

Supply chain management grievance and communication mechanisms

To strengthen communication and collaboration with affected regions, upstream and downstream supply chain enterprises, government departments, NGOs, media, and other stakeholders, respond promptly and effectively to related concerns, and continuously improve the company's supply chain governance capabilities and information transparency, adhering to the principles of "honesty, trustworthiness, and responsibility," the company has specially established the "Shanghai Shanshan New Materials Co., Ltd. Supply Chain Appeal and Communication Mechanism."

1. Mechanism Objectives

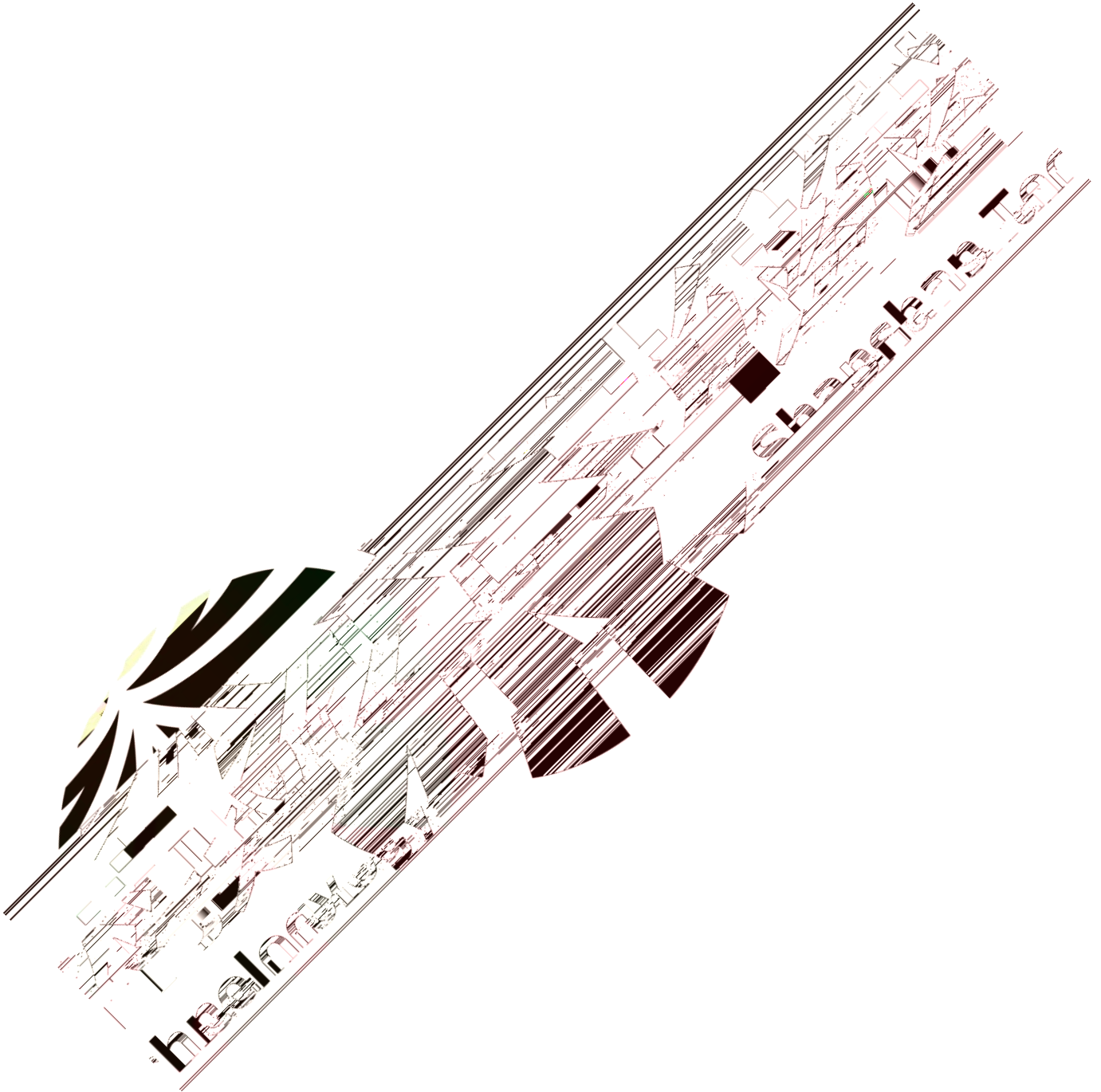
This mechanism aims to receive, review, respond to, report, and handle the expectations and demands of stakeholders regarding supply chain governance, strengthen communication and collaboration with external parties, and build a dialogue and consultation platform to continuously enhance the company's supply chain governance capabilities.

2. Scope of Appeals and Communication

This mechanism applies to relevant parties of the Company and departments, units, and personnel involved in responsible mineral procurement work. The scope of stakeholder suppliers covers all Shanshan Technology suppliers, subcontractors, and every tier of their subordinates in the value chain.

To ensure the effective operation of the complaint and communication mechanism, this mechanism only accepts appeals or information provided in good faith and good faith, and must meet the following conditions:

2.1 Identified risks and challenges related to the company's supply chain;



This complaint and communication mechanism operates through the following six steps:

Step 1: Accept complaints or communication

Staff handling complaints and communications are responsible for recording the content of the complaint and communication, ensuring that relevant details are included in the "Supply Chain Due Diligence Grievance Handling Opinion."

Step 2: Preliminary assessment

Conduct a preliminary assessment of whether the content of the complaint and communication aligns with the scope of this complaint and communication mechanism, and convey the information to the relevant company leadership and departments.

Step 3: Confirm the appeal

Within seven working days of receiving the complaint and communication, a written reply to the complainant confirming receipt and providing steps and timeline for resolving the complaint.

Step 4: Appeal response

Upon receiving an appeal, an investigation is initiated immediately, and within one month from the start of the complaint, a related investigation report or action report is completed, along with a conclusion drawn to the response. In cases of complex or special circumstances that prevent completion of investigations and responses within the specified time, communication records related to the complaint must be properly maintained and continuous follow-up to ensure the issue is resolved promptly and properly, with timely updates on progress provided to the complainant until the issue is finally closed.

There will be three ways to respond:

- 1) If the appeal does not meet the scope of the appeal and cannot be substantiated, the appeal will be dismissed;

2) Accept appeals, but the company does not have any complaint issues and does not need to take corrective or improvement measures;

3) Accept appeals and confirm that corrective or improvement measures are needed.

Step 5: Improve your actions

If the complainant is dissatisfied with the investigation report or action measures, the company will conduct further satisfaction surveys and research to determine and implement action plans that need to be carried out in depth. If the complainant still cannot reach agreement with the company's improvement actions, the complaint may be referred to a third party for mediation or external experts may be engaged for review and negotiation.

Step 6: Monitoring and evaluation

The company's supply chain department reports every quarter on received complaints, resolutions, and pending issues to representatives of responsible procurement and supply chain due diligence management. Analyze the status and timeline of grievance resolution, and assess the effectiveness of the grievance and communication mechanism.

6 Complaint Protection

The supply chain department keeps all records of appeal applications, processing, review, and related party communications, with appeal information retained for at least 10 years. Staff involved in handling complaints are responsible for confidentiality of information that is required to be kept confidential or information not permitted to be made public. Appeals are handled using the conflict avoidance principle. If the complainant believes any company member has a conflict of interest with the complaint, they may request recusal in the complaint letter. Shanshan Technology earnestly protects and safeguards the rights and interests of complainants, strictly prohibits transferring appeal

materials to the respondent, strictly forbids retaliation against complainants through complaints, and guarantees their right to know, i.e., whether the appeal is valid and the final outcome of the resolution.

7. Relevant documents

7.1 "Supply Chain Due Diligence Complaint."

7.2 "Supply Chain Due Diligence Grievance Handling Opinion."

The final interpretation of this policy belongs to the Department of Supply Chain.

Shanghai Shanshan New Materials Co., Ltd

June 2025