Tinci Materials Grievance Management

## ****1. Grievance Management Policy and Commitment****

### ****1.1 Policy Statement****

The company is committed to establishing a fair, transparent and efficient grievance management mechanism to ensure that grievances from employees, customers, suppliers, community members and other stakeholders are handled promptly and fairly, safeguarding the rights and interests of all parties and promoting transparency and accountability. We promise:

**Respect human rights and laws and regulations, and protect the legitimate rights and interests of complainants.**

**Provide safe and accessible channels for complaints and protect complainants from retaliation.**

**All grievances are handled in a fair, transparent and confidential manner.**

**Regularly review the grievance management process and continuously improve the grievance mechanism.**

### ****1.2 Scope of application****

This policy applies to:

* Employee complaints regarding labor conditions, discrimination, harassment, etc.
* Customer complaints about product or service quality.
* Concerns expressed by community members about the environmental or social impacts of the project.
* Feedback from direct and indirect suppliers on contract performance and compliance issues.

### ****1.3 Complaint channels****

The company has established a special reporting mechanism . If you have any questions about this policy or find any violation of this policy , you can consult or report it in the following ways :

* OA Report
* WeChat Official Account-TINCI MATERIALS
* Email: tousujubao@tinci.com
* Tel: 86-13422286620
* TINCI Official website: <https://www.tinci.com/lxwm/>

The company will respond after internally identifying the risk level upon receipt of the complaint and provide feedback to the reporter within **30 days** at the latest .

[For](https://www.tinci.com/lxwm/%E3%80%82) relevant proof, please refer to the link [:](%3A%20%20) <https://www.tinci.com/lxwm/>

### ****1.4 Grievance Management Framework****

* Grievance Committee: The company has established a Grievance Committee composed of stakeholder representatives to review and make decisions on grievances.
* Single coordination point: A single coordination point for grievance management is established, with the internal audit department taking on relevant responsibilities, handling complaints in a unified manner, and formulating priority policies.

## ****2. Risk Assessment****

### ****2.1 Identification of potential complaint risks****

Identify risks that may lead to complaints through stakeholder interviews and historical data analysis:

**Labor rights** : wage arrears, occupational health and safety issues.

**Environmental impact** : pollution, noise, and ecological damage.

**Community relations** : land acquisition, destruction of cultural heritage.

**Business practices** : fraud, breach of contract.

### ****2.2 Risk Level Assessment****

Complaint risks are graded according to **the probability of occurrence** and **impact** , and different response times are set :

| **Risk Level** | **Response time** |
| --- | --- |
| high | 24h |
| middle | 7 days |
| Low | 30 days |

## ****3. Mitigation and prevention measures****

### ****3.1 Precautions****

**Training and publicity** : Regularly conduct training on grievance procedures and rights protection for management, employees and suppliers.

**Transparent communication** : The complaint process and contact information are made public through websites, bulletin boards, complaint hotlines, email, etc.

**Contractual clauses** : Specify dispute resolution mechanisms in commercial contracts and ensure suppliers/contractors comply with grievance management requirements.

**Supplier compliance management:** Suspend cooperation or exclude direct or indirect suppliers that do not meet requirements until rectification is completed; collaborate with suppliers to ensure compliance through special action plans, including:

* Clearly defined non - compliant behaviors : violation of NDPE policies, labor rights, etc.;
* Develop a time-bound corrective action plan ;
* Provide training, resource support and progress tracking.

### ****3.2 Mitigation measures****

**Quick response**: Set up a 24-hour complaint hotline (86-13422286620).

**Third-party mediation** : Introducing an independent mediator or arbitration body for complex complaints.

**Compensation plan** : Develop a reasonable compensation or remediation plan (such as economic compensation, environmental restoration).

**Supplier Collaborative Action: Manage** supply chain - related complaints through collective investigations and joint supplier intervention; provide remedies for damage to people and the environment that has occurred .

## ****4. Monitoring Mechanism****

### ****4.1 Monitoring indicators****

Audit and Supervision Department: Number and classification statistics of complaints (monthly/quarterly).

Audit and Supervision Department: Average processing time (target: ≤15 working days).

Audit and Supervision Department: Complaint resolution rate (annual target: ≥90%).

### ****4.2 Monitoring Tools****

**Complaint registration form :** record the complainant, time, problem description, and handling progress.

**Supplier Correction Tracking Sheet:** Record corrective actions, time limits and verification results.

**Database system** : used to track and analyze complaint trends.

## ****5. Reporting and Verification****

### ****5.1 Internal Reporting****

**Monthly report** : Submitted to management, summarizing grievance types, processing status, pending issues and trend analysis.

**Annual review**: The Audit and Supervision Department reviews the compliance and effectiveness of complaint management and makes recommendations for improvement.

### ****5.2 External Verification****

**Independent Audit : A third-party organization will review the** compliance and effectiveness of complaint management every two years .

**Stakeholder feedback** : Assess satisfaction with the grievance mechanism through questionnaire surveys.

**Public disclosure** : Publish grievance data (anonymized) in the sustainability report.

**Internal and external communication** : Communicate the grievance mechanisms of its operations to relevant stakeholders (e.g. suppliers, workers, communities, etc.) .

**Grievance Log:** The Company maintains a grievance log which is updated regularly to record information about new grievances as well as actions and progress towards grievance resolution .

**Stakeholder notification mechanism:** A grievance mechanism is made public to suppliers, employees, and the community through the official website, contract annexes, training, and other channels (link: https://www.tinci.com/lxwm/).

## 6. ****Compensation Mechanism****

### ****6.1 Compensation Principles****

**Restorative** : Prioritize restoration of the affected party to its original state (e.g., cleaning up contamination).

**Compensatory** : Financial compensation (such as back pay, medical expenses).

**Non-economic compensation** : public apology, commitment to policy revisions.

### ****6.2 Compensation Process****

**Assessment of losses** : Determined by a special team or a third-party agency.

**Negotiation plan** : Confirm the form of compensation with the complaining party.

**Execution and feedback** : Track the complainant’s satisfaction after compensation.

**Take action:** Investigate through collective action, engage complainants (such as suppliers), and support remediation of harm (if it occurs) to people and the environment.

## 7Supplier ****Non- Compliance Process****

### ****7.1 Non-Compliance Definition and Response****

**Clear definition: including but not limited to violations of NDPE policies, labor rights, environmental standards, contract terms, etc.**

**Time-bound actions:**

* **First non- compliance : A rectification notice will be issued within 15 working days, and rectification support will be provided;**
* **Continued non-compliance: Suspension of cooperation/procurement arrangements, initiation of sanctions proceedings.**

### ****7.2 Re-inclusion criteria after suspension of cooperation****

**Suppliers must meet the following conditions before resuming cooperation:**

* **Develop a time-bound action plan to ensure compliance with the responsible sourcing policy;**
* **Commit to restoration, remediation and compensation for violations (e.g. environmental restoration, back pay);**
* **Verify the effectiveness of rectification through third-party audits.**

### ****7.3 Monitoring and Verification****

The company verifies corrective actions through progress reports, on-site verification, and third-party audits;

Closing of non- compliant items requires the following: 100% rectification is completed and there are no repeated violations.

## 8 Supplementary Provisions

This policy will be revised and improved based on actual conditions to ensure compliance with the 8 effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and other relevant requirements. If you have any questions, you can report through the above complaint and grievance channels.