

Zhejiang Huayou Cobalt Co., Ltd.

Grievance Mechanism

Huayou encourages stakeholders to responsibly and seriously provide comments or suggestions on the company's ESG management, especially the responsible management of the mineral supply chain, to help the company improve its work; At the same time, it also accepts complaints from stakeholders and provides proper and smooth channels and appropriate and fair ways to handle complaints, ensuring that the company's work is carried out in a standardized and orderly manner.

I. Grievance Channels

Stakeholders can provide comments, suggestions or complaints to Huayou by telephone, email or letter.

(1) Company grievance

China

Tel: 0573-88587878

Email: CSR@huayou.com

Address: Huayou Cobalt R&D Building, No. 79, Wuzhen East Road, Tongxiang City (Group Headquarters ESG and Sustainable Development Department)

DRC

Phone: +243 841206837

Email: RSE@huayou.com

Address: CDM (African Resources Industry Group), Lika West Road, Rori West Block, Anax District, Lubumbashi City, Upper Katanga Province

Indonesia

Phone: +081223930989/+082198735711

Email: HYNC@huayou.com

Address: IMIP Park, Morowali, Central Sulawesi, Indonesia (Indonesia Nickel Industry Group)

(2) Industry grievances

The company participates in the "Mining Industry and Mineral Value Chain Regulation Consultation Mechanism" of the China Chamber of Commerce for Import and Export of Metals, Minerals and Chemicals, in order to effectively resolve disputes and strengthen communication, coordination, and cooperation among all parties. Stakeholders can also submit complaints about the company's responsible management of the mineral supply chain through the email address of the Assessment Center of the Minmetals Chamber of Commerce: rbc@cccmc.org.cn.

II. Receiving of complaints

Huayou ESG and Sustainable Development Department is the department responsible for handling complaints. A dedicated person is responsible for receiving each comment, suggestion, or complaint submitted by stakeholders, and sending a confirmation email to the complainant within two working days after receiving the complaint application materials.

III. Grievance Review

The following conditions can be accepted for the appeal:

One is related to the ESG management of Huayou Cobalt, especially the responsible management of the mineral supply chain, including any identified risks;

- (1) Identify any deficiencies, inconsistencies or shortcomings in the mineral supply chain due diligence management system;
- (2) Include sufficient objective evidence to reasonably support the allegations of the person submitting the complaint;
- (3) Violations of the requirements of the Human Rights and Labor Practices Policy and the Environmental, Health, and Safety Policy;
- (4) Violating the requirements of the Code of Business Ethics;
- (5) Submit in good faith.

We do not accept complaints that meet the following conditions:

- (1) One is unrelated to the responsible management of the mineral supply chain of Huayou Cobalt;
- (2) Issues related to matters beyond the control, influence, or responsibilities of Huayou Cobalt;
- (3) Lack of sufficient objective evidence to support the complaint reasonably;
- (4) Failure to submit in good faith.
- (5) All appeals must have factual basis and true content. It is not allowed to use speculative and false content as the basis for appeals, and malicious attacks and slander are not allowed.

IV. Grievance Handling

Huayou ESG and the Sustainable Development Department will initially assess whether the content of the complaint falls within the scope of this complaint mechanism, whether the content of the complaint is clear, and whether the evidence is sufficient and credible.

Once reviewed and evaluated, if the content of the complaint does not fall within the scope of acceptance of this mechanism, a decision to reject the application will be issued to the complainant.

After review and evaluation, if the content of the appeal application is unclear or the evidence is insufficient, the party initiating the appeal is required to supplement relevant materials and information within a specified timeframe, and will undergo another review after providing the supplementary materials.

After review and assessment, if the content of the appeal application is clear and the evidence is sufficient, a decision to accept the appeal will be issued to the applicant.

The ESG and Sustainable Development Department shall organize research and analysis of the grievance issues based on the content of the grievance, and propose handling suggestions for the grievance. The handling of complaints can be carried out through dialogue and consultation meetings, consideration of written materials, expert consultation, and other methods. The ESG and Sustainable Development Department liaises with the complainant and organizes communication with the complainant regarding the complaint issue and research analysis, with the complainant responding or clarifying the complaint issue. The ESG and Sustainable Development Department will provide a complaint handling opinion and ruling within 7 working days and send it to the complainant in writing by email.

V. Record and confidentiality

Huayou ESG and the Sustainable Development Department keep records of all grievance applications, processing, review, and communication with relevant parties.

The personnel involved in handling the complaint shall be responsible for keeping confidential the information that is required to be kept confidential and not allowed to be disclosed. Without the consent of the head of the ESG and Sustainable Development Department, it is prohibited to disclose to people outside the office. If there is any violation, punishment will be imposed in accordance with the company's reward and punishment regulations.

Protection of the complainant

The personnel accepting the complaint information will keep it strictly confidential. The complaint materials should be strictly managed as confidential information, and no one is allowed to access them without the approval of the company's main leaders or leaders in charge. It is strictly prohibited to transfer the complaint materials to the accused party, retaliate against the whistleblower, protect the legitimate rights and interests of the whistleblower, and transfer to the judicial authority for handling those who have seriously leaked secrets and caused damage to the legitimate rights and interests of the whistleblower.

VI. Protection of Grievants

The personnel handling grievances shall strictly keep confidential the grievance information. Grievance materials shall be managed as confidential information and may not be accessed by anyone without the approval of the company's principal leaders or relevant department heads. It is strictly prohibited to transfer grievance materials to the respondent and to retaliate against the complainant. The legitimate rights and interests of the complainant shall be protected. In cases of serious breaches of confidentiality leading to damage to the complainant's legitimate rights and interests, the matter shall be referred to judicial authorities for handling.

Zhejiang Huayou Cobalt Co., Ltd.
ESG and Sustainable Development Department
November 30, 2024

Grievance Information Collection Form

Name:		Company:	
Phone Number:		Email:	
Suggestions, Comments, or Complaints Content:			
Document:			