Grandblue Environment Co., Ltd.

Supplier Code of Conduct

I. Purpose

This Supplier Code of Conduct sets forth the expectations and requirements of Grandblue Environment Co., Ltd. for all suppliers in the areas of environmental responsibility, social accountability, and corporate governance. It is designed to ensure compliance with all applicable laws, regulations, and ethical business standards, while fostering strong, cooperative relationships and shared social responsibility between Grandblue and its supply partners.

II. Scope of Application

This Code applies to all suppliers of Grandblue Environment Co., Ltd., including their ultimate controllers, employees, subcontractors, and affiliated parties. By signing any procurement contract, framework agreement, quotation, or similar document with Grandblue, suppliers are deemed to have unconditionally accepted and agreed to comply with this Code.

III. Code Provisions

Article 1 – Compliance with Laws and Regulations

(1) Suppliers must comply with all applicable laws, regulations, administrative directives, industry standards, and regulatory requirements in the countries or regions where they operate.

(2) Suppliers are expected to promote lawful, ethical conduct throughout their own supply chains, encouraging compliance among their partners and subcontractors.

(3) Where legally permitted, suppliers should maintain appropriate records demonstrating compliance with all applicable laws and regulations.

Article 2 – Labor and Employment Standards

(1) Respect for Human Rights:

- Suppliers must respect the dignity, privacy, and rights of all

individuals. They shall not coerce individuals into employment or subject them to involuntary labor.

- Suppliers must not engage in violence, including but not limited to verbal abuse, threats, corporal punishment, sexual harassment, or any form of physical or psychological coercion.
- Suppliers must not conduct illegal or inappropriate searches, including opposite-sex searches or threats thereof.
- Suppliers must not participate in or support human trafficking in any form.
- Workplaces must be free from discrimination based on race, age, gender, class, political position, religion, marital status, sexual orientation, disability, pregnancy, or any other factors unrelated to job performance.

(2) Voluntary Employment:

- Suppliers must ensure that employment is freely chosen.
- The use of forced, bonded, indentured, or prison labor is strictly prohibited.
- Suppliers must not restrict employees' freedom of movement or require the surrender of personal legal documents (e.g., passports, identification documents, travel permits, or other personal legal documents) as a condition of employment.

(3) Prohibition of Child Labor:

- Suppliers must comply with local laws on the minimum working age.
- The employment of minors, including apprentices and vocational students, must strictly follow legal provisions related to minimum age and compulsory education requirements.

(4) Fair Compensation:

- Suppliers must provide fair, timely, and complete wages to all employees in accordance with applicable laws and regulations.
- Legally mandated benefits must be provided.

- Wage transparency must be ensured by issuing clear, accurate, and understandable pay statements.

(5) Freedom of Association and Collective Bargaining:

- Suppliers must respect employees' legal rights to freely associate, join industry organizations and trade unions, and engage in collective bargaining.
- Suppliers must not harass, intimidate, or retaliate against employees for lawfully and peacefully participating in union activities or related efforts.

Article 3 – Occupational Health and Safety

(1) Compliance and Workplace Safety:

- Suppliers must comply with all applicable laws and regulations related to occupational health and safety.
- A safe and healthy working environment must be provided for all employees.
- Any conditions that pose a serious risk to life or health must be identified and eliminated without delay.

(2) Hazard Management and Prevention:

- Suppliers are responsible for the proper handling and management of hazardous materials and equipment.
- Preventive systems and employee training programs must be established to minimize workplace accidents and injuries.
- Suppliers must ensure the provision of suitable personal protective equipment, on-site medical resources and first aid, clearly marked emergency exits and functional fire safety equipment
- Working areas must be clean, well-lit, and comfortable, and must include hygienic restroom facilities.
- Additional protective measures must be implemented to safeguard the health and safety of female employees, particularly pregnant or nursing mothers.

(3) Working Hours and Rest Periods:

- Suppliers must comply with all applicable laws and regulations regarding working hours, rest periods, and overtime.
- All overtime work must be strictly voluntary and fairly compensated.

(4) Incident Management and Reporting:

- Suppliers must implement procedures and systems to prevent and manage work-related injuries and illnesses.
- All work-related incidents must be accurately recorded, tracked, and reported.
- Corrective actions must be implemented promptly, and support must be provided to ensure the timely recovery of affected employees.

Article 4 – Business Ethics

(1) Integrity and Accountability:

- Suppliers are expected to conduct business with the highest standards of integrity.
- All contractual commitments must be honored in good faith.
- Suppliers shall: Deliver products and services that meet quality standards; avoid deception, fraud, or misrepresentation; uphold their reputation and credibility through ethical conduct.

(2) Prohibition of Improper Benefits:

- Suppliers must conduct business transparently and ethically, refraining from offering, providing, soliciting, or accepting any form of improper benefits not stipulated in contractual agreements.
- Improper benefits include, but are not limited to: explicit rebates, hidden rebates, cash, gifts, shopping cards, physical items, securities, travel incentives, or other non-material benefits.
- Suppliers must proactively disclose any actual or potential conflicts of interest involving client personnel.

(3) Intellectual Property and Information Protection:

- Suppliers must respect and safeguard all intellectual property rights.

- Strict confidentiality must be maintained when handling client information, particularly during the transfer of technologies, processes, or proprietary knowledge.

(4) Fair Competition:

- Suppliers must adhere to all applicable national and regional antitrust and fair competition laws and regulations.
- Unethical practices such as price-fixing, market allocation, collusion, or bid rigging are strictly prohibited.
- Business opportunities must be pursued through legitimate and transparent channels.

(5) Anti-Money Laundering Compliance:

- Suppliers must comply with all applicable national and regional anti-money laundering laws, regulations, and international conventions.
- This includes conducting proper customer identity verification, maintaining accurate records of customer data and transactions, and promptly reporting large or suspicious transactions to the appropriate authorities.

Article 5 – Environmental Protection

(1) Regulatory Compliance:

- Suppliers must obtain, maintain, and update all required environmental permits, licenses, and registrations.
- All operational and reporting obligations associated with these approvals must be fulfilled in full compliance with applicable laws and regulations.

(2) Sustainable Operations:

- Suppliers shall uphold environmental principles across their operations.
- This includes strict adherence to all relevant environmental laws and regulations aimed at conserving natural resources, promoting

recycling and circular resource use, minimizing pollution at the source, preventing air and water contamination, and reducing solid waste sent to landfills.

(3) Commitment to Climate and Biodiversity: Suppliers must take active steps to reduce their environmental footprint by:

- Implementing conservation and substitution practices.
- Minimizing energy, water, and natural resource consumption.
- Reducing greenhouse gas emissions.
- Preserving biodiversity.
- Preventing deforestation and protecting soil and land ecosystems.

(4) Hazardous Waste and Material Management: Suppliers must handle, store, and dispose of hazardous materials and waste in a safe, secure, and legally compliant manner.

(5) Environmental Management Systems:

- Suppliers shall establish comprehensive environmental management systems to ensure the effective implementation of environmental protection initiatives.
- Suppliers are encouraged to adopt advanced environmental technologies, improve resource efficiency, and reduce emissions and waste generation.

(6) Energy Conservation:

- Suppliers must implement energy conservation management systems to support environmental and sustainability goals.
- The adoption of energy-efficient technologies and equipment is encouraged to maximize energy utilization and minimize environmental impact.

(7) Quality and Green Product Standards:

- Suppliers shall maintain effective quality management systems, including quality control processes, product testing and validation, and traceability mechanisms.
- Products must comply with applicable quality standards.

- Suppliers are encouraged to pursue green product certifications to strengthen market competitiveness and support environmental objectives.

Article 6 – Interpretation and Effective Date: This Code is interpreted and administered by Grandblue Environment Co., Ltd. and shall take effect on the date of its official issuance.

In the event of any discrepancy in meaning or interpretation between the English and Chinese versions of this document, the Chinese version shall prevail.

This Policy was revised on August 31, 2026.