



Linergy Power Sdn. Bhd.

Due Diligence Management Policy for Responsible Mineral Resources Supply Chain

Fully recognizing that the mining, trading, processing, and exporting of the minerals in the conflict-affected and high-risk areas may have a significant negative impact and realizing that companies have an obligation to respect human rights and never have any negative impact on society. Linergy (hereinafter referred to as “the Company” or “we”) is committed to adopting the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas* (Third Edition) (hereinafter referred to as “*OECD Guidance*”) which was issued by Organization for Economic Cooperation and Development (OECD), and the *US Dodd-Frank Wall Street Reform and Consumer Protection Act* (hereinafter referred to as *Dodd-Frank Act*) regulating the Tin, Tantalum, and Tungsten and Gold (herein-after referred to as “3TG”) Minerals in Conflict Areas. This policy applies to tungsten, tin, tantalum, gold, nickel, cobalt, manganese, lithium, graphite, mica, copper, aluminum, and other mineral supply chains of Linergy, its subsidiaries, and holding companies. We incorporate the and the *OECD Guidance* into contracts or agreements with mineral resource suppliers. The Company has always been committed to ethical sourcing and prohibits the use of mineral resources from conflict areas. The Company clearly requires all suppliers to refrain from sourcing minerals from conflict zones or violating its policies. The Company is committed to using conflict free minerals from the “Democratic Republic of the Congo” only as defined by applicable laws and regulations. Accordingly, the Company conduct reasonable due diligence on our suppliers to ensure that their products do not contain minerals from conflict areas, and require written certification if necessary. Linergy will widely promote this policy and endeavor to implement this policy in the mineral resources sup-ply chain in accordance with the *OECD Guidance*.

Serious Abuses Associated with the Extraction, Transport or Trade of Mineral

While sourcing from, or operating in high-risk areas, Linergy will neither tolerate nor profit in any way from, contribute to, assist with or facilitate the commission by any party of:

1. The worst forms of child labor; (*In the International Labor Organization C182 - Worst Forms of Child Labor Convention, 1999 (No. 182), the worst form of child labor is defined in Chapter 3, wherein the sub-clause (d) defines one of the forms, that is work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of children*);
2. Any forms of torture, cruel, inhuman and degrading treatment;
3. Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
4. Other gross human rights violations and abuses such as widespread sexual violence;



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5. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;

6. Mineral products from other areas that do not meet the “conflict-free criteria”, such as raw minerals from mining in the Democratic Republic of the Congo that have been identified by the UN Security Council as causing human rights violations and environmental degradation, or minerals from Congolese veins in Rwanda, Uganda, etc.

Risk Management of Serious Abuses

Linergy will immediately suspend or discontinue engagement with upstream suppliers where the Company identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

Direct or Indirect Support to Non-state Armed Groups

Linergy does not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

1. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
2. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
3. illegally tax or extort intermediaries, export companies or international traders.

Risk Management of Direct or Indirect Support to Non-state Armed Groups

Linergy will immediately suspend or discontinue engagement with upstream suppliers where Linergy identifies a reasonable risk that they are sourcing from, or linked to, any parties providing direct or indirect support to non-state armed groups.

Public or Private Security Forces

1. Linergy agrees to eliminate, in accordance with the following rules of risk management of public or private security forces, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders;

2. Linergy recognizes that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or



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transportation routes from interference with legitimate extraction and trade;

3. Where Linergy or any company in our supply chain contract public or private security forces, Linergy commits to cooperating with security forces in accordance with the *Voluntary Principles on Security and Human Rights*. In particular, Linergy will implement screening mechanisms to prevent any business engagement with security force personnel or units that have been documented to have committed human rights abuses;

4. Linergy will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved;

5. Linergy will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Risk Management of Public or Private Security Forces

In accordance with the specific position of the company in the supply chain, Linergy will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as defined in paragraphs 1 of regarding public or private security force, where the Company identifies that such a reasonable risk exists. In such cases, Linergy will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where Linergy identifies a reasonable risk of activities inconsistent with paragraphs 4 and 5 of regarding public or private security force, we will respond in the same vein.

Bribery and Fraudulent Misrepresentation of the Origin of Minerals

In strict adherence to the Malaysian Anti-Corruption Commission (MACC) Act 2009, Linergy will not offer, promise, give or demand any bribes, and will resist any attempt to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Anti- Money Laundering

Linergy will support efforts, or take steps, to contribute to the effective elimination of money laundering where the Company identifies a reasonable risk of money laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers in accordance with the Anti-Money Laundering,



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Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA).

Payment of Taxes, Fees and Royalties due to Governments

Linergy will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain. We commit to disclosing such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Risk Management of Bribery and Fraudulent Misrepresentation of the Origin of Minerals, Money-Laundering and Payment of Taxes, Fees and Royalties to Governments

In accordance with the specific position of the company in the supply chain, Linergy commits to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. Linergy will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Occupational Health and Safety

When purchasing or producing, Linergy neither benefit, assist, or facilitate any party providing the life-threatening occupational environment for any of its direct and/or indirect employees and/or anyone at its production site, nor purchase from or in any manner engage the party providing the same.

Risk Management on Occupational Health and Safety

Linergy will immediately suspend or discontinue engagement with upstream suppliers if we reasonably believe that the upstream supplier provides the life-threatening occupational environment for any of its direct and/or indirect employees and/or anyone at its production site, purchase from or in any manner engage any party providing the same.

Child Labor

Linergy neither employs the child labor under the minimum age as specified by the applicable law and regulation of the host country, nor benefit, assist, or facilitate the aforesaid employment, nor purchase from or do business with, any party employing the same. If there is no applicable law and regulation in the host country relating to the minimum age, it shall be 16 years.

Risk Management of Child Labor

Linergy will immediately suspend or discontinue engagement with upstream suppliers if we reasonably believe that the upstream suppliers employ the child labor under the minimum age, purchase from or in any manner engage any party employing the same.

Land Rights, Emissions and Artisanal Operators

Linergy will not engage in or tolerate extracting resources or otherwise benefiting from land where the free, prior and informed consent of local communities and indigenous



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peoples has not been obtained, including those for which the extractor holds a legal title, lease, concession, or license.

Linergy will not engage in or tolerate extracting resources or otherwise benefiting from mining operations where the culture and heritage of local communities and indigenous peoples have not been respected and protected, or where traditional cultures of local peoples have been harmed.

Linergy will not engage in or tolerate extracting resources or otherwise benefiting where a legal title, lease, concession, or license has been illegally obtained or violates national law. Linergy will ensure avoiding major adverse impacts and gross violation of local laws and regulations regarding ambient soil, air, and water conditions, including manufacturing, trading, and using chemicals and hazardous substances subject to international bans due to their high toxicity to living organisms, environmental persistence, or potential for irreversible ecological impacts, and/or releasing arsenic and mercury emissions.

Linergy commits to regularly assessing and mitigating the adverse impacts on soil, air, and water by the mining operation, considering ambient soil, air, and water conditions. The Company will apply technically and financially feasible pollution prevention principles and techniques to avoid, minimize, and control pollution. It will monitor all emissions and discharges of potential pollutants in compliance with the relevant laws and regulations of host countries, promptly follow up on and remediate pollution issues, clearly document and publicly disclose the result and implement effective emissions control and reduction strategies.

Linergy agrees to ensure and surpass applicable legal requirements with regard to chemicals and toxic substances, avoid manufacturing, trading, and using chemicals and hazardous substances subject to international bans due to their high toxicity to living organisms, environmental persistence, or potential for irreversible ecological impacts, including rigorously suppressing arsenic mercury emissions and managing cyanide according to the highest international standards and ensure that hazardous wastes are handled, stored, transported, treated, and disposed according to laws and regulations and in a way that eliminates leaks, spills, or other releases to the environment.

Linergy will prohibit the extraction of resources from World Heritage properties or legally protected areas, thereby providing a threat to the outstanding universal value for which these properties are protected.

Linergy will pay specific attention to risks of forced labor, child labor, unsafe working conditions, uncontrolled use of hazardous substances and other significant environmental impacts with regard to sourcing from artisanal and small-scale producers and work together and seek a productive relationship with artisanal and small-scale operators in the extraction area.

Risk Management of Land Rights, Emission sand Artisanal Operators



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In accordance with the specific position of the company in the supply chain, Linergy will immediately devise, adopt and implement a risk management plan with suppliers and other stakeholders to prevent or mitigate the risk of infringing land rights, causing major adverse environmental impacts, or specific risks regarding artisanal and small-scale operators, where Linergy identifies that such a reasonable risk exists. Regarding Smelters/Refineries, The Company's supply chain due diligence management system would identify smelters/refineries among its suppliers, and the due diligence for such suppliers would additionally look at the source of minerals, the availability of industry-recognized credentials. Moreover, On-site audits are conducted by the Company or commissioned by a third party when required. The results of the audits are publicly disclosed at the appropriate time and through appropriate channels, such as ESG reports, etc.

Smelter / Refinery

Within the Company supply chain due diligence framework, smelters/refineries among suppliers are systematically identified. For these entities, due diligence procedures specifically include verification of mineral provenance and possession of industry-recognized certifications (e.g., RMI-CIR, LBMA Responsible Sourcing). When required, on-site audits are conducted either internally or through accredited third-party auditors. Audit findings are disclosed through appropriate channels and timelines, including ESG reports and public sustainability disclosures.