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The Company consistently upholds ethical sourcing, commits not to use mineral resources from conflict regions, and explicitly requires suppliers not to use mineral resources from conflict regions or those that violate Company policy. The Company undertakes not to engage in any activities that would finance conflict. Shanshan complies with relevant United Nations sanctions resolutions, and domestic laws implementing such resolutions.

Other gross human rights violations and abuses such as widespread sexual violence;

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War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;

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Any act of forcing another person to work by means of violence, threat or restriction of personal freedom;

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Any act of disrespecting employees or discriminating against them on the grounds of gender or sexual orientation, race, skin color, age, marital status, pregnancy status, religion, nationality, illness or disability;

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Any act that interferes with employees’ freedom to form trade unions, as well as their freedoms of collective association and collective bargaining.

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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 providing direct or indirect support to non-state armed groups as defined above.

We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

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In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 1, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 4 and 5, we will respond in the [illegible]

When procuring or producing in high-risk areas, we will not provide benefits, assistance, or convenience to any party that causes significant adverse impacts on surrounding soil, air, water, or other seriously violates relevant with local laws and regulations, nor will we source from or be associated with such parties. We will support or take measures to regularly assess and reduce the adverse impacts of mining on soil, air, and water.

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We have received the *Responsible Mineral Supply Chain Due Diligence Policy* issued by Shanghai Shanshan New Materials Co., Ltd., and fully understand and endorse all requirements concerning responsible mineral procurement set forth in this Policy. To ensure the compliance and sustainability of our cooperation, we hereby solemnly commit as follows:

1.

We will strictly comply with this Policy and fully integrate the requirements for responsible mineral procurement into our internal procurement management system and the entire supply chain process.

2.