

Supplier Code of Conduct

Guangdong Brunp Recycling Technology Co., Ltd. Supplier Code of Conduct (hereinafter referred to as "this Code of Conduct") applies to all suppliers providing products and/or services to Guangdong Brunp Recycling Technology Co., Ltd. and its affiliated companies controlled or involved in operation and management through holdings, equity ownership, voting rights, agreements, etc. (collectively referred to as "Brunp").

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This Code of Conduct commits to adopting the relevant policy requirements, including the Guidelines for Responsible Mineral Supply Chain Due Diligence in China (China Guidelines) issued by the China Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters (CCCMC), the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance), the OECD Guidelines for Multinational Enterprises, the EU Battery Regulation and Waste Battery Regulation, the International Bill of Human Rights (including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights), the UN Guiding Principles on Business and Human Rights, and the ILO Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy issued by the Organization for Economic Cooperation and Development (OECD). It aims to clarify Brunp's corporate social responsibility management requirements for suppliers, ensure that suppliers produce products or provide services in a socially responsible manner, and promote the sustainable development of the industrial chain.

CCMC

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This Code of Conduct mainly includes six aspects: suppliers' CSR management system, labor requirements, safety and occupational health, environmental and business ethics requirements, and suppliers' OECD responsible mineral survey policy. If a supplier has other written agreements with Brunp on relevant content or has made other commitments to Brunp in addition to this Code of Conduct, and such agreements or commitments conflict with the content of this Code of Conduct, the agreement with the higher standard or requirement shall prevail.

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Glossary

1. CSR Refers to Corporate Social Responsibility, including requirements for management systems, labor, safety and occupational health, environment, business ethics, etc.

1. CSR (Corporate Social Responsibility)



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2. Child Labor: Any worker under the age of 16 (China's legal standard), or under the age of completing compulsory education, or under the minimum employment age of the country/region where the labor is employed (whichever is the highest of the three).

2. 16

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3. Young Workers: Any worker who is older than the age defined for child labor as above but under the age of 18.

3. 18

4. Prison Labor: Persons imprisoned by the government or military.

4.

5. **Conflict-Affected and High-Risk Areas (CAHRA):** Areas where there is armed conflict, large-scale violence, or other risks harmful to the public, such as international or non-international conflict areas, liberation wars, rebellions, civil war zones, etc., usually accompanied by political instability, human rights violations and other phenomena.

5. CAHRA

6. Country of Origin: The location where minerals are mined.

6.

Chapter 1 Supplier CSR Management System

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1. CSR System Suppliers shall establish and effectively operate a CSR management system with reference to standards such as the Responsible Business Alliance (RBA) Code of Conduct, SA8000, ISO14001, ISO45001, ISO26000 Guidelines, relevant laws and regulations, and Brunp's requirements.

1. CSR (RBA) SA8000 I SO14001
I SO45001 I SO26000 CSR

2. CSR Policy: Suppliers shall establish a social responsibility policy, including compliance with laws, regulations and international standards, and a commitment to continuous improvement.

2. CSR

3. CSR Requirements: All activities of suppliers must be based on full compliance with the laws, regulations of the country/region where they operate and Brunp's requirements. At the same time, suppliers shall comply with relevant international and industry CSR standards. If the laws of the above-mentioned country/region conflict with these standards, the higher standard consistent with the national/regional laws shall be adopted. If there is no conflict between the legal provisions and these standards but the content specified is the same, the provisions or content that better protect the interests of employees shall be adopted.

3. CSR

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4. Management Responsibilities and Obligations

4.

4.1 Suppliers shall establish a responsible organization for CSR management, which shall include senior management, CSR professionals, various departments and corresponding functional responsibilities.

4.1

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4.2 Suppliers shall conduct CSR management on their tier-1 suppliers/subcontractors, including but not limited to requiring tier-1 suppliers to establish a CSR management system, conduct CSR risk assessment, CSR performance management, on-site CSR audits and follow-up improvement of issues.

4.2 / CSR
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4.3 Suppliers shall formulate CSR agreements with their tier-1 suppliers and promote the signing of such agreements to encourage tier-1 suppliers to strengthen social responsibility management.

4.3 CSR

4.4 Suppliers shall take CSR as a necessary condition or threshold standard when certifying and selecting new tier-1 suppliers. If the CSR of a new tier-1 supplier fails to meet the requirements, it shall not be approved.

4.4 CSR
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5. Risk Assessment and Risk Management

5.

Suppliers shall formulate procedures to identify risks related to their operations in terms of management systems, labor, safety and occupational health, environment, business ethics, etc., and implement appropriate procedures to ensure compliance and risk control.

6. Performance Objectives with Implementation Plans and Measures

6.



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Suppliers shall formulate CSR performance objectives, indicators and implementation plans to improve their social responsibility performance and regularly evaluate the achieved performance.

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7. Training

7.

Suppliers shall formulate training plans for management and employees to implement their CSR policies, procedures and improvement objectives.

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8. Communication

8.

Suppliers shall formulate a set of procedures to promptly communicate CSR-related performance, CSR reports and CSR incidents to Brunp, other customers, their employees and their tier-1 suppliers.

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9. Internal Audit and Evaluation

9.

Suppliers shall conduct regular internal audits and self-evaluations to ensure compliance with the social responsibility requirements of laws and regulations, international standards and this Code of Conduct.

10. Continuous Improvement

10.

10.1 Suppliers shall formulate procedures to formulate improvement plans

for non-conformities identified in internal and external evaluations,

inspections and audits, and take appropriate remedies and corrections according to their nature and severity.

10.1

10.2 Bangpu Recycling, its customers, or third parties designated by its customers shall be entitled to conduct on-site audits on the CSR (Corporate Social Responsibility) management systems and on-site CSR management of suppliers and their tier-1 upstream suppliers. Suppliers (including their tier-1 upstream suppliers) shall actively cooperate with such audits and provide necessary support; if the audit identifies non-compliance with relevant requirements in CSR management, suppliers must timely complete corrective action requirements.

10.2

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10.3 The relevant audits conducted by Brunp on suppliers or their tier-1 suppliers shall not affect or exempt the suppliers from their responsibilities and obligations to Brunp.

10.3

11. Documentation and Records

11.

Suppliers shall establish documents and records to ensure compliance with laws and regulations and Brunp's requirements, and properly protect confidential information.

12. Issue Handling and Corrective Actions

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2.2

2.3 When hiring young workers as needed, suppliers shall provide labor protection in accordance with legal requirements, including but not limited to: not arranging young workers to work in toxic and hazardous positions, not arranging young workers to work night shifts, etc.

2.3

2.4 Except for jobs or positions that are not suitable for women as stipulated by local regulations, women shall have equal employment opportunities with men. Suppliers shall prohibit arranging female employees to engage in prohibited labor as stipulated by local regulations, and shall prohibit arranging female employees to engage in work at heights, low temperatures, cold water operations and other prohibited labor as stipulated by local laws during menstruation or pregnancy. Suppliers shall prohibit arranging female employees to engage in prohibited labor as stipulated by local regulations, overtime work or night shifts during the period of breastfeeding infants under one year old.

2.4

3. Forced or Compulsory Labor

3.

3.1 The Supplier shall ensure that all employees are employed on a purely voluntary basis. The Supplier shall not employ any form of slavery (including modern slavery), forced labor, debt bondage labor, human trafficking victims, or prison labor. The Supplier shall not restrict personal freedom, withhold identity documents, or engage in human trafficking, including the

transportation, harboring, recruitment, transfer, or receipt of such labor or services by means of threat, coercion, compulsion, abduction, or deception. Employees shall not be required to pay deposits, recruitment fees, or other charges to the employer or its agents.

3.1

3.2 Suppliers shall not use or support the use of prison labor, nor shall they outsource products to prison labor for production.

3.2

3.3 Suppliers shall sign labor contracts with employees. The conclusion and modification of labor contracts shall follow the principles of equality, voluntariness and consensus through consultation, and shall not violate laws and regulations.

3.3

3.4 Suppliers shall terminate employees' labor contracts in accordance with legal provisions, and give written notice and compensation to the parties in advance in accordance with legal provisions.

3.4

3.5 Suppliers shall not withhold workers' wages, welfare benefits, property or documents to force employees to work continuously for them

3.5

3.6 In addition to prohibiting unreasonable restrictions on entry and exit from the workplace, suppliers shall not impose unreasonable restrictions on employees' freedom of movement in the workplace.

3.6

4. Working Hours and Rest

4.

4.1 Suppliers shall comply with local legal provisions on working hours and rest.

4.1

4.2 Regardless of whether they adopt hourly wage, piece-rate wage or comprehensive working hour system recognized by local regulations, suppliers shall keep accurate working time records.

4.2

4.3 Suppliers shall establish an effective overtime control mechanism to ensure that employees' overtime work is voluntary and that employees' physical and mental health is protected.

4.3

5. Basic Wages and Social Insurance

5.

5.1 The wages paid by suppliers shall be at least the minimum wage standard stipulated by the local government. They shall provide welfare benefits and pay overtime wages in accordance with national legal provisions. Suppliers shall stipulate working conditions, wage benefits and wage payment cycles in the labor contract.

5.1

5.2 The wage payment time shall be in accordance with local government regulations, and wages shall not be in arrears or delayed.

5.2

5.3 Suppliers shall provide social insurance for employees in accordance with legal provisions, including work-related injury insurance, and pay the corresponding insurance premiums in accordance with the law.

5.3

5.4 Suppliers shall employ dispatched workers and outsourced labor in accordance with the restrictive provisions of local laws.

5.4

6. No Discriminatory Systems and Practices

6.

6.1 In matters involving employment, remuneration, training, promotion, dismissal or retirement, suppliers shall not engage in or support discriminatory systems and practices based on factors such as race, nationality, religion, disability, gender, marital status, political affiliation or age.

6.1

6.2 Suppliers shall not allow any acts of threat, abuse, exploitation or sexual harassment in the workplace, residences provided or managed by them and other places, including gestures, language and physical contact.

6.2

6.3 Suppliers shall respect employees of different races and religious beliefs and provide necessary convenience and conditions in terms of customs.

6.3

6.4 Under no circumstances shall suppliers require employees to undergo pregnancy or virginity tests.

6.4

7. Freedom of Association and Communication

7.

7.1 Suppliers shall have organizations (such as trade unions, workers' congresses, clubs and other communication channels) that can represent and safeguard the legitimate rights and interests of employees and carry out activities independently in accordance with the law.

7.1

7.2 Suppliers shall ensure that persons participating in workers' organizations and worker representatives are not discriminated against, harassed, coerced or retaliated against because of their trade union membership or participation in trade union activities. Employee representatives may maintain contact with the employees they represent at the workplace.

7.2

7.3 Suppliers shall ensure that employees have the right to participate in democratic management and equal consultation through workers' congresses, employee representatives or other forms in accordance with legal provisions.

7.3

8. Establishment of Systems to Safeguard Employees' Rights and Interests

8.

8.1 Suppliers shall establish rules and regulations to safeguard employees' rights and interests in accordance with the law, including working



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3.1

3.2 Emergency drills must be conducted at least once a year, or in accordance with local legal requirements (whichever is more stringent).

3.2

4. Work-Related Injuries and Occupational Diseases

4.

4.1 If an employee is injured at work or suffers from an occupational disease, the supplier shall provide first aid and assist the employee in obtaining subsequent treatment.

4.1

4.2 Suppliers shall establish processes for investigating, analyzing and statisticalizing work-related injuries and occupational diseases to reduce the incidence of accidents and work-related injuries.

4.2

5. Occupational Health

5.

5.1 In accordance with the principle of hierarchical control, suppliers shall identify, assess and control hazards caused by chemical, biological, physical and other factors to workers. If any potential hazards are found, suppliers shall seek opportunities to eliminate and/or reduce the potential hazards. If eliminating or reducing the hazards is not feasible, potential hazards shall be controlled through appropriate design, engineering and management control measures. When hazards cannot be fully controlled through these measures, appropriate and well-maintained personal protective equipment shall be provided to workers free of charge for their use.

5.1

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5.2 Suppliers shall establish mechanisms to predict, identify, assess and control occupational hazard factors existing in the workplace. Suppliers shall conduct occupational health monitoring for employees engaged in work involving occupational hazard factors in accordance with the law.

5.2

5.3 Employees engaged in special operations shall receive special training and be required to obtain special operation qualifications.

5.3

6. Machine Safety Protection

6.

Suppliers must conduct safety hazard assessments on production equipment and other machinery. Physical protective devices, interlocking devices and barriers shall be provided for machinery that may cause employee injuries and properly maintained.

7. Health and Safety Communication

7.

7.1 Suppliers shall provide workers with health and safety information about the workplace and conduct training in the workers' native language or a language they can understand to enable them to correctly recognize workplace hazard labels they are exposed to, including but not limited to mechanical,

electrical, chemical, fire and physical hazards. Suppliers shall post health and safety-related information in locations easily visible to workers.

7.1

7.2 Suppliers shall conduct health and safety training for employees in accordance with local regulations so that they can fully recognize the hazard factors related to the work process and working environment and how to minimize the hazards. Suppliers shall provide pre-job training for all workers before they start work and conduct regular training for workers after they start work.

7.2

7.3 Suppliers shall encourage workers to raise any health and safety issues without fear of retaliation.

7.3

Chapter 4 Environment

Environmental responsibility is a necessary condition for producing and providing products and services. In production and operation, suppliers shall comply with all relevant environmental laws and regulations, reduce adverse impacts on communities, the environment and natural resources in an environmentally responsible manner, and ensure public health and safety.

1. Environmental Permits

1.

Suppliers shall obtain and timely renew all necessary environmental permits, approvals and registrations and comply with their provisions.

2. Pollution Prevention and Resource Conservation

2.

Suppliers shall reduce and eliminate all types of pollution and resource consumption at the source or through practical actions (such as process improvement, material substitution, resource conservation, material recycling and reuse).

3. Hazardous Substances

3.

Suppliers shall identify, label and manage chemicals, wastes and other materials that may be hazardous to humans or the environment, and ensure their safe handling, transportation, storage, use, recycling or reuse and disposal.

4. Restricted Substances

4.

Suppliers shall comply with all applicable laws, regulations and customer requirements regarding prohibited or restricted substances, and take effective measures to prohibit or restrict the use of certain specific substances in products and/or manufacturing processes.

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5. Solid Waste

5.

Suppliers shall adopt a systematic approach to identify, manage, reduce, responsibly dispose of or recycle solid waste (non-hazardous waste).

6. Wastewater

6.

6.1 Suppliers shall adopt a systematic approach to identify, manage and reduce wastewater generated in the production and operation process. Wastewater shall be classified, monitored, controlled and treated as required before discharge.

6.1

6.2 Suppliers shall conduct regular monitoring of the operation of their wastewater treatment systems to ensure optimal performance and compliance.

6.2

7. Rainwater

7.

Suppliers shall adopt a systematic approach to prevent illegal discharge and overflow of wastewater into rainwater drainage pipelines.

8. Waste Gas

8.

8.1 Suppliers shall classify, regularly monitor, control and treat volatile organic chemicals, sprays, corrosive substances, suspended particles,

such resources through energy conservation, reuse, recycling, alternative energy or other methods.

12. Soil

12.

Suppliers shall actively take countermeasures in terms of soil pollution, soil erosion, land use and land degradation, such as participating in soil protection projects, promoting environmentally friendly building materials, reducing soil damage during transportation, and assisting in soil erosion



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13. 2

Prioritize the selection of environmentally friendly materials and products, and encourage upstream and downstream of the supply chain to jointly participate in environmental protection.

Avoid purchasing raw materials or products that may cause damage to biodiversity.

13.3 Reduction of Environmental Impact:

13. 3

Implement energy conservation and emission reduction measures to improve the efficiency of energy and resource use.

Save water and reduce the discharge of wastewater, waste gas and solid waste.

Actively participate in waste recycling and reuse activities to reduce environmental impact.

13.4 Establishment of Environmental Management System

13. 4

Establish and improve an environmental management system, such as the ISO14001 environmental management system

I SO14001

Conduct regular environmental assessments, monitor and report environmental impacts.

14. Code of Conduct for Respecting Indigenous Communities

14.

14.1 Respect for Cultural Customs:

14.1

Suppliers shall respect the culture and customs of local communities and avoid impacting or damaging the culture of indigenous peoples.

When carrying out business activities, fully consider the cultural traditions and beliefs of indigenous peoples.

14.2 Promotion of Community Development:

14.2

Actively participate in community construction and development activities, and provide employment opportunities and skills training for indigenous peoples.

Support local education, medical care and infrastructure construction to promote the sustainable development of the community.

14.3 Protection of Indigenous Peoples' Rights and Interests:

14.3

Respect the land and natural resource rights and interests of indigenous peoples and avoid illegal occupation or damage.

Before carrying out projects, fully communicate and consult with indigenous peoples to ensure that the projects are in line with their wishes and interests.

14.4 Establishment of Harmonious Relations:

14.4

Establish friendly and harmonious relations with indigenous peoples to strengthen mutual understanding and trust.

Adopt fair and reasonable methods to resolve disputes and conflicts related to indigenous peoples.

Chapter 5 Business Ethics

1. Integrity in Operations

1.

Suppliers shall adhere to the highest standards of integrity in all business activities and prohibit any form of corruption, embezzlement, extortion, misappropriation of public funds, money laundering and other acts. All business transactions shall be transparent and accurately reflected in business accounts and records.

2. No Improper Benefits

2.

Suppliers shall not offer or accept any bribes, commercial kickbacks or other forms of improper benefits, including cash gifts, securities, payment vouchers and inappropriate gifts.

3. Fair Trade

3.

The Company recognizes the potential significant negative impacts associated with mining, trading, processing, and exporting minerals in conflict-affected and high-risk areas, as well as its obligation to respect human rights and not contribute to conflicts. The supply chains of metals such as gold, tin, tantalum, tungsten, nickel, cobalt, lithium, manganese, natural graphite, copper, aluminum, and mica involved in the Company's products or materials shall comply with the following code of conduct:

1. Severe Human Rights Violations Related to Mineral Mining, Transportation, or Trading:

1.

When conducting procurement or business activities in conflict-affected and high-risk areas, the Company will not tolerate, nor profit from, assist, facilitate, or enable any party to commit in any way:

i) Torture in any form, cruel, inhuman, or degrading treatment;

i)

ii) Forced or compulsory labor in any form. Forced or compulsory labor refers to any work or service extracted from any person under the threat of punishment and not voluntarily provided by that person;

ii)

iii) The worst forms of child labor;

iii)

iv) Other serious violations and abuses of human rights, such as widespread sexual violence;

iv)

v) War crimes, other serious violations of international humanitarian law, crimes against humanity, or genocide.

v)

2. Regarding Direct or Indirect Support to Non-State Armed Groups:

2.

The Company will not tolerate any direct or indirect support to non-state armed groups through mineral mining, transportation, trading, processing, or exporting. "Direct or indirect support" to non-state armed groups through mineral mining, transportation, trading, processing, or exporting includes, but is not limited to, purchasing minerals from non-state armed groups or their affiliates, making payments to them, or providing logistical support or equipment to them in other ways. These armed groups or their affiliates:

i) Illegally control mining sites, or otherwise control transportation routes, mineral trading points, and upstream actors in the supply chain; and/ or

i)

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ii) Illegally tax or extort money or minerals at mining site entrances, along transportation routes, or at mineral trading points; and/ or

ii)

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of minerals obtained through illegal taxation or extortion at mining site entrances, along transportation routes, or at mineral trading points of upstream suppliers.

6. Regarding Payments of Taxes, Fees, and Royalties to Governments:

6.

The Company will ensure the payment of all legal taxes, fees, and royalties to governments related to the mining, trading, and export of minerals in conflict-affected and high-risk areas, and commit to disclosing such payments in accordance with the principles of the Extractive Industries Transparency Initiative (EITI) based on the Company's position in the supply chain.

EITI