



Linergy Power Sdn. Bhd.

Supplier' s Code of Conduct

Linergy' s vision is “strive to be a global premier innovative technology corporation, deliver excellent contribution to the green energy resolution for mankind, and enrich the spiritual and material wellbeing of our employees.” Linergy is committing to responsible social, environmental and ethical practices. Linergy' s suppliers shall provide a safe working environment and ensure that employees are treated with respect, dignity and fairness, act according to ethical standards, and take environmentally responsible actions when producing products or providing services to Linergy. In all of its business activities, suppliers are obliged to fully comply with the laws and regulations of the country/region in which it domiciles and principles set forth in the Supplier Code of Conduct (hereinafter referred to as “this Code” or “this Code of Conduct”).

Linergy requires suppliers to implement this Code by using the management system described below. Linergy may go to (and / or appoint a third-party supervisor to go to) suppliers' premises with or without prior notice to evaluate whether suppliers has complied with laws and regulations and this Code, suppliers shall provide the highest degree of coordination. In the event that suppliers violate any term of this Code of Conduct, refuse Linergy' s audit request without reasonable cause or provide false statement or hidden facts during Linergy' s audit or when filling the questionnaires requested by Linergy, Linergy shall have the right to immediately cease the cooperation relationship with suppliers.

Linergy Supplier Code of Conduct was formulated by reference to the *Responsible Business Alliances Code of Conduct (RBA CoC)*, the *Social Responsibility Standard (SA8000)*, the *Universal Declaration of Human Rights*, the *Foreign Corrupt Practices Act (FCPA)*, *ISO 14001*, *ISO 45001*, the *OECD Due Diligence Guide for Responsible Mineral Supply Chains in Conflict-Affected and High-Risk Areas* and a series of standards issued by the International Labour Organization (ILO), which can also be used by suppliers as information source.

A. LABOR

Suppliers are committed to safeguarding the human rights of employees in accordance with internationally accepted standards, treating them with dignity and respect, and promoting a diverse and inclusive working environment. Employees referred to in this Code include temporary employees, immigrants, apprentices, contract employees, direct employees, and other types of employees.

The labor standards are as follows:

1. Prohibition of Forced Labor

Forced labor in any form, including but not limited to, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. As part of the hiring process, all workers shall be provided with a written employment agreement in their native language, or in a language the workers can understand, which clearly outlines the terms and conditions of employment. Foreign



Linergy Power Sdn. Bhd.

migrant workers shall receive the employment agreement prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work shall be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given, which shall be clearly stated in workers' contracts. Suppliers shall maintain documentation on all leaving workers. Employers, agents, and sub-agents may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Notwithstanding the foregoing, employers can only hold documentation if necessary to comply with the local law. In this case, at no time shall workers be denied access to their documents. Workers shall not be required to pay recruitment fees or other related costs to employers, agents, or sub-agents. If any such fees are found to have been paid by workers, such fees shall be repaid to them.

2. Young Workers

Child labor shall not be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. If child labor is identified, assistance/remediation shall be provided. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

3. Working Hours

A workweek shall not exceed the maximum set by local law, except in emergency or unusual situations. All overtime shall be voluntary. Workers shall be allowed at least one day off every seven days.

4. Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

5. Non-Discrimination/Non-Harassment/Humane Treatment



Linergy Power Sdn. Bhd.

Suppliers shall commit to a workplace free of harassment and unlawful discrimination. There shall be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Companies shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Workers shall be provided with reasonable accommodation for religious practices and disability. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or hepatitis B tests that could be used in a discriminatory way.

6. Freedom of Association and Collective Bargaining

Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

7. Community Relations and Indigenous Rights

Suppliers shall take measures to reduce any negative impact of its operations on the local community, including environmental, social, cultural and other quality of life factors. Affected communities should be consulted to identify community needs, develop plans, and devote resources to support community development. The suppliers shall implement a management system that respects the rights of indigenous peoples, including freedom, prior informed and consent; To avoid adverse impacts on indigenous peoples' lands, livelihoods, resources and cultural heritage, and to develop and implement indigenous peoples' participation programs.

8. Third-party Recruitment Agents

Suppliers shall ensure that third-party recruitment agents comply with this Code and statutory requirements.

B. HEALTH AND SAFETY

Suppliers shall understand that, in addition to minimizing work related injuries and illnesses, the establishment of a safe and healthy working environment can improve the quality of products and services, which is conducive to promoting production, improving employee retention and morale. Suppliers shall also understand that continuous employee



Linergy Power Sdn. Bhd.

investment and education is critical to identifying and resolving health and safety issues in the workplace. The health and safety standards are as follows:

1. Occupational Health and Safety

Suppliers shall obtain and continuously update all necessary health and safety permits, and abide by provisions of these permits. Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) shall be identified and assessed, mitigated using the Hierarchy of Controls. Where hazards cannot be adequately controlled by these means, workers shall be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Gender-responsive measures shall be taken, such as not having pregnant women and nursing mothers in working conditions, which could be hazardous to them or their child and to provide reasonable accommodations for nursing mothers.

2. Special Operation Management

Suppliers shall establish a permit system for special operations (such as high-altitude operations, hot-fire operations, confined space operations, etc.) and implement them effectively. The implementation of these procedures needs to cover contractors in the plant.

3. Industrial Hygiene

Worker exposure to chemical, biological, and physical agents shall be identified, evaluated, and controlled according to the Hierarchy of Controls. When hazards cannot be adequately controlled, workers shall be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Suppliers shall provide workers with safe and healthy working environment, which shall be maintained through ongoing, systematic monitoring of workers' health and working environment. Suppliers shall provide occupational health monitoring to routinely evaluate if workers' health is being harmed from occupational exposures. Protective occupational health programs shall be ongoing and include educational materials about the risks associated with exposure to workplace hazards.

4. Physically Demanding Work

Workers exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, and controlled.

5. Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers shall be provided and properly maintained where machinery presents an injury hazard to workers.

6. Sanitation, Food, and Housing

Workers shall be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the participant or a labor agent shall be maintained to be clean and safe,



Linergy Power Sdn. Bhd.

and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, and adequate conditioned ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

7. Health and Safety Communication

Suppliers shall provide workers with appropriate workplace health and safety information and training in the workers' native language or in a language the workers can understand, covering all identified workplace hazards the workers may encounter, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Health information and training shall include content on specific risks to relevant demographics, such as gender and age, if applicable. Training shall be provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

8. Incidents and Occupational Injuries Management

Procedures and systems shall be in place to prevent, manage, track and report health and safety incidents and attempted incidents, including provisions to encourage worker reporting, classify and record health and safety incidents and attempted incidents, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work. Suppliers shall allow workers to remove themselves from imminent harm, and not return until the situation is mitigated, without fear of retaliation.

9. Emergency Preparedness

Potential emergency situations and events shall be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills shall be executed at least annually or as required by local law, whichever is more stringent. Emergency plans shall also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

C. ENVIRONMENT

Suppliers shall understand that environmental responsibility is an important part of manufacturing world class products. During the manufacturing process, adverse impacts on communities, the environment and natural resources shall be minimized while protecting public health and safety.

The environmental standards are as follows:

1. Environmental Permits and Reporting



Linergy Power Sdn. Bhd.

All required environmental permits (e.g., discharge monitoring), approvals, and registrations shall be obtained, maintained, and kept up to date, and their operational and reporting requirements shall be followed.

2. Pollution Prevention and Resource Conservation

Emissions and discharges of pollutants and generation of waste shall be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, shall be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

3. Hazardous Substances

Chemicals, waste, and other materials posing a hazard to humans or the environment shall be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal. Hazardous waste data shall be tracked and documented.

4. Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (hazardous waste). Waste data shall be tracked and documented.

5. Air Emissions and Noise

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations shall be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances shall be effectively managed in accordance with the *Montreal Protocol* and applicable regulations. Suppliers shall conduct routine monitoring of the performance of its air emission control systems. Suppliers shall identify, control, monitor and reduce noise sources that affect the noise level of the factory boundary.

6. Materials Restrictions

Suppliers shall adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

7. Water Management

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater shall be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance. A systematic approach should be used to prevent stormwater runoff pollution. Prevent

waste water from illegal discharges and overflows from entering stormwater drains, public water supply systems or public waters. The management of water resources by the suppliers shall guarantee the right of each person in the local community to obtain adequate, safe, acceptable, reasonably priced and easily accessible water resources for personal and domestic use. The suppliers shall make comprehensive use of resources and take measures to prevent and deal with floods and droughts. The suppliers' utilization of water resources and management of water pollution shall reduce and eliminate the negative impact on the seabed and marine environment.

8. Biodiversity

Suppliers shall mitigate the adverse impacts of operations, services and products on biodiversity, including but not limited to habitats, wildlife, flora and ecosystems, and shall publicly disclosed such information, in accordance with the *Convention on Biological Diversity*.

9. Energy Consumption and Greenhouse Gas Emissions

Suppliers shall establish and report against an absolute corporate-wide greenhouse gas reduction goal. Energy consumption and all Scopes 1, 2, and significant categories of Scope 3 greenhouse gas emissions shall be tracked, documented, and publicly reported. Suppliers shall look for methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.

10. Recycling Economy

Active measures should be taken to verify or increase the use ratio of recycled materials, and help build a resource-saving and environment-friendly society by implementing the principles of reduction, reuse and recycling.

D. ETHICS

In order to fulfill social responsibilities and establish a successful market position, suppliers shall comply with the highest standards of ethical requirements, including:

1. Business Integrity

The highest standards of integrity shall be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement.

2. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage shall not be promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

3. Disclosure of Information



Linergy Power Sdn. Bhd.

All business dealings shall be transparently performed and accurately reflected on the participant's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance shall be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

4. Intellectual Property

Intellectual property rights shall be respected. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information shall be safeguarded.

5. Fair Business, Advertising and Competition

Standards of fair business, advertising, and competition shall be upheld.

6. Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers shall be maintained, unless prohibited by law. Suppliers shall have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

7. Responsible Sourcing of Minerals

The *Linergy Due Diligence Management Policy for Responsible Mineral Resources Supply Chain* should be followed and establish internal policies to ensure that tantalum, tin, tungsten, gold, cobalt and other responsible mineral-related raw materials in its supply chain do not originate from high-risk areas, including areas where conflict, the worst forms of child labor, forced labor and human trafficking, serious human rights violations (such as widespread sexual violence) or other high-risk activities (including serious health and safety risks and adverse environmental impacts) are reasonably and objectively determined. Suppliers shall develop its due diligence policy and management system in accordance with the *OECD Guideline for Responsible Supply Chain Due Diligence of Minerals from Conflict Affected and High Risk Areas* or an equivalent and recognized due diligence framework, conduct due diligence on the source and chain of custody of production and marketing of these minerals to identify and assess related risks and take appropriate measures to mitigate such risks, and shall make public the annual due diligence report of the supply chain.

8. Privacy

Suppliers shall commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees strictly in accordance with the Malaysian Personal Data Protection Act 2010 (PDPA). Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

In the course of providing goods or services, the Supplier may process "Personal Data" on behalf of the Company. The Supplier shall act as a "Data Processor" and must:



Linergy Power Sdn. Bhd.

- Process data only according to the Company's written instructions.
- Implement technical and organizational security measures to protect data from loss, misuse, or unauthorized access.
- Ensure all personnel handling such data are bound by confidentiality.
- Notify the Company immediately (within 72 hours) of any suspected personal data breach.

9. Anti-Bribery and Corruption (ABC)

The Supplier shall maintain a zero-tolerance policy towards all forms of bribery and corruption in accordance with the Malaysian Anti-Corruption Commission (MACC) Act 2009. The Supplier, including its "associated persons" (as defined under Section 17A of the MACC Act), is strictly prohibited from offering, promising, or giving any gratification, whether in the form of cash, gifts, or entertainment, to any employee or representative of the Company to obtain or retain business or an advantage. The Supplier warrants that it has implemented "Adequate Procedures" in line with the Ministerial Guidelines to prevent such acts and shall promptly report any solicitation of bribes to the Company's whistleblowing channel.

10. Anti-Money Laundering (AML)

The Supplier shall comply with all applicable anti-money laundering and counter-terrorism financing laws in strict compliance with the Malaysian Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA). The Supplier represents that all funds used in its business transactions are derived from legitimate sources and not from "unlawful activities" as defined under AMLA. The Supplier shall maintain accurate financial records and agrees to conduct reasonable due diligence on its own sub-suppliers and partners to ensure no involvement in financial crimes or sanctioned activities.

11. Anti-Competition

The Supplier shall conduct its business in a manner that promotes fair and open competition in accordance with the Malaysian Competition Act 2010. The Supplier is strictly prohibited from engaging in anti-competitive agreements or practices, including but not limited to price-fixing, bid-rigging (collusive tendering), market allocation, or limiting production to the detriment of the Company. The Supplier warrants that its prices and terms were determined independently without consultation with competitors.

E. MANAGEMENT SYSTEMS

Suppliers shall adopt or establish a management system of which the scope is related to the content of this Code (e.g., *ISO14001/ISO45001/ISO50001*). In designing this management system, suppliers shall ensure that: (a) it complies with applicable laws, regulations and client requirements related to suppliers' operations and products; (b) it conforms to this Code; and (c) identifies and reduces operational risks related to this Code. The system shall also be able to promote continuous improvement.

The management system shall contain the following elements:

1. Company Commitment



Linergy Power Sdn. Bhd.

Suppliers shall establish human rights, health and safety, environmental and ethics policy statements affirming participant's commitment to due diligence and continual improvement, endorsed by executive management. Policy statements shall be made public and communicated to workers in a language they understand via accessible channels.

2. Management Accountability and Responsibility

Suppliers shall clearly identify senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

3. Legal and Customer Requirements

Suppliers shall adopt or establish a process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

4. Risk Assessment and Risk Management

Suppliers shall adopt or establish a process to identify the legal compliance, environmental, health and safety, labor practice and ethics risks, including the risks of severe human rights and environmental impacts, associated with participant's operations. Suppliers shall determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

5. Improvement Objectives

Suppliers shall establish written performance objectives, targets and implementation plans to improve the participant's social, environmental, and health and safety performance, including a periodic assessment of participant's performance in achieving those objectives.

6. Training

Suppliers shall establish programs for training managers and workers to implement participant's policies, procedures, and improvement objectives and to meet applicable legal and regulatory requirements.

7. Worker/Stakeholder Engagement and Access to Remedy

Suppliers shall establish processes for ongoing two-way communication with workers, their representatives, and other stakeholders where relevant or necessary. The process shall aim to obtain feedback on operational practices and conditions covered by this Code, and to foster continuous improvement. Workers shall be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation.

8. Audits and Assessments

Suppliers shall conduct periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and the requirements form Linergy.

9. Corrective Action Process



Linergy Power Sdn. Bhd.

Suppliers shall establish a process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews.

10. Documentation and Records

Suppliers shall create and maintain documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy.

11. Suppliers' Responsibility

Suppliers shall establish procedures to communicate the Code of Conduct requirements to their own suppliers and to monitor compliance. Suppliers shall share the monitoring results with Linergy.

References:

[1] RBA Code of Conduct

<http://www.responsiblebusiness.org/>

[2] Social Accountability

www.cepaa.org/

[3] Universal Declaration of Human Rights

<https://www.un.org/zh/about-us/universal-declaration-of-human-rights>

[4] Occupational Health and Safety Management Systems

<https://www.iso.org/standard/63787.html>

[5] Environmental Management Systems

<https://www.iso.org/iso-14001-environmental-management.html>

[6] International Labour Organization

<http://www.ilo.org/global/lang-en/index.htm>

[7] The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-business-conduct_15f5f4b3-en.html

[8] Malaysian Personal Data Protection Act 2010 (PDPA)

[9] Malaysian Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA)

[10] Malaysian Competition Act 2010