

## HiThium Code of Conduct

Xiamen HiTHIUM Energy Storage Technology Co., Ltd.

## PREFACE

Xiamen Hithium Energy Storage Technology Co. Ltd., (hereinafter referred to as “Hithium” or the “Company”) has always been committed to providing safe, efficient, clean, and sustainable green energy solutions for the world since its establishment. With the growing development of the Company, Hithium believes that honesty, trustworthiness, and compliance with the law are the cornerstones of the Company's global business success, as well as the solid foundation of Hithium's sustainable development.

The Company ensures that the Company's operation and management as well as the behavior of its employees comply with laws and regulations, binding industry standards and business ethics by continuously improving the compliance management system, optimizing the compliance risk management mechanism, and fostering a culture of compliance among all employees. To better help every person in Hithium understand and master the Company's compliance requirements and combine them with daily operation and management, the Company formulated and issued this Code of Conduct.

As an important part of the Company's compliance management system, the Code of Conduct not only puts forward specific behavioral requirements for all employees, including management, in all aspects of their daily work, and clearly defines the bottom line that must not be touched in business behavior, but also puts forward compliance requirements for business partners and other stakeholders. To ensure that the Code of Conduct is continuously complied with, Hithium will continuously establish and improve the compliance monitoring system to support all employees or business partners to report to the Company when they encounter or find any behavior that does not comply with the Code of Conduct, and to ensure that the contents of the report are effectively communicated and receive an appropriate response.

## **Scope of Application**

This Code of Conduct applies to all employees of Xiamen Hithium Energy Storage Technology Co. Ltd. and its affiliated companies, as well as the Company's business partners and other stakeholders.

## **Consultation and Suggestion**

If the Company's employees or business partners have any questions or suggestions in the process of implementing this Code of Conduct, please promptly submit them to the Company's Legal and Compliance Center to obtain relevant answers and feedback.

Contact Email: [HC-Compliance@hithium.com](mailto:HC-Compliance@hithium.com)

## **Complaints and Reports**

When the Company's employees or business partners discover situations that do not comply with the requirements of this Code of Conduct, they should proactively and promptly file a complaint or report to the Company's Legal and Compliance Center.

All complaints and reports can be submitted confidentially and anonymously. The Company will conduct thorough investigations, prioritizing investigations involving significant risks. The investigation process is conducted by an independent department, ensuring complete confidentiality. The Company will inform the named reporter of the progress of the investigation, as appropriate, and will communicate the results of the investigation upon completion. Where necessary, the Company will take corrective action and hold those responsible accountable.

The Company has zero tolerance for any retaliation and strictly prohibits retaliation against any employee or business partner who, in good faith, raises concerns, seeks advice, reports non-compliance, or provides information during an investigation. The

Company conducts annual employee training on the Code of Conduct and regularly requires employee's confirmation to ensure that all employees are aware of and agree to its content and to promote the effective use of reporting channels. If you experience or discover any retaliation, please immediately report it to the Company's Legal and Compliance Center.

Contact Email: [HC-Compliance@hithium.com](mailto:HC-Compliance@hithium.com)

## **1. Respect and Protect Employees**

### **1.1 A Respectful Work Environment**

Hithium is committed to providing a safe, fair, and respectful work environment. The Company does not tolerate any form of harassment, discrimination, or exclusion. Hithium is a company that values equal opportunity and all employment decisions (hiring, promotion, termination, etc.) are based on legitimate business considerations such as experience, skills, education, performance, and leadership.

### **1.2 Supporting and Guaranteeing Human Rights**

The Company respects all internationally recognized human rights consistent with the United Nations Guiding Principles on Business and Human Rights. The Company seeks to treat everyone affected by its operations and supply chains with fairness and respect. The Company is committed to using its best efforts to identify and address risks associated with human rights violations, to remain alert to suspicious situations, and to exercise reasonable due diligence.

Hithium attaches great importance to the protection of employees' labor rights and interests. In accordance with the laws and regulations of China and the jurisdictions where the Company conducts business, the Company ensures that the basic rights of employees are protected in terms of salary and benefits, working hours, freedom of association and group negotiations.

### **1.3 Occupational Health and Safety in the Workplace**

Hithium insists on people-oriented and putting safety first. The Company complies with the relevant laws and regulations on employee health and workplace safety, and builds an occupational health protection mechanism and continues to improve the company's occupational health management level by continuously improving the specialized management of occupational health.

Each employee shall abide by the law and avoid any behavior that may endanger

his/her health or the health of others, and shall immediately report to his/her supervisor or the relevant department of the Company when he/she perceives dangerous or harmful operations, equipment or environment in the workplace.

## **2. Operating Responsibly**

### **2.1 Cooperation with the Government**

The Company treats government agencies fairly and honestly. The Company is committed to complying with all contractual terms and conditions, laws and regulations applicable to the Company when working with the government.

The Company's employees shall provide timely feedback to the Company when negotiating contracts in which government entities are known end users, or engaging with government's employees regarding potential government contracts.

### **2.2 Fair Competition**

The Company advocates a free competitive market, opposes practices that restrict market competition, and eliminates any behavior that harasses the order of market competition and harms the legitimate rights and interests of other operators or consumers, such as collusive bidding, false advertising, and infringement of trade secrets.

The Company shall deal fairly with the Company's customers, suppliers, and competitors, and shall not obtain an unfair advantage through manipulation, concealment, misuse of privileged information, misrepresentation of material facts, or any other unfair dealings or behaviors.

### **2.3 Anti-Monopoly**

The Company complies with all applicable antitrust laws and regulations. The Company will not enter into improper agreements with other companies to fix prices or terms offered to customers, allocate markets or customers, or manipulate the bidding process.

Employees of the Company should comply with antitrust laws and regulations when engaging with business partners or other third parties, and be alert to and recognize potential antitrust compliance risks.

#### 2.4 Anti-Bribery and Anti-Corruption

Violations of anti-corruption laws and regulations can trigger investigations for the Company and the individuals involved, and lead to reputational damage and even criminal penalties. The Company does not tolerate bribery or corruption of any kind, including the giving or receiving of bribes, kickbacks, or facilitation payments of any kind.

The Company's employees shall comply with internal company regulations regarding the prevention of bribery, corruption and other corrupt practices. When dealing with government agencies in various countries, employees shall not bribe officials with money or giving advantages of any kind to obtain orders or benefits. If an official actively requests personal benefits, it must not be agreed under any circumstances and the situation must be reported to the Company immediately.

#### 2.5 Being Cautious with Gifts and Hospitality

Hithium always adheres to customer-centricity, responds to customer needs, pays attention to customer experience, and create higher value for customers. Employees of the Company should be cautious with giving gifts to customers and entertaining customers. Gifts and entertainment should be provided in accordance with laws and the Company's regulations, and within the scope of standard business practices. In principle, employees are not allowed to give valuable gifts or arrange expensive entertainment for customers.

#### 2.6 Environmental Protection

Sustainable development is one of the key concepts of Hithium. Hithium is committed to preventing or continuously reducing the environmental impact in the development, production, storage, transportation, and use of products and raw materials. At the

same time, Hithium applies the same principles when building, operating, renovating, or expanding production plants and avoid any illegal emissions of substances.

The Company encourages its employees to fulfill their environmental protection obligations and responsibilities in their work and life, and actively practice the concept of low-carbon living.

### **3. Practicing Good Business Compliance**

#### **3.1 Anti-Money Laundering**

Money laundering is a criminal act that legalizes illegal gains. The Company strictly abides by applicable domestic and international laws and regulations on anti-money laundering and will never participate in any money laundering activities. The Company will only choose to conduct business with customers who have good business reputations and legitimate sources of funds.

No employee shall use the Company's products to engage in illegal activities with anyone in the conduct of business activities, such as laundering funds from illegal sources; in the course of business, focus should be placed on customers or other business partners who use large amounts of cash payments. Once any suspicious financial transactions and activities are detected, they should be immediately reported to the Company.

#### **3.2 Ensuring Fiscal and Tax Integrity**

The Company shall comply with accounting practices and financial reporting requirements applicable to the Company and prepare timely, accurate, and complete financial information for reporting to management, investors, regulators, and other stakeholders. The Company shall comply with the tax laws and regulations of the countries and regions in which it operates and fulfill its tax obligations and tax withholding obligations under the laws.

The Company develops and implements financial audit systems and internal control

procedures to prevent financial fraud and malpractice.

### 3.3 International Trade Compliance

As a company with international operations, Hithium complies with applicable regulations of global trade controls and economic sanctions. The Company is committed to improving the level of security management in the supply chain and carefully ensures that applicable customs and trade regulations are checked, enforced, and complied with in its business activities.

Employees of the Company who are responsible for importing or exporting goods or technologies are obliged to comply with the current sanctions programs, export control and customs laws and regulations, as well as with the relevant guidelines and processes in their work.

### 3.4 Responsible Procurement Activities

In order to implement responsible procurement activities, during the procurement of materials, products and services, the Company will require suppliers to comply with relevant laws, regulations and commercial ethics of human rights and labor protection, hygiene and security, environmental protection, export control, information security, etc.

The Company will continuously improve and conscientiously implement the relevant system of supplier management, optimize the supplier's access and assessment mechanism, and ensure that the purchased materials, equipment, etc. can effectively meet the requirements of Hithium.

### 3.5 Guarantee of Product Safety and Quality

Hithium's product quality is the key part of the Company's reputation and the foundation of the Company's competitiveness. In the countries or regions where Hithium's products are provided, Hithium complies with applicable laws and regulations related to the quality, safety and performance of the Company's products.

The Company integrates safety compliance into the product regulatory life cycle and establishes a quality management system to ensure that the Company can continue to provide products and services that meet the requirements of relevant parties.

#### **4. Safeguarding the Legitimate Interests of the Company**

##### **4.1 Avoidance of Conflict of Interest**

Conflicts of interest will affect the credibility of the Company and may expose the Company to various risks, as well as damage the Company's reputation. To effectively avoid conflicts of interest, Hithium requires every employee to immediately and formally report to the Company when their personal interests may affect, or be perceived to affect, their professional judgment or the interests of the Company, and to ensure that the Company always acts in its best interests. The Company encourages open communication and commends proactive reporting. In the following respects, any employee of the Company shall:

- 4.1.1 Not accept monetary or other improper benefits from any of Hithium's business partners, suppliers, other partners or potential third parties;
- 4.1.2 Not work for any third party who is a current or potential business partner or supplier of Hithium;
- 4.1.3 Not conduct the business of the Company with family members or other people with whom you have a significant personal relationship, and not use the position at Hithium to obtain preferential treatment for them;
- 4.1.4 Not take possession of the opportunities discovered by using the Company's property, information or position, and not seek personal benefits by using the Company's property, information or position.

##### **4.2 Management and Protection of the Company Brand**

The company brand is an integral part of the Company's business and an important corporate asset of Hithium. All employees shall abide by the Company's rules and

regulations on brand and publicity, properly manage and protect the Company's brand, and shall not do any behavior that damages the Company's brand image. Employees can only contact the media on behalf of the Company if they are authorized by the Company to deal with the media.

#### 4.3 Proper Storage and Reasonable Utilization of the Company Property

Employees of the Company shall properly keep and rationally use the Company's property, including tangible assets such as real estate, equipment, inventory, products and office facilities, as well as intangible assets such as trade secrets, proprietary technologies, brands and computer systems, and eliminate any theft, improper use, or other acts that damage the value of the Company's assets.

#### 4.4 Respect and Protection of the Intellectual Property

Hithium's intellectual property is key to the success of the Company's business. The Company respects and protects intellectual property rights, encourages and adheres to technological innovation, pays attention to the leading and important role of intellectual property rights such as patents and trademarks, combines intellectual property management with technology R&D and asset operation, and continuously improves the core competitiveness of enterprise.

The Company recognizes and respects the intellectual property rights of its competitors and business partners, and does not use their intellectual property rights unless expressly permitted by the right holders or laws.

#### 4.5 Preservation of Trade Secrets

Every employee is obliged to keep trade secrets. These trade secrets involve various aspects of the Company, such as the Company's organizational structure, matters related to business, production, research and development, as well as company data, etc.

#### 4.6 Data and Personal Information Security

Data and personal information security is an important part of the Company's compliance management. The Company governs and establishes a continuously improved information security protection system, and ensure that all data processing activities are legal, compliant, and adequately protected. The Company shall ensure that personal data (including, but not limited to, personal information of employees, customers and suppliers) is processed only for specific and explicit purposes and must comply with applicable laws and regulations for the protection of personal data.

By developing and implementing a corporate data security protection system, deploying effective technical security measures such as encryption and firewalls, conducting regular vulnerability scans and coordinating emergency response mechanisms, the Company actively monitors and responds to threats, and prevents data from being disclosed, altered, or destroyed by any unauthorized parties. At the same time, the Company requires suppliers, contractors, and other third parties to comply with the same information security requirements. Through binding agreements and notifications on obligations, the Company ensures that their information processing practices adhere to the standards of Hithium.

Each employee should treat company data and personal information in a responsible and secure manner, and be aware of possible threats and risks. In case of suspected data or personal information security leakage or uncertainty about how to handle the situation, please report to the Company in a timely manner.