

Regulations on the Management of Appeals and Remedies for Critical Minerals

1. Objective

Shenzhen Highpower Technology Co., Ltd. (hereinafter referred to as "HPT" or the "Company") has formally established a standardized, scientific, and effective mechanism for addressing appeals and providing remedies, which enables all stakeholders to report and address issues and misconduct related to social responsibility, environmental protection, and supply chain due diligence management in a systematic and transparent manner.

HPT is committed to preventing and mitigating any adverse impacts related to social responsibility, environmental concerns, and supply chain management. This ensures full compliance with relevant regulations, protects the legitimate rights and interests of stakeholders, and promotes the sustainable and responsible development of the entire supply chain.

2. Scope

2.1. *Organizational Scope*

This procedure applies to Shenzhen Highpower Technology Co., Ltd. and all of its majority-owned subsidiaries, including but not limited to Huizhou Highpower Technology Co., Ltd., Springpower Technology (Shenzhen) Co.,

Ltd., Icon Energy System (Shenzhen) Co., Ltd., Guangdong Highpower New Energy Technology Co., Ltd., and Shenzhen Highpower Supply Chain Management Co., Ltd.

2.2. *Business Scope*

This procedure applies to all internal and external stakeholders who are either directly or potentially involved in social responsibility, environmental management, supply chain management, and business operations associated with HPT.

3. Definitions of Terms

Not applicable.

4. Obligations

The Audit Department of HPT is responsible for overseeing the appeal process, which includes monitoring and addressing appeals received via the public email channel, implementing formal appeal procedures, ensuring the confidentiality of the identities of affected individuals or complainants, providing timely and appropriate responses, and maintaining thorough records of the entire process along with detailed outcomes.

5. Content

5.1. *Formal Appeal Channels*

HPT has officially established and launched a formal channel for appeals and communication within the aforementioned scope. If you have any concerns or correspondence related to this matter, please do not hesitate to contact us via email at hpshenji@highpowertech.com.

5.2. *Launch a formal appeal*

5.2.1. Any stakeholder who identifies issues or inappropriate practices related to the company's social responsibility, environmental management, and supply chain management, including non-compliance with the ***Due Diligence Guidance for Responsible Supply Chains of Critical Minerals***, process violations in critical mineral supply management, failure to fulfill obligations, neglect of responsibilities, or perceived infringement of their rights during the supply chain management process, may submit an appeal through this formal procedure.

5.2.2. When relevant stakeholders submit appeals related to the aforementioned issues, they should include the following information:

- (1) The name of the complainant (anonymous submissions are acceptable), the affiliated unit (if applicable), and an

indication of whether confidentiality is required. If yes, HPT will ensure that it is maintained.

- (2) A detailed description of the issues and reasons for the appeal must also be provided.
- (3) Relevant supporting evidence should be included as it facilitates resolving appeals and enhances effective communication.
- (4) If the complainant has any feasible suggestions for resolution, HPT respectfully invites them to submit these suggestions for consideration.

5.2.3. HPT will not consider any appeals regarding the following content:

- (1) appeals identified as malicious will be disregarded;
- (2) appeals that fail to provide sufficient supporting evidence will not be evaluated;
- (3) appeals that fall outside the scope of this mechanism will be redirected to the appropriate department for resolution, with relevant assistance provided where necessary.

5.3. *Appeal Management and Remedy Procedures*

5.3.1. *Appeal Receiving*

The audit department performs weekly reviews of the inbox and systematically archives the information along with the supporting

documentation provided by the appealing party.

5.3.2.Appeal Confirmation

The auditing department first assesses whether the subject matter of the appeal and communication is within the scope of the ***Regulations on the Management of Appeals and Remedies for Critical Minerals***. Subsequently, it verifies the accuracy and authenticity of the appeal and conveys the relevance and significance of the information to the leader of the due diligence investigation team, the head of auditing, and the CEO of HPT. The confirmation email with a detailed process and timeline will be sent to all formal appeals with real-name identification via email within 7 business days.

5.3.3.Appeal Responding

The auditing department shall conduct an investigation based on the actual circumstances, complete the relevant investigation report or action plan within one month from the date the appeal is initiated, and formulate a conclusive response. This response email generally includes the following three categories:

- (1) appeals were identified as invalid and subsequently rejected for failing to align with the designated scope;
- (2) appeals have been accepted, but no relevant issues were

identified within HPT; therefore, no action is required.

- (3) appeals have been accepted and confirmed, and it has been officially stated that remedial measures will be implemented accordingly.

5.3.4. Appeal Investigation and Remedy

The audit department shall promptly organize and complete the investigation, implement necessary remedial measures, and provide a formal response to the complainant. HPT will prioritize addressing the most severe adverse effects or those that could lead to irreversible consequences if not addressed in a timely manner.

HPT will conduct supplementary investigations, further refine the plan, and implement a more comprehensive action plan if the complainant expresses dissatisfaction with the investigation report or remedial measures. If consensus on corrective actions cannot be reached, the appeal may be referred to an external organization or expert for mediation, investigation, and negotiation. Under exceptional circumstances, the company will cooperate with judicial authorities to pursue appropriate legal resolutions.

5.3.5. Rectification and Subsequent Follow-up

Upon completion of the appeal investigation and resolution, a formal remediation request will be issued to the respondent with a specified deadline for developing effective solutions and a defined timeline for implementation.

Annually, the Audit Department will report to the leader of the due diligence investigation team on the conditions of appeal received, resolved, and outstanding. The Department will also conduct an annual analysis of appeal resolution effectiveness, evaluate the efficacy of appeal and communication mechanisms, and integrate these data into the HPT Annual Supply Chain Due Diligence Report.

5.4. *Appeal Documentation*

The audit department will formally record all received appeals, including the following details:

- (1) complainant's identity and submission date;
- (2) the type of appeal, specific issue, and any supporting information;
- (3) decision to accept or reject the appeal.

5.5. *Complainant Protection*

5.5.1. *Confidentiality of the Complainant's Information*

The appeal information must be formally registered and processed by

the auditing department. The individual responsible for processing the appeal is required to ensure the strict confidentiality of the complainant's information. Except for the designated personnel within the division, it is strictly prohibited to disclose the complainant's information to any unauthorized party. The appeal documentation should be managed as a highly confidential document under rigorous control measures. Access to these materials shall only be granted with explicit approval from either the HPT management team or the designated individual in charge.

5.5.2. Protection of the rights and interests of complainant

HPT actively supports such appeals and effectively safeguards the rights and interests of the complainants. Any form of retaliation against complainants due to their appeals is strictly prohibited, and the right of complainants to be informed is ensured, including the validity status of the appeal and the final result. In cases where serious leaks cause harm that results in damage to the legitimate rights and interests of the complainants, the case will be referred to judicial authorities for further legal proceedings.

HPT hereby makes a solemn commitment to firmly uphold and protect the rights and interests of the complainant from any infringement.

6. Relevant Standards

- 6.1. Regulation (EU) 2023/1542 on batteries and waste batteries
(commonly referred to as the "New EU Battery Regulation")
- 6.2. OECD Due Diligence Guidance for Responsible Business Conduct
- 6.3. OECD Due Diligence Guidance for Responsible Supply Chains of
Minerals from Conflict-Affected and High-Risk Areas
- 6.4. UN Guiding Principles on Business and Human Rights

Shenzhen Highpower Technology Co., Ltd.

March, 2025