

**Document Name: Grievance Mechanism for Due Diligence Management of Mineral Supply Chain**

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**Ganzhou Tengyuan Cobalt New Material Co., Ltd.**  
**Grievance Mechanism for Due Diligence Management of Mineral Supply Chain**

In order to timely identify and address various risks and hidden dangers that may exist in the mineral supply chain, ensure smooth communication between stakeholders and the company's management, establish a harmonious and mutually beneficial stakeholder relationship, and safeguard the legitimate rights and interests of all stakeholders, Ganzhou Tengyuan Cobalt New Material Co., Ltd. (hereinafter referred to as "Tengyuan Cobalt") formulates this grievance mechanism in accordance with the "Due Diligence Management Policy for Mineral Supply Chain of Ganzhou Tengyuan Cobalt New Material Co., Ltd.".

**1. What issues can be appealed?**

Grievances meeting the following conditions will be accepted:

- 1) Related to the due diligence management of Tengyuan Cobalt's mineral supply chain.
- 2) Tengyuan Cobalt's business activities or business relationships have caused or may cause negative impacts on stakeholders.
- 3) Tengyuan Cobalt's business activities or business relationships violate the requirements in the "Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains", the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", or the "Due Diligence Management Policy for Mineral Supply Chain of Ganzhou Tengyuan Cobalt New Material Co., Ltd.".

Grievances meeting any of the following criteria will not be accepted:

- 1) Unrelated to the due diligence management of Tengyuan Cobalt's mineral supply chain.
- 2) Inability to provide sufficient evidence or witnesses to support the identified issues.
- 3) Malicious grievances or grievances initiated to gain a competitive advantage.
- 4) If the appealed issue does not fall within the scope that Tengyuan Cobalt's internal mechanism can resolve, we will actively coordinate with external institutions to resolve it.

## 2. Who can file a grievance?

Any individual or group, including but not limited to Tengyuan Cobalt's customers, suppliers, affected community residents, employees, board members, etc., regardless of whether there is a direct or indirect connection with Tengyuan Cobalt, if they believe that Tengyuan Cobalt or the supply chain has the supply chain due diligence management issues listed in Article 1, and has caused negative impacts on themselves (or the stakeholders they represent) in the past year or in the possible future, can file a grievance with the Tengyuan Mineral Supply Chain Management Office.

If the grievance is filed by a third-party group or individual representing the affected party, the institution or individual should clearly state the object they represent and provide clear evidence of representation.

Individuals and groups filing grievances are hereinafter referred to as "Grievants".

## 3. How to file a grievance?

Grievants should fill out the "Tengyuan Cobalt Supply Chain Due Diligence Grievance Form" shown in Appendix I, in any language. The grievance form should be delivered by email, mail, or in person to the Tengyuan Cobalt Supply Chain Management Office (hereinafter referred to as the "Office"), which is the daily administrative body of the Tengyuan Mineral Supply Chain Management Committee (hereinafter referred to as the "Committee").

Email: [csr@tycogz.com](mailto:csr@tycogz.com)

Mailing/On-site Reception Address: Mineral Supply Chain Management Office, Ganzhou Tengyuan Cobalt New Material Co., Ltd., No. 9 Xijin Avenue, Ganzhou High-tech Industrial Development Zone, Jiangxi Province.

If you choose to submit materials in person at the Office, please make an appointment in advance via email.

For internal grievances within the company, you can choose the suggestion box, email [csr@tycogz.com](mailto:csr@tycogz.com), the company's Mineral Supply Chain Management Office, superior leaders of various departments, up to the General Manager.

Grievants must provide facts sufficient to support an investigation. If there is a lack of conclusive evidence, grievants must explicitly provide witnesses. If the information provided by the grievant is insufficient to conduct an investigation, the Office will advise them to provide more information within 15 days, otherwise it cannot be accepted.

In addition to the company's grievance channels, grievants can refer to the "Mediation and Consultation Mechanism for the Mining and Mineral Value Chain" formulated by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC).

For detailed instructions, please click the following website link:

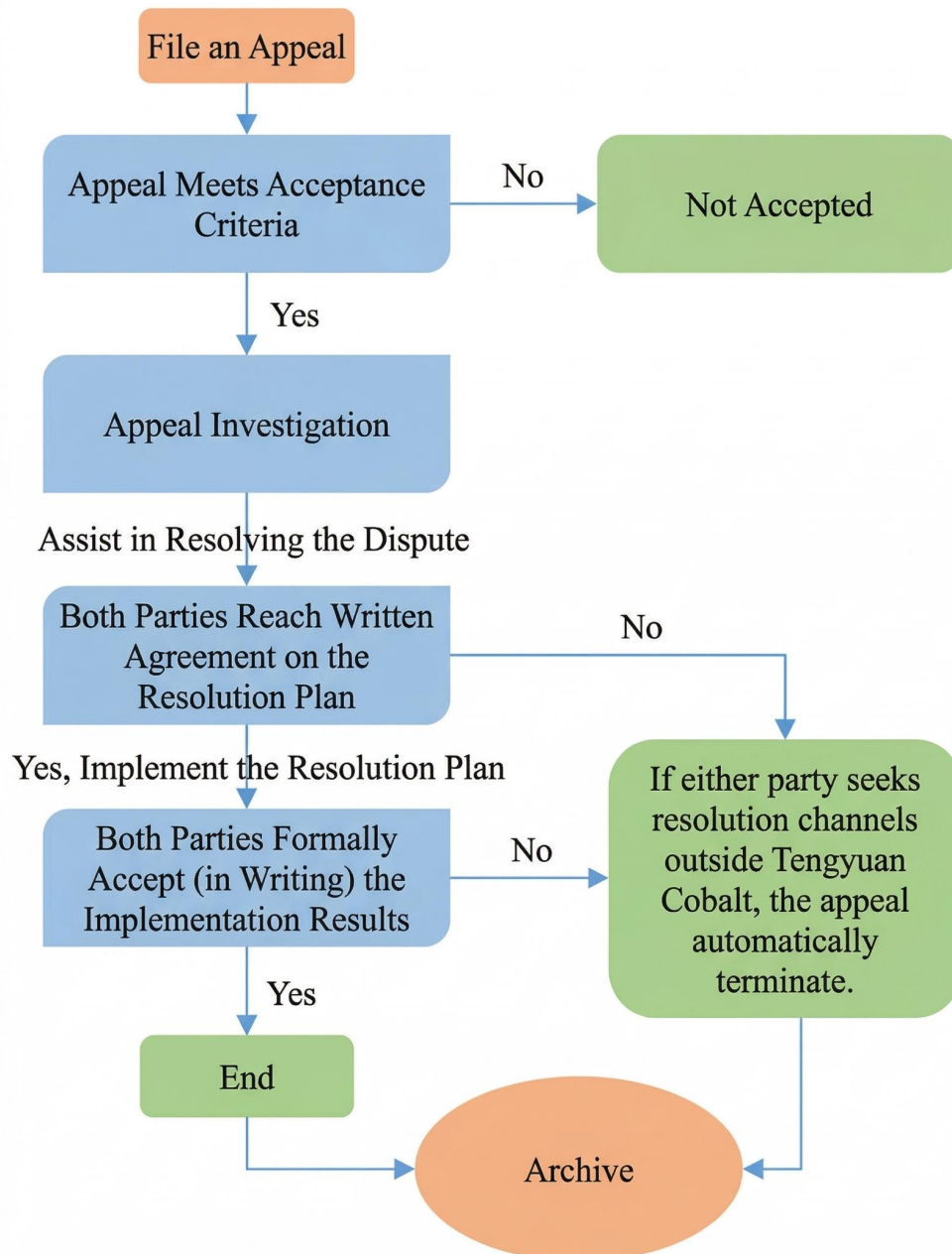
<https://www.cccmc.org.cn/kcxfzxx/zyzx/al/ff80808187f9e83501881d10823206e4.html>

#### 4. How to handle grievances?

Tengyuan Cobalt is committed to handling grievances quickly and effectively, and we will process grievances according to the flowchart shown in Figure 1.

The grievance adopts a conflict avoidance mechanism. If you believe that any personnel in the Committee have a conflict of interest with the grievance, you can request their recusal in the grievance form.

Figure 1: Grievance Handling Process of Ganzhou Tengyuan Cobalt New Material Co., Ltd.



After receiving the grievance materials, we usually take action according to the following steps:

Step 1: The Office confirms receipt of the grievance materials to the grievant (within 2 working days after receiving the materials).

Step 2: The Office reviews the grievance materials according to the grievance acceptance criteria listed in Article 1, decides whether to accept it, and notifies the grievant of the decision in writing (including email or paper documents). If it is decided not to accept, the reasons for non-acceptance will be explained at the same time, and the processing results will be reported to the Committee (within 5 working days after receiving the materials).

Step 3: If it is decided to accept the grievance, the Office will submit the grievance materials to the Committee. Based on the content of the grievance, the Committee will organize relevant members of the Committee to initiate the grievance investigation procedure, in order to cooperate with the relevant parties to the grievance (grievant, respondent, and other possible stakeholders), deeply and comprehensively understand the issues raised in the grievance, identify more stakeholders related to the grievance, complete the investigation report, and submit it to the grievant, the respondent, and the Board of Directors of Tengyuan Cobalt. (Within 30 days after deciding to accept the grievance).

Step 4: Resolve disputes. The Committee, together with the grievant and the respondent, proposes a solution and procedure acceptable to both parties for the dispute, and promotes the two parties to reach a written consensus.

Step 5: The grievant and the respondent cooperate to implement the consensus solution, and the Committee is responsible for supervising the implementation.

Step 6: Remedial measures (if applicable). Based on the investigation results, take the following remedial measures to ensure compliance with the core principles of United Nations human rights treaties, including non-discrimination, fairness, timeliness, and effectiveness:

1. Conduct a risk assessment of the appealed issues, immediately stop or adjust the problematic activities, and ensure that the issues no longer cause further harm to the affected parties or other relevant parties.
2. Provide appropriate relief to the affected parties, including but not limited to financial compensation, resource support, psychological assistance, or other restorative measures to make up for the harm caused.
3. Review and improve management processes and systems, make adjustments for the deficiencies found in the investigation, ensure that relevant responsible entities are held accountable, and prevent similar issues from happening again.

Remedial measures should be completed within 30 working days to ensure timeliness and effectiveness. If an extension is needed due to special circumstances, the specific reasons must be explained to the grievant in writing, a clear extension period must be provided, and the grievant's right to know the progress and participate must be guaranteed.

The remediation process must remain transparent, provide information to affected parties or relevant stakeholders, and invite them to participate in discussions and decision-making in relevant links (if applicable).

The measures taken should comply with the basic requirements of the United Nations "International Covenant on Economic, Social and Cultural Rights" and the "International Covenant on Civil and Political Rights".

Step 7: Both the grievant and the respondent accept the execution results of the solution and sign the execution result confirmation letter, and the Committee decides to close the case. If after one or several rounds of consultation, either the grievant or the respondent does not accept the solution (Step 4), or does not accept the execution results of the solution (Step 5), they can seek resolution channels outside Tengyuan Cobalt, such as third-party dispute resolution institutions or experts, etc., and the company's internal grievance procedure automatically terminates. The Committee will notify the grievant, the respondent, and the Board of Directors of Tengyuan Cobalt of the final result of the grievance procedure.

Step 8: For all accepted grievances, the Committee fills out the "Tengyuan Mineral Supply Chain Due Diligence Grievance Archive Card", which is archived and kept together with the grievance form, investigation report, solution, execution result confirmation letter, and other related documents.

We need to report the grievance feedback and processing results to the Supply Chain Due Diligence Management Committee, and at the same time integrate the grievance feedback into the risk identification and management process.

## **5. Are grievants protected?**

Grievants can choose to file a grievance anonymously or with their real names. We will keep your identity confidential and promise not to take any retaliation against the grievant.

Under any circumstances, we guarantee to process, investigate, reply, and archive the received grievance materials in an independent, impartial, and objective manner.

## **6. Improvement Mechanism and Preventive Measures**

Experience summary:

Analyze grievance cases, identify weak links in systems or management processes, and formulate corresponding improvement measures.

Preventive measures:

1. Strengthen employee training to enhance responsibility awareness and skill levels.
2. Improve supply chain management to reduce potential risks to stakeholders.
3. Regularly review and update the grievance mechanism to ensure its adaptability and effectiveness.
4. Report the implementation of improvement measures to stakeholders, and publicly

disclose the results of grievance handling where appropriate, to enhance the transparency and credibility of the mechanism.

#### **7. When does this grievance mechanism take effect?**

This mechanism shall take effect on the date of review and approval by Tengyuan Cobalt.

**Ganzhou Tengyuan Cobalt New Material Co., Ltd.**

**December 25, 2024**

## Appendix I:

### Tengyuan Mineral Supply Chain Due Diligence Management Grievance Form

Name of Grievant (can be anonymous)	Request Confidentiality: <input type="checkbox"/> Yes <input type="checkbox"/> No
Contact Number	Email
Whether it is an entrusted third party	If yes, entrusted by which person or group (attach entrustment certificate at the same time)
Conflict Avoidance	(If you need specific personnel of the Tengyuan Cobalt Supply Chain Management Committee to recuse themselves, please list their names)
Facts and evidence of the negative impact suffered (or likely to be suffered), and any other information that can support the grievance (can attach pages and grievance evidence):	
Your appeal, and the solution you hope to adopt to achieve the appeal (clear and actionable appeals can help us solve your problem faster):	

Signature of Grievant Representative:

Date of Grievance: