

Grievance Management

Stand 2026



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1. Purpose

To promptly identify and address potential risks and non-compliance issues within CNGR Advanced Materials Co., Ltd. and its branches and subsidiaries (hereinafter referred to as "the Company") regarding environment, society, governance. This procedure aims to continuously enhance the Company's management capabilities and information transparency, establish harmonious and mutually beneficial relationships with all stakeholders, protect the legitimate rights and interests of stakeholders, and provide an effective remediation channel that meets international standards.

2. Scope of Grievance

Any stakeholder may submit opinions, suggestions, or grievances regarding matters related to the Company's products, or any violation of laws, regulations, and environment, society, governance requirements, especially supply chain due diligence requirements, caused by or contributed to by the Company's activities in the extraction, trade, handling, and import/export of minerals, its operational conduct, or business relationships. Such matters include, but are not limited to: child labor, human rights violations, workplace harassment, acts harmful to the environment or society, wrongful or constructive dismissal, forced labor, modern slavery, bribery, money laundering, discrimination (including but not limited to race, color, age, gender, sexual orientation, ethnicity, religion, marital status, disability, pregnancy), occupational health and safety and unclear mineral sources.

Acceptable Grievances are those that meet the following conditions:

Relate to the Company's environment, society, governance and supply chain due diligence, including any identified related risks;

Point out defects, inconsistencies, or deficiencies in the due diligence management system;

Include sufficient objective evidence to reasonably support the allegations made by the person submitting the grievance;

Violate the requirements of the Company's Policy for Responsible Global Mineral Supply Chain Due Diligence;

Violate the requirements of the Supplier Code of Conduct;

Violate the requirements of the CNGR Business Conduct Guidelines;

Violate the requirements of the CNGR Human Rights Policy;

Violating the requirements of the CNGR ESG Policy;

Are submitted in good faith.

Grievances will not be accepted if they meet the following conditions:

Are not related to the Company's environment, society, governance or supply chain due diligence;

Relate to issues outside the Company's control, influence, or responsibility;

Lack sufficient objective evidence to reasonably support the grievance;

Are not submitted in good faith.

3. Grievance Time Limit

Stakeholders should file grievances concerning disputed events within one year of the event's

occurrence. The Company generally will not accept grievances regarding disputed events raised by relevant stakeholders after more than one year. However, for ongoing violations or severe human rights impacts known to the Company, the Company commits to handling these flexibly and not strictly adhering to this time limit, ensuring affected parties can access effective remediation.

4. Grievance Channels

To ensure the "accessibility" of the mechanism, the Company provides multiple, accessible, and free grievance channels.

4.1 Internal Grievance Channels

WeChat mini-program "Lianjie Zhongwei" (Clean CNGR)

Company Social Responsibility Public Email: cngcrCSR@cngrgf.com.cn

QR Code (leading to the email/mini-program)



Suggestion Boxes

Direct superiors in various departments

Human Resources Department

General Manager's Office

President's Office

Direct reporting to senior company leaders

4.2 External Grievance Channels

WeChat mini-program "Lianjie Zhongwei" (Clean CNGR)

Company Social Responsibility Public Email: cngcrCSR@cngrgf.com.cn

Note: Grievants may choose to file a grievance by real name or anonymously. The Company commits to effectively monitoring and managing all grievance channels.

4.3 Industry and Other External Grievance Channels

CCCMC (China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters):

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

Channels applicable in Indonesia also include:

Indonesian Ministry of Energy and Mineral Resources Complaint Platform:

<https://www.esdm.go.id>

Indonesian Ministry of Environment and Forestry (KLHK) Reporting Platform:

<https://icircle.menlhk.go.id>

Indonesian National Commission on Human Rights (Komnas HAM):

<https://www.komnasham.go.id>

5. Grievance Handling Process

To ensure the "predictability" and "equity" of the mechanism, the Company commits to following this transparent and time-bound procedure:

External Grievances: The Sustainable Development Office is responsible for leading the handling of external grievance information.

Internal Grievances: Designated departments at each base are responsible for receiving and leading the handling of internal grievance information at the base level. The President's Office is responsible for receiving and leading the handling of internal grievance information at the headquarters.

Step 1: Acknowledgment and Confirmation (within 2 working days)

Upon receiving the grievance materials from the reporter, the responsible department shall complete a Grievance Form. Within 2 working days, it shall confirm receipt of the grievance to the grievant and inform them of the subsequent process and estimated timeline.

Step 2: Preliminary Assessment (within 5 working days)

The responsible department shall complete a preliminary assessment within 5 working days of receiving the grievance. This involves investigating the grievance content and making a determination on whether it meets the acceptance criteria. If the decision is to reject the grievance, the department must provide the grievant with a written explanation. If accepted, the process proceeds to the next step.

Step 3: Investigation and Determination (within 15 working days, extendable based on complexity)

If the grievance content is deemed valid and meets the acceptance criteria, the responsible department shall complete a detailed investigation within 15 working days. It shall communicate the investigation results with the relevant stakeholder(s) (where applicable, considering their safety). If an issue is confirmed to exist, the department shall negotiate with the grievant to find mutually acceptable remediation measures commensurate with the impact on rights. It shall determine any necessary corrective actions and require the responsible department to implement them. The responsible department shall verify the implementation of corrective actions. If the responsible department cannot resolve the issue, it may seek assistance from the Executive Vice President/Vice President or request third-party mediation. If the grievance meets the criteria but, after consultation with the stakeholder, it is determined that the Company is not responsible for the issue, the department shall clearly explain the basis for this determination to the grievant; no corrective or improvement actions are

required.

Step 4: Result Feedback and Communication (within 5 working days)

In accordance with the UN Guiding Principles on Business and Human Rights, the Company commits to transparent management of the grievance handling process (receipt, investigation, feedback) and will appropriately disclose process information to stakeholders. Within 5 working days after the investigation is completed, the Company shall inform the grievant in writing (via recordable methods such as email or letter) of the investigation findings, conclusions, and any remediation measures taken or planned. (The method of notification follows the principle of grievant protection).

Step 5: Review and Further Action

If the grievant is unsatisfied with the investigation report or proposed actions, they may request a review of the grievance within 15 working days of receiving the results. The Company will initiate further investigation and study by a higher management level to determine and implement necessary courses of action.

Step 6: Third-Party Involvement

If the grievant and the Company still cannot agree on corrective actions, the grievant may seek resolution methods outside the Company, including but not limited to engaging external experts for review, referring the matter to a third party for mediation, or pursuing judicial avenues. The Company commits to respecting and cooperating with such external procedures.

Step 7: Learning and Disclosure

Without disclosing personal privacy and sensitive information, the Company will periodically disclose information through regular reports (e.g., annual ESG Report, Due Diligence Report). This includes the number and types of grievances received, the proportion of grievances processed and resolved, and the proportion of grievances addressed through remediation measures. This demonstrates the effectiveness of the mechanism and facilitates organizational learning.

6. Application of Grievance Results (Continuous Learning)

The Company regards the grievance mechanism as a crucial component of its "Five-Step Framework" for supply chain due diligence, particularly playing a key role in risk identification and mitigation stages. The Company commits to incorporating the outcomes of grievances from employees, communities, and other stakeholders into its risk identification and assessment processes. All received grievances will be systematically recorded and serve as a significant information source during periodic risk assessments, helping the Company identify potential human rights, environmental, and operational risks, thereby driving continuous improvement in mitigation measures and management systems.

7. Non-Retaliation Policy and Information Confidentiality

When handling grievances, the Company adheres to the principles of factuality, due process, confidentiality, and timeliness. Personnel handling grievances must maintain strict

confidentiality regarding the grievance information. Grievance materials are managed strictly as confidential documents; access requires approval from the Company's Strategy and ESG Committee. It is strictly forbidden to transfer grievance materials to the party against whom the grievance is filed. The Company protects the legitimate rights and interests of the grievant and prevents any retaliatory actions against them. Retaliatory actions include, but are not limited to: bullying; termination or unlawful withdrawal of benefits; compensation reduction; unfair negative work performance evaluations; exclusion from company activities or meetings; defamation; disciplinary action; wrongful termination; "cold-shouldering" at work.

The Company will take all reasonable measures to prevent retaliation against grievants, including, when necessary, temporarily adjusting work arrangements or providing other protective measures.

If an internal grievant believes they have been subjected to any retaliatory action violating this policy, they may file a complaint with their supervisor, the Legal Counsel, or the Head of Human Resources. External grievants may file complaints through industry associations, judicial institutions in their country of residence, etc. Individuals who seriously breach confidentiality, leading to harm to the grievant's legitimate rights and interests, will be referred to judicial authorities for handling.

8. Policy Review and Revision

This policy was approved and adopted by the Strategy and ESG Committee in 2026. To ensure the mechanism continues to meet the effectiveness criteria of the UN Guiding Principles on Business and Human Rights (UNGPs), the Company will conduct an annual assessment of the effectiveness of the grievance management process. Based on the assessment results, this process may be adjusted periodically. Relevant adjustments will be submitted to the Company's Strategy and ESG Committee for review. If there are no content changes, the policy should be submitted to the Strategy and ESG Committee for ratification at least once every three years.

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