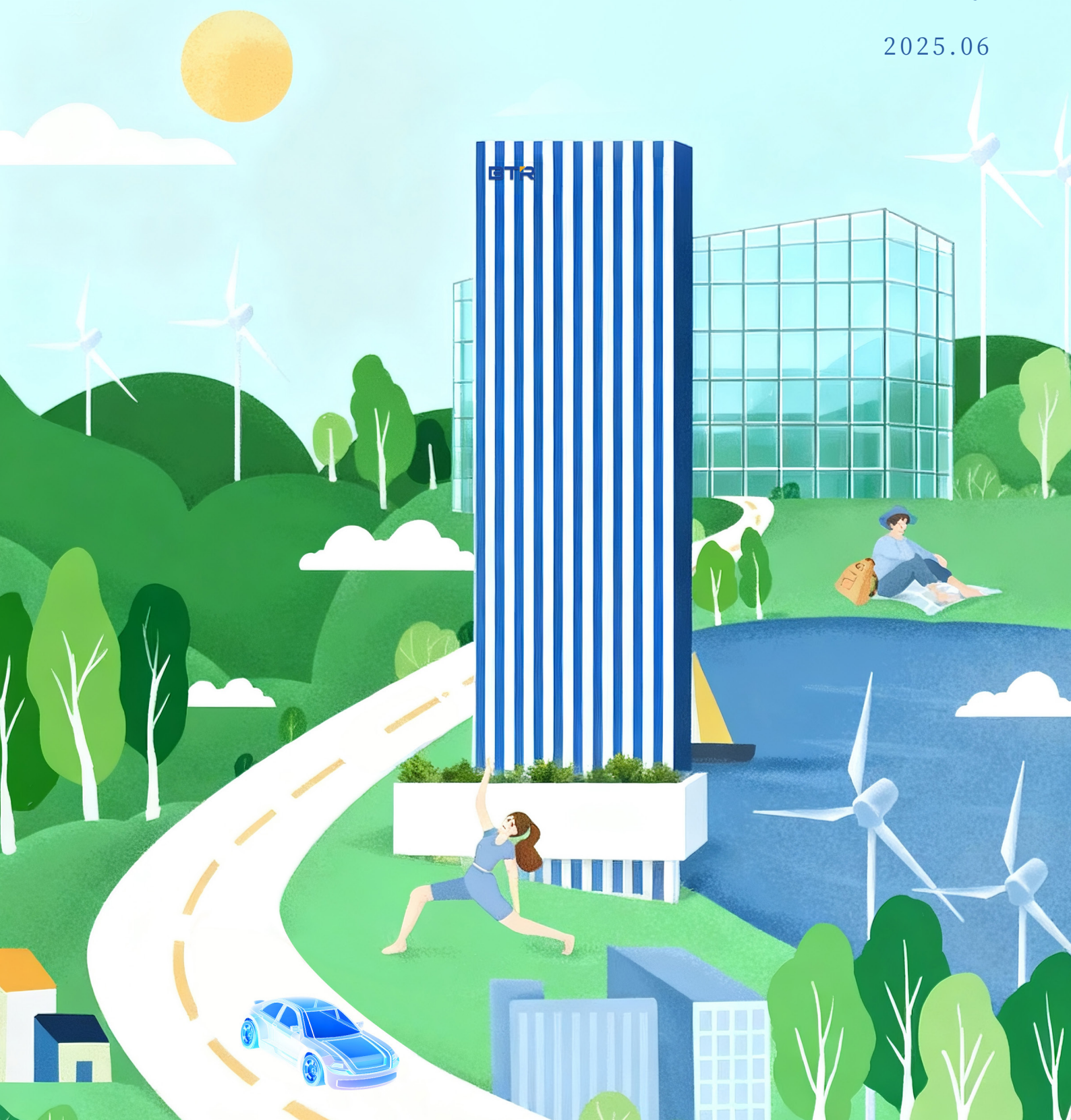


BTR New Material Group Co., Ltd. Environment, Health and Safety (EHS) Management Policy

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1. Purpose

BTR New Material Group Co., Ltd. (hereinafter, “BTR” or the “Company”) adopts the following EHS management policy:

- Compliance with laws and regulations; green and harmonious development
- Strengthened management; continuous improvement
- Safety first; prevention oriented
- Participation by all; safety for everyone

To fulfill the Company’s EHS objectives and commitments, minimize adverse impacts of our operations on ecosystems and communities, safeguard the occupational health and safety of all employees, and continuously enhance our EHS management capabilities, BTR hereby promulgate this Policy.

2. Scope of Application

This Policy applies to all business sites and all employees of BTR and its wholly owned and controlled subsidiaries. BTR also expect our business partners, suppliers, and other stakeholders to observe the EHS requirements set forth in this Policy.

3. General Requirements

3.1 Adherence to EHS Principles

The Company complies with the laws, regulations, and commitments applicable in the jurisdictions where BTR operate and strictly prohibits any violations of occupational health, safety, or environmental requirements. EHS responsibilities are embedded at each position. Through organization wide risk identification and emergency drills, BTR fortify risk control defenses and ensure highly effective response to emergencies.

3.2 Control of Pollutant Emissions

The Company shall systematically identify environmental aspects and impacts arising from operations; take preventive measures to reduce the generation and discharge of pollutants; improve resource efficiency through life cycle management; progressively adopt cleaner sources of energy; and advance a green, low carbon transition.

3.3 Stakeholder Engagement

The Company actively consults, communicates, and shares our practices on environmental issues and management with internal and external stakeholders, and is committed to fostering stakeholder participation and capacity building on environmental matters.

4. BTR' s Commitments

4.1 Energy and Carbon Emissions Management

The Company is firmly committed to a carbon neutral approach guided by the principles of “green harmony and win win cooperation.” BTR seek to achieve emission reduction targets that cover both our own operations and the value chain, improving energy efficiency and increasing the use of renewable energy to mitigate climate change. At the same time, the Company explicitly commits not to participate in any investments in fossil fuel expansion, ensuring overall strategic alignment with a low carbon transition.

4.2 Climate Change Management

The Company supports the temperature control objectives of the Paris Agreement, is committed to avoiding investments in fossil fuel expansion, and will not fund activities that deny climate change or oppose climate related regulations.

4.3 Water Resources Management

The Company commits to increasing water reuse and conducting water risk identification. BTR strive to become a benchmark water efficient enterprise characterized by leading conservation awareness, sound water saving systems, comprehensive water saving fixtures, advanced water use efficiency, and rigorous monitoring and management.

4.4 Pollutant Management

The Company ensures that all pollutants, including wastewater, air emissions, noise, and solid waste, are discharged in full compliance with applicable standards. BTR prioritize source control of pollutants and work to reduce and remediate environmental pollution in all its types, thereby mitigating adverse impacts on human health and the environment.

4.5 Chemicals Management

The Company strictly complies with laws and regulations governing chemicals and hazardous substances; is committed to preventing and reducing hazardous chemical incidents; and works to eliminate environmental contamination and personal injury. The use of any chemicals or hazardous substances banned under international conventions which due to high biological toxicity, environmental persistence, or potential irreversible ecological impacts is strictly prohibited.

4.6 Green Product Development

The Company is committed to developing green products trusted by customers, embedding green, low carbon design throughout the product life cycle, and ensuring year by year reductions in products' life cycle carbon emissions intensity.

4.7 Circular Economy Strategy

The Company commits to increasing the recycling rate of raw materials used in anode and cathode products; advancing a circular economy strategy on an ongoing basis; improving resource use efficiency; and building a closed loop system from “green manufacturing” to “green regeneration.”

4.8 Soil Pollution and Biodiversity Protection

Across all operations, the Company will responsibly manage soil health and biodiversity and follow the mitigation hierarchy—avoid, reduce, restore, offset—in biodiversity conservation. BTR is dedicated to preventing soil contamination during operations and reducing the negative impacts of our activities on the natural environment.

4.9 Supply Chain Environmental Management

The Company commits to strengthening risk prevention and control in supply chain environmental management, tightening supplier audits and admission criteria, and embedding green requirements throughout the whole supply chain so as to minimize adverse impacts by upstream and downstream suppliers on communities, the environment, and natural resources.

4.10 Product Safety Management

The Company commits to producing products that comply with applicable laws and regulations, and strives to achieve zero consumer safety complaints attributable to environmental factors and zero product recalls.

4.11 Emergency Response Action

The Company will remain vigilant regarding sudden environmental incidents and their prevention and response, vigorously advance risk control and potential hazard remediation, and ensure rapid and effective action when emergencies occur, with the goal of enhancing environmental emergency management capabilities Company wide.

4.12 Occupational Health Management

The Company promise to place employee health and safety first. BTR is committed to continually improving the work safety system, providing safety training and protective measures, preventing workplace injuries and occupational diseases, and safeguarding employees' physical and mental well being.

5. Policy Implementation and Management

5.1 Governance Framework

The Company has established an EHS Committee chaired by the General Manager

to lead environmental and safety management. As the highest decision making body for environmental management and occupational health and safety, the EHS Committee sets and promulgates the Company's EHS policies and objectives. It convenes EHS meetings on a regular basis to analyze the current EHS landscape and make decisions on major matters. The ESG Management Department, as the standing body of the EHS Committee, is responsible for EHS system development and execution; driving achievement of EHS targets and indicators; conducting regular hazard inspections and following up on remediation; formulating emergency response plans and organizing regular drills; and raising Company wide awareness of environmental protection and safety.

5.2 Management Measures

The Company has established and continuously operates environmental, energy, and occupational health and safety management systems that conform to ISO 14001, ISO 50001, and ISO 45001 certification standards, and has issued an EHS Management Manual, an Energy Management Manual, and a suite of internal policies and procedures. These systems and procedures comprehensively cover workplace safety, risk control and hazard remediation, emergency management, occupational health, as well as energy consumption monitoring, implementation of energy saving measures, and energy efficiency optimization. In addition, by establishing specialized committees, building domain specific management sub systems, and setting up inspection and evaluation mechanisms, the Company systematically advances effective implementation and continuous improvement, thereby providing a robust institutional safeguard for achieving the Company's objectives and commitments.

6. Review Mechanism

The Company will review and update this Policy periodically or as needed in response to changes in laws and regulations, industry standards, and customer requirements. 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 EHS risk events. Proposed revisions shall be put forward by the ESG Management Department, reviewed by the EHS Committee for approval, and, once approved, implemented and disclosed to relevant stakeholders through appropriate channels.



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