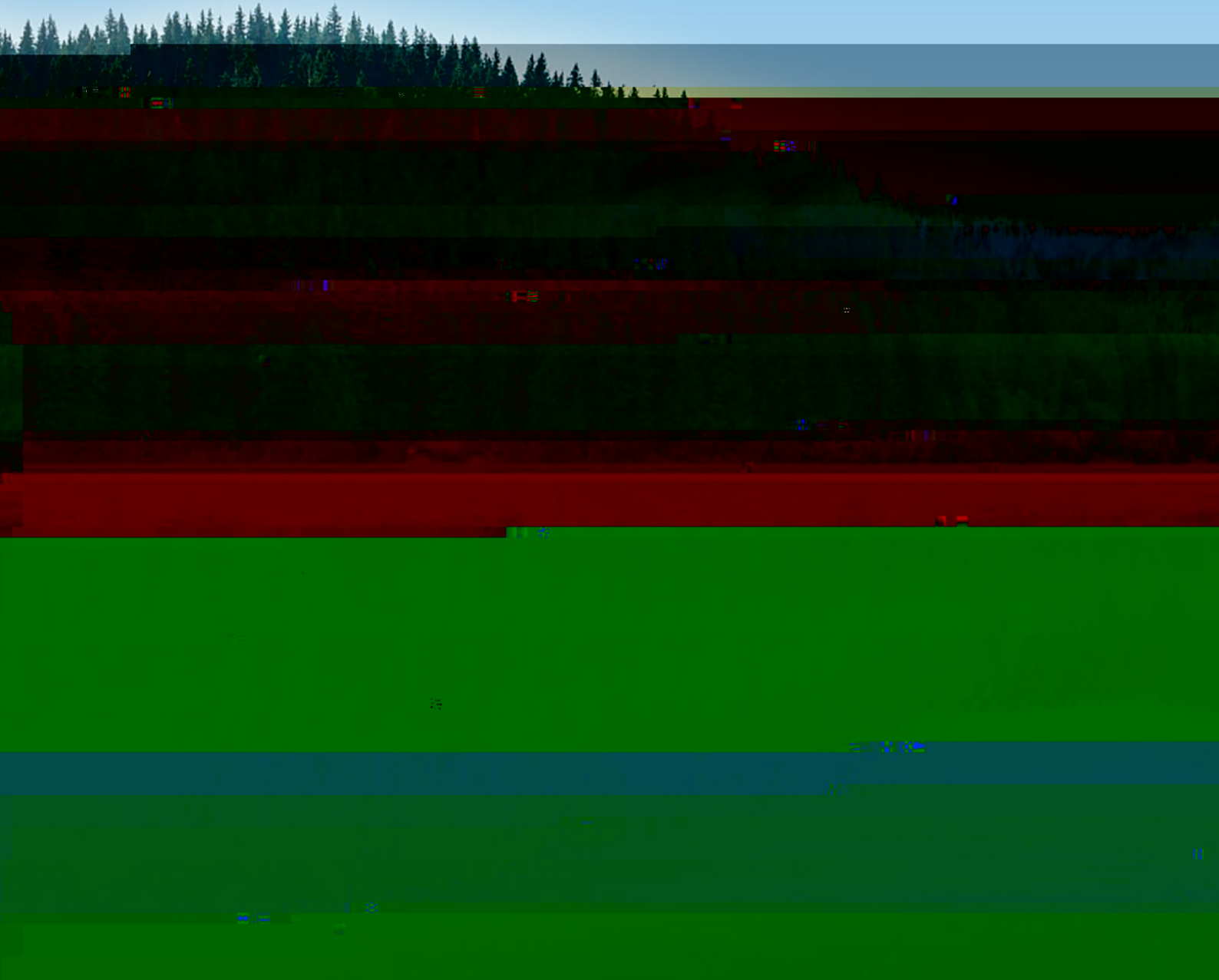




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Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to adverse impacts to society, CNGR commits to adopt and widely disseminate the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Chinese Guidance), published by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCME), and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, published by the OECD (OECD Guidance) incorporate it into its contracts and agreements with suppliers. CNGR is committed to conducting supply chain due diligence in accordance with the six-step framework of the Chinese Guidance and the five-step framework of the OECD Guidance. This policy provides a reference for conflict-sensitive procurement activities throughout the mineral supply chain. CNGR commits not to engage in any activity that would contribute to the conflict and to abide by relevant UN sanctions, Or, where applicable, comply with domestic laws implementing such resolutions.

The objective minerals of due diligence for CNGR:Nickle/Cobalt/Manganese/Lithium.

This Policy is applicable for CNGR Advanced Material Co.,LTD and all of its controlling subsidiaries. Meanwhile, CNGR requires and urges its suppliers and partners to comply with this policy.

1. While sourcing from, or operating in high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

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- the worst forms of child labour (Hazardous work is one of the worst forms of child labour);
- any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- other gross human rights violations and abuses such as widespread sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

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2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, ~~identifying~~

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including regarding human rights, providing security to mine workers, equipment and facilities, and protecting the site or transportation routes from interference with legitimate extraction and trade.

6.

7. Where we or any company in our supply chain contract public or private

management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

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13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from 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 internationally recognised transparency standards. We support the implementation of the principles and standards of the Extractive Industries Transparency Initiative (EITI) to enhance transparency in the mineral supply chain. When required by EITI reporting, we will disclose information in accordance with EITI principles and guidelines, and actively encourage suppliers to disclose relevant information.

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14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation of 6 months.

14.

15. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and / or indirect employees and / or any person present on the party's operations.

15.

18. 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 employing children as defined in paragraph 17.

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21. We do not participate in, tolerate, or profit from extracting or sourcing resources from mining operations where the cultural heritage of local and indigenous peoples have not been respected and protected, or where traditional values and heritage of local peoples have been harmed.

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22. If we have proper reasons to believe that such a case exists, we will immediately work with suppliers

