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countersigning department	Countersignature of the signer	Date
Finance Department		25-7.31
Administrative Department		2025.7.31
Logistics/Warehousing Department		2025.7.31
Procurement Department		2025.7.31
Sales/Customer Service Department		2025.7.31
Quality Department		2025.7.31
Technology R&D Department		2025.7.31
Production Department		2025.7.31
Engineering Department		2025.7.31
Information Technology Department		2025.7.31
Human Resources Department		2025.7.31

1 Purpose

Sino Legend (China) Chemical Company Ltd. (hereinafter referred to as the “Company”) is dedicated to the research and development and manufacturing of phenolic resins for rubber and tire applications, as well as functional rubber processing additives. Upholding the development philosophy of “Better Materials, Better Planet, We Strive for a Brighter Future”, the Company integrates environmental, health and safety (EHS) protection into all aspects of its production and business operations. The Company strictly complies with applicable national and local environmental laws and regulations, continuously enhances its EHS management performance, creates long-term value for employees, customers, communities and other stakeholders, and contributes to the green transformation of the industry and ecological protection.

2 Scope of Application

This Policy applies to all operational activities of the Company and to all employees, covering the entire life cycle of all products, including research and development, raw material procurement, manufacturing, product storage, transportation, sales, use and disposal. It also applies to partners and visitors who provide services to the Company, such as raw material supply, equipment operation and maintenance, and logistics and transportation.

3 Responsibilities

- 3.1 The Executive Vice General Manager shall have overall responsibility for the Company’s EHS performance, approve the Environmental, Health and Safety Policy and major EHS-related decisions, ensure the allocation of necessary resources for EHS management, and oversee the effective implementation of this Policy.
- 3.2 The EHSQ function shall take the lead in formulating and updating the Environmental, Health and Safety Policy and management system, organizing the cascading and assessment of EHS objectives, conducting environmental protection and safety training, monitoring and compliance evaluations, and coordinating the handling of EHS matters.
- 3.3 The Production Department shall strictly implement environmental protection operating procedures, carry out measures for energy conservation, emission reduction and consumption reduction, strengthen the environmentally sound operation and maintenance of production equipment, and ensure that pollutant emissions meet applicable standards.

- 3.4 The Technology and R&D Department shall focus on the development of green processes and products, promote the application of cleaner production technologies, and reduce environmental impacts arising from R&D activities.
- 3.5 The Procurement Department shall give priority to environmentally compliant suppliers and raw materials, and incorporate EHS requirements into the supplier evaluation system.
- 3.6 All employees shall comply with this Policy and relevant environmental protection requirements, actively participate in environmental initiatives, and promptly report any EHS hazards or violations.

4 Content

4.1 Employee Health and Safety

The Company is committed to placing employee health and safety as a top priority and has established a comprehensive health and safety management system covering all operational processes. The Company optimizes working environments, conducts regular workplace risk assessments, provides necessary protective equipment and emergency supplies, and prevents occupational diseases and safety incidents. Employee health records are maintained, regular occupational health check-ups are organized, and psychological health consultation and support services are offered. Standardized work procedures are implemented, health and safety training and emergency drills are conducted, ensuring that employees master safe operating skills and emergency response methods relevant to their positions.

Sustainable Targets for 2024–2030: Annual completion rate of employee occupational health check-ups: 100%; zero cases of occupational disease.

Sustainable Targets for 2024–2030: Average annual duration of employee health and safety training: ≥ 24 hours.

4.2 Greenhouse Gas Emissions and Energy Consumption

The Company is committed to giving priority to the use of renewable energy, following the 1.5°C pathway to advance a green and low-carbon transformation, and continuously reducing the environmental impact of its operations. Distributed photovoltaic power generation projects are established at production sites to steadily increase the proportion of clean energy. The Company optimizes its energy structure, promotes the use of high-efficiency energy-saving equipment, improves energy utilization efficiency, controls greenhouse gas emissions, and contributes to the achievement of China's "dual-carbon" goals.

Using 2024 as the baseline year, by 2030 the total carbon emissions (Scope 1 and Scope 2) will be reduced

by 42%; by 2030, the comprehensive energy consumption per unit of product will decrease by 20%. By 2030, the carbon footprint verification for all products—including tackifying resins, reinforcing resins, resorcinol-formaldehyde bonding resins, phenolic curing resins, tread resins, rubber processing additives, other functional additives, and chemical plasticizers—will be completed at a 100% rate. Carbon neutrality is targeted to be achieved by 2050.

4.3 Water Resources

The Company adopts a “water conservation first, recycling, and full-process control” approach and is committed to reducing the use of fresh water. Water conservation processes are promoted in production, and a closed-loop cooling system is applied in the phenolic resin synthesis process. Wastewater treatment processes are optimized to improve treatment efficiency, ensuring that treated wastewater meets discharge standards and that water pollutant emissions are strictly controlled.

Using 2021 as the baseline year, water consumption per unit of product will be reduced by 20% by 2030. Sustainable Target: From 2024 to 2030, ensure 100% compliance of wastewater discharge every year.

4.4 Air Pollution

The Company is committed to strictly controlling air pollutant emissions, optimizing production processes, and enhancing the management of volatile organic compounds (VOCs), dust, and other pollutants to reduce odor and improve regional air quality. The Company continuously promotes the transition from unorganized emissions to organized collection, and synergistically reduces emissions through source reduction, process control, and end-of-pipe treatment, thereby lowering the intensity of VOC and other air pollutant emissions and improving resource recovery. A management mechanism of “planned monitoring—online/outsourced monitoring—early-warning linkage—rectification closed-loop” is established to ensure stable compliance of emission concentrations and rates at discharge points.

Using 2024 as the baseline year, total VOC emissions will be reduced by 10% by 2030.

Sustainable Target: From 2024 to 2030, ensure 100% compliance of exhaust gas emissions every year.

4.5 Hazardous Chemicals

The Company has established a comprehensive management system for hazardous chemicals, standardizing the procurement, storage, use, transportation, and disposal processes to prevent environmental risks such as leaks and explosions, and to ensure ecological safety. Priority is given to the use of bio-based or degradable materials as substitutes for chemicals, with efforts made to minimize

chemical usage.

Using 2024 as the baseline year, the average per capita training hours for compliant hazardous chemical management will increase by 1.5 hours by 2030.

Sustainable Target: From 2024 to 2030, ensure zero incidents of hazardous chemical leaks each year, with a 100% success rate in emergency response.

4.6 Waste

The Company follows the principles of reduction, resource utilization, and harmless treatment in the management of solid waste. Waste generation is minimized at the source, and by optimizing formulations and processes during production, the generation of by-products is reduced. Precision dosing technologies for raw materials are promoted to decrease material loss. Generated solid waste is preferentially recycled and reused, either directly as products or converted into secondary raw materials. For solid waste that cannot be immediately reused, classified collection, standardized storage, and transfer are implemented, and compliant disposal methods that are environmentally harmless or of low hazard are applied to control risks.

Using 2024 as the baseline year, the generation of hazardous waste per unit of product will be reduced by 20% by 2030, with 100% standardized disposal of hazardous waste maintained.

Using 2024 as the baseline year, the comprehensive utilization rate of general industrial solid waste will increase by more than 15% by 2030.

4.7 Customer Health and Safety

The Company is committed to integrating customer health and safety into product life-cycle management. It provides customers with comprehensive product information and safe use guidelines to help mitigate health and safety risks. During the product R&D stage, toxicological analyses and safety assessments are conducted, with clear disclosure of product composition, hazard characteristics, safe use methods, emergency response measures, and environment-related indicators.

Sustainable Targets for 2024–2030: Zero product recalls attributable to health and safety issues each year.

Sustainable Target: Ensure a 100% provision rate of product information and safety data sheets/instructions for 2024–2030.

4.8 Product Use

The Company is committed to developing and manufacturing green products with low pollution and low

energy consumption, and to restricting the use of toxic and hazardous substances. It focuses on the R&D of low-odor, low-VOC phenolic resins and processing additives to reduce the environmental impact of products during tire manufacturing and use. A product environmental certification system is established to promote key products obtaining the China Environmental Labeling certification.

Using 2024 as the baseline year, ensure the development of at least 5 low-pollution, low-energy-consumption products by 2030.

4.9 End-of-Life of Products

The Company is committed to promoting environmental management across the entire product life cycle by establishing product take-back and resource recovery mechanisms to reduce the environmental impact of end-of-life products. In consideration of the characteristics of phenolic resins and rubber additives, the Company collaborates with tire manufacturers and recycling and treatment enterprises to establish coordinated recovery mechanisms and provides customers with technical guidance on the disposal of waste products.

Using 2024 as the baseline year, achieve a resource recovery rate of more than 30% for end-of-life products related to phenolic resins by 2030.

Using 2024 as the baseline year, optimize the primary packaging weight of at least 5 products by 2030.

5 Policy Update and Revision

5.1 Following the implementation of this Policy, the EHSQ function shall establish a dynamic policy tracking mechanism and designate dedicated personnel to collect and monitor updates to national and local environmental, health and safety laws and regulations, as well as relevant industry standards. In principle, this Policy shall undergo a comprehensive review every 2 years. However, a revision process shall be initiated within 30 days if any of the following circumstances occur: the issuance of new mandatory environmental protection regulations at the national or local level; the addition of new production sites or changes to major production processes; failure to meet annual environmental targets for two consecutive quarters; the occurrence of a major environmental pollution incident; or the submission of significant environmental protection requests by customers.

5.2 The policy revision process shall follow a five-step procedure of “research – drafting – solicitation of opinions – review – disclosure”. The EHSQ function shall first conduct research and prepare a revision draft based on regulatory requirements, industry practices, and the Company’s actual

conditions. Opinions shall then be solicited from all departments, frontline production employees, and key customers, with a consultation period of no less than 7 working days. After the revision draft is reviewed and approved at a dedicated management meeting, it shall be disclosed via the Company's notice boards, internal OA system, and partner-dedicated platforms for a period of no less than 5 working days. All feedback received during the disclosure period shall be addressed on an item-by-item basis.

- 5.3 The formulation, update, and revision of this Policy shall be fully documented, including research reports, revision drafts, records of opinion solicitation, review meeting minutes, and disclosure screenshots. Both electronic and hard-copy versions of such records shall be retained, with the hard copies kept by designated personnel within the EHSQ Department, for a retention period of no less than five years. Where policy revisions result in changes to existing environmental protection operating procedures, the relevant procedures shall be updated accordingly and targeted training shall be organized concurrently.

6 Policy Implementation and Oversight

- 6.1 The Company shall cascade the objectives of this Policy to all departments and incorporate them into annual work plans. EHS performance monitoring and evaluations shall be conducted on a regular basis, with the results reported to management and disclosed to employees.
- 6.2 Environmental protection and EHS training shall be strengthened to ensure that all employees understand the requirements of the Environmental, Health and Safety Policy and their respective environmental responsibilities, thereby enhancing EHS awareness and operational competencies.
- 6.3 The Company shall accept supervision from governmental regulatory authorities, customers, the public, and the media, regularly disclose environmental information, and promptly rectify any identified EHS issues.