

**Zhejiang Huayou Cobalt Co., Ltd.**

**Grievance Mechanism**

Huayou encourages stakeholders to responsibly and seriously provide comments or suggestions on the company's ESG management and sustainable development practices, including supply chain due diligence, to help improve operations. Huayou accepts complaints from stakeholders and ensures fair, transparent, and proper channels for resolution to maintain orderly ESG and sustainability management.

### **I. Grievance Channels**

Stakeholders may submit comments, suggestions or complaints to Huayou by telephone, email or written letter.

#### **1. Company Complaint Channels**

##### **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 Complaint Channels**

Huayou participates in the "Mining Industry and Mineral Value Chain Regulation Consultation Mechanism" of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCC MC), in order to effectively resolve disputes and strengthen communication, coordination, and cooperation among all parties. Stakeholders may submit complaints related to mineral supply chain due diligence via:

Email: rbc@ccc mc.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. Complaint Time Limit**

Complaints must be filed within one year of the disputed incident. Complaints beyond this period will not be accepted.

### **IV. Grievance Review**

- (1) Acceptable Complaints must meet the following criteria:
- a. Related to Huayou's ESG, sustainable development, or supply chain due diligence (including identified risks);
  - b. Identify deficiencies or inconsistencies in ESG or supply chain management systems;

Supported by sufficient objective evidence;

- c. Involve violations of the requirements of the Human Rights and Labor Practices Policy and the Environmental, Health, and Safety Policy;
- d. Involve violations of the requirements of the Business Ethics Code of Conduct;
- e. Submitted in good faith.

- (2) We do not accept complaints that meet the following conditions:

- a. Unrelated to Huayou's ESG, sustainable development, or supply chain due diligence;
- b. Issues related to matters beyond the control, influence, or responsibilities of Huayou;
- c. Lack of sufficient objective evidence to support the complaint reasonably;
- d. Failure to submit in good faith.

All complaints 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.

## **V. Grievance Handling**

### **(1) Preliminary Assessment**

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.

- a. 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.
- b. 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.
- c. 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.

### **(2) Investigation & Resolution**

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.

### **(3) Appeals Process**

If the complainant disagrees with the outcome:

- a. Internal Review: Submit a written appeal (detailing objections). A cross-departmental team (ESG, Legal, etc.) will re-evaluate within 15 working days.
- b. External Mediation: For unresolved high-risk issues (e.g., human rights, corruption), an independent third party (e.g., RBA) may mediate upon mutual agreement.

## **VI. 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.

## **VII. 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. Retaliation against complainants is strictly prohibited. Violations will be referred to judicial authorities.

Zhejiang Huayou Cobalt Co., Ltd.  
ESG & Sustainable Development Department  
April 20, 2025

### Grievance Information Collection Form

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