

Contemporary Amperex Technology Co., Limited

Due Diligence Management Policy for Responsible Mineral Resources Supply Chain

I. Commitment

Contemporary Amperex Technology Co., Limited ("the Company") fully recognizes that sourcing mineral resources from conflict-affected and high-risk areas (CAHRAs) may contribute to severe human rights abuses, environmental degradation, corruption, and armed conflict. As a global leader in lithium-ion battery manufacturing, the Company is firmly committed to upholding its responsibilities under the UN Guiding Principles on Business and Human Rights and core International Labour Organization (ILO) Conventions.

The Company hereby commits to fully implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition), the China Responsible Mineral Supply Chain Due Diligence Management Guide issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers and Exporters (CCCMC), and the mandatory due diligence requirements for critical raw materials under the EU Battery and Waste Batteries Regulation (Regulation (EU) 2023/1542, "EUBR").

The Company adheres strictly to ethical sourcing principles and does not use minerals affected by conflicts. It explicitly requires all suppliers to refrain from sourcing conflict-affected minerals or engaging in any activities that violate this policy. The Company ensures that its procurement practices do not contribute to armed conflict, gross human rights violations, forced labor, child labor, environmental harm, or corruption, and actively promotes responsible, transparent, and traceable practices throughout its supply chain.

II. Scope of Application

This policy applies to the Company and all its subsidiaries and holding companies



worldwide, covering the following critical raw materials: nickel, cobalt, lithium, natural graphite, mica, copper, aluminum, and other relevant minerals.

It encompasses all stages of the supply chain, including exploration, mining, beneficiation, smelting, refining, processing, and trading—particularly for minerals sourced from CAHRAs.

III. Governance Structure

The Corporate Sustainability Management Committee oversees the implementation of responsible mineral supply chain due diligence. Execution is coordinated by the Supply Chain Sustainability Committee and the Sourcing Center, with key responsibilities including:

- Establishing and maintaining a risk-based due diligence management system;
- Identifying and assessing actual and potential risks across the supply chain,
 implementing tiered risk management and mitigation measures;
- Conducting regular supplier assessments through questionnaires, document reviews, information verification, and third-party on-site audits where necessary;
- Publicly disclosing annual reports on due diligence activities and risk management outcomes, including in the Company's ESG reporting.

IV. Prohibited and Controlled Risks

The Company and its suppliers must proactively identify and exclude the following risks prior to mineral procurement. Should any of these risks be identified within the supply chain, immediate risk mitigation measures shall be implemented.

1. Severe Human Rights Abuses

- The worst forms of child labor, including hazardous work or child labor under conditions of forced labor;
- Forced or compulsory labor, including coercion through threats, debt bondage, or confiscation of identity documents;
- Torture, cruel, inhuman, or degrading treatment;
- Systematic sexual violence, gender-based discrimination, or persecution based on



identity;

- Widespread or systematic human rights violations, such as arbitrary detention, forced displacement, or denial of fundamental freedoms;
- War crimes, crimes against humanity, genocide, or other serious breaches of international humanitarian law.

2. Armed Conflict and Illegal Control

- Providing direct or indirect support to non-state armed groups, including:
 - Purchasing minerals from, making payments to, or supplying equipment or logistical support to such groups or their affiliates;
 - Engaging in transactions with entities that control mine sites, transportation routes, or trading nodes;
 - Sourcing minerals from areas subject to illegal taxation, extortion, or checkpoint operations by non-state armed actors.
- Misuse of public or private security forces, including:
 - Employing security personnel known to have committed serious human rights abuses;
 - Supporting security forces that illegally control mining areas or extort miners and intermediaries;
 - Failing to prevent security-related harm to vulnerable groups, particularly artisanal and small-scale miners.

3. Corruption, Fraud, and Money Laundering

- Bribery and corruption: offering, promising, giving, or soliciting bribes to obtain mining licenses, evade oversight, or conceal origin;
- Origin fraud: falsifying documentation or misrepresenting source locations to circumvent sanctions or compliance checks;
- Tax evasion or fee concealment: failure to pay legally mandated royalties, export duties, or other statutory fees;
- Money laundering risks: engaging in transactions involving minerals derived from illegal taxation or extortion, or involving opaque financial flows.

4. Occupational Health and Safety Hazards

- Failure to provide basic personal protective equipment (PPE) or emergency response measures;
- Exposure to dust, toxic gases, or hazardous chemicals without adequate ventilation



or protection;

- Absence of safety training, standard operating procedures, or emergency response plans;
- Structural safety hazards at mining, smelting, or processing facilities—including slope instability, tailings dam leakage, or uncontrolled high-temperature/high pressure equipment—without reasonable risk controls.

5. Land, Community, and Cultural Rights Violations

- Conducting extraction activities without obtaining the Free, Prior and Informed
 Consent (FPIC) of Indigenous Peoples and local communities;
- Illegally acquiring land use rights, including through forged permits or unlawful occupation in violation of national law;
- Damaging cultural heritage sites or religious places, or failing to respect local cultural identity and traditional practices.

6. Significant Environmental and Climate Impacts

- Illegal or excessive discharge of toxic substances, particularly arsenic, mercury, cyanide, lead, and cadmium;
- Causing severe pollution of water, soil, or air without implementing technically feasible mitigation measures;
- Mining within World Heritage Sites, national parks, Key Biodiversity Areas, or other legally protected zones;
- Failing to monitor or publicly report emissions data, or lacking environmental compliance records;
- Inadequate management of tailings storage facilities, posing risks of dam failure or leakage;
- Significantly exacerbating climate change or water stress without assessing carbon footprint or water consumption impacts.

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

- Presence of forced labor, child labor, unprotected chemical handling, or extremely hazardous working conditions in ASM operations;
- Lack of basic occupational health and safety safeguards, leading to frequent injuries or fatalities:
- Absence of legitimate trade channels, increasing vulnerability to infiltration by armed groups or corrupt networks.



V. Policy Implementation and Review

This policy takes effect immediately upon issuance and is overseen by the Corporate Sustainability Management Committee, which is responsible for interpretation, enforcement, and periodic review. The Company will dynamically update this policy in response to evolving international human rights and environmental standards, regulatory developments and changes in its business operations.

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Effective Date: November 2025