

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 (CCCMC), 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@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. 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

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:			