

Shangda Superalloys Materials Co., Ltd.

Occupational Health and Safety Management Statement

Shangda Superalloys Materials Co., Ltd. (hereinafter referred to as "the Company") strictly complies with the Work Safety Law of the People's Republic of China, the Law on the Prevention and Control of Occupational Diseases of the People's Republic of China, the Hebei Province Work Safety Regulations, and other relevant laws, regulations, and standards. Adhering to the principle of "Safety First, Prevention Foremost, Comprehensive Management," the Company systematically manages occupational health and safety risks, safeguards employee well-being, and continuously achieves safe production.

I. Management Responsibility

The Company has established a Work Safety Committee, with the Chairman serving as the Director. The Committee holds monthly and quarterly safety meetings to implement the Company's primary responsibilities. The Safety Supervision Office serves as the dedicated safety management organization, with each department appointing full-time or part-time safety officers, thereby creating a **"horizontal to the edge, vertical to the bottom"** safety management network. A company-wide work safety responsibility system is implemented, with all employees signing responsibility agreements. Safety performance is incorporated into the annual assessment.

II. System Development

The Company has obtained **ISO 45001 Occupational Health and Safety Management System** certification. It has established an integrated management manual and system documents covering hazard identification, emergency response, and incident management. Internal audits are conducted annually, and third-party certification audits are carried out every three years to ensure the system operates effectively and undergoes continuous improvement.

III. Risk Management and Control

1. Strengthen source management of equipment and processes, strictly implementing the "Three Simultaneities" for safety facilities in construction projects.
2. Standardize the management of related parties and on-site construction, enforcing strict approvals, inspections, and hazard rectification.
3. Conduct regular hazard identification, risk grading and control, and occupational disease hazard reporting. Develop an annual safety work plan.

IV. Training and Emergency Response

Establish a three-tier safety education and specialized training system to enhance company-wide safety awareness and skills. Develop production safety accident emergency response plans and conduct regular emergency drills to ensure rapid response and minimize accident losses.

V. Employee Protection

Provide labor protection equipment and occupational health and safety protection facilities.

Conduct regular occupational health examinations and standardize the management of occupational health records, effectively safeguarding employee rights and interests.

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April 15, 2026