

JL MAG RARE-EARTH CO., LTD.

Anti-Corruption Policy

Introduction

JL MAG RARE-EARTH CO., LTD. (hereinafter referred to as "JL Mag," "the Company," or "we") recognizes that integrity in operations and compliance with laws are essential for sustainable enterprise development, and strives to create a clean, honest, and transparent workplace environment. The Company strictly complies with relevant bribery and corruption laws and regulations such as the Anti-Monopoly Law of the People's Republic of China, the Anti-Unfair Competition Law of the People's Republic of China, and the Interim Provisions on Prohibiting Commercial Bribery Activities, as well as other applicable national anti-bribery regulations and implementation rules.

This policy applies to all staff of JL Mag and its subsidiaries, including directors, senior management, all employees, other personnel (whether permanent, fixed-term, or temporary), consultants, contractors, interns, etc.

Part 1: Anti-Corruption and Anti-Bribery

JL Mag prohibits directors and all employees from engaging in any illegal or unethical economic activities for personal gain, and advocates that all employees adhere to professional ethics and personal integrity. The Company requires key personnel such as managers, sales staff, and procurement personnel to sign the Business Ethics Commitment Letter and the Integrity and Self-Discipline Commitment Letter. Suppliers are required to strictly comply with sunshine procurement integrity requirements and must sign the Supplier Anti-Bribery Commitment Letter and the Sunshine Procurement Integrity Agreement, clearly declaring no bribery or acceptance of bribes, to jointly maintain a good working environment.

Part 2: Gifts

JL Mag encourages employees to maintain professionalism and courtesy in business interactions, but must ensure that the acceptance and provision of gifts comply with the following regulations: Prohibition of accepting or providing cash or cash equivalents; In principle, the acceptance and provision of gifts should be explicitly refused, and in special circumstances, written reporting is required and gifts must be surrendered for handling; All accepted and provided gifts must comply with relevant

laws and regulations, and no prohibited items may be accepted or provided, nor any items that may affect or be perceived to affect objective judgment and duty performance; The value of all accepted and provided gifts should be reasonable and must not exceed industry standards and Company-specified limits; All accepted and provided gifts must be recorded.

Part 3: Charitable Donations or Sponsorships

JL Mag actively participates in social and community development to improve public welfare. Any charitable donations or sponsorships must comply with the following regulations: All charitable donations or sponsorships must comply with legal requirements, undergo the Company's internal approval process, and be recorded; All charitable donations or sponsorships must not involve any potential or actual corruption, bribery, conflict of interest, or unfair competition that violates business ethics; Unauthorized provision of any form of benefit or advantage to individuals or organizations with actual or potential business dealings or interests with the Company for the purpose of bribery or obtaining improper benefits is prohibited, strictly avoiding donations or sponsorships (including political donations and charitable contributions) for bribery purposes.

Part 4: Whistleblower Protection

The Company strictly follows the provisions of the Company Whistleblowing Management System to conduct registration, acceptance, investigation, and reporting of whistleblowing incidents. During the handling process, the whistleblower's personal information such as name, unit, contact details, and the specific content of the report are kept strictly confidential to ensure the whistleblower does not suffer any form of retaliation. If whistleblower information is leaked, appropriate actions will be taken according to relevant management measures after verification.

Additionally, when there is a conflict of interest between the handling personnel and the whistleblower or the reported individual, the handling personnel will recuse themselves to ensure fair handling of the report.

Part 5: Communication and Training

JL Mag regularly conducts business ethics compliance training and seminars for all employees, covering areas such as anti-corruption, anti-bribery, and anti-fraud. All new employees are required to receive anti-corruption and business ethics related training. JL Mag periodically provides training and awareness courses on this policy, integrity culture and related norms, Company procedures and measures. All employees should actively and punctually complete relevant training and courses.

Part 6: Disciplinary Measures

Any employee found violating this policy will be subject to disciplinary action in accordance with applicable laws and Company policies, including termination of employment.

Part 7: Reporting Violations and Suspected Matters

Any employee who discovers conduct violating this policy has an obligation to immediately report it through JL Mag's whistleblowing channels. Any employee with questions, suspicions that this policy has been violated, or concerns about past or proposed conduct of anyone within the Company or any third party cooperating with the Company in any capacity is encouraged to contact JL Mag through the following channels:

Mailing Address: Audit Department, JL MAG RARE-EARTH CO., LTD., No. 81 Jinling West Road, Ganzhou City

Postal Code: 341000

Email: SJ@JLMAG.CN

Report Landline: 0797-8068243

On-site Report Acceptance Department: Audit Department, JL MAG RARE-EARTH CO., LTD.

Policy Review and Revision

The contents of this policy are supervised by JL Mag's Audit Department, with major impacts and policy implementation reported to the Board Audit Committee. JL Mag regularly reviews this policy and revises it based on the latest laws and regulations, regulatory developments, business conditions, and other factors. Employees should stay updated on policy revisions to ensure their conduct complies with the requirements of this policy.