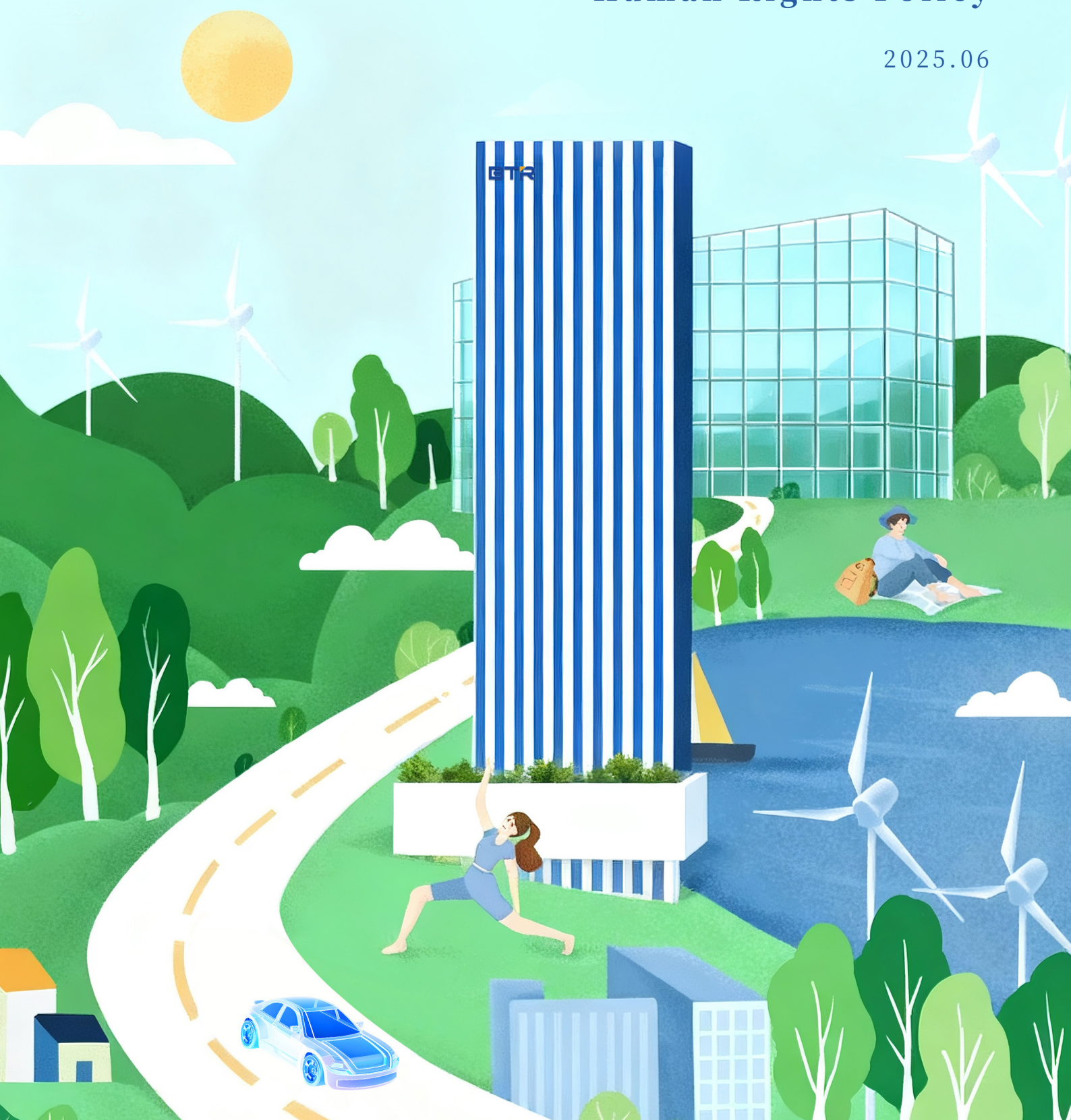


BTR New Material Group Co., Ltd. Human Rights Policy

2025.06



BTR New Material Group Co., Ltd.

Human Rights Policy

1. Purpose

BTR New Material Group Co., Ltd. (hereinafter, “BTR,” or the “Company,”), as a new energy materials enterprise with global influence, recognizes that respect for and protection of human rights are fundamental to sustainable development. Guided by the philosophy of innovation led, compliant operations, green harmony, and win win cooperation, BTR fulfill our human rights responsibilities across business operations, supply chain management, and community engagement. This Policy sets out our commitments and rules of conduct to ensure that our business activities align with internationally recognized human rights standards and comply with the laws and regulations of the countries and regions in which BTR operate. All Company employees, senior management, and our subsidiaries—as well as suppliers, contractors, business partners, customers, and communities—should understand and jointly observe this Policy, advancing the protection of human rights and creating a fair and harmonious environment for employees, partners, and society.

2. Scope of Application

This Policy applies to BTR and its wholly owned and controlled subsidiaries, and to all directors, managers, and employees (including regular employees, contract employees, and temporary employees). BTR also expect business partners, suppliers, and other stakeholders to observe the human rights principles set forth herein.

3. Objectives and Commitments

BTR is committed to upholding all basic human rights protected under international and domestic law. BTR support and follow the internationally recognized standards and principles below:

- United Nations - Universal Declaration of Human Rights
- Ten Principles of the United Nations Global Compact
- International Labour Organization - Declaration on Fundamental Principles and Rights at Work
- United Nations - Guiding Principles on Business and Human Rights (UNGPs)

The Company undertakes to comply with applicable laws and regulations worldwide. Where local laws differ from international human rights standards, BTR will seek appropriate methods which consistent with local law to honor the highest

applicable standard and to respect and protect human rights to the greatest extent possible.

3.1 Freedom of Employment and Prohibition of Forced Labor

BTR categorically prohibit all forms of forced labor, debt bondage or indentured labor, slavery, and human trafficking. All employment relationships must be established on a voluntary and informed basis. Employees have the right to freely choose employment and to terminate the employment relationship; no one may be compelled to work through coercion, deception, violence, or any other involuntary means.

3.2 Prohibition of Child Labor

BTR strictly prohibit the recruitment and use of child labor. The Company, its contractors, business partners, and supply chain enterprises must comply with statutory minimum working age requirements and must not employ anyone below the lawful employment age.

For underage workers (who meet the lawful working age but are under 18), BTR provide special protection: they are not assigned to work that may harm their physical or mental health; BTR comply with legal limits on working hours and night work; and BTR safeguard their health and right to education.

3.3 Equal Employment and Anti Discrimination

BTR foster a diverse, equal, and inclusive workplace. BTR respects the dignity of every employee and ensures fair opportunity in recruitment, training, promotion, compensation, and benefits. Any form of discrimination or harassment is strictly prohibited. All employees and job applicants enjoy equal employment opportunities and room for development regardless of ethnicity, race, color, sex, sexual orientation, gender identity, age, religion, political opinion or affiliation, place of origin, marital or family status, pregnancy status, or disability. The Company also prohibits workplace harassment, insults, bullying, or retaliation on any such basis. Upon discovery of discrimination or harassment, the Company applies a zero tolerance approach, conducts timely investigations, and imposes appropriate discipline, thereby cultivating a culture of mutual respect.

3.4 Safe and Healthy Working Environment

BTR is committed to providing a safe and healthy workplace, complying with local occupational health and safety laws, and continuously improving occupational health and safety management. BTR provide necessary personal protective equipment (PPE) and training, conduct safety education and emergency drills, and work to prevent workplace injuries and occupational diseases. BTR also require contractors and all other personnel present at our worksites to comply with the same safety and health standards, ensuring safety for everyone working on Company premises.

3.5 Working Hours and Leave

BTR complies with local labor laws on working hours and rest and leave. Through sound production planning and workflow design, BTR schedule work reasonably and safeguard employees' lawful rights to rest and leave. The Company ensures access to paid annual leave, national statutory holidays, maternity leave, marriage leave, and other legally mandated leaves, and actively encourages employees to maintain work-life balance and attend to their physical and mental well being.

3.6 Employee Compensation and Benefits

The Company upholds the principles of fairness, impartiality, and transparency, and is committed to building a compensation and promotion system that respects human rights, fosters growth, and complies with applicable laws and regulations. Our specific policies are as follows:

3.6.1 The Company adheres to the principle of equal pay for equal work, ensuring that all employees receive wages that meet the legal requirements of the countries and regions in which they work, and undertakes that wages paid to all regular employees are not lower than the local government's minimum wage and living wage standards.

3.6.2 The Company has established a comprehensive total rewards system guided by the principles of external competitiveness, internal equity, motivational impact, individualized and differentiated design, and cost effectiveness for the Company. BTR have promulgated policies including the Compensation Management Measures and the Benefits Policy Management Provisions to ensure broad coverage of incentive mechanisms, share the fruits of development with employees, and promote the joint growth of employees and the Company.

3.7 Qualifications and Promotion Management

The Company consistently follows the promotion principles of fairness, impartiality, and openness, and has built and continues to refine a scientific and transparent promotion management system. BTR provide dual career paths in management and technical, and continuously optimize talent identification and selection mechanisms to help outstanding talent emerge. The Company is committed to offering clear career development prospects to realize a win win outcome for employee growth and organizational development.

3.8 Freedom of Association and Social Dialogue

BTR respects employees' lawful rights to freedom of association and collective bargaining, and supports employees in voluntarily forming or joining trade unions or employee representative organizations and engaging in collective consultation. BTR are committed to building relationships of mutual trust with employees and union representatives and have established multi tier communication mechanisms, including an annual employees' congress, employee forums, suggestion boxes, and internal social platforms, encouraging employees to offer proposals for the Company's sustainable development without fear of retaliation.

3.9 Employee Training and Development

The Company is committed to providing equal training and development opportunities to every employee to support their career growth. Through our Talent Development Institute, BTR have established a systematic, strategy oriented development framework focused on business enablement and capability enhancement, continuously cultivating a learning organization, strengthening organizational capability and the talent pipeline, and providing a solid foundation for employees' all round development.

3.10 Protection of Indigenous Peoples and Local Communities

BTR respects and protects the lawful rights, interests, and cultural traditions of indigenous peoples and local communities in the areas where BTR operate. Company undertake to comply with national laws in project operations and resource utilization, respect community cultures and ways of life, engage in active consultation, avoid negative impacts, and promote shared community development through philanthropy and partnerships.

3.11 Privacy and Personal Information Protection

BTR strictly complies with national laws and regulations on personal information protection and with the Company's internal information security policies. Employees' personal information is strictly protected and may not be disclosed externally without authorization. Information provided by customers, suppliers, and other partners is likewise lawfully safeguarded and used, protecting all parties' information security and privacy rights.

4. Policy Implementation and Management

4.1 Governance Framework

Management is responsible for approving and overseeing this Policy and for receiving regular reports on human rights management. ESG working group coordinates day to day management of human rights and labor topics to ensure effective implementation of this Policy. Comprising Human Resources, Legal, Procurement, Risk Control, and other relevant departments, the working group operates on a cross functional basis. Each department, in accordance with its division of responsibilities, integrates human rights risk management into its business processes.

4.2 Management Measures

In line with the OECD Due Diligence Guidance for Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights, the Company conducts human rights due diligence, regularly identifying and assessing potential human rights risks in our business and supply chain, such as labor rights and working conditions. The Company also periodically reviews and tracks qualitative and quantitative objectives under this Policy (see disclosures on the Company's website and in our ESG Report) to ensure effective implementation of improvement measures.

4.3 Whistleblowing

BTR has established accessible appeals and reporting mechanisms to promptly identify and remedy any human rights issues. Employees may report and provide feedback on violations of this Policy through multiple channels, including communication with their direct supervisor, anonymous suggestion boxes, employee relations consultations, and designated reporting mailboxes. All complaints and reports are treated seriously; the identity of reporters is kept strictly confidential, and reporters need not fear retaliation, reprisal, or harm. (For details, refer to the BTR Reporting Management Measures.)

5. Review and Revision

The Company undertakes to periodically review and evaluate this Policy to ensure ongoing alignment with international standards, applicable laws and regulations, and the Company's operating context. As a general principle, a review will be conducted at least once every three years or initiated immediately upon significant changes in external regulatory requirements, material shifts in the business model, or the occurrence of major human rights risk events. Revision proposals shall be put forward by the ESG Management Department, reviewed by Management, and the updated version will be publicly disclosed. Through periodic review and dynamic revision, the Company continuously improves its human rights management practices and ensures the effectiveness and forward looking nature of this Policy.



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