Gotion High-Tech Environmental Management Policy

1. Summary

With the progress of human society, the impact of corporate activities on the natural environment has become increasingly significant; adhering to the principles of natural ecology and fulfilling environmental protection responsibilities constitute an indispensable social obligation for enterprises. Gotion High-Tech Co., Ltd. (hereinafter referred to as "Gotion High-Tech" or the "Company") has consistently placed environmental protection at a central position within its corporate development strategy, implements the concept of sustainable development throughout all aspects—including production activities and daily operations—ensures rigorous environmental management, and actively fulfills its environmental protection responsibilities. To reaffirm our commitment to environmental protection and to standardize our environmental management requirements, we hereby issue this Statement.

2. Scope of Application

This policy applies to Gotion High-tech Co., Ltd. and its wholly-owned and controlled subsidiaries, covering all aspects of the company's production and business operations, products and services, distribution and logistics, waste management, due diligence, mergers and acquisitions, and other related activities. The Company encourages its third-party partners (such as customers and suppliers) as well as its internal employees to jointly comply with the provisions of this document.

3. Management Structure

3.1. The Strategy and ESG Committee under the Board of Directors oversees and provides guidance on environmental matters. The EHS Management Committee, composed of senior executives including members from Gotion High-Tech's

management team, serves as the company's highest decision-making body for environmental management; it is responsible for formulating the company's environmental management policies, objectives, and performance metrics, overseeing the implementation and continuous improvement of relevant environmental management policies, and organizing various production bases to conduct activities such as environmental factor identification, compliance reviews, internal audits, and management reviews.

3.2. The Company's EHS Management Center, in accordance with the environmental management policy and guidelines, is responsible for drafting, revising, and promoting the implementation of various environmental protection systems; it provides resource coordination and technical support for the environmental protection management work carried out by all centers, the Engineering Research Institute, and all production bases; it drives the achievement of various performance indicators; and it continuously monitors the environmental management performance of each subsidiary as reflected by these indicators.

3.3. The safety and environmental management departments at all production bases shall strictly comply with laws, regulations, and ordinances; establish and continuously ensure the effective operation of their environmental management systems; decompose and drive the implementation of environmental performance indicators; and actively participate in local environmental improvement initiatives.

4. Control Measures

The company adopts "Rational utilization of resources and protection of the environment in accordance with the law" as its environmental management policy; in alignment with this policy, Gotion High-tech has formulated the following management requirements and measures, including but not limited to:

4.1. Laws and Regulations

Gotion High-tech strictly complies with and implements the *Environmental Protection Law of the People's Republic of China*, the *Atmospheric Pollution Prevention and Control Law of the People's Republic of China*, the *Solid Waste Pollution Prevention and Control Law of the People's Republic of China*, the *Water Pollution Prevention and Control Law of the People's Republic of China*, the *Environmental Impact Assessment Law of the People's Republic of China*, the *Pollutant Discharge Standards for the Battery Industry*, as well as all applicable laws, regulations, their implementation rules, and ordinances governing the locations where its production bases are operated; it regularly identifies new items, and continuously implements and improves its environmental management system.

4.2. Environmental Factor Identification

In accordance with Gotion High-Tech's "Management Measures for Environmental Factors, Hazard Identification, and Risk Assessment," the company regularly organizes the identification of key environmental factors across its production, office, and social activity sites, formulates corresponding risk grading and control measures, incorporates these measures into the annual internal audit checklist, and continuously improves its environmental management practices.

4.3. Training and Events

To enhance employees' environmental protection awareness, the company has incorporated environmental protection curriculum content into the onboarding training for new employees and regularly organizes comprehensive environmental awareness training sessions for all staff, covering areas such as waste management, water resource management, and energy management; additionally, the company conducts annual themed activities during "Safety Month and Environment Day," which include training lectures, knowledge quizzes, campaigns promoting low-carbon travel, and initiatives to reduce carbon emissions, among other educational and awareness-raising activities, aimed at preventing and reducing the occurrence of environmental incidents.

4.4. System Certification and Management

Gotion High-Tech has established an ISO 14001 Environmental Management System (EMS) and, in accordance with the requirements of this system, has developed and issued a series of system documents, including the "EHS Management System Manual," "EHS Employee Handbook," "Environmental Protection Operation Control Management Regulations," "Air Pollution Prevention and Control Management Measures," "Water Pollution Prevention and Control Management Measures," "Waste Management Measures," and "Pollution Prevention and Control Facilities Management Measures." Through the establishment and implementation of this system, the company has effectively advanced the achievement of its goals regarding environmental protection, pollution prevention, and continuous improvement; all wholly-owned subsidiaries under the company have successfully obtained ISO 14001 certification.

4.5. Carbon Management and Climate Change Mitigation

In response to the severe challenges posed by global climate change, the company has consistently steadfastly implemented the concept of green development, deeply integrating a 'green DNA' throughout the entire product lifecycle and adopting systematic measures to continuously reduce greenhouse gas emissions. The company's carbon management goals and actions strictly adhere to the ambition set forth in the Paris Agreement—to limit global temperature rise to within 1.5°C—while maintaining full alignment with the national carbon peaking and carbon neutrality strategies, thereby ensuring that its emission reduction pathway is scientific, transparent, and traceable. Building on this foundation, the company commits to achieving operational carbon peaking by 2027 and operational carbon neutrality by 2035, taking concrete actions to respond to the global consensus on climate governance and driving a high-quality low-carbon transition.

At the carbon emissions management level, the company has developed standardized documents such as the "Management Measures for Greenhouse Gas Inventory," established a regular inventory review mechanism, forms specialized teams annually

to conduct greenhouse gas emission inventories, generates detailed inventory reports, and continuously updates and discloses this information to the public through official channels to ensure data transparency. The company commits to providing green and low-carbon products and will progressively provide transparent digital information regarding the environmental impacts of these products, such as Environmental Product Declarations (EPDs) or other types of eco-labels.

Furthermore, to achieve the company's "Dual Carbon" goals, the company has established a Green Zero-Carbon Strategy, aiming to build a zero-carbon supply chain, zero-carbon manufacturing, zero-carbon R&D, and zero-carbon operations, while continuously improving its management systems to enhance its capacity for managing greenhouse gas emissions.

4.6. Resource Management

The company has established clear, quantifiable targets and supporting measures for energy and water resource management; it has committed to and actively implemented multiple initiatives to control and reduce water pollution; simultaneously, through process optimization and recycling, the company has reduced its water intake year by year, ensuring that its water resource management objectives align with national water conservation initiatives and the green development policy. For 2026, the company has set a target of controlling its energy consumption at 22.1 kWh/kWh, steadily advancing efforts to improve energy efficiency and enhance operational performance; in the water conservation sector, the company has specified that each subsidiary shall achieve a year-on-year reduction in water consumption per unit of output by 5%, urges all subsidiaries to benchmark against industry leaders, conducts thorough specialized assessments of water-saving opportunities, and ensures the effective implementation of all energy-saving measures.

The company has established water conservation as a routine priority task; it regularly holds Energy Month meetings to analyze water usage across its subsidiaries and

organizes specialized water-saving training sessions, covering topics such as equipment technical upgrades, production process improvements, and optimization of management measures.

Regarding water usage assessment, the company implements monthly water consumption target management for its subsidiary companies across all bases, requiring them to comprehensively review and analyze their internal production and domestic water usage; to continuously monitor data through both horizontal and vertical comparisons to identify abnormal water-consuming points; and to conduct root cause analysis and implement corrective actions for processes that consistently exceed standards or exhibit significant fluctuations. Additionally, the company discloses the results of these water usage analyses during monthly meetings, organizes outstanding subsidiaries to share their water-saving experiences and technologies, and facilitates knowledge exchange among subsidiaries to collectively enhance overall water conservation capabilities.

The company commits to strengthening the retrofitting of water-saving processes for equipment and facilities, promoting the recovery and reuse of water resources throughout the production process, and establishing a refined water-use system that covers the entire production workflow.

4.7. Pollutant Management

During its production and operational activities, the company consistently adheres to the principles of reduction, resource recovery, and harmless treatment; it employs environmentally friendly production equipment and is committed to reducing the generation and discharge of wastewater, exhaust gases, boundary noise, and solid waste at the source of production and operation.

All production bases shall strictly comply with the approval of the Environmental Impact Assessment (EIA), the "Technical Specifications for Application and Issuance of Pollutant Discharge Permits – Battery Industry," and other relevant standards; they

shall apply for pollutant discharge permits, formulate annual pollutant discharge monitoring plans, engage qualified third-party entities to conduct regular monitoring, and ensure that wastewater, exhaust gases, and noise levels at the plant boundary meet the prescribed discharge standards through continuous monitoring and supervision.

The company has formulated and implemented the "Waste Management Measures," which provide comprehensive guidance for the compliant management of solid waste across all subsidiaries. We strictly adhere to the principles of source reduction, sorted collection, and compliant disposal; in accordance with national and local regulations, we implement categorized storage and labeling management for general industrial solid waste, hazardous waste, and municipal solid waste. Specifically, hazardous waste must be stored in dedicated areas equipped with impermeable and leak-proof measures, with dedicated personnel from the EHS Department responsible for maintaining record-keeping and conducting daily supervision. All types of waste are uniformly transported by designated personnel: general industrial solid waste is disposed of according to prescribed procedures; hazardous waste is entrusted to qualified third-party entities for standardized treatment, while the transfer manifest system is strictly enforced; municipal solid waste is collected on a regular basis by the administrative management department. Furthermore, specialized emergency response plans have been developed for all processes involving hazardous waste, and regular drills are conducted to effectively mitigate environmental risks and ensure prompt response and proper handling of emergencies. Regarding pollutant emission reduction, the company has established annual pollutant reduction targets (as listed below) based on the actual operational conditions of each production base, and has incorporated these targets into the "EHS Objectives and Indicators Management Plan":

- The reduction in pollutant emissions per unit of output (GWh or t) shall be no less than 5% year-on-year.

- Wastewater reduction target: By 2026, the COD emission factor for wastewater pollutants at the battery production base—expressed as emissions per unit of production capacity—shall be reduced by 15% compared with the levels recorded in 2024.
- Waste gas reduction target: By 2026, the non-methane total hydrocarbon emission factor per unit of production capacity at the battery manufacturing base shall be reduced by 15% compared with the levels recorded in 2024.
- Hazardous Waste Reduction Target: By 2026, the volume of hazardous waste disposed of per unit of production capacity at the battery manufacturing base shall decrease by 5% year-on-year.

4.8. Control of Hazardous Substances

The company is consistently committed to ensuring that all its products comply with both domestic and international regulations governing hazardous substances, and will continue to promote the use of eco-friendly materials to enhance the green attributes of its products. Building on this foundation, the company continues to invest significant R&D resources and budgets to actively identify and advance low-risk alternative solutions for key hazardous substances, while continuously optimizing material structures in a manner that ensures product performance and safety.

The company commits to closely monitoring industry technological trends and policy developments, actively maintaining transparency in its communications, evaluating opportunities for collaboration with professional institutions and industry associations, and working together to advance the systematic substitution and governance of hazardous substances.

5. Continuous Improvement and Social Responsibility

Environmental protection constitutes a core component of corporate social responsibility. To this end, we will continue to refine our internal environmental management system, establish a long-term performance evaluation and internal audit

monitoring mechanism, and conduct regular reviews, dynamic optimizations, and periodic internal and external environmental audits (covering areas such as legal compliance, waste reduction, pollutant reduction, enhancement of the environmental management system, energy conservation and consumption reduction, water resource utilization, and biodiversity conservation) to ensure the scientific basis and effectiveness of our environmental goals. We encourage all employees to actively participate in environmental protection initiatives, motivate staff to proactively propose environmental improvement suggestions, and establish a routine feedback mechanism to integrate environmental awareness into every aspect of our work. Simultaneously, we will uphold the principle of open collaboration, actively engage with government authorities, industry partners, and relevant stakeholders across the industrial chain to build a diversified and synergistic environmental protection ecosystem; through joint participation in environmental protection projects and the sharing of technical expertise, we will advance the implementation of the green development concept and contribute Gotion's efforts toward the sustainable development of society.

6. Policy Implementation and Revision

This policy has been approved by the Strategy and ESG Committee and shall come into effect as of the date of its publication. The Company commits to conducting timely reviews and revisions in accordance with the latest laws and regulations to ensure the suitability, adequacy, and effectiveness of this policy. This policy is prepared in both Chinese and English versions; in the event of any discrepancy between the Chinese and English versions, the Chinese version shall prevail.

This policy will be fully communicated to all employees of the company via the internal information network, and will be reinforced through training to enhance awareness and ensure its effective implementation across all staff members.