

# EVE Energy Code of Business Conduct

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## **I. Preface**

EVE Energy Co., Ltd. and its subsidiaries (hereinafter collectively referred to as "EVE Energy", "EVE", the "Company", or "We") are fully committed to advancing China's new energy development strategy. Guided by uncompromising compliance and unwavering integrity, we uphold the highest standards of business ethics and social responsibility in our global operations and drive sci-tech innovation with a focus on life and value creation.

The EVE Energy Code of Business Conduct is anchored in three foundational pillars:

**Brand Vision:** " Empower the World with EVE Energy". The convergence of the Internet of Things (IoT) and artificial intelligence (AI) is reshaping the global progress. New energy is the pivotal force. Through continuous innovation in integrated lithium battery solutions in its years of development, EVE Energy transcend energy and physical limits, constantly unlocking the boundless potential of the Internet of Everything (IoE).

**Brand Mission:** " Powering Boundless Potential through Integrated Battery Solutions". EVE Energy relentlessly advance lithium battery technology and iteration, delivering the world's most diversified lithium battery technology roadmap and its broadest application spectrum to provide the end-users with reliable power and accelerates the IoE.

**Core Value:** "Innovation with Integrity, Striving for Excellence, Value Creation, Trustworthy, Teamwork, Respect Individuals". EVE Energy emphasizes balanced development across out businesses and fosters harmonious coexistence across our industrial chain. We deeply recognize that trust from employees, consumers, clients, suppliers, shareholders, and society is the bedrock of our existence. Therefore, we remain steadfast in integrity, honor every commitment, and strive to build an ecologically sustainable

community.

**"Innovation with Integrity"**: We conduct business the right way, fully compliant with all laws and regulations, and creating social value. Every employee is expected to act ethically, excel in their role, and continuously advance both technical expertise and managerial capability.

**"Pursuing Excellence"**: We transform impossibilities into realities. Where others meet standards, we exceed expectations.

**"Creating Value"**: We deliver meaningful impact: progress for society, superior solutions for customers, and growth opportunities for every employee.

**"Keeping Integrity"**: We say what we mean and deliver what we promise

**"Teamwork"**: We replace individual heroism with unified, disciplined, and highly effective collective action.

**"Respecting Individuals"**: We celebrate the unique strengths and perspectives of every team member, cultivating an inclusive culture where everyone belongs.

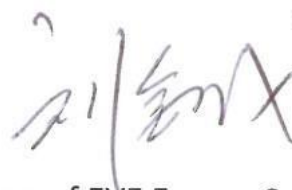
To support sustainable development, EVE Energy strictly adheres to applicable laws and regulations as well as social morality and business ethics in all its business activities. Through the philosophy of "Extreme Manufacturing", we ensure production is safe, efficient, and environmentally responsible. Guided by the principle of "Green & Precision", we establish resilient and sustainable product value chains and build circular-economy supply networks. Anchored in the concept of "Trustworthy & Reliable", we balance economic success with environmental and social value.

Wherever we operate, each of us represents EVE. In line with our vision, mission,

values, and the way we conduct business operations, this Code of Business Conduct sets the non-negotiable principles and codes that guide every director, executive, and employee.. It safeguards our integrity, ensures compliance, fulfills our commitments, and protects the reputation and interests of EVE Energy, its people, and all stakeholders\*.

Every EVE employee must own their responsibilities, act ethically, and remain fully compliant. This is how we create shared value and achieve sustained success.

We hope that every EVE employee carefully reads and understands this Code. And ultimately, apply it every day, everywhere. Together with society and our industry, we will accelerate humanity's journey toward a sustainable future and power the world forward.



Chairman of EVE Energy Co., Ltd.

\*Stakeholders mainly refer to EVE Energy's customers, clients, employees, shareholders, investors, and business partners, governments, regulators, communities, and non-governmental organizations, among others.

## **II. Basic Principles**

### **1. Compliance with laws and regulations**

EVE and its employees must fully understand and strictly adhere to all applicable laws and regulations, including but not limited to those in the jurisdictions where we conduct business, international conventions and common practices, as well as internal rules and policies formulated to ensure compliance. We will never tolerate any conduct that may breach the law and will always operate on the basis of full legal conformity. We will also respect the laws and align our actions with them.

### **2. Business integrity**

EVE conducts every business relationship according to the highest ethical standards and has established non-negotiable minimum standards in key areas of employee conduct, including but not limited to integrity, legal compliance, antitrust, anti-fraud, anti-bribery, anti-corruption, non-discrimination, anti-harassment, and prevention of conflicts of interest and insider trading.

We remain steadfast in our commitment to ethical business practices:

- The board of directors, as the highest body for the management of business ethics, is responsible for establishing, improving, and effectively implementing internal controls to set a clear tone of honesty and integrity at the top.
- The management shall lead by example in practicing and upholding the highest standards of business ethics to ensure all business activities comply with laws, regulations, and ethical norms. It shall promote an integrity culture through effective oversight, annual training, and transparent communications, implement a

zero-tolerance policy on any violation of this Code and take timely corrective actions and accountability measures to safeguard the Company's reputation and stakeholder trust.

- Each department shall implement end-to-end compliance controls covering pre-event, in-process, and post-event phases and prevent violations at the source through such control measures as risk pre-assessments, operational reviews, and partner due diligence; conduct regular self-evaluation of ethics compliance and internal-control effectiveness to identify and rectify non-compliance in time; systematically reduce the opportunities for misconduct by investigating reported incidents and conducting root-cause analyses. Employees who breach rules shall be subject to disciplinary action in accordance with Company policies; partners who violate integrity or contractual obligations shall be held liable under applicable law, internal measures, and contracts; suspected illegal acts or criminal offenses shall be referred to judicial authorities according to law.

To effectively implement the requirements of business ethics, the Company has established and maintains detailed rules and regulations and compliance guidelines, providing the employees with clear red lines and standardized procedures for daily business activities, including but not limited to such key links as approval processes for gifts and hospitality, conflict-of-interest disclosure mechanisms, and anti-fraud identification and controls. All employees must strictly follow these guidelines in conducting business, department heads shall bear oversight responsibility for their teams' compliance. The operating guidelines are subject to systematic review and update, in combination with actual needs for and operational

practices of the Company's business development, to reflect changes in applicable laws and regulations of the state, the latest requirements of regulatory policies to ensure the compliance, applicability, and timeliness of the content of the guidelines.

- Disclose and resolve conflicts of interest fairly and transparently.
- Comply fully with all applicable antitrust, competition, and fair-trading laws to eliminate anti-competitive behavior.
- Prohibit bribery, corruption, and any conduct that may lead to or suggest such offenses by employees, service providers, or agents.
- Ensure the accuracy of financial records and strict adherence to EVE's accounting standards, thereby fulfilling our duties to shareholders, regulators, and all stakeholders.

### **3. Human rights, health and safety, diversity and inclusion**

EVE respects and advances human rights throughout its operations and across the entire value chain. We are committed to providing safe and healthy working conditions and flexible job opportunities for our employees worldwide, enabling every employee to balance life and career.

We pursue the safety vision of "Zero Injuries, Zero Fires", adhere to the occupational health and safety policy of "Safety First, Prevention-focused, Comprehensive Management, People-centered, and Health for All", continuously improve our OHSMS, and constantly enhance the OHS performance. We follow the principle that "EHS (Environment, Health, and Safety) always comes first" and adopt an attitude of "Investing Money, Time, and Manpower to without limit" to provide employees with a safe, healthy, and reliable workplace.

We deeply recognize that occupational health and safety is a core competitive advantage, and fire and explosion prevention are our top priorities. Sound OHS measures and performance form the foundation for the Company's sustainable growth.

We respect and uphold the human rights of each and every employee and comply with applicable laws and regulations of all countries and regions, as well as international norms, practices, and local cultural customs. We value the concerns of our stakeholders and promise and commit to advance gender equality and provide equal opportunities for all. In addition, we maintain zero-tolerance toward any human-rights abuse in our business operations or value chain, including but not limited to child labor, forced labor, and modern slavery and for any discrimination based on origin, nationality, religion, race, gender, age, physical condition, or sexual orientation, and any participation in or condoning of any form of harassment for any above-mentioned or any other reasons.

#### **4. Environmental sustainability**

We adhere to the sustainable development concept of "Complying with Law, Continuous Improvement, Pollution Prevention and Control, Energy Conservation and Emissions Reduction and Providing Green Products with Better Energy Utilization Efficiency". We continuously innovate in efficient management and clean technologies, actively address risks and opportunities in such fields as environmental pollution, climate change, water scarcity, and biodiversity, and implement action plans for environmental management and carbon emission management. Water is recycled and reused, pollutants and waste are strictly controlled, and the environmental impact of construction, operations and products is minimized to achieve coordinated environmental, economic and social development.



## **5. Transparent interactions and communications**

EVE is committed to creating an inspiring, innovative, transparent, and open workplace where every employee is respected, heard and empowered to participate, create and contribute. We engage responsibly with all stakeholders, integrating external perspectives through collaboration, knowledge-sharing, open discussions and dialogue. We consider ourselves as an integral part of society. When interacting with public authorities on policy development and implementation, we are transparent and accountable. Employees and external stakeholders may report suspected non-compliance. Every report is investigated thoroughly and retaliation against good-faith whistle-blowers is strictly prohibited.

### **III. Code of Conduct**

This Code sets mandatory standards for every business decision and action. Where its requirements exceed prevailing business practice or applicable laws, regulations and rules, this Code prevails.

#### **1. Market and competition**

##### **(1) Anti-Monopoly and fair trade**

EVE shall fully comply with all applicable anti-monopoly, competition, and fair trade laws and regulations, and shall in no case engage in any activities that may restrict competition. EVE shall maintain fair dealings with customers and suppliers, independently set business policies and prices, and shall never coordinate, whether formally or informally, directly or indirectly, with competitors or other parties that are not affiliates in setting such business policies or prices. No illegal or improper advantage shall be sought, directly or indirectly, through manipulation, concealment, misuse of confidential information, misrepresentation of material facts, or any other unfair means.

##### **(2) Anti-corruption and anti-bribery**

EVE has a zero-tolerance stance toward all forms of corruption and bribery\*. We are committed to establishing a robust oversight mechanism to ensure effective prevention, identification, investigation, and treatment of corruption and bribery-related conduct.

The board of directors serves as the highest governing body for internal anti-corruption and anti-bribery efforts, and leads and bears ultimate responsibility for establishing anti-corruption management system; the management is accountable for comprehensively identifying and assessing corruption and bribery risks across the Company and all business

units, with emphasis on analyzing both likelihood and impact, thereby establishing a prevention and control mechanism. The anti-corruption and anti-bribery management measures are embedding into daily operations to ensure effective implementation and continuous improvement of control measures.

The Company maintains a multi-channel whistleblowing mechanism to keep confidential whistleblowers and whistleblowing. Employees and stakeholders may report corruption and bribery by multi-channel whistle-blowing programme, such as email, hotline, whistleblowing mailbox, and WeChat official account. A corruption and bribery risk assessment is conducted at least once a year to update the anti-bribery risk register, comprehensively identify the risks in business links and develop prevention and control measures so as to ensure that the anti-bribery requirements can be cascaded and implemented at all levels. A company-wide communication and training programme is designed and delivered on a regular basis, covering all employees (full-time and part-time) and third parties (including suppliers, contractors, agents, etc.), to equip them to understand and fulfil their anti-bribery obligations and to act in accordance with the law. Detailed record-keeping rules, approval workflows and behavioural guidelines codify every step, guaranteeing that our anti-corruption and anti-bribery policies are executed precisely and effectively.

We compete exclusively on quality and capability. Every business activity must be in conformity with the principles of "Legality, Reasonableness, Proportionality, and Transparency" and comply with our internal rules and regulations. Business hospitality and token gifts may be offered to/accepted by employees only when operationally necessary and permitted by local laws and regulations and to the extent falls within the limits set by

company policy. Typical examples include modest gifts exchanged to maintain ordinary business relationships, or branded promotional items or souvenirs given or received at public events such as trade fairs..

Employees must never allow themselves to be influenced by receiving a benefit, nor may they offer a benefit to improperly influence anyone else. If the provision or acceptance of hospitality or gifts could reasonably create the impression of improper influence, the exchange must be declined. At no time may employees, directly or through any intermediary, offer, promise or provide any personal or improper financial or other advantage to obtain or retain business or any other advantage from any third party, whether a government body, a commercial entity or an individual. Moreover, special attention must be paid to the following relatively special types of payments:

- Facilitation payment: The Company strictly prohibits making payments or providing conveniences labelled as “facilitation payment” (i.e., to accelerate routine government actions). Regardless of the amount, local practices, or business needs, employees must not engage in such conducts with government agencies or officials. In addition, employees must not accept any similar benefits as returns for favoring third parties. Employees must avoid participating in activities that may lead to suspicions of the above-mentioned practices.
- Extortion payment: The Company prohibits employees from extorting any benefits from stakeholders. If an employee encounters any extortion (i.e., when government officials or other powerful individuals use their authority or control to threaten life, health, personal freedom, or safety to extort payments or other things of value), the

employee shall try to delay and immediately seek help from or report to the Company's management or the embassy. The employee will not be adversely treated for reporting such incidents or having to make payments under urgent and realistic threats.

The Company prohibits any third party (including suppliers, contractors, agents, etc.) from engaging in bribery on behalf of the Company. Before any engagement, the Company ensures that the third party understands and complies with the Company's anti-corruption and anti-bribery policies through standardized procurement process, due diligence for anti-bribery compliance, and written confirmation of anti-bribery commitments. During the relationship, EVE periodically reviews the third party's compliance performance and works with partners to raise standards.

This Code sets the minimum anti-bribery requirements. Specific operating procedures and standards are provided in Company's internal policies on gifts and hospitality, donations and sponsorships, and other related instruments.

The Company is committed to maintaining the highest standards of integrity and ethics. Employees who are uncertain whether a business conduct is ethical, or who need advice on ethical matters, should consult their line manager, the Compliance Department, or the designated compliance email address. All enquiries will be handled confidentially and free from retaliation. The Company encourages employees to actively raise concerns and promises to respond seriously to each report to ensure compliance culture can be implemented.

\* Corruption refers to abuse of power, violation of integrity principles, or breach of

compliance bottom lines to seek improper benefits for organizations or individuals or to damage the Company's interests, including bribery, embezzlement, misappropriation of assets, transfer of benefits, abuse of authority, fraud, etc.

Bribery, a typical form of corruption, refers to any act anywhere directly or indirectly offering, promising, giving, accepting, or soliciting an undue advantage of any value (monetary or non-monetary) to induce or reward a person to act or refrain from acting in the performance of their duties.

### **(3) Anti-fraud**

EVE conducts business with absolute integrity and has zero tolerance for any form of deception aimed at securing economic gain. Any false statement or fabrication of facts is strictly prohibited. Employees are strictly forbidden to falsify or alter financial data, misstate or conceal financial information; obtain business opportunities through fraudulent means or engage in fictitious or deceptive trading; make false claims about products or services, or withhold material risk information; or misuse their position to divert assets, appropriate benefits, or collude with external parties to the Company's detriment. All personnel must actively participate in compliance training and rigorously enforce internal controls to prevent fraud.

### **(4) Anti-money laundering and counter-terrorist financing**

EVE fully complies with applicable anti-money laundering laws. continuously assess the risk that our operations could be exploited for money laundering and maintain relationships only with law-abiding partners whose funds are demonstrably legitimate. EVE selects secure and reliable financial institutions, cooperates with them in identification of any company or

its customers/clients in business transactions, conducts appropriate due diligence on business partners and received property, with a particular focus on subjects making large-amount cash payments in transactions, and accepts supervision from government authorities regarding cross-border fund transfers.

EVE fully complies with applicable counter-terrorism laws and resolutely implements counter-terrorist financing regulations. By establishing robust customer-identification, suspicious transaction reporting, and internal monitoring mechanisms, EVE effectively implements compliance controls for anti-money laundering and counter-terrorist financing.

#### **(5) Trade compliance and import/export controls**

EVE observes all applicable laws, regulations, and regulatory policies on customs, export control, or economic sanctions, and earnestly fulfills its trade compliance responsibilities and obligations. By continuously enhancing employees' trade compliance awareness, incorporating trade compliance into the Company's systems and processes, and making timely updates and adjustments in response to changes in external laws and regulations, EVE achieves comprehensive trade compliance management and supervision across all business links.

#### **(6) Protection of intellectual property rights and trade secrets**

Intellectual property is the lifeblood of EVE's profitability and must be vigorously protected. We equally respect the IP rights of others and comply with all relevant laws on proprietary information and other intellectual properties in every jurisdiction where we operate. We honor and safeguard the confidential information and/or personal information of stakeholders, adhere to confidentiality obligations, and take appropriate measures to prevent

misuse of such information. Without the consent of a stakeholder, such stakeholder's confidential and/or personal information shall not be disclosed, reproduced, or otherwise used.

EVE values and protects our confidential information while respecting others' confidential information. All non-public or undisclosed information is confidential information, including but not limited to trade secrets, business plans, market and service plans, consumer survey results, engineering and manufacturing schemes, product formulas, designs, databases, document records, salary information, and other non-public financial or other data.

To protect confidential information, EVE has taken stringent confidentiality measures, requiring all its employees to strictly perform confidentiality obligations for the Company's information, properly store information and materials of commercial value, exercise prudence when treating mails, emails, links, or other information received at work from unknown source, and follow standardized procedures for the production, receipt, sending, transmission, use, reproduction, retention, and destruction of documents. Employees are strictly prohibited from conducting illicit trading or seeking illegal benefits using insider information. Unless otherwise required by law or authorized by the management, employees shall not disclose or permit the disclosure of confidential information to third parties, and this confidentiality obligation survives termination of the employment relationship. In addition, employees must exercise prudence when storing and sending confidential information, and take each and every possible measure to prevent inadvertent leakage of confidential information.

EVE likewise respects third parties' equivalent rights to protect their trade-secret



information. If third parties (such as shareholders, investors, partners, suppliers, or customers/clients) share trade secrets or other confidential information with EVE, EVE will prudently treat them/it as if they/it were/was EVE's own trade secrets, and take proper measures to prevent relevant information from being misused. Without the consent of the disclosing party, the disclosing party's confidential information shall not be disclosed, reproduced, or otherwise used. Employees shall also protect the trade secrets acquired by them from previous employment relationships.

#### **(7) Quality assurance and product safety**

We will never compromise on the safety of any product anywhere in the world. Guided by the policy of "Focusing on Customer Needs, Being Extremely Conscientious, Resolutely Meeting the Highest Industry Standards, and Continuously Improving Product and Service Quality", we are committed to enhancing consumer service experiences. Our fundamental commitments include:

- Developing, manufacturing, and delivering reliable, best-in-class products and services;
- Maintaining high product-safety standards in all countries/regions where we operate; and
- Inspiring a sense of ownership among all employees and third parties in our value chain regarding product quality and safety.

## **2. Protection of employees' rights and interests**

### **(1) Fairness and reasonableness**

To safeguard labor rights and maintain amicable and harmonious employer-employee

relations, EVE provides fair and reasonable compensation package and working conditions. EVE upholds the principle of equity in recruitment, remuneration, performance evaluation, and promotion opportunities, while maintaining effective and appropriate mechanisms of fairness and reasonableness.

## **(2) Respect for human rights**

EVE adheres to corporate social responsibility and ethical standards by neither coercing nor threatening individuals into involuntary labor. Under no circumstances shall we employ forced labor or child labor in violation of applicable laws, regulations, orders, or restrictions in the countries or regions where we operate. Furthermore, EVE neither uses nor procures any products or raw materials derived from forced labor, and is committed to ensuring our products contain no components involving forced labor.

## **(3) Non-discrimination and anti-harassment**

EVE respects each employee's personal dignity, privacy, and personal rights, and undertakes to maintain a workplace free from discrimination and harassment. Employees shall not discriminate based on origin, nationality, religion, race, gender, age, or sexual orientation, nor shall they engage in verbal or physical harassment for any above-mentioned reason or any other reasons. The Company firmly resists humiliating or degrading behaviors, including physical punishment, mental/physical abuse, violence, obscene language, and sexual harassment; the Company eliminates all discrimination and unfair treatments regarding employment, compensation, welfare and benefits, career development, selection, promotion, and other matters related to race, belief, gender, religion, age, marital status, nationality, disability, or sexual orientation.

**(4) Personal privacy protection**

EVE attaches importance to the substantive protection of personal information and privacy. Guided by the integration of rights and obligations, EVE complies with local privacy protection laws and regulations. EVE adheres to the fundamental principles of legality, legitimacy, necessity, and good faith in processing personal information, and properly manages personal information involving the Company, EVE ensures the security of such personal information by appropriate technical means and organizational management measures.

**(5) Freedom of association**

EVE respects employees' freedom of association and their right to equal consultations. The Company has an organization capable of representing and safeguarding employees' legitimate rights and interests while carrying out activities independently according to law. Employees have the right to participate in democratic management and equal consultations through workers' congress, employee representatives, or other lawful means. The Company ensures that no employee faces retaliation for any aforementioned participation.

**(6) Employee safety**

EVE places great importance to employee safety and occupational health and is committed to providing a safe workplace. EVE implements work safety measures by "Investing Money, Time, and Manpower to Ensure Safety at All Costs" and maintains a zero-tolerance stance against risks and hidden hazards. EVE has established an executive-led safety inspection mechanism. For typical or challenging-to-resolve hidden hazards, executives work on the spot to drive timely rectification, creating a safe and comfortable

environment for employees and their production activities. In addition, EVE fosters a unique safety culture by organizing various activities.

### **(7) Expatriate assignment and employment compliance**

While expanding its global business footprint, EVE attaches importance to compliance in employee expatriation and is committed to making thorough preparation for employees before expatriate assignment. EVE develops comprehensive country-specific training plans covering local culture and customs, visas, work permits, personal taxation, and social security. These measures can ensure that expatriate assignments proceed smoothly on an ethically sound and legally compliant basis, upholding EVE's good reputation in the international market.

## **3. Protection of the Company's rights and interests**

### **(1) Insider trading**

EVE respects and complies with insider trading rules regarding securities transactions. EVE prohibits trading EVE's shares or securities while in possession of undisclosed information that may influence stock prices or using or sharing important non-public information about EVE or any other Company for securities trading purposes. Any violation of the aforementioned prohibitions may result in disciplinary sanction and even potential criminal prosecution.

### **(2) Conflict of interests**

A conflict of interests arises when an employee's personal interests or the interests of a third party compete with those of EVE.

Employees shall proactively avoid any situations that may involve or have involved the

conflict of interests between their personal interests and those of EVE, and shall always prioritize EVE's best interests. Unless otherwise provided specifically, employees shall not engage in transactions on behalf of EVE with any partners (such as suppliers) in which they or their specific related parties hold equity or positions, if such transactions could lead to transfer or loss of the Company's interests.

Unless the Company explicitly waives the business opportunity that would be available to it, employees shall not use the Company's property, information, or their positions to acquire such business opportunity.

If a conflict of interests arises or a situation potentially involving/leading to a conflict of interests occurs, employees shall report it to their direct supervisor and/or the HR Department or the Legal Department, and actively cooperate in adjusting or avoiding the conflict of interests to seek a fair and transparent resolution.

### **(3) Non-competition**

Non-competition is designed to prevent former employees from working for EVE's competitors or establishing their own businesses using EVE's trade secrets and their professional expertise obtained in EVE, thereby harming EVE's legitimate commercial interests. While respecting the career development of former employees, EVE protects its own trade secrets, including technical know-how, confidential or proprietary information, information system, etc. EVE conducts background investigations and requires written declarations to ensure that no prospective hires are bound by any non-competition obligations, thereby preventing legal disputes arising from employment of the prospective hires in violation of non-competition provisions; EVE also signs written confidentiality agreements

about non-competition with the employees under any circumstance requiring confidentiality, such as employment or assignment to specific projects, to clearly define restricted activities, geographical scope, and duration. Employees shall strictly adhere to such non-competition agreements, refraining from any actions that may harm or jeopardize EVE's legitimate economic interests. Written non-competition agreements shall be properly retained for future dispute resolution.

#### **(4) Family members and relatives**

The actions of family members outside the workplace may also influence an employee's objectivity in making decisions on behalf of the Company, potentially leading to a conflict of interests. If an employee's family member expresses interest in conducting business dealings with the Company, the establishment or continuation of such commercial relationship, the standards adopted, as well as the terms and conditions of commercial relationship shall not be less favorable to the Company than those offered to any unrelated parties seeking cooperation with the Company under similar circumstances.

Employees' immediate family members and spouses may be hired as employees or consultants only if they are qualified as required, have achieved required performance, or have required skills and experience, and no direct or indirect reporting relationships may exist between an employee and his/her relative or spouse. These fair employment principles apply to all aspects of work, including compensation, welfare and benefits, promotion, job transfer, etc., and as well as to the development of such relationships between relevant employees after the employee is employed by the Company. When candidates are equally suitable, priority may be given to the children of EVE's employees for internship, training, holiday temporary

work, and similar short-term assignments.

**(5) Asset protection**

All employees shall protect and reasonably and efficiently use EVE's property and strive to prevent EVE's property from being lost, damaged, misused, stolen, swindled, misappropriated, or destroyed. These obligations apply to both tangible and intangible assets, including trademarks, technical know-how, confidential or proprietary information, information system, and other trade secrets, such as electronically transmitted and stored data and computer resources. To the extent permitted by applicable laws, the Company reserves the right to monitor and inspect how employees use the Company's assets, including review of all emails, data, and documents stored on the Company's network terminals.

**(6) Information security and data compliance**

EVE complies with all applicable laws, regulations, and regulatory policies on information disclosure. To protect confidential information, EVE takes strict confidentiality measures, incorporating internal information security checks into routine processes and conducting employee training to rigorously prevent the loss, misuse, unauthorized access, damage, disclosure, or alteration of confidential information or personal data.

EVE complies with all applicable laws, regulations, and regulatory policies on data management, ensuring that the collection, use, storage, disclosure, cross-border transfer, or destruction of users' personal data is conducted in accordance with applicable laws and regulations. Data compliance controls are incorporated into the Company's rules, regulations, and procedures and employees' overall compliance awareness is enhanced through training of employee data management, ensuring compliance with data protection requirements.

**(7) Reports, announcements, and information disclosure**

EVE complies with all applicable laws, regulations, and regulatory policies on information disclosure. Accurate and reliable corporate records serve as the sources of basic data required for business decision-making and strategic planning as well as the foundation for public disclosure. The Company's records include but are not limited to payrolls, time cards, travel expense reports, emails, financial data, performance evaluation records, electronic documents, and all other records maintained in normal business operations.

All of the Company's records must be complete, accurate, and reliable. When conducting business, employees shall promptly report both favorable and unfavorable information to the management, without delay, omission, misrepresentation, or concealment. Financial records in particular form the basis for the Company to manage its business and fulfill its obligations to various stakeholders. All authentic, accurate, and complete information concerning the Company's business, financial position, and operating results shall be disclosed in time. We shall understand and comply with tax laws in the countries/regions where we operate, pay taxes in accordance with laws and regulations, strictly adhere to all applicable standards, laws, regulations, and policies on transaction-related accounting treatment, financial reporting, estimates and forecasts, and shall not maintain false or misleading accounts, thereby ensuring compliant retention of financial records.

Meanwhile, EVE has incorporated record retention requirements into the Company's policies and business processes, clarifying approval authorities and disclosure responsibilities for key information, to comprehensively prevent compliance risks. All discussions and communications regarding the Company's matters, including those between employees and



external parties and between employees, shall be conducted through the Company's designated channels, such as corporate email and telephone, to ensure compliant record retention of the exchanged information. For the important records concerning the rights and interests of the Company and its stakeholders, written documents in either paper or electronic form shall be obtained and retained.

#### **4. Customers/clients and business partners**

EVE treats its customers/clients and business partners with honesty, integrity, and fairness. EVE maintains business relationships only with reputable and responsible customers/clients and business partners, and pays attention to and positively influences their management of occupational health, safety, and environment as well as their social contributions. By establishing and perfecting a robust business partner qualification system, we rigorously screen and select high-quality business partners, conduct regular compliance reviews, and perform appropriate due diligence for compliance regarding the business partners' export controls, labor protection, environment, social responsibility, and supply chain traceability, which enables us to build sound supply chain management processes, enhance transparency and standardization of procurement, and strive for common sustainable development.

In commercial activities, we hope that our customers/clients and business partners can adopt consistent fundamental business principles with us and we will regularly communicate with them by such means as agreements, emails, or meetings. If they fail to adhere to any of our business principles, we will require open and transparent discussions, take corrective measures or, if necessary, terminate the relationship. In return, we respect our partners'

reasonable standards.

## **5. External relations and social responsibility**

### **(1) Environmental protection**

EVE complies with all applicable environmental laws, regulations, and international treaties and will fully consider the impact of its corporate activities on natural and ecological environment. EVE is pursuing the practice of green park concept of sustainable development, constantly innovating in management and technology for energy saving and practice, and striving to create a green and low-carbon zone.

### **(2) Fulfillment of social commitments**

EVE never forgets the trust and support from society, and is committed to consistently integrating corporate development with social responsibility. EVE fully recognizes that its operations directly and indirectly impact individuals, local economies, and social development. EVE strives to build responsible community relations through actively participating in public welfare, creating safe communities, supporting community development, and conducting sustainable investments and operations. By collaborating and maintaining positive relationships with business partners, EVE makes contributions to building a harmonious society.

### **(3) Maintenance of public relations**

As expanding globally, EVE establishes and continuously improves communication and disclosure mechanisms with local governments, news media, labor unions, local communities, NGOs, civil society organizations, and other external stakeholders. EVE pays close attention to regulatory developments of the judicial and law-enforcing organs in the areas where we

operate, promptly identifies important issues that may affect the Company's business operations, respects local religious customs and cultural taboos, properly manages the relationships with all sectors of society, actively fulfills corporate social responsibilities, and builds a positive social image.

#### **(4) Charitable donations and sponsorship**

Guided by the commitment to give back to society, EVE Energy strictly regulates charitable donations and sponsorship. All donations must be made through legitimate public welfare organizations, with a strict prohibition on political or discriminatory donations and any form of benefit transfer. We have instituted a tiered approval mechanism to conduct rigorous due diligence on all prospective donees. Donations are strictly prohibited to internal personnel, related parties, or organizations subject to the influence of government officials, ensuring full legal and regulatory compliance in all donation decisions. All donations must be governed by written agreements; in-kind contributions shall comply with applicable safety and environmental standards, and the use of all funds shall be subject to periodic audits.

#### **(5) Political participation and donations**

EVE Energy strictly prohibits any direct or indirect political participation or activities in the name of the Company or through third parties, including but not limited to direct or indirect political donations, campaign funding, or lobbying expenditures to political parties, political organizations, candidates, or their related parties; disguised political spending through industry associations or charities; using the Company's platforms to state political stances. The Company has been maintaining political neutrality in all business operations.

#### **(6) Respect for local culture and customs**

In global expansion, EVE encourages employees to actively practice the corporate values and deeply understand local ethnic customs, religious beliefs, and cultural taboos, while requiring them to strictly adhere to internal conduct requirements. In business activities and daily interactions, we stick to the principles of equality, respect, civility, and politeness, promoting efficient and harmonious cross-cultural communications to enhance EVE's international image and influence.

## **IV. Compliance with the Code of Business Conduct**

### **1. Training and updating**

EVE organizes annual communication and training sessions on the fundamental principles and responsibilities outlined in the EVE Energy Code of Business Conduct to ensure that all employees fully understand and strictly adhere to the EVE Energy Code of Business Conduct. EVE encourages employees to expose, in the form of whistleblowing, any violations of laws or regulations and will address any gaps as needed, maintaining a zero-tolerance stance against non-compliance.

EVE's board of directors and management, as the highest body for the Code of Business Conduct, are responsible for establishing, improving, and effectively implementing internal controls to build a healthy ethical environment and set an ethical tone characterized by honesty and integrity at the top. Regular self-assessment of compliance with the Code of Business Conduct are conducted and timely corrections and improvements will be made for any identified inconformity.

### **2. Strict compliance with the Code**

All employees shall understand and fully comply with all provisions of this Code and seek guidance from their direct supervisors, the HR Department, or the Legal Department when necessary. Failure to comply with this Code may result in disciplinary sanction, dismissal, and even legal proceedings and criminal penalties.

### **3. Reporting and whistleblowing**

EVE encourages employees and stakeholders to seek assistance or to expose, in the form of whistleblowing, any actual or suspected violations of this Code, laws, or regulations,

through designated contact information. Whistleblowing will not be viewed as disloyalty but rather as an act of protecting the reputation and integrity of the Company and employees.

EVE prohibits retaliation for any whistleblowing conducted in good faith and also safeguards the rights and interests of the persons subject to complaints or whistleblowing. For confirmed violations, EVE will take rigorous action against the liable persons. In addition, EVE will identify causes, improve preventive mechanisms, and mitigate systemic risks.

We are willing to collaborate with business partners to ensure that products and services meet sustainable development requirements at the source. To ensure effective implementation of the Code of Business Conduct as well as timely identification, prevention, and resolution of unethical behaviors or violations of the Code of Business Conduct, the Company provides multiple reporting and whistleblowing channels, and proactively educates employees and stakeholders so that potential violations can be investigated and corrected early. Timely reporting or whistleblowing is generally beneficial to avoiding or reducing negative impacts on the Company. We undertake to maintain strict confidentiality of your personal information and ensure that you will not be subject to retaliation. Please use any of the following convenient channels for reporting or whistleblowing:

### **Compliance reporting**

Email: [legalcompliance@evebattery.com](mailto:legalcompliance@evebattery.com)

### **Audit & Inspection Department**

Whistleblowing email: [audit@evebattery.com](mailto:audit@evebattery.com)

Whistleblowing hot-line: 0752-5752017

Note: The hotline and the email operate independently 24/7, with full local-language support provided by the Company.

This Code is prepared in Chinese and English. In case of any inconsistency between the two versions, the Chinese version shall prevail.

If you have any questions or comments regarding this Code, please contact EVE Energy via email at: [Sustainability@evebattery.com](mailto:Sustainability@evebattery.com).

EVE Energy Co., Ltd.

August 12, 2025