

Code of Conduct for Partners

Xiamen HiTHIUM Energy Storage Technology Co., Ltd.

Xiamen Hithium Energy Storage Technology Co., Ltd. (hereinafter referred to as "Hithium", Hithium Energy Storage" or "the Company") is committed to being customer-centric and providing safe, efficient, clean, and sustainable green energy solutions globally.

The term partners in this Code of Conduct refers to Hithium 's customers, suppliers, contractors, and all external stakeholders who have business relationships with Hithium.

This Code of Conduct aims to clarify Hithium's ESG management requirements for partners, ensuring that partners cooperate with Hithium in a socially responsible manner and promoting the sustainable development of the industry chain.

This Code primarily includes three areas: E (Environmental), S (Social), and G (Governance), encompassing five dimensions: environmental management standards, labour standards, health and safety standards, business ethics standards, and management systems. This Code is the behavioural standard that all types of partners must comply with when conducting business with the Company. Failure to comply with this Code gives the Company the right to independently decide not to establish, suspend, or terminate business dealings or contractual relationships with the partner. If the partner has made other written agreements or commitments with Hithium regarding relevant content outside this Code of Conduct, the higher standard or stricter requirement shall prevail.

1. Environmental

1.1 Environmental Management

Environmental responsibility shall be an essential condition for partners during the production and provision of products and services. Partners shall strictly comply with

applicable legal and regulatory requirements, identify environmental impacts, and minimize adverse effects on the community, environment, and natural resources while ensuring public health and safety.

1.1.1 Environmental Permits and Reporting

- Partners shall obtain, maintain, and update all necessary environmental permits (e.g., emission monitoring), approval documents, and registration certificates, and comply with their operational and reporting requirements.

1.1.2 Pollution Prevention and Resource Conservation

- Partners shall minimize or eliminate pollutant emissions, releases, and waste generation at the source or through pollution control equipment, improvements in production, maintenance, facility processes, or other practices;
- Partners shall use natural resources, including water, fossil fuels, minerals, and timber from virgin forests, through improvements in production, maintenance, and facility processes, substitution of materials, reuse, conservation, and recycling, or other practices.

1.1.3 Hazardous Substances

- Partners shall identify, label, and manage chemicals, waste, and other materials that pose a hazard to humans or the environment to ensure safe handling, movement, storage, use, recycling or reuse, and disposal;
- Partners shall track and record data on hazardous waste.

1.1.4 Solid Waste

- Partners shall adopt systematic methods to identify, manage, reduce, responsibly dispose of, or recycle solid waste (non-hazardous waste);

- Partners shall track and record data on solid waste.

1.1.5 Air Emissions

- Partners shall classify, routinely monitor, control, and treat volatile organic chemicals, aerosols, corrosive substances, suspended particles, ozone-depleting substances, and combustion by-products generated during operations before discharge as required;
- Partners shall routinely monitor the operational status of their air emission control systems.

1.1.6 Materials Restrictions

- Partners shall comply with all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

1.1.7 Water Management

- Partners shall implement a water management plan to record, classify, and monitor water sources, usage, and discharge;
- Partners shall seek opportunities to conserve water;
- Partners shall control pollution channels;
- All wastewaters shall be classified, monitored, controlled, and treated as required before discharge or disposal;
- Partners shall routinely monitor the operational status of their wastewater treatment and control systems to ensure optimal performance and regulatory compliance.

1.1.8 Energy Consumption and Greenhouse Gas Emissions

- Partners shall track, record, and publicly report energy consumption as well as significant categories of Scope 1, Scope 2, and Scope 3(encouraged) greenhouse gas emissions;
- Partners shall seek methods to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.

2 Social

2.1 Labour Standards

Partners shall commit to respecting workers' human rights, ensuring their dignity, and extending this commitment to all workers, including temporary workers, migrant workers, student workers, contract workers, directly hired workers, and any other type of worker.

2.1.1 Prohibition of Forced labour

- Partners shall not engage in any form of forced labour, including but not limited to bonded labour (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery, or human trafficking, including the transport, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, or fraud for the purpose of labour or services;
- Partners shall not impose unreasonable restrictions on workers' freedom of movement within the factory or access to facilities provided by the Company, such as worker dormitories or living quarters (if applicable);
- As part of the hiring process, partners must provide all workers with a written employment agreement in their native language or a language they can understand, specifying the terms and conditions of employment. Overseas migrant workers must receive the employment agreement before leaving their home country/region, and such agreements shall not be altered upon their

arrival in the destination country/region unless changes are made to comply with local laws or provide equal or better conditions;

- All work shall be voluntary, and workers shall be free to leave their employment or terminate their employment relationship at any time without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts;
- Partners shall retain relevant documentation for all departing workers. Employers, agents, and sub-agents shall not hold, destroy, conceal, or confiscate identity documents or immigration documents, such as government-issued identification, passports, or work permits;
- If an employer needs to hold such documents to comply with local laws, workers must still have unrestricted access to their documents at all times;
- Workers shall not pay any recruitment fees or other related fees to the employer's agents or sub-agents for their employment. If such fees have been paid, they must be reimbursed to the workers.

2.1.2 Young Workers

- Partners shall not use child labour at any stage of production. (Note: In China, child labour refers to workers under the age of 16, and in other countries, under the age of 15. Workers under the age of 18 (Young Workers) shall not engage in work that may endanger their health or safety, including night shifts or overtime work);
- If child labour is identified, immediate assistance/remediation measures must be provided.

2.1.3 Working Hours

- Partners shall ensure that workers' working hours do not exceed the maximum limit set by local law;

- Workers' total working hours per week (including overtime) shall not exceed 60 hours, except in emergencies or exceptional circumstances;
- All overtime must be voluntary;
- Workers shall have at least one day off every seven days.

2.1.4 Wages and Benefits

- Partners shall pay workers wages that comply with all applicable wage laws, including those relating to minimum wage, overtime, and legally mandated benefits;
- Partners shall ensure equal pay for equal work and equitable pay for comparable work;
- Partners shall pay workers overtime wages at a rate higher than their normal hourly rate;
- Partners shall not use wage deductions as a disciplinary measure;
- In each pay cycle, partners shall provide workers with a clear and comprehensible wage statement that includes sufficient information to verify the accuracy of compensation for work performed;
- The use of temporary workers, dispatch workers, and outsourced workers by partners must comply with local legal restrictions.

2.1.5 Non-Discrimination/Non-Harassment/Humane Treatment

- Partners shall commit to providing a workplace free from harassment and unlawful discrimination;
- Partners shall not subject workers to harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public humiliation, or verbal abuse, nor shall they threaten to engage in any such treatment;

- Partners shall not discriminate or harass workers in hiring and employment practices (such as wages, promotions, rewards, and training opportunities) based on race, skin color, age, gender, sexual orientation, gender identity or expression, ethnicity or nationality, disability, pregnancy, religion, political affiliation, union membership, protected veteran status, protected genetic information, or marital status;
- Partners shall clearly define and communicate disciplinary policies and procedures supporting these requirements to workers;
- Partners shall provide reasonable accommodation for workers' religious practices and disabilities;
- Partners shall not require workers or potential workers to undergo medical tests or physical exams that could have discriminatory purposes.

2.1.6 Freedom of Association and Collective Bargaining

- Partners shall respect all workers' rights to freely form and join unions, engage in collective bargaining, and peacefully assemble, as well as their right to refrain from such activities;
- Where the rights to freedom of association and collective bargaining are restricted under applicable laws and regulations, partners shall allow workers to elect and join other lawful forms of worker representative organizations.

2.2 Health and Safety

Partners should understand that, in addition to reducing work-related injuries and illnesses, a safe and healthy work environment can improve product and service quality, promote production, enhance worker retention, and boost worker morale. Partners should also recognize that continuous worker engagement and education are crucial to identifying and addressing health and safety issues in the workplace.

2.2.1 Occupational Health and Safety

- Partners shall use a hierarchy of control measures to identify, assess, and mitigate potential health and safety hazards (e.g., chemical, electrical, and other energy sources, fire, vehicle, and fall hazards) that workers may encounter;
- If the above measures cannot effectively control hazards, partners shall provide workers with appropriate and well-maintained personal protective equipment and educational materials regarding the risks associated with these hazards;
- Partners shall implement gender-equity measures, such as avoiding placing pregnant or nursing women in work environments that could harm them or their children, and providing reasonable accommodations for nursing mothers.

2.2.2 Emergency Preparedness

- Partners shall identify and assess potential emergencies and incidents, and minimize their impact by implementing emergency plans and response procedures, including emergency reporting, worker notification and evacuation procedures, training, and drills;
- Partners shall conduct emergency drills at least once a year or as required by local laws (whichever is stricter);
- Partners' emergency plans shall include appropriate fire detection and suppression equipment, unobstructed exits, adequate exit facilities, emergency contact information, and recovery plans.

2.2.3 Occupational Injury and Illness

- Partners shall establish procedures and systems to prevent, manage, track, and report work-related injuries and illnesses, including: encouraging worker

reporting, classifying and recording injury and illness cases, providing necessary medical services, investigating cases and taking corrective actions to eliminate the sources of accidents, and assisting workers in returning to work;

- Partners shall allow workers to evacuate in the face of imminent harm and not require them to return until the situation is resolved, without fear of retaliation.

2.2.4 Industrial Hygiene

- Partners shall use a hierarchy of control measures to identify, assess, and control hazards to workers posed by chemical, biological, and physical agents;
- When hazards cannot be adequately controlled, partners shall provide workers with appropriate and well-maintained personal protective equipment free of charge and ensure its proper use;
- Partners shall provide a safe and healthy work environment for workers and maintain this environment through systematic monitoring of workers' health conditions and the work environment;
- Partners shall provide occupational health monitoring and regularly assess whether workers' health has been compromised due to occupational exposure;
- Partners shall continuously implement occupational health protection programs, which should include risk education materials related to workplace hazards.

2.2.5 Physically Demanding Work

- Partners shall identify, assess, and control the impact of physically demanding work on workers, including manual handling/loading and

unloading of materials, repetitive lifting of heavy objects, prolonged standing, and highly repetitive or forceful assembly work.

2.2.6 Machine Safeguarding

- Partners shall assess production and other machinery for safety hazards;
- For machinery that could pose injury risks to workers, partners shall install physical guards, interlocks, and barriers and maintain them properly.

2.2.7 Sanitation, Food, and Housing

- Partners shall provide workers with clean toilet facilities, potable water, and sanitary facilities for food preparation, storage, and consumption;
- Worker dormitories provided by partners or labour agents shall be clean, safe, and equipped with appropriate emergency exits, basic living necessities, and adequate space.

2.2.8 Health and Safety Communication

- Partners shall provide workers with appropriate workplace health and safety information and training in their native language or a language they understand, covering all identified workplace hazards, including but not limited to mechanical, electrical, chemical, fire, and physical hazards;
- Partners shall clearly post health and safety-related information in factory areas or other locations where it is easily visible and accessible to workers;
- Health information and training shall include content specific to risks for particular groups, such as gender and age (if applicable);
- Partners shall provide training to all workers before they begin work and conduct regular training after work has commenced;
- Partners shall encourage workers to raise any health and safety concerns without fear of retaliation.

3 Governance

3.1 Ethics

To meet social responsibility and establish market success, partners and their agents shall adhere to the highest ethical standards.

3.1.1 Business Integrity

- Partners shall uphold the highest standards of integrity in all business interactions;
- Partners shall adopt a zero-tolerance policy prohibiting all forms of bribery, corruption, extortion, and embezzlement.

3.1.2 No Improper Advantage

- Partners shall not promise, offer, authorize, give, or accept bribes or other forms of benefits to obtain illegal or improper advantages;
- Partners are prohibited from directly or indirectly promising, offering, authorizing, giving, or accepting anything of value through third parties to secure or retain business, direct business to any individual, or otherwise gain an improper advantage;
- Partners shall implement monitoring, record-keeping, and enforcement procedures to ensure compliance with anti-corruption laws.

3.1.3 Disclosure of Information

- All business dealings conducted by partners shall be transparent and accurately recorded;
- Partners shall disclose information regarding labour, health and safety, environmental practices, business activities, structure, financial status, and

performance in accordance with relevant regulations and prevailing industry practices. Falsification of records or misrepresentation is prohibited.

3.1.4 Intellectual Property

Partners shall respect intellectual property rights. Transfer of technology or know-how must be conducted in a manner that protects intellectual property rights and safeguards the information security of customers and partners.

3.1.5 Fair Business, Advertising and Competition

Partners shall adhere to the standards of fair business, advertising, and competition.

3.1.6 Protection of Identity and Non-Retaliation

- Unless prohibited by law, partners shall maintain programs to protect the confidentiality and anonymity of whistle-blowers, including workers and other stakeholders who report concerns;
- Partners shall establish communication mechanisms to enable workers to raise concerns without fear of retaliation.

3.1.7 Responsible Sourcing of Minerals

- Partners shall adopt policies to safeguard that due diligence is conducted on the source and chain of custody of any commodities procured for Hithium Energy Storage involving tantalum, tin, tungsten, gold and other minerals to reasonably ensure that the source is in accordance with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or an equivalent and recognized due diligence framework.

3.1.8 Privacy and Information Protection

- Partners shall commit to protecting the personal information of all individuals with whom they do business (including partners, customers, consumers, and workers) to meet the reasonable privacy expectations of those individuals. Participants shall comply with privacy and information security laws and regulatory requirements when collecting, storing, processing, transmitting, and sharing personal information.

3.2 Management Systems

Partners shall adopt or establish management systems related to the scope of this Code of Conduct. These systems shall ensure compliance with applicable laws, regulations, and customer requirements related to participants' operations and products, conform to this Code, and identify and mitigate risks associated with this Code.

3.2.1 Company Commitment

- Partners shall formulate policy statements on human rights, health and safety, environment, and ethics, affirming their commitment to due diligence and continuous improvement, and secure senior management's endorsement;
- Policy statements shall be made publicly available and communicated to workers in a language they understand through accessible channels.

3.2.2 Management Accountability and Responsibility

- Senior executive management and Company representatives responsible for implementing management systems and related programs shall be clearly identified;
- Partners' senior management shall periodically review the status of the management system.

3.2.3 Legal and Customer Requirements

- Partners shall adopt or establish processes to identify, monitor, and understand applicable laws, regulations, and customer requirements (including those of this Code).

3.2.4 Risk Assessment and Risk Management

- Partners shall adopt or establish processes to identify risks related to legal compliance, environmental health and safety, labour practices, and ethics, including risks of severe human rights and environmental impacts associated with their operations;
- Partners shall determine the relative significance of these risks and implement appropriate procedures and physical controls to manage identified risks and ensure regulatory compliance.

3.2.5 Improvement Objectives

- Partners shall establish written performance objectives, targets, and implementation plans to improve their social, environmental, health, and safety performance (including periodically assessing their progress toward these objectives).

3.2.6 Training

- Partners shall implement training programs for managers and workers to effectively execute their policies, procedures, and improvement objectives and meet applicable legal and regulatory requirements.

3.2.7 Communication

- Partners shall establish processes to clearly and accurately communicate information about their policies, practices, expectations, and performance to workers, partners, and customers.

3.2.8 Worker/Stakeholder Engagement and Access To Remedy

- Partners shall establish ongoing, two-way communication processes with workers, their representatives, and other stakeholders (as relevant or necessary) to obtain feedback on practices and conditions covered by this Code and to foster continuous improvement;
- Partners shall provide workers with a safe environment to raise grievances and feedback without fear of retaliation.

3.2.9 Audits and Assessments

- Partners shall conduct regular self-evaluations to ensure compliance with legal and regulatory requirements related to social and environmental responsibility, the requirements of this Code, and contractual requirements from customers.

3.2.10 Corrective Action Processes

- Partners shall establish processes to timely address deficiencies identified through internal or external assessments, inspections, investigations, and audits.

3.2.11 Documentation and Records

- Partners shall create and maintain documentation and records to ensure regulatory compliance, meet Company requirements, and adhere to relevant confidentiality and privacy protection clauses.

3.2.12 Partner Responsibility

- Partners shall establish processes to communicate the requirements of this Code to their own partners and to monitor their compliance with this Code.

References :

- Responsible Business Alliance (RBA) Code of Conduct, Version 8.0
- EU Batteries and Waste Batteries Regulation
- International Labour Organization (ILO) Core Conventions
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- United Nations Convention Against Corruption
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women
- United Nations Global Compact