

# Farasis Energy Supply Chain Due Diligence Policy

## 孚能科技供应链尽责政策

### 一、Policy Commitments 政策承诺

Farasis Energy (Ganzhou) Co., Ltd. (hereinafter referred to as "Farasis Energy" or "we") recognizes that mineral exploitation, trading, processing and export activities conducted in high-risk areas may entail substantial adverse impacts, and acknowledges its obligation to respect human rights and avoid adverse social repercussions. Farasis Energy commits to fulfilling the responsibilities and obligations set forth in the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization Conventions. The Company pledges to fully comply with the mandatory due diligence requirements for critical raw material supply chains stipulated in the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition), the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) Guidelines for Responsible Mineral Supply Chain Management in China, as well as the EU Battery Regulation (EU 2023/1542) (EUBR), and incorporate such requirements into contracts or agreements signed with suppliers. We will widely disseminate this policy and embed its provisions into contracts or agreements governing suppliers' responsible sourcing from high-risk jurisdictions.

孚能科技(赣州)股份有限公司(以下简称“孚能科技”或“我们”)认识到在高风险区域从事矿产开采、交易、处理、出口存在可能形成重大负面影响的风险,并认识到我们有尊重人权、不对社会产生负面影响的义务,孚能科技承诺履行《联合国工商业与人权指导原则》《国际劳工组织公约》所确立的责任义务,承诺全面采纳经济合作与发展组织(OECD)《受冲突影响和高风险区域矿产供应链尽职调查指南(第三版)》、中国五矿化工进出口商会(CCCMC)《中国负责任矿产供应链尽责管理指南》、《欧盟电池法案》(EU 2023/1542)(EUBR)对关键原材料供应链尽职调查的强制性要求,并将其纳入与供应商签订的合同或协议之中。我们将广泛传播这个政策,并且将这一政策纳入到供应商从高风险区域负责任采购的合同或者协议中。

This policy provides a reference for conflict-sensitive procurement activities and suppliers' risk awareness involved in the entire supply chain of mineral resources. We are committed to complying with relevant UN sanction resolutions and applicable domestic laws enforcing such resolutions, and will not engage in any activities that aid or facilitate conflicts. To this end, we will identify the risks specified below and implement measures to mitigate them.

这一政策为矿产资源供应链全过程涉及冲突敏感的采购活动以及供应商的风险意识提供参考。我们承诺遵守联合国相关制裁决议,遵守适用执行此类决议的国内法律,不参与任何会为冲突提供帮助或便利的行为。为此,我们将对下文风险进行识别并实施措施降低风险。

### 二、Scope of Application 适用范围

This system applies to Farasis Energy (Ganzhou) Co., Ltd. and its subordinate branches, subsidiaries, and various bases involving suppliers of key materials such as positive electrodes, negative electrodes, and electrolytes, as well as high-risk supply chains involving mineral resources and key raw materials.

本制度适用于孚能科技(赣州)股份有限公司及其下属分公司、子公司、各基地的涉及镍、钴、锂、天然石墨等关键原材料的供应商,以及涉及上述矿产的勘探、开采、选矿、冶炼、精炼、加工、贸易等全供应链活动。

### 三、Risk Control 管控风险

#### 1. Regarding serious infringements associated with the extraction, transport or trade of minerals

##### 与矿产开采、运输或交易有关的严重侵权行为

When conducting procurement or business activities in high-risk areas, we will neither tolerate nor benefit from, help, assist or facilitate any party in any way:

- 1.1 The worst form of child labor (hazardous work is one of the worst forms of child labor);
  - 1.2 Torture, brutality, inhuman and degrading treatment in any form;
  - 1.3 Forced or compulsory labor in any form, which is, people are forced to engage in labors or services under threat of punishment and unwillingness;
  - 1.4 Systemic sexual violence, gender discrimination or identity-based persecution;
  - 1.5 Large-scale or systematic human rights violations, such as arbitrary detention, forced displacement and deprivation of fundamental freedoms;
  - 1.6 War crimes, crimes against humanity or genocide or other serious violations of international humanitarian law.
- 在高风险区域开展采购或经营活动时,我们既不会容忍也不会以任何方式获利于、帮助、协助或便利任何一方实施:

- 1.1 最恶劣形式的童工(危害性工作是最恶劣形式童工中的一种);
- 1.2 任何形式的酷刑、残暴、不人道和有辱人格的待遇;
- 1.3 任何形式的强迫或强制劳动,即以惩罚相威胁,在他人非自愿的情况下迫使从事一切劳动或服务;
- 1.4 系统性暴力、性别歧视或基于身份的迫害;
- 1.5 大规模或系统性侵犯人权行为,如任意拘禁、强迫迁移、剥夺基本自由;
- 1.6 战争罪、反人类罪、种族灭绝罪或其他严重违反国际人道法的行为。

#### **Risk reduction**

##### **降低风险**

If we have the right reason to believe that the risk exists, that is, the upstream supplier is purchasing or associated with any party of the serious infringements set out in aforementioned clause we will immediately suspend or terminate the cooperation with the upstream supplier.

如果我们有合理理由认为该风险存在,即上游供应商正从实施第 1 条所规定的严重侵权行为的任何一方进行采购或与该方有关联,我们将立即中止或终止与该上游供应商的合作。

## **2. Direct or indirect support to illegal organized armed groups and public or private security forces**

### **直接或间接支持非法的有组织武装团体和公共或私人安全武装**

We do not tolerate any direct or indirect support to non-state-owned organized armed groups through the exploitation, transport, trade, handling or export of minerals. Such support includes but is not limited to purchasing resources from illegal organized armed groups or their affiliates, making payments or otherwise providing logistic support or equipment to them. These armed groups or their affiliates:

- 2.1 Illegally control the mine site, or, in other ways, control the transport routes, mineral resources trading points and the upstream actors of the supply chain;
- 2.2 Conduct illegal tax collection or extortion of money or mineral resources at the mine site, along the line of transport or on the points of mineral resources trading;
- 2.3 Conduct illegal taxation or extortion to middlemen, exporters or international traders.

我们不容忍任何通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供直接或间接的支持。通过矿产资源开采、运输、交易、处理或出口为非国有的有组织武装团体提供“直接或间接的支持”,包括且不限于从非法的有组织武装团体或其关联方购买资源,向其付款,或以其他方式向其提供后勤支援或设备等。这些武装团体或关联方:

- 2.1 非法控制矿址,或以其他方式控制运输路线、矿产资源交易点以及供应链的上游行为主体;
- 2.2 在矿址入口、运输路线沿线或矿产资源交易点非法征税或者勒索钱财或矿产资源;
- 2.3 对中间商、出口企业或国际贸易商非法征税或勒索。

#### **Risk reduction**

##### **降低风险**

If we have reason to believe that the upstream suppliers are purchasing or having relations with any party that provides direct or indirect support to non-state armed groups, we will immediately suspend or terminate cooperation with the supplier.

如果我们有理由认为,上游供应商从向非国家武装团体提供直接或间接支持的任何一方进行采购或与之存

在关系,我们将立即中止或终止与该供应商的合作。

### 3. Regarding public or private security forces

#### 关于公共或私人安全武装

We will eliminate the illegal taxation or extortion of money or mineral resources from the illegally controlled mine sites, transport routes and the upstream participants of the supply chain at the entrance of the mine site, along the route of the transport line, or in the mineral resources trading site, or provide direct or indirect support to public or private security forces that illegally levy taxes or extortion on intermediaries, exporters or international traders. We recognize that the role of public or private security forces along mine sites, surrounding areas and transport routes is only to maintain the rule of law, which include guaranteeing human rights, protecting the safety of miners, equipment and facilities, safeguarding the mines or transport routes so that legitimate mining and trade are not disrupted.

我们将杜绝向非法控制矿址、运输路线以及供应链上游参与方,在矿址入口、运输路线沿线或矿产资源交易点非法征税或勒索钱财或矿产资源,或者向中间商、出口企业或国际贸易商非法征税或进行勒索的公共或私人安全武装提供直接或间接支持。我们认可,矿址、周边地区和运输道路沿线的公共或私人安全武装的作用仅是维护法治,包括保障人权、保护矿工、设备和设施安全、保护矿址或运输路线以使合法的开采和贸易不受干扰。

Where we, or any business or business relationship in our supply chain has a contract with the public or private security forces, we commit to or we will require that such security forces are recognized by established international standards and guidance documents dealing with public or private security forces. In particular, we will support or take measures to use screening policies to ensure that individuals or security armed units known to have committed human rights violations are not recruited.

在我们或我们供应链上的任何企业或商业关系与公共或私人安全武装签订了合约的情况下,我们承诺或者将规定,这类安全武装需被公认的处理公共或私人安全武装的国际标准和指导性文件所认可。尤其是,我们将支持或采取措施,运用筛查政策,确保已知实施过侵犯人权行为的个人或安全武装单位不被录用。

We will support or take measures to cooperate with the central or local governments, international organizations and civil society organizations to formulate feasible solutions to improve the transparency, proportionality and accountability in payments made to public security forces for the provision of security.

我们将支持或采取措施,与中央或地方政府、国际组织和民间社会组织开展合作,共同制定提高公共安全武装安保费用的透明度、相称性和问责性的可行解决方案。

We will provide support or take measures to cooperate with the central or local governments, international organizations and civil society organizations, if the mineral resources in the supply chain are exploited through individual workshops or small-scale mining, and the adverse effects of public or private security forces deployed in mines on vulnerable groups should be avoided or minimized, especially on small workshops.

我们将支持或采取措施,与当地政府、国际组织和民间社会组织开展合作,供应链上的矿产资源通过小作坊或小规模采矿方式开采的,避免或最大限度地降低公共或私人安全武装驻扎在矿址给弱势群体带来的不利影响,尤其是对小作坊的不利影响。

#### Risk reduction

#### 降低风险

If we have right reason to believe the upstream supplier purchases or relates to any party that provides direct or indirect support to a non-state organized armed group, we will immediately suspend or terminate the cooperation with the supplier. We will establish, adopt and implement risk management plans with the supplier and other stakeholders, in accordance with the specific position of the enterprise in the supply chain, so as to prevent or reduce the risk of providing direct or indirect support to the public or private security forces. Since these security forces illegally control the mine sites, transport routes and upstream participants in the supply chain, conduct illegal taxation or extortion of money or mineral resources at the site entrance, the transport line or the mineral trade point, or collect illegal taxation or extortion from intermediaries, export companies or international traders, we have reason to believe that there is a risk. If the implementation of the risk management plan is not effective, we will suspend or discontinue

cooperation with the supplier.

如果我们有合理理由认为上游供应商从向非国有有组织武装团体提供直接或间接支持的任何一方进行采购或与之存在关联,我们将立即中止或终止与该供应商的合作。我们将根据企业在供应链上所处的具体位置,立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划,从而防范或降低向公共或私人安全武装提供直接或间接支持的风险。这些安全武装非法控制矿址、运输路线和供应链上游参与方,在矿址入口、运输线路或矿产交易点非法征税或勒索钱财或矿产资源,或对中间商、出口公司或国际贸易商非法征税或勒索,我们有理由认为存在风险。如果风险管理计划实施未奏效,我们将中止或终止与供应商的合作。

#### 4. Regarding corruption, money laundering and costs relating to payments to the government

##### 关于腐败、洗钱和向政府支付的各项费用

We shall not directly or indirectly offer, promise, give or solicit any bribes, and will resist extortion of bribes. We will not engage in bribery or violate relevant international anti-corruption standards and practices to conceal or falsify the origin of mineral resources, or to make false declarations on taxes, fees and mining royalties payable to the government for activities such as the exploitation, trading, processing, transportation and export of mineral resources.

我们不直接或间接提供、承诺、给予或索要任何贿赂,并且抵制索贿,不会为了掩盖或伪造矿产资源原产地,虚报矿产资源开采、交易、处理、运输、出口等活动应向政府缴纳的税收、费用和特许开采费而行贿或不遵守相关国际反腐败标准和惯例。

We prohibit bribery in all business activities and transactions, including bribery of agents and other third parties, and formulate standards and approving procedures for sending gifts; we do our best to promote responsible business practices with all business partners.

我们禁止一切业务活动和交易中的贿赂行为,包括代理方和其他第三方的贿赂行为,为馈赠、收受礼物制定标准与审批程序;尽最大努力促进与所有业务伙伴间负责责任的商业实践。

If we have reason to believe there is risk of money laundering related to or associated with the mineral resources of illegal taxation or extortion at the entry of the mine site, the route of the transport line or the upstream supplier's mineral resources trading location, as a result of exploitation, transaction, handling, transport or export, we will support or take measures to contribute to the effective elimination of money laundering. We commit ourselves to take effective measures to prevent involvement in money laundering or terrorist financing, for example, monitor transactions over abnormal or suspicious activities, and keep cash transaction records above the maximum amount of applicable laws and regulations by defining or publicizing the suppliers and customer identities and the actual ownership, etc.

如果我们有理由认为,存在因开采、交易、处理、运输或出口在矿址入口、运输路线沿线,或上游供应商矿产资源交易地进行非法征税或勒索而得的矿产资源所引起或与之相关的洗钱风险,我们将支持或采取措施,为有效消除洗钱行为做出贡献。我们承诺采取有效措施,防止卷入洗钱或恐怖主义融资,例如:通过明确和发布供应商、客户身份和实际所有权等,监测异常或可疑活动的交易,保存高于适用法律法规中金额上限的现金交易记录。

We will ensure that all legal taxes, fees and royalties related to the mining, trading and export of mineral resources in conflict-affected and high-risk areas are paid to the government and will be disclosed on the basis of the position of the enterprise in the supply chain.

我们将确保向政府支付所有与受冲突影响和高风险区域矿产资源开采、交易、出口相关的合法税收、费用和特许费,并承诺根据企业在供应链上所处位置,对此类支付进行披露。

#### Risk reduction

##### 降低风险

We undertake to cooperate with suppliers, central or local governments, international organizations, civil society and the affected third parties, as appropriate, in accordance with the specific position of the enterprise in the supply chain, and to improve or track performance for the purpose of taking measurable actions within a reasonable time span to prevent or reduce adverse impact risks. If the risk reduction measures do not work, we will suspend or discontinue cooperation with upstream suppliers.

根据企业在供应链上所处的具体位置，我们承诺与供应商、中央或地方政府、国际组织、民间社会以及受影响的第三方酌情开展合作，本着在合理的时间跨度内采取可测量措施，防范或降低不利影响风险之目的，对绩效进行改善或跟踪。风险降低措施未起作用的，我们将中止或终止与上游供应商的合作。

## 5. Violations of Land, Community and Cultural Rights

### 职业健康安全

We do not participate in, tolerate, or benefit from any mining, smelting or processing activities where basic personal protective equipment (PPE) and emergency rescue measures are not provided, and where workers are exposed to dust, toxic gases or high-risk chemicals in environments lacking ventilation and protection. We do not participate in, tolerate, or benefit from production operations that lack safety training, operating procedures or emergency response plans for accidents. We do not participate in, tolerate, or benefit from mining or production activities carried out at mines, smelters or processing sites with potential structural safety hazards, such as slope instability, tailings pond leakage and malfunction of high-temperature and high-pressure equipment, where reasonable control measures have not been implemented.

我们不参与、不容忍、也不受益于未提供基本个人防护装备（PPE）或应急救援措施，以及在无通风、无防护条件下接触粉尘、有毒气体或高危化学品的采矿、冶炼或加工活动。我们不参与、不容忍、也不受益于缺乏安全培训、作业规程或事故应急预案的生产作业过程。我们不参与、不容忍、也不受益于矿山、冶炼或加工场所存在结构性安全隐患（如边坡失稳、尾矿库泄漏、高温高压设备失控等）且未采取合理控制措施的开采或生产行为。

### Risk reduction

#### 降低风险

If we have reasonable grounds to believe that such risks exist and reasonable control measures have not been put in place, we will immediately formulate, adopt and implement a risk management plan together with suppliers and other stakeholders based on the enterprise's specific position in the supply chain, so as to prevent or mitigate specific risks related to occupational health and safety. If the implementation of the risk management plan fails to achieve the desired results, we will suspend or terminate our cooperation with the relevant supplier.

如果我们有合理理由认为此类风险存在，且未采取合理控制措施，我们将根据企业在供应链上所处的具体位置，立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划，从而防范或降低与职业健康安全相关的具体风险。如果风险管理计划的实施未奏效，我们将中止或终止与该供应商的合作。

## 6. Violations of Land, Community and Cultural Rights

### 关于土地、社区与文化权利侵害

We will not participate, tolerate, or benefit from the exploitation of resources on land that has not obtained the free, prior and informed consent of the locals and indigenous people, including the miners of legal ownership, leasehold, concession or license. We will not participate, tolerate, or benefit from the exploitations where the culture and heritage of the locals and indigenous people are not respected or protected, or the traditional culture of the locals are harmed. We will not participate, tolerate, or benefit from exploitation of land whose legal ownership, leasehold, concession or license is illegally obtained, or in violation of domestic laws.

我们不参与、不容忍、也不受益于在未获得当地人和土著人自由、预先、知情的同意的土地上开采资源，包括持有法定所有权、租赁权、特许权或许可证的开采商。我们不参与、不容忍、也不受益于当地人和土著人的文化和遗产未受尊重和保护，或损害当地人传统文化的开采作业。我们不参与、不容忍、也不受益于在非法获得法定所有权、租赁权、特许权或许可证，或违反国内法的土地上开采资源。

### Risk reduction

#### 降低风险

If we have reasonable grounds to believe that such risks of violations of land, community and cultural rights exist, we will immediately develop, adopt and implement risk management plans together with suppliers and other stakeholders based on the enterprise's specific position in the supply chain, so as to prevent or mitigate specific risks of violations against land, community and cultural rights.

如果我们有理由认为,我们将根据企业在供应链上所处的具体位置,立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划,从而防范或降低侵害土地、社区、文化权利的具体风险。

## 7. Severe environmental and climate hazards

### 重大环境与气候危害

We ensure that we do not adversely affect the conditions of the surrounding soil, air and water or seriously violate local laws and regulations, including the manufacture, trade, and use of chemicals and hazardous substances which are prohibited by international standards because of their high toxicity, environmental persistence, or potential irreversible ecological effects on the organism, or emissions of arsenic and mercury.

我们确保避免给周围土壤、空气和水的状况造成重大不利影响,严重违反当地相关法律法规,包括制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质,或排放砷和汞。

We undertake to regularly assess and reduce the adverse effects of mining on soil, air and water. We will take into consideration the conditions of the surrounding soil, air and water resources, take the pollution prevention methods and techniques with technical, capital feasibility and applicability, and try to avoid, reduce and control the pollution; we will monitor the major pollutants discharged by enterprises, grasp the situation of enterprise pollution at any time, and make clear the records and publicize the monitoring results in accordance with the relevant laws and regulations of the host country; the strategy of controlling and reducing emissions will be adopted.

我们承诺定期评估、降低采矿对土壤、空气、水造成的不利影响。考虑周围土壤、空气和水资源的条件,采取具有技术、资金可行性与适用性的污染预防方法与技术,尽力避免、降低、控制污染;按照东道国的相关法律法规要求,对企业排放的主要污染物进行监测,随时掌握企业污染状况,并明确记录、公开监测结果;采取控制与减少排放策略。

We agree to ensure compliance with applicable legal requirements for chemicals and toxic substances management, avoid the manufacture, trade, and use of chemicals and hazardous substances which are prohibited by international standards because of their high toxicity, environmental durability, or potential irreversible ecological effects on the organism, which includes strict control of the emissions of arsenic and mercury in accordance with the highest international standards, the management of cyanides, and the treatment, storage and transport of hazardous substances in accordance with relevant laws and regulations, in order to ensure there is no leakage, spillage or other forms of release into the environment during the process.

我们同意确保遵守化学品和有毒物质管理适用的法律要求,避免制造、交易、使用因对生物体高毒性、环境持久性、或潜在的不可逆生态影响而受到国际禁令的化学品与危险物质,其中包括按照最高国际标准严格控制砷和汞的排放,管理氰化物,确保危险物质的处置、贮存和运输符合相关的法律法规,确保在过程中无泄漏、无溢溅或以其他形式释放到环境中。

We prohibit resource extraction in World Heritage Sites, national parks, key biodiversity areas or legally protected reserves, as well as any activities that pose threats to the outstanding universal values of these areas.

我们禁止在世界自然遗产地、国家公园、生物多样性关键区或法定保护区开采资源,以及由此给这些地区的突出普遍价值造成威胁。

We commit to not participating in, tolerating, or benefiting from any mining, smelting or processing operations that fail to monitor or disclose major pollutant emission data and lack environmental compliance records, pose risks of dam failure or leakage due to unmanaged tailings pond safety hazards, or significantly exacerbate climate change and water resource pressure without assessing carbon footprints and water consumption impacts.

我们承诺不参与、不容忍、也不受益于未监测或公开主要污染物排放数据且缺乏环境合规记录;未管理尾矿库安全风险而存在溃坝或泄漏隐患;或显著加剧气候变化与水资源压力且未评估碳足迹与水耗影响的任何开采、冶炼或加工作业。

### Risk reduction

#### 降低风险

If we have reasonable grounds to believe that such risks exist, we will immediately work with suppliers and other stakeholders to formulate, adopt and implement risk management plans based on the enterprise's specific

position in the supply chain, so as to prevent or mitigate specific risks that may lead to significant adverse environmental impacts.

如果我们有合理理由认为该风险存在,我们将根据企业在供应链上所处的具体位置,立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划,从而防范或降低引发重大不利环境影响的具体风险。

## 8. Risks Associated with Artisanal and Small-Scale Mining (ASM)

### 小规模采矿(ASM)相关风险

We focus on the following risks associated with small workshops or small-scale miners: forced labour, child labour, unsafe working conditions, uncontrolled use of hazardous chemicals, frequent casualties stemming from the absence of basic occupational health and safety measures, vulnerability to infiltration by illegal armed groups or corrupt networks due to a lack of legitimate trading channels, and other significant environmental impacts.

我们重点关注与小作坊或小规模采矿商相关的以下风险:强迫劳动、童工、不安全工作条件、不受控危险化学品使用、因缺乏基本职业健康与安全措施而导致的频繁伤亡事故、因未建立合法贸易渠道而容易被非法武装或腐败网络渗透的问题,以及其他重大环境影响。

#### Risk reduction

#### 降低风险

If we have reasonable grounds to believe that such risks exist, we will immediately work with suppliers and other stakeholders to formulate, adopt and implement risk management plans based on the enterprise's specific position in the supply chain, so as to prevent or mitigate the specific risks associated with small workshops or small-scale miners.

如果我们有合理理由认为存在此类风险,我们将根据企业在供应链上所处的具体位置,立即与供应商及其他利益相关方一起制定、采用和实施风险管理计划,从而防范或降低与小作坊或小规模采矿商相关的具体风险。

## 四、Policy Implementation and Update 政策实施与更新

This policy shall take effect on the date of issuance. The Corporate Sustainable Supply Chain Management Committee is responsible for interpretation, supervision of implementation and regular review. The company will dynamically optimize the content of this policy in accordance with the evolution of international human rights and environmental standards as well as the actual business expansion conditions.

本政策自发布之日起生效,由公司供应链可持续管理委员会负责解释、监督执行与定期评审。公司将根据国际人权与环境标准演进,以及业务拓展实际情况,动态优化本政策内容。

## 五、Appeal and Communication 申诉与沟通

The company has established a supply chain appeal and communication mechanism, which has been published on the official website. If you have any questions about this policy, you may send an email to [sustainability@farasisenergy.com.cn](mailto:sustainability@farasisenergy.com.cn) for further inquiries, or file appeals and communicate through the channels specified in the appeal and communication mechanism.

公司已建立供应链申诉与沟通机制并已在官网发布,如果您对本政策有任何疑问,可以发送邮件到 [sustainability@farasisenergy.com.cn](mailto:sustainability@farasisenergy.com.cn) 进一步咨询,也可以按照申诉与沟通机制中的渠道方式进行申诉沟通。