

Shangda Superalloys Materials Co., Ltd.

## Labor Rights and Interests Protection Policy

Shangda Superalloys Materials Co., Ltd. (hereinafter referred to as "the Company") consistently adheres to a people-oriented approach and compliant operations. It strictly complies with the national laws and regulations, including the Labor Law of the People's Republic of China, the Labor Contract Law, the Trade Union Law, the Work Safety Law, and the Special Rules on the Labor Protection of Female Employees. The Company integrates the protection of labor rights and interests into all aspects of its corporate governance, production operations, and corporate culture development. It strives to build legal, standardized, transparent, and harmonious labor relations, effectively safeguarding employees' legitimate rights and interests, and promoting the healthy development of both the employees and the Company.

### I. Standardized Employment Management

The Company strictly implements the labor contract system, adhering to principles of legality, fairness, equality, voluntariness, and consensus. It signs written labor contracts with all employees establishing formal employment relationships, clearly defining the rights and obligations of both parties, and ensuring employees' rights to employment choice and labor rights. The Company upholds fairness and impartiality in recruitment, employment, compensation, training, promotion, transfer, and termination processes, eliminating all forms of employment discrimination, and ensuring equal employment and career development opportunities for employees. The Company supports the Trade Union in carrying out its work legally, maintains open communication channels with employees, and properly handles matters related to labor relations through democratic management, consultation, and communication to protect employees' legitimate claims.

### II. Comprehensive Compensation, Benefits, and Leave Protection

The Company has established a compensation distribution mechanism that aligns with job responsibilities, work performance, and actual contributions, ensuring timely, full, and standardized salary payments in strict accordance with national wage payment regulations. It legally contributes to pension insurance, medical insurance, unemployment insurance, work injury insurance, maternity insurance, and housing provident fund for employees, safeguarding their statutory social security rights. The Company strictly implements national working hour systems and rest and leave regulations, ensuring statutory holidays, marriage leave, maternity leave, paternity leave, and other types of leave, thereby protecting employees' rights to rest and leave.

### III. Enhanced Work Safety and Occupational Health Protection

The Company places high importance on work safety and occupational health, establishing a robust work safety responsibility system and occupational health management mechanisms. It continuously improves the working environment, enhances safety protection facilities, standardizes the provision of personal protective equipment, and supervises its correct use. The Company conducts regular safety training, hazard identification and rectification, and emergency

drills to enhance employee safety awareness and emergency response capabilities, preventing and reducing work-related accidents and occupational hazards. It strictly implements management requirements for special and high-risk positions, organizes occupational health examinations, and maintains health management records, maximizing the protection of employee safety and physical and mental well-being.

#### IV. Comprehensive Career Development and Training System

The Company values employee capability enhancement and career development. It has established a regular training mechanism, providing pre-job training, skills training, safety training, and professional technical training based on job requirements to help employees improve their overall quality and job competence. The Company builds reasonable career paths, improves internal training, competitive selection, and incentive mechanisms, encouraging employees to grow and succeed in their roles, thereby achieving the synergistic progress of personal value and corporate development.

#### V. Enhanced Humanistic Care and Rights Protection

The Company actively fosters a respectful, inclusive, and friendly work atmosphere, cares about employees' work and personal lives, and conducts necessary care, 慰问, and assistance activities. It strictly implements special labor protection regulations for female employees, legally safeguarding their legitimate rights. The Company establishes a robust employee feedback and dispute resolution mechanism, adhering to legal principles to handle labor disputes promptly and appropriately, maintaining stable and harmonious labor relations.

#### VI. Continuous Improvement and Compliance Commitment

The Company regards the protection of labor rights as a long-term priority, continuously improving management systems and strengthening internal supervision to enhance management standards. It strictly complies with national and local laws and regulations, adheres to business ethics and social responsibility, actively accepts supervision from government agencies, trade unions, and the community, earnestly fulfills its corporate social responsibilities, and provides employees with a safe, healthy, fair, and secure development environment.

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