

Social Responsibility Grievance Management

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1. Objective

In order to timely identify and deal with the various risks and potential accidents that may exist in the corporate social responsibility of CNGR Advanced Materials Co.,Ltd and branch company. To continuously improve the company's management capabilities and information transparency, establish a harmonious and mutually beneficial relationships among stakeholders, and guarantee the legitimate rights and interests of stakeholders.

2. Appeal Range

Any violation of laws, regulations and social responsibility, in particular supply chain due diligence management requirements, caused or contribute by any interested party in connection with the mining, trade and import/export of our products, responsible minerals, operational practices, business relationships. Instance: child labor, human rights violations, workplace harassment, environmentally or socially harmful acts, unjustified dismissal, forced labor, modern slavery, bribery, money laundering, discrimination (including but not limited to race, color, age, sex, sexual orientation, religion, marriage, disability, pregnancy, etc.), unknown source of mineral, etc. Make comments, suggestions or appeal.

Appeals that meet the following conditions are acceptable:

- a. Related to the company's social responsibility, supply chain due diligence management including any identified associated risks.

- b. Identify deficiencies, inconsistencies or inadequacies in the due diligence management system.
- c. Include sufficient objective evidence to support the submitting the complaint.
- d. Violate the requirements of the *CNCR Due Diligence Policy for a Responsible Global Supply Chain of Mineral*.
- e. Violate the requirements of the *CNCR Suppliers' Code of Conduct*.
- f. Violate the requirements of the *Code of Business Conduct of CNCR*.
- g. Violate the requirements of the *CNCR Human Rights Policy*.
- h. Integrity.

Inadmissibility principle:

- a. Not related to the corporate social responsibility, supply chain due diligence management;
- b. Related issues outside of the company's control, influence or responsibility;
- c. Lack of sufficient objective evidence to support the complaint;
- d. Unfairness.

3. Effective Scope

Stakeholders shall appeal for disputed events that have occurred less than one year. Events that have existed for more than one year will out of scope for

handling.

4. Appeal Channel

For events that cause or contribute to incidents that satisfies the above appeal conditions to CNGR, stakeholders can file appeals and seek remedies in the following ways:

4.1 Internal Channel:

- a. WeChat App "Integrity CNGR" .
- b. Public Mailbox(cngrCSR@cngrgf.com.cn).
- c. Complaint Box.
- d. Supervisors of departments.
- e. Human Resources.
- f. The general manager' s office.
- g. The CEO' s office or speak directly to the company's senior leadership.

4.2 External Channel:

- a. WeChat App "Integrity CNGR" .
- b. Public Mailbox(cngrCSR@cngrgf.com.cn).



Note: The complainant can choose real name or anonymous

4.3 Industry Channel:

RCI (Responsible Critical Mineral Initiative):

<https://www.cccmc.org.cn/kcxfzxx/zyzx/al/ff80808187f9e83501881d10823206e4.html>

RMI (Responsible Mineral Initiative): <https://mineralsgrievanceplatform.org>

5. Handling Method

External: the Mineral supply chain due diligence team lead the related event about the mineral due diligence; the CEO's Office is responsible for leading the handling of information related to external complaints other than mineral supply chain due diligence management.

Internal: Labor union is responsible for receiving and leading the processing of internal grievance information in the industry base; The CEO's Office is responsible for receiving and leading the processing of internal complaint information from the headquarters.

Step 1: The lead department investigates the content of the complaint within the five working days, after receives the complaint materials and the Complaint Form provided by the whistleblower.

Step 2: The lead department shall make a decision within three working days: reject the complaint or accept the review.

Step 3: If the complaint is true and meets the conditions, the lead

department shall make a concession with the stakeholder on the handling method within ten working days. And the responsible department implement the corrective action, the lead department shall verify the rectification situation. If the lead department is unable to resolve the issue, it may request assistance from the Executive Vice President/Vice President or apply for third-party mediation. If the Company is judged not to have a grievance problem after agreeing with stakeholders, no corrective or improvement measures will be attached.

Step 4: Publish the result or inform the whistleblower of the result within five working days. (The way of notifying the result will follows the whistleblower protection principle)

Step 5: If the whistleblower is not satisfied with the investigation report or action measures, could re-complaint. CNGR will conduct further investigation and research to determine the action plan that needs to be carried out in depth and implemented.

Step 6: If the whistleblower still cannot agree with the company on improvement actions, it may take to seek a solution outside the company, including but not limited to hiring external experts to participate in the investigate, referring to a third party (such as RCI, RMI, etc.) for mediation or the judicial route.

Step 7: Disclose the number and type of appeals and the percentage of appeals handled and resolved, including through remedies, in the form of

periodic reports (annual ESG reports, due diligence management reports).

6. Whistleblower Protection and Information Privacy

CNGR will follow the facts, procedures, confidentiality and timeliness principles in handling process. The complaint will keep confidential. Complaint materials are strictly managed according to confidential level information and are not allowed to be accessed without the approval of the Sustainability Committee in charge. It is strictly forbidden to transfer the complaint materials to the complained party, to protect the legitimate rights and interests of the complainant and to prevent retaliation against the complainant. Retaliation includes but not limited to bullying, termination or unlawful withdrawal of benefits, reduction compensation, poor job performance evaluations, exclusion from company events or meetings, defamation of character, disciplinary action, wrongful termination, and other methods.

If whistleblower believes that he or she has been subjected to any retaliation, he or she could report to his or her supervisor, legal counsel, HR, Industrial association or local judicial authorities. Actions that leakage confidential information or cause damage to the whistleblower legitimate interests will be dealt with by the judicial authorities.

7. Policy Review and Revision

This policy was approved and implemented by the Strategy and ESG Committee in Jan 2024, with adjustments made to the process from time to time based on an effective assessment of the appeal management process. Changes to the adjustments will be presented to the Strategy and ESG Committee for review. If there are no changes in content, it shall be submitted to the Strategy and ESG Committee for approval at least once every three years.

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