

Responsible Mineral Supply Chain Grievance Mechanism

2025.06



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1. Purpose

BTR New Material Group Co., Ltd., including its subsidiaries, branches and affiliated companies (hereinafter “BTR” or the “Company”), is committed to adopting an open and transparent approach to handling grievances from stakeholders related to mineral extraction, transportation, trade, export and processing, so as to promote communication and cooperation between BTR and stakeholders and to safeguard the rights and interests of BTR and those stakeholders.

BTR undertakes to establish this grievance mechanism in accordance with:

- the second edition of the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (hereinafter the “Chinese Guidelines”) issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC);
- the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas (hereinafter the “OECD Guidance”) issued by the Organisation for Economic Co operation and Development (OECD); and
- BTR’s Responsible Mineral Supply Chain Due Diligence Policy.

2. Scope of Grievances

BTR accepts grievances that meet all of the following conditions:

1. The grievance is related to BTR’s responsible mineral supply chain due diligence;
2. Due to deficiencies in mineral supply chain due diligence, the grievance has caused or may cause damage to the interests of the relevant parties;
3. The grievance concerns violations of relevant requirements of the OECD Guidance, the Chinese Guidelines and BTR’s Responsible Mineral Supply Chain Due Diligence Policy; and
4. The grievance is supported by sufficient, reasonable and objective evidence.

BTR does not accept grievances that fall under any of the following circumstances:

1. The grievance is unrelated to BTR’s Responsible Mineral Supply Chain Due Diligence Policy;

2. The complainant is unable to provide sufficient evidence or witnesses to support the alleged issues. Where the information provided by the complainant is insufficient to carry out an investigation, the Company will recommend that additional information be provided within 30 days; otherwise, the grievance cannot be accepted;

3. Malicious grievances or grievances raised for the purpose of gaining a competitive advantage;

4. Grievances that fall outside the scope of BTR's internal mechanism. In such cases, BTR cannot accept the grievance but will coordinate with external institutions to have the matter handled.

3. Definition of Minerals

Minerals include cobalt (Co), lithium (Li), nickel (Ni), manganese (Mn), graphite (C), copper (Cu), aluminum (Al) and other minerals.

4. Grievance Channels

Any grievances and related communication within the above scope should preferably be submitted by email or letter to the Company's grievance handling mailbox.

- Grievance handling email: shensu@btrchina.com
- Postal address: BTR New Material Group Co., Ltd., BTR New Energy Technology Building, No. 8 Guangyuan 4th Road, Phoenix Sub district, Guangming District, Shenzhen, Guangdong, China

5. Requirements for Submitting Grievances

For grievances or communication information submitted by complainants (including individuals and the entities they represent, as applicable), the following conditions must be met, or the complainant may directly complete the attached Supply Chain Due Diligence Complaint Form.

(Note: If necessary information is missing, the grievance may be regarded as invalid at the acceptance stage due to insufficient or unverifiable evidence.)

1. The complainant's name (or anonymity), organization and whether confidentiality is requested should be indicated, including a valid telephone number and email address;

2. If the grievance is submitted by an appointed representative, information and contact details of the person granting the authorization should be provided, including a valid telephone number and email address;

3. The grievance or communication matter should be described in detail and supporting evidence should be provided. This will facilitate the effective resolution of the grievance or communication. Suggested solutions or measures that the complainant considers feasible are welcome;

4. Grievance information should, to the extent possible, be expressed in Chinese or English. Use of other languages may affect the progress and response time of grievance handling.

6. Grievance Handling Procedure

This grievance mechanism operates through the following six steps:

Step (1): Acceptance of grievances or communications

The complainant completes the Supply Chain Due Diligence Complaint Form with the required information and submits it through BTR's grievance channels. Personnel responsible for handling grievances and communications will record the content of the grievance and communication, and ensure that the relevant content is entered into the Supply Chain Due Diligence Complaint Handling Opinion Form.

Step (2): Preliminary assessment

A preliminary assessment is conducted to determine whether the grievance or communication falls within the scope of this grievance and communication mechanism. Relevant information will be communicated to the responsible Company leadership and departments.

Step (3): Confirmation of the grievance

Within seven business days after receipt of the grievance or communication, a written reply will be provided to the complainant to confirm receipt and to outline the steps and timeline for addressing the grievance.

Step (4): Response to the grievance

An investigation into the grievance will commence immediately upon receipt. Within one month from the date on which the grievance is initiated, a grievance related investigation report or action report will be completed and a response conclusion will be formed.

The response may take one of the following three forms:

1. The grievance does not fall within the grievance scope; the grievance is not substantiated and is rejected;
2. The grievance is accepted, but the Company is not involved in the alleged issues and no corrective or improvement measures are required; or
3. The grievance is accepted and it is confirmed that corrective or improvement measures need to be taken.

Step (5): Improvement actions

If the complainant is not satisfied with the investigation report or the actions taken, the Company will carry out further investigation and study in order to determine deeper level actions that need to be implemented. If the complainant and

the Company still cannot reach agreement on the improvement actions, the grievance may be referred to a third party for mediation, or external experts may be engaged to participate in the review and consultation.

Step (6): Timely monitoring

The relevant grievance handling departments of the Company will, on a quarterly basis, report to the Committee on grievances received, grievances resolved and outstanding grievances. Each year, the Company will analyze the status and timeliness of grievance resolution and evaluate the effectiveness of the grievance and communication mechanism.

7. Protection of Complainants

BTR undertakes to keep complainants' information strictly confidential and to adopt a conflict of interest avoidance mechanism. If a complainant believes that any Company personnel has a conflict of interest in relation to the grievance, the complainant may request recusal in the complaint form.

Employees who fail to comply with the principle of confidentiality and thereby cause damage to the interests of a complainant will be subject to corresponding disciplinary measures by BTR based on the seriousness of the circumstances. Any retaliation against a whistle blower, or instigation of others to retaliate, will be handled strictly in accordance with relevant BTR policies and, where suspected to constitute a crime, will be referred to judicial authorities.



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