

Zangge Mining Co., Ltd.
Interim Code of Business Conduct



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Chapter I General Provisions

Article 1 Purpose

Zangge Mining Co., Ltd. (the “Company”) conducts its business in a fair and ethical manner and actively assumes corporate responsibility toward society and the environment. The Company is committed to operating as a respected and responsible mining enterprise.

The Company has formulated this Code to clarify the standards of conduct and fundamental principles governing the Company’s interactions with various stakeholders in the course of its business activities, including the core values guiding the selection of business partners.

Article 2 Basis for Formulation

This Code is formulated with reference to internationally recognized standards and industry best practices, including the following:

- (1) the Ten Principles of the United Nations Global Compact;
- (2) the United Nations Guiding Principles on Business and Human Rights; and
- (3) the United Nations Convention against Corruption.

Article 3 Scope of Application

This Code applies to the Company and all subsidiaries directly or indirectly wholly owned or controlled by the Company, whether domestic or overseas.

This Code also serves as an important reference standard for the Company in project investment decisions and the selection of suppliers.

The Company encourages its business partners to comply with this Code. Any violation of this Code may adversely affect a partner’s business relationship with the Company and may result in its termination.

Chapter II Governance

Article 4 Compliance with Laws and Regulations

The Company conducts its operations on the basis of compliance with laws and regulations.

This Code is formulated based on the fundamental principle of lawful and compliant operations. All personnel must comply with the laws and regulations of the jurisdictions in which the Company operates, respect local customs, and avoid any illegal or improper conduct.

Article 5 Stakeholder Engagement

The Company respects the views and concerns of stakeholders.

The Company shall proactively communicate with stakeholders to better understand their concerns and incorporate such insights into its business operations.

The Company shall establish a fair, convenient, effective and timely grievance mechanism, including accessible channels for stakeholder complaints and appeals, and shall endeavor to address issues raised by stakeholders.

Article 6 Open and Fair Competition

The Company advocates open and fair competition.

In the course of competition, the Company adheres to the principles of openness and fairness and complies with applicable antitrust and unfair competition laws and regulations in the jurisdictions where it operates as well as relevant international rules.

The Company strives to outperform competitors through excellent performance in a fair and honest manner rather than through unethical or illegal business practices.

The Company is committed to providing customers with high-quality, safe and responsible products and services, ensuring that transaction data are truthful and reliable, and rejecting any form of commercial fraud.

The Company strictly prohibits obtaining information about competitors or business partners through illegal or unethical means and prohibits spreading false information about competitors.

When interacting with competitors or potential competitors, employees are strictly prohibited from disclosing any confidential information.

Article 7 Business Ethics and Anti-Fraud

The Company adopts a zero-tolerance policy toward bribery, extortion and corruption.

The Company strictly prohibits offering cash, cash equivalents or any other direct or indirect benefits to individuals or organizations in order to obtain business advantages or improper benefits, and likewise prohibits accepting or soliciting any improper benefits.

Any illegal or improper conduct will be subject to strict disciplinary action.

Employees shall not engage in activities involving kickbacks, improper investment gains, money laundering, secret commissions, gifts, entertainment or sponsored travel under circumstances that violate laws, regulations or Company policies or that may create improper influence.

Article 8 Anti-Money Laundering

The Company strictly complies with national and international anti-money laundering laws and regulations and firmly prevents and combats any form of money laundering.

All employees must comply with applicable anti-money laundering regulations and must not participate in or assist with any activities involving money laundering, terrorist financing or other illegal financial flows.

Employees must promptly report any suspicious transactions or behaviors.

Any violation of anti-money laundering regulations will be handled seriously in accordance with applicable laws and Company disciplinary rules, including disciplinary sanctions and potential legal liability.

Article 9 Conflicts of Interest

The Company seeks to avoid the negative impacts of conflicts of interest on both the Company and individuals.

Employees shall report all actual and potential conflicts of interest in accordance with prescribed procedures and proactively recuse themselves where necessary.

Through appropriate conflict management mechanisms and control measures, such conflicts shall be effectively identified and managed.

Article 10 Insider Trading

The Company strictly prohibits insider trading.

Employees must not use material non-public information to conduct securities or stock transactions, nor provide such information to others for trading purposes.

The Company will implement management measures for insider information and persons with access to such information.

Before insider information is publicly disclosed, it must not be used for personal financial gain or other personal interests.

Chapter III Social

Article 13 Occupational Health and Safety

The Company regards occupational health and safety as one of its most fundamental responsibilities.

Guided by the principle of “life first,” the Company adopts zero fatalities as its safety objective. Every individual has the responsibility to work safely, strictly comply with relevant requirements, and care for the health and safety of others and the surrounding community.

The Company shall ensure that employees perform their duties only when they are physically and mentally fit. The Company firmly opposes drug use. Personnel must not work under the influence of alcohol and must only perform their duties after adequate rest and when they are physically and mentally fit.

If the Company identifies any behavior that may endanger the health or safety of an employee or others, appropriate action shall be taken to stop such unsafe behavior in order to reduce potential harm and promote safe work practices.

Article 14 Working Environment

The Company is committed to creating a healthy and positive working environment for employees.

The Company pays attention to both the physical and mental health of employees, strives to eliminate occupational health risks, and promotes a balance between employees' work and personal life.

Article 15 Respect for Human Rights

The Company respects the fundamental human rights of all stakeholders.

The Company firmly opposes any conduct that infringes upon human rights and refuses to associate itself with human rights violators.

The Company prohibits the use of child labor and any form of forced or compulsory labor, and respects and safeguards the basic rights of employees.

The Company adopts a zero-tolerance policy toward bullying, intimidation and harassment.

The Company respects the legitimate rights and interests of employees by providing fair compensation, reasonable working hours and safe working conditions, and by establishing appropriate policies and control measures for the protection of workers' rights.

Article 16 Labor Rights

The Company makes recruitment and promotion decisions in a fair manner and requires all employees to treat each other in a professional, courteous and respectful manner in the course of business.

The Company prohibits discrimination in employment or promotion on the basis of race, religion, age, nationality, gender, marital status, pregnancy or other protected characteristics.

Employees or job applicants shall not be required to undergo medical examinations that are discriminatory in nature.

Article 17 Respect for Indigenous Peoples' Rights

The Company respects the rights of indigenous peoples and the cultures, traditions and

beliefs of indigenous communities.

The Company seeks to establish open, honest and mutually beneficial long-term partnerships with the communities in which it operates.

The Company engages in regular consultations with indigenous communities affected by its operations on matters of concern to them, establishes appropriate communication and consultation mechanisms, and gives due attention to their concerns and properly addresses legitimate requests.

The Company respects the traditional rights of indigenous peoples, their cultural heritage and their connection to land.

The Company respects indigenous peoples' rights to participation and to information, and ensures that engagement with communities is conducted in a culturally appropriate manner.

The Company strictly prohibits any business activities that disrespect or damage the cultural heritage of indigenous peoples.

Article 18 Human Rights Protection in High-Risk Areas

The Company opposes the infringement of indigenous peoples' rights by conflict parties and seeks to mitigate human rights risks in the regions where it operates.

When conducting business in conflict-affected or high-risk areas, the Company shall ensure that its activities do not cause, support or benefit illegal armed conflict, nor contribute to serious human rights violations or breaches of international humanitarian law.

The Company follows applicable United Nations principles on the use of force.

Security personnel engaged by the Company shall only perform preventive and defensive security duties within legally authorized operational areas and shall not participate in military or security activities outside such areas.

The Company shall not employ or cooperate with security personnel or organizations that have committed serious human rights violations.

Article 19 Community Engagement

The Company maintains sincere and constructive communication with local communities.

Through a spirit of sincere cooperation and shared development, the Company establishes effective community communication mechanisms to ensure dialogue with local communities on issues of concern.

The Company listens to community concerns and incorporates community needs, where appropriate, into its business operations.

Article 20 Community Development

The Company endeavors to provide support to the communities in which it operates.

The Company is committed to maintaining positive relationships with local communities. To the extent practicable, the Company gives priority to providing employment opportunities for local residents and business opportunities for local enterprises, while striving to minimize negative impacts on local communities and promote harmonious and sustainable development.

Article 21 Lawful Tax Compliance

The Company fulfills its obligation to pay statutory taxes and fees in the countries where it operates.

The Company complies with applicable laws and regulations in its jurisdictions of operation and pays all required taxes and fees in accordance with the law, including taxes, royalties and other statutory charges.

Article 22 Responsible Political Participation

The Company follows the principle of responsible political participation.

Employees engaging in political activities during their personal time must comply with the laws and regulations of the jurisdictions in which they operate. Such activities must not harm the interests of the Company.

Article 23 Responsible Procurement

The Company requires suppliers to conduct business responsibly and in accordance with

business ethics.

The Company requires contractors and suppliers to operate responsibly and to ensure that their policies, standards and practices relating to ethics, safety, health, environmental protection and human rights are consistent with the Company's requirements.

Article 24 Privacy Protection

The Company places a high priority on protecting the personal information and privacy of employees, customers, business partners and other stakeholders.

The Company strictly complies with applicable laws and regulations and adopts both procedural and technical measures to safeguard personal data and prevent unauthorized access, disclosure, alteration or misuse.

Employees shall fulfill their confidentiality obligations and handle personal information in a lawful and responsible manner to ensure information security and regulatory compliance.

Article 25 Data Security

The Company is committed to establishing and maintaining a sound data security management system to protect important information assets of the Company and its partners.

Through the implementation of information security management processes and technical safeguards, the Company seeks to prevent data leakage, tampering, loss and other security risks.

Employees must comply with the Company's information security policies and are strictly prohibited from accessing, disseminating or using sensitive data without authorization. All employees share responsibility for maintaining a secure information environment.

Chapter IV Environment

Article 26 Environmental and Ecological Protection

The Company seeks to minimize the impact of its operations on the ecological environment.

The Company conducts the development and utilization of salt lake resources and related mineral resources in a responsible manner. Through measures such as improving management

models, upgrading production equipment and technological processes, replacing conventional materials with more environmentally friendly alternatives, and promoting resource conservation, recycling and reuse, the Company strives to improve the comprehensive utilization of mineral, energy and water resources.

The Company is committed to continuously improving its environmental performance across all business activities and integrating environmental protection throughout the entire life cycle management of mining projects. This includes reducing waste emissions, promoting biodiversity conservation, rationally planning land use and implementing ecological restoration measures, in order to minimize disturbance to land and surrounding ecosystems.

Article 27 Climate Change

The Company actively responds to climate change.

The Company supports the achievement of the goals of global climate agreements and strives to enhance the climate resilience of salt lake ecosystems, mining operations and surrounding communities through dual controls on energy consumption and carbon emissions.

The Company adopts production processes, raw materials and energy sources with lower environmental impact, and continuously seeks practical approaches, methods and technologies for energy conservation and emissions reduction.

The Company is committed to working together with upstream and downstream partners across the value chain to achieve coordinated emissions reduction.

Article 28 Water Resource Protection

The Company attaches great importance to the conservation and protection of water resources.

The Company strictly complies with applicable laws and regulations, promotes water conservation and recycling, and continuously optimizes production processes to reduce water consumption.

The Company strengthens wastewater treatment and ensures that discharged water meets

applicable standards.

Taking into account the characteristics of salt lake resource development and mining production, the Company implements scientifically based water resource management and control measures to prevent water pollution and ecological damage and to safeguard the health and stability of regional aquatic ecosystems.

Article 29 Land Protection

The Company adheres to the principle of rational utilization of land resources and scientifically plans land development, geological environment restoration and land reclamation.

The Company applies the principle of minimizing land disturbance in order to reduce the impact of production and construction activities on the natural ecosystem.

The Company strictly implements land reclamation and ecological restoration measures to promote the recovery of ecological functions in affected areas.

Through strengthened land resource management and monitoring, the Company ensures that project land use is lawful and compliant and promotes the sustainable development of mining areas and surrounding ecosystems.

Chapter V Supplementary Provisions

Article 30 Applicable Principles

Any matters not provided for in this Code, or any inconsistency between this Code and applicable laws, regulations, normative documents or stock exchange business rules, shall be governed by the applicable laws, regulations, normative documents and stock exchange business rules.

Article 31 Language

This Code is issued in both Chinese and English, and both language versions shall have equal effect.

In the event of any inconsistency between the Chinese and English versions or any ambiguity arising therefrom, the Chinese version shall prevail.

Article 32 Interpretation

This Code shall be drafted, amended, interpreted and supervised for implementation by the Safety, Environmental Protection & ESG Office of the Company.

Article 33 Approval Authority

This Code was reviewed and approved by the Board of Directors of the Company and shall take effect as of the date of issuance.