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|  | 供应链尽责管理申诉机制<br>Supply Chain Due Diligence<br>Grievance Mechanism | 文件编号 | SVT-SA-019 |
|   |  | 版 别  | A/0        |
|   |  | 生效日期 | 2024/10/12 |
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## Supply Chain Due Diligence Grievance Mechanism

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### 1 Purpose

This mechanism is formulated in accordance with the **OECD Guidelines** and the Company's Responsible Mineral Supply Chain Due Diligence Policy. It aims to promptly identify and address potential risks and hidden dangers in the supply chain, further enhance the transparency and compliance of supply chain due diligence management, ensure smooth communication between the Company and internal & external stakeholders, safeguard the legitimate rights and interests of all stakeholders and the Company, and optimize the internal and external environment for corporate development.

### 2 Scope

1. Matters related to the Company's mineral supply chain due diligence management;
2. Damages to the interests of relevant parties caused by inadequate mineral supply chain due diligence management;
3. Violations of the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas** or the Company's relevant policies on mineral supply chain due diligence management.

#### Grievances Not Accepted

Any grievance falling into the following categories will be rejected:

1. Grievances irrelevant to the Company's mineral supply chain due diligence management;
2. Grievances without sufficient evidence or witnesses to support the alleged issues;
3. Malicious grievances or those filed to gain competitive advantages;
4. Matters beyond the resolution scope of the Company's internal mechanism (the Company will actively coordinate external institutions for handling).

### 3 Definitions

#### 3.1 Grievant

A grievant refers to any person who files a grievance against the Company's policies and activities concerning mineral supply chain due diligence management.

Grievants include but are not limited to the Company's customers, suppliers, affected community residents, employees and board members. Any party, whether having a direct or indirect connection with the Company, may file a grievance to the Responsible Mineral Supply Chain Due Diligence Team if they believe the Company or its supply chain has problems falling within the aforesaid scope, and such problems have caused or may cause

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adverse impacts on themselves or the stakeholders they represent. Where a grievance is submitted by an organization or individual on behalf of affected parties, the representative shall clearly state the represented parties and provide valid proof of representation.

### 3.2 Grievance

A grievance means a form of communication whereby the Company’ s employees or other stakeholders submit opinions or inquiries about the Company’ s policies and activities on mineral supply chain due diligence management in writing or via the official website.

### 3.3 Mineral

Minerals herein refer to mica.

## 4 Grievance Channels

### 4.1 Internal Grievance

Company employees (internal grievants) may fill out the **Mineral Supply Chain Due Diligence Grievance Form** and submit it via suggestion boxes, company email or the official website. Suggestion boxes are placed on the first floor of the Taping Workshop and in the staff canteen. Relevant grievance channels are posted at major entrances and exits of the Company.

### 4.2 External Grievance

External grievants including customers, government departments, media and other stakeholders may submit the completed **Mineral Supply Chain Due Diligence Grievance Form** by email or through the Company’ s official website.

## 5 Contact Information for Grievances

1. Dedicated grievance email: enquiry@vitar.com.hk Grievance hotline: 0852 24113108
2. Grievance authority: Mineral Supply Chain Due Diligence Committee
3. Official grievance website: <https://vitar.com.hk/>

## 6 Grievance Handling Organizations


### 6.1 Mineral Supply Chain Due Diligence Committee

It is the specific department responsible for receiving, handling and replying to external grievances, and coordinates relevant departments to work out solutions.

### 6.2 Grievance Handling Committee

Composed of staff from the Administrative and Human Resources Department, it is supported by the Responsible Mineral Supply Chain Due Diligence Team.

### 6.3 Functions of the Grievance Handling Committee

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The Committee does not directly receive grievances. Upon receipt of escalated grievances, it issues the final interpretation and solution on behalf of the Company.

## 7 Grievance Principles

The submission, acceptance and handling of all grievances shall comply with the following five principles:

### 7.1 Fact-Based Principle

Grievances shall be raised based on specific facts rather than the Company's strategies, policies or guidelines, accompanied by complete factual evidence and documents. The Company shall conduct all handling work by verifying facts and make decisions based on verified findings.

### 7.2 Relevance Principle

All stakeholders including employees, customers, suppliers, government authorities, media and nearby residents may only file grievances within the scope specified in Clause 2. Matters outside this scope shall be submitted through other designated channels and are not governed by this mechanism.

### 7.3 Procedural Principle

Grievants shall follow the procedures stipulated herein when submitting and participating in grievance proceedings. The Company shall also conduct grievance handling in strict accordance with this mechanism.

### 7.4 Confidentiality Principle

Both grievants and the Company shall handle grievances in strict confidence. All involved personnel shall keep relevant information confidential. The Responsible Mineral Supply Chain Due Diligence Team will fully respect grievants' wishes and protect their identities and related information.

### 7.5 Timeliness Principle


Grievants shall file grievances in a reasonable time after they know or ought to know the relevant facts to facilitate investigation and handling. The Company shall process and respond to grievances in a timely manner. Grievances filed more than two years after the grievant knew or ought to know the facts will not be accepted.

## 8 Grievance Process

Grievance Submission → Grievance Review

- **Disapproved:** Grievance Return & Case Closure
- **Approved:** Grievance Acceptance & Investigation → Grievance Resolution → Case Closure → Document Filing

## 9 Grievance Procedures

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### 9.1 File a Grievance

Grievants may submit grievances through the official channels published by the Company, and may choose to remain anonymous.

### 9.2 Grievance Review

Within **5 working days** after receiving a grievance, the Mineral Supply Chain Due Diligence Team shall review whether the grievance complies with acceptance criteria. If rejected, the Team shall inform the grievant of the result upon receipt confirmation, terminate the case, and fill out the **Mineral Supply Chain Due Diligence Grievance Handling Form**.

### 9.3 Acceptance and Investigation

For accepted grievances, the Mineral Supply Chain Due Diligence Team shall forward all materials to the Grievance Handling Committee. The Committee, together with relevant departments, will conduct discussions, investigations and evidence collection, and may seek opinions and support from senior management when necessary.

### 9.4 Grievance Resolution

Based on collected information and investigation results, the Grievance Handling Committee will conduct verification and discussions. It may arrange negotiations and mediation between the two parties. A formal reply shall be delivered to the grievant within **15 working days**.

- If both parties reach an agreement: Both sides shall implement the agreed solution under the supervision of the Committee. The two parties shall sign the **Mineral Supply Chain Due Diligence Grievance Handling Form** (in duplicate), and the case will be closed.
- If no agreement is reached: Both parties may resort to external solutions including third-party mediation, review by external experts, negotiation or judicial proceedings.

### 9.5 Document Filing

The Grievance Handling Committee shall file all documents generated during the entire grievance process (including rejected cases) with a detailed catalogue for future reference. All grievance records shall be retained for **at least 5 years**.

### 9.6 Conflict of Interest Recusal Mechanism

If the grievant believes any member of the handling team has a conflict of interest with the grievance, they may request recusal in the grievance document.

## 10 Grievant Protection

### 10.1 Confidentiality of Grievant Information

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Grievance information is registered and processed by designated personnel, who shall keep the grievant's information strictly confidential. Except for the competent leaders, no personnel shall disclose the grievant's information. All grievance documents are classified as top-secret company files; access is restricted to competent leaders only, and dissemination to relevant interested parties is prohibited.

### 10.2 Protection of Grievants' Rights and Interests

This management system is designed to improve the Company's supply chain governance. The Company encourages objective and factual grievances and fully protects grievants. Retaliation against any grievant is strictly prohibited. Grievants are entitled to full information on the validity of their grievances and final handling results.

### 10.3 Penalties for Breach of Confidentiality and Retaliation

Any act of breaching confidentiality or retaliating against grievants shall be deemed a serious violation of company discipline. Offenders will have their labor contracts terminated and may be referred to judicial authorities for legal liability.

**Commitment:** The Company will fully protect the legitimate rights and interests of all grievants.

### 10.4 Impartial Handling

The Responsible Mineral Supply Chain Due Diligence Team shall handle, investigate, reply to and file all grievances in an independent, fair and objective manner.

### 10.5 Continuous Improvement

All grievance feedback will be integrated into the Company's continuous improvement system. Corrective and preventive action plans will be formulated for valid grievances where necessary. All feedback will be incorporated into the due diligence management system for ongoing optimization.

## 11 Relevant Documents

1. Mineral Supply Chain Due Diligence Grievance Form
2. Mineral Supply Chain Due Diligence Grievance Handling Form

Mineral Supply Chain Due Diligence Grievance Form  
表格

Grievant Name

Occupation

Relationship with the Company

Contact Information

Date of

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Grievant Name

Occupation

Incident

Facts, reasons and claims of the grievance (attach additional pages and evidence if needed): Grievant' s

Signature: Date:

Review result and acceptance decision:

**Mineral Supply Chain Due Diligence Grievance Handling Form**

表格

Grievant Name

Occupation

Relationship with the Company

Contact Information

Date of

Incident

Facts, reasons and claims of the grievance (attach additional pages and evidence if needed):

Handling process and conclusion of the review team:

Final conclusion of the Company (if applicable):

Grievant' s Confirmation: