply with relevant legal requirements, assume liability of responsible sourcing, and build a safe, stable, transparent, and sustainable supply chain.

supplychain@shanshan.com

The Company has established a complaint and communication channel, with the email address: supplychain@shanshan.com. If suppliers have any of the following situations, they may provide feedback to Shanshan Technology via the above email:

1

Identified risks and challenges associated with the Company's supply chain;

2

Gaps and deficiencies in the Company's supply chain due diligence management system and measures;

3

Other relevant suggestions and opinions related to the supply chain supported by sufficient evidence.

Attachment I: Acknowledgment Letter

Shanghai Shanshan New Material Co., Ltd.

2025 9

Effective Date: Sep., 2025

We have received the issued by Shanghai Shanshan New Materials Co., Ltd., and fully understand and endorse all requirements concerning responsible mineral procurement set forth in this Policy. To ensure the compliance and sustainable cooperation, we hereby solemnly commit as follows:

1.

We will strictly comply with this Policy and fully integrate the requirements for responsible mineral procurement into our internal procurement management system and the entire supply chain process.

2.

We will actively cooperate in conducting mineral supply chain due diligence, and provide the required relevant materials (including but not limited to mineral origin certificates, supplier qualification documents, etc.) in a timely and accurate manner.

3.

We will strengthen the management and audit of our upstream mineral suppliers, promote our upstream partners to jointly practice responsible mineral procurement, and ensure that minerals such as natural graphite involved