

Anti-Modern Slavery Policy

1. Effective Date: 2025.02

2. Scope

This Policy applies to HyperStrong Group (the “Company”) and all its direct and indirect subsidiaries, affiliates, and controlled entities. It extends to all individuals working for or on behalf of HyperStrong Group, including employees, directors, officers, contractors, temporary workers, interns, agents, and representatives (collectively, “Associated Persons”). Additionally, it applies to all third - party suppliers, sub - suppliers, contractors, and business partners (collectively, “Business Partners”) that provide goods, services, or materials to HyperStrong Group.

3. Purpose

Modern slavery—encompassing forced labor, debt bondage, human trafficking, child labor, and involuntary servitude—is a criminal offense and a severe violation of fundamental human rights. It involves depriving individuals of their freedom to exploit them for personal or commercial benefit.

The objectives of this Policy are to:

- Prohibit all forms of modern slavery and forced labor within HyperStrong Group’s operations and supply chain.
- Ensure compliance with all applicable anti - slavery laws and regulations in the jurisdictions where HyperStrong Group conducts business, including (but not limited to) the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2023, and the German Supply Chain Due Diligence Act (LkSG).

- Define clear responsibilities for preventing, detecting, and addressing risks related to modern slavery.
- Establish a framework for reporting suspected violations and safeguarding whistleblowers from retaliation.

4. Definitions

- **Modern Slavery:** Any practice that exploits individuals through coercion, deception, or denial of freedom, including (but not limited to) forced labor, debt bondage, human trafficking, child labor (work that robs children of their childhood, access to education, or potential), and involuntary servitude.
- **Forced Labor:** Work or services performed against an individual's will, under threat of penalty (e.g., physical harm, financial penalty, or restriction of freedom) or coercion (e.g., withholding identity documents, manipulating debt, or threatening family members).
- **Business Partner:** Any third-party supplier, sub-supplier, contractor, vendor, distributor, or service provider that engages with the HyperStrong Group, regardless of their tier in the supply chain.
- **HyperStrong Group:** Beijing HyperStrong Technology Co., LTD. and all its direct and indirect subsidiaries, affiliates, and controlled entities.

5. Policy Requirements

5.1 Obligations of the HyperStrong Group

HyperStrong Group shall:

- Ensure all its operations are free from modern slavery and forced labor. This includes prohibiting Associated Persons from engaging in, facilitating, or tolerating any form of modern slavery.
- Provide Associated Persons with fair and transparent employment terms, including written contracts in a language they understand, wages that meet or exceed legal minimums (and living wages where applicable), and unobstructed access to legal identity documents (e.g., passports, work permits).
- Maintain safe and healthy working conditions, in line with local labor laws and international standards (such as those set forth by the International Labour Organization [ILO]).
- Conduct regular human rights risk assessments to identify modern slavery risks in its operations and supply chain, with heightened focus on high - risk regions (e.g., areas with weak labor protection) and high

- risk materials (e.g., battery components, metals).

5.2 Obligations of Business Partners

All Business Partners must:

- Comply with this Policy and all applicable anti - slavery laws.
- Prohibit modern slavery and forced labor in their own operations and require their sub - suppliers to adopt the same standards (via a “flow-down clause” in all contracts with HyperStrong Group).
- Maintain accurate records of their workforce (e.g., employment contracts, wage statements) and allow HyperStrong Group or its third - party auditors to inspect these records upon request.
- Refrain from withholding or confiscating workers’ identity documents, charging workers recruitment fees (which can lead to debt bondage), or restricting workers’ freedom of movement.
- Immediately notify HyperStrong Group of any suspected modern slavery violations in their operations or supply chain.

5.3 Due Diligence and Monitoring

The HyperStrong Group shall implement a risk-based due diligence process to monitor compliance with this Policy, including:

- **Supplier Onboarding:** Requiring all new Business Partners to complete a self - assessment questionnaire (SAQ) to identify modern slavery risks, and conducting additional screenings (e.g., third - party audits) for high - risk partners.
- **Supply Chain Mapping:** Developing and maintaining maps of high - risk supply chains (e.g., for battery cells) to track the origin of materials and identify potential risks.
- **Corrective Action Plans (CAPs):** Requiring Business Partners that fail to comply with this Policy to implement a CAP within a specified timeframe. If a Business Partner fails to address violations, HyperStrong Group may terminate the business relationship.

5.4 Reporting and Whistleblower Protection

- **Reporting Channels:** Any Associated Person or Business Partner may report suspected modern slavery violations confidentially through:

1. The HyperStrong Group Whistleblower Email: jubao@hyperstrong.com
2. The HyperStrong Group Online Reporting Portal: <https://www.hyperstrong.com/en/contact-us>

Where permitted by law, reports may be submitted anonymously.

- **Whistleblower Protection:** HyperStrong Group prohibits retaliation against any individual who reports a suspected violation in good faith—even if the report is later found to be unsubstantiated. Retaliation includes (but is not limited to) dismissal, demotion, harassment, or discrimination. Any Associated Person who retaliates against a whistleblower will face disciplinary action, up to and including termination of employment.
- **Investigation:** All reports of suspected modern slavery will be promptly investigated by HyperStrong Group's Compliance Team or an independent third - party investigator. The results of the investigation will be shared with the Audit Committee of the Board of Directors, and appropriate action will be taken to address any confirmed violations.

5.5 Training and Awareness

HyperStrong Group shall:

- Provide mandatory training on this Policy to all Associated Persons, with targeted focus on employees involved in procurement, supply chain management, and auditing.
- Offer training resources to Business Partners to support their understanding and compliance with this Policy.
- Conduct regular awareness campaigns (e.g., internal newsletters, workshops) to emphasize the importance of eradicating modern slavery.

6. Non-Compliance and Consequences

- **Associated Persons:** Any Associated Person who violates this Policy will be subject to disciplinary action, which may include warnings, suspension, or termination of employment—depending on the severity of the violation.
- **Business Partners:** Any Business Partner who violates this Policy may face consequences such as:
 1. Mandatory participation in a remediation program.

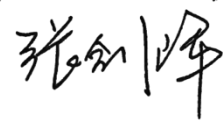
2. Suspension from eligibility for new business with HyperStrong Group.
3. Termination of the business relationship.
4. Legal action, where applicable.

7. Policy Review and Updates

This Policy will be reviewed annually by HyperStrong Group's Compliance Team and approved by the Board of Directors. Updates will be made to reflect changes in laws, regulations, or business risks, and all Associated Persons and Business Partners will be notified of material revisions.

8. Access to the Policy

This Policy is available on the HyperStrong Group's official website
(<https://www.hyperstrong.com/en/about-us/sustainability>).



Beijing HyperStrong Technology Co., LTD.

Feb 27th, 2025