申诉管理程序
KMC Grievance Management Procedure

1 目的

1 Purpose

为及时发现和处理卡玛蒂维矿业有限公司在企业社会责任方面可能存在的各类风险与隐患，不断提升公司管理能力和信息透明度，建立和谐互利的各利益相关方关系，维护利益相关方的合法权益，特建立本申诉管理程序。本程序用于建立并运行 KMC 投诉与申诉机制，确保易达、公平、可预见、透明且与权利相容。

To enable Kamativi Mining Company Limited (KMC) to identify and address in a timely manner potential risks and concerns relating to corporate social responsibility; continuously strengthen its management capacity and information transparency; foster harmonious and mutually beneficial relationships with stakeholders; and safeguard stakeholders' lawful rights and interests, KMC has established this Grievance Management Procedure. This Procedure governs the establishment and operation of KMC's complaints and grievance mechanism and is intended to ensure that the mechanism is accessible, equitable, predictable, transparent, and rights-compatible.

2 范围

2 Scope

适用于卡玛蒂维矿业有限公司的所有利益相关方，包括但不限于员工、供应商、承包商、分包商、社区居民、合作方、代理及任何受影响或自认为受影响的个体等。

This Procedure applies to all KMC stakeholders, including, but not limited to, employees, suppliers, contractors, subcontractors, community residents, business partners, agents, and any other individual who is affected or believes they may be affected.

2.1 利益相关方参与年度评审

2.1 Stakeholder Participation in the Annual Review

2.1.1 本机制的建立与更新应由综合部牵头，联合后勤部、工人委员会，并邀请社区代表、承包商代表、弱势群体代表共同参与设计与评审，至少每 12 个月评审一次。

2.1.1 The Administration Department shall lead the establishment and updating of this mechanism in coordination with the Logistics Department and the Workers' Committee. Representatives of communities, contractors, and vulnerable groups shall be invited to participate jointly in its design and review. The mechanism shall be reviewed at least once every 12 months.

2.1.2 评审内容含：渠道有效性、处理时效、满意度、补救落实率、复发率、可及性（语言/无障碍/成本）与改进建议；评审结论形成《申诉与合规报告》。

2.1.2 The review shall cover channel effectiveness, handling timeliness, satisfaction, the remedy implementation rate, recurrence rates, accessibility (including language, disability-related accessibility, and cost), and recommendations for improvement. The review findings shall be documented in the Grievance and Compliance Report.

2.1.3 重大变更前进行利益相关方征询，并公开机制要点与渠道更新。

2.1.3 Before any material change is made, KMC shall consult stakeholders. The key elements of the mechanism and any updates to its channels shall be publicly disclosed.

3 名词解释

3 Definitions

3.1 申诉：指利益相关方针对公司在运营过程中涉嫌违反法律法规、社会责任、环境保护、人权保障、道德商业行为、安保管理等提出的正式意见或控诉。

3.1 Grievance: A formal concern or complaint raised by a stakeholder regarding an alleged violation by KMC, in the course of its operations, of applicable laws or regulations or of requirements relating to social responsibility, environmental protection, human rights safeguards, ethical business conduct, security management, or similar matters.

3.2 补救：停止侵害、恢复、补偿、康复、道歉、保证不再发生等措施。

3.2 Remedy: Measures such as cessation of the harm, restoration, compensation, rehabilitation, an apology, and guarantees of non-recurrence.

4 职责

4 Responsibilities

综合部 **Administration Department**	牵头制度与渠道、开箱与登记、回执出具、对外公开、年度评审。 Lead management of the Procedure and grievance channels; open grievance boxes and register grievances; issue acknowledgments of receipt; manage public disclosure; and coordinate the annual review.
后勤部 **Logistics Department**	受理外部申诉、统计披露、社区沟通。 Accept and handle external grievances; compile and disclose grievance statistics; and liaise with communities.
工人委员会 **Workers' Committee**	受理内部员工申诉、参与调查并监督利益冲突回避。 Accept and handle internal worker grievances; participate in investigations; and oversee conflict-of-interest screening and recusal.
分管副总/总经理 **Supervising Deputy General Manager / General Manager**	负责升级复核与资源保障；必要时引入独立第三方。 Conduct escalated reviews, ensure adequate resources, and engage an independent third party where necessary.

5 作业程序

5 Operating Procedure

5.1 申诉的内容

5.1 Scope of Grievances

5.1.1 任何利益相关方可就与本公司产品、责任矿产的开采、贸易、处理和进出口、运营行为、业务关系中造成或促成的违反法律法规和社会责任，尤其是供应链尽责管理的要求事项，例如：童工/未成年工、人权侵犯、非法武装团体控制、职场骚扰、危害环境或社会的行为、不当或无故解雇、强迫劳动、现代奴役、贿赂、洗钱、歧视（包括但不限于人种、肤色、年龄、性别、性倾向、种族、宗教、婚姻、残疾、怀孕等方面）；对申诉人、举报人或相关证人实施打击报复、威胁、骚扰、降职、解雇、歧视对待等行为；承包商、供应商或其他业务伙伴存在人权侵害、资质造假、信息隐瞒、违规经营、规避监管、未落实人权、环境或安全责任的行为；矿产来源不明、任何安保人员包括动用的公安力量等现象提出意见、建议或申诉。同时，涉及公司复垦与关闭规划或实施过程中的利益相关方，亦可通过申诉机制表达诉求或提出投诉。

5.1.1 Any stakeholder may submit comments, suggestions, or grievances concerning any violation of laws, regulations, or social responsibility requirements that KMC causes or contributes to in connection with its products; the extraction, trade, processing, import, or export of responsible minerals; its operations; or its business relationships, particularly matters relating to supply chain due diligence. Examples include, but are not limited to: child labor or the employment of underage workers; human rights abuses; control by illegal armed groups; workplace harassment; conduct that harms the environment or society; improper or unjustified dismissal; forced labor; modern slavery; bribery; money laundering; discrimination, including discrimination based on race, color, age, gender, sexual orientation, ethnicity, religion, marital status, disability, or pregnancy; retaliation, threats, harassment, demotion, dismissal, or discriminatory treatment directed at a complainant, whistleblower, or relevant witness; misconduct by a contractor, supplier, or other business partner, including human rights abuses, falsification of qualifications, concealment of information, noncompliant operations, evasion of regulatory oversight, or failure to fulfill human rights, environmental, or safety responsibilities; minerals of unknown origin; or concerns involving any security personnel, including the use of public security forces. Stakeholders involved in KMC's mine reclamation and closure planning or implementation may also use the grievance mechanism to express their concerns or lodge a complaint.

5.1.2 可接受满足以下条件的申诉：

5.1.2 Grievances shall be accepted when they meet the following criteria:

5.1.2.1 与公司的社会责任、供应链尽责管理包括任何已识别的相关风险。

5.1.2.1 Relate to KMC's social responsibility or supply chain due diligence, including any identified related risks.

5.1.2.2 指出管理系统的缺陷、不一致或不足。

5.1.2.2 Identify a deficiency, inconsistency, or inadequacy in the management system.

5.1.2.3 包括足够的客观证据以合理地支持提交申诉人员的指控。

5.1.2.3 Include sufficient objective evidence to reasonably support the allegations made by the complainant.

5.1.2.4 违反卡玛蒂维矿业有限公司文件制度的要求。

5.1.2.4 Concern a violation of the requirements set out in KMC's policies and procedures.

5.1.2.5 本着诚信提交。

5.1.2.5 Be submitted in good faith.

5.1.3 不接受以下条件的申诉：

5.1.3 A grievance shall not be accepted if any of the following applies:

5.1.3.1 与公司的社会责任、供应链尽责管理不相关。

5.1.3.1 It is unrelated to KMC's social responsibility or supply chain due diligence.

5.1.3.2 与公司控制、影响或职责以外的问题相关。

5.1.3.2 It concerns a matter beyond KMC's control, influence, or responsibilities.

5.1.3.3 缺少合理支持申诉的足够客观证据。

5.1.3.3 It lacks sufficient objective evidence to reasonably support the grievance.

5.1.3.4 未本着诚信提交。

5.1.3.4 It was not submitted in good faith.

5.1.4 机制公开：

5.1.4 Public Disclosure of the Mechanism

5.1.4.1 公司在官网、公示栏与社区公告中公开申诉机制摘要、所有渠道、受理范围、处理时限、申诉人权利与外部救济路径（含 IRMA/RMI/RCI 平台），并按年度更新。

5.1.4.1 KMC shall publish, on its official website, public notice boards, and community announcements, a summary of the complaints and grievance mechanism; all submission channels; the scope of grievances accepted; handling timeframes; complainants' rights; and available avenues for external remedy, including the IRMA, RMI, and RCI platforms. This information shall be updated annually.

5.2 申诉方式

5.2 Grievance Submission Channels

5.2.1 内部申述方式：

5.2.1 Internal Grievance Channels:

5.2.1.1 向上级口头报告。

5.2.1.1 Report the grievance orally to a supervisor.

5.2.1.2 写申述信投入意见箱。

5.2.1.2 Submit a written grievance through a suggestion box.

5.2.1.3 发送邮件：KMC@scyahua.com。

5.2.1.3 Send an email to KMC@scyahua.com.

5.2.1.4 拨打举报热线：+263773718612。

5.2.1.4 Call the reporting hotline at +263773718612.

5.2.2 外部申诉方式：社会责任公共邮箱（esg@scyahua.com）。

5.2.2 External Grievance Channel: Public email address for social responsibility matters: esg@scyahua.com.

5.2.3 行业申诉方式：

5.2.3 Industry-Level Grievance Channels:

5.2.3.1 RCI（关键矿产倡议）：https://www.cccmc.org.cn/

5.2.3.1 Responsible Critical Minerals Initiative (RCI): https://www.cccmc.org.cn/

5.2.3.2 RMI（责任矿产倡议）：https://mineralsgrievanceplatform.org

5.2.3.2 Responsible Minerals Initiative (RMI) — Minerals Grievance Platform: https://mineralsgrievanceplatform.org

5.2.3.3 在 IRMA 审核前后（自评至纠正行动期间），公司将在公告中提供 IRMA 相关反馈渠道链接与联系人，鼓励利益相关方在需要时直接向 IRMA 指定平台反映。

5.2.3.3 During the period before and after an IRMA audit (from self-assessment through corrective action), KMC shall include in its notices links and designated contacts for IRMA-related feedback channels and encourage stakeholders, where needed, to raise matters directly through the platform designated by IRMA.

5.2.4 申诉人的权利

5.2.4 Rights of the Complainant

5.2.4.1 申诉人不需要支付任何申诉费用。

5.2.4.1 The complainant shall not be charged any fee for submitting or pursuing a grievance.

5.2.4.2 申述人可选择自身能够理解的语言发起实名或匿名申诉。

5.2.4.2 The complainant may submit an identified or anonymous grievance in a language they understand.

5.2.4.3 申诉可以由个人发起，也可以由集体发起。发起申诉时， 申诉人可以自 由决定是否需要权利代表人，可以自由选择权利代表人。

5.2.4.3 A grievance may be submitted by an individual or a group. When submitting a grievance, the complainant may freely decide whether they require a representative and may freely select that representative.

5.2.4.4 申诉人可以合理地获得必要的信息、建议和专业知识，以便在公平、知情和尊重的条件下 参与申诉程序，且可以自由选择参与或者退出申诉过程。

5.2.4.4 The complainant shall have reasonable access to the sources of information, advice, and expertise necessary to engage in the grievance process on fair, informed, and respectful terms, and may freely choose whether to participate in or withdraw from the process.

5.2.4.5 申诉人可以选择自身能够理解的语言向公司发起合理的支持请求。

5.2.4.5 The complainant may request reasonable support from KMC using a language they understand.

5.2.5 公司提供的服务及申诉机制运行管理要求:

5.2.5 Support Provided by KMC and Requirements for Administration of the Grievance Mechanism:

5.2.5.1 公司不允许收取任何申诉费用。

5.2.5.1 KMC shall not charge any fee for use of the grievance mechanism.

5.2.5.2 意见箱放置在无监控地段，尊重员工选择匿名申述的权利。

5.2.5.2 Suggestion boxes shall be located in areas not covered by surveillance, respecting workers' right to submit grievances anonymously.

5.2.5.3 公司不得干涉申诉人对权利代表的选择。

5.2.5.3 KMC shall not interfere with a complainant's choice of representative.

5.2.5.4 申诉人发起的合理的且公司能够提供的支持请求，公司将根据申诉人的不同需求，提供必要的支持和便利措施。对于有特殊需求的申诉人（如语言、文化差异或残疾等），公司将提供相应的支持。

5.2.5.4 Where a complainant makes a reasonable request for support that is within KMC's capacity to provide, KMC shall provide the necessary support and reasonable accommodation tailored to the complainant's needs. Appropriate support shall be provided to complainants with specific needs, including those related to language, cultural differences, or disability.

5.2.5.5 申诉处理责任人或小组必须根据实际调查情况填制《申诉表》，《申诉表》 内容必须包含申诉内容、调查结果、处理建议、协调结果、结果实施部门。 申诉人明确的，《申诉表》还须申诉人本人签字确认。若拒绝申诉人请求，应说明拒绝原因并记录于《拒绝请求记录表》。

5.2.5.5 The person or team responsible for handling the grievance shall complete the Grievance Form based on the investigation findings. The Grievance Form shall include the grievance details, investigation findings, proposed resolution, outcome of consultation, and department responsible for implementation. Where the complainant is identified, the complainant shall sign the form to confirm its contents. If the complainant's request is rejected, the reasons shall be stated and recorded in the Rejected Grievance Request Register.

5.2.5.6 申诉人可获得与案件相关的必要信息（在不泄露隐私与商业机密的前提下）。

5.2.5.6 The complainant may obtain necessary case-related information, subject to the protection of personal privacy and confidential business information.

5.2.5.7 公司可为申诉人提供法律/翻译/技术建议的引介或费用减免支持（视个案与当地资源情况）。

5.2.5.7 Depending on the circumstances of the case and the availability of local resources, KMC may facilitate access to legal, translation or interpretation, or technical advisory services, or provide assistance with associated fee reductions or waivers.

5.2.5.8 申诉人可自选权利代表人参与各关键节点会议与签署文书。

5.2.5.8 The complainant may select a representative of their choice to participate in meetings at each key stage and sign relevant documents.

5.2.5.9 公司不得随意披露《申诉表》详细表单。匿名申诉原则上也不会进行公示。

5.2.5.9 KMC shall not disclose the detailed contents of a Grievance Form without proper authorization. As a general rule, individual anonymous grievances shall not be publicly disclosed.

5.2.6 可及性承诺

5.2.6 Accessibility Commitment

5.2.6.1 公司不收取任何费用；受理匿名/实名。

5.2.6.1 KMC charges no fees and accepts both anonymous and identified grievances.

5.2.6.2 受理语言：英文/绍纳语/恩德贝莱语/中文；对不具备书写能力的申诉人，可由社区联络员协助口述记录。

5.2.6.2 Accepted languages are English, Shona, Ndebele, and Chinese. For complainants who are unable to write, a community liaison officer may assist by recording the grievance as an oral statement.

5.2.6.3 线下渠道：在社区/办公室/营地门岗/选厂公示栏设置意见箱与告示牌，每周五由综合部+工人委员会联合开箱登记。

5.2.6.3 Offline channels: Grievance boxes and notice boards shall be installed at community locations, offices, camp gatehouses, and the processing plant. Every Friday, the Administration Department and the Workers' Committee shall jointly open the boxes and register the submissions received.

5.2.6.4 对弱势群体（未成年人监护、孕产妇、残障者、非识字群体）提供合理便利（陪同、无障碍通道、翻译），由综合部在《受理登记表》上勾选并记录已提供的便利措施。

5.2.6.4 Reasonable accommodations—including accompaniment, accessible routes, and interpretation—shall be provided to vulnerable groups, including minors requiring guardian participation, pregnant and postpartum women, persons with disabilities, and persons with limited literacy. The Administration Department shall check the applicable item on the Grievance Intake and Registration Form and record the accommodations provided.

5.3 申诉程序与时限：

5.3 Grievance Handling Procedure and Timeframes

5.3.1 受理与登记（3 个工作日）：开箱收到申诉后 3 个工作日内，由综合部登记并发《收讫回执》（含案件编号、承办人、预计完成日、 申诉人权利与申诉渠道）。

5.3.1 Case Intake and Registration (3 Working Days): Within three working days after a grievance is retrieved from a grievance box, the Administration Department shall register the case and issue an Acknowledgment of Receipt stating the case number, case officer, expected completion date, the complainant's rights, and available grievance channels.

5.3.1.1 向上级口头报告的程序：向所属单位部门负责人报告,其中任何一级管理人员可以解决问题的应及时予以解决,并要知会上一级领导，不能解决的再向上一级报告。

5.3.1.1 Procedure for Oral Reporting to Management: The matter shall be reported to the head of the relevant operating unit or department. Any manager at any level who is able to resolve the matter shall do so promptly and inform the manager at the next higher level. If the matter cannot be resolved, it shall be escalated to the next higher level.

5.3.2 筛选与分流（5 个工作 日）：综合部接收到举报人申诉材料后，填写《申诉表》，指派申诉处理责任单位或责任人，完成受理审查（是否属于范围、证据是否足以立案、是否需紧急处置），并进行利益冲突排查与回避。外部申诉信息处理单位为后勤部，内部申诉信息处理单位为工人委员会。

5.3.2 Screening and Assignment (5 Working Days): Upon receiving grievance materials from the complainant, the Administration Department shall complete the Grievance Form, assign the responsible grievance-handling unit or person, and conduct an intake assessment to determine whether the matter falls within scope, whether the evidence is sufficient to open a case, and whether urgent action is required. The Department shall also conduct conflict-of-interest screening and ensure recusal where necessary. External grievances shall be handled by the Logistics Department, and internal grievances shall be handled by the Workers' Committee.

5.3.3 调查与沟通（15 个工作 日）：组织调查、至少一次面对面或等效沟通， 向申诉人说明可行补救选项与预计时间。

5.3.3 Investigation and Engagement (15 Working Days): The responsible grievance-handling unit or person shall conduct an investigation and hold at least one face-to-face meeting or equivalent form of engagement, and shall explain to the complainant the feasible remedy options and anticipated timeframes.

5.3.4 决定与补救（5 个工作日）：形成《申诉处理记录表》与补救方案；如拒绝，需给出书面理由并告知申诉/外部救济路径。

5.3.4 Decision and Remedy (5 Working Days): Complete the Grievance Case Register and develop a remedy plan. If the complainant's request is rejected, provide written reasons and inform the complainant of the available appeal and external remedy pathways.

5.3.5 申诉/复议（15 个工作日）：申诉人不服可一次申诉；由更高管理层或独立第三方复核。

5.3.5 Appeal/Review (15 Working Days): A complainant who is dissatisfied with the decision may file one appeal. The appeal shall be reviewed by a higher level of management or an independent third party.

5.3.6 结案与回访（30 日内）：跟踪补救执行，并在结案后 30 日内完成回访与满意度记录。

5.3.6 Case Closure and Follow-Up (Within 30 Days): Track implementation of the remedy and, within 30 days after case closure, complete follow-up with the complainant and record the complainant's satisfaction.

注：对迫切/高风险情形（如人身与安全风险），即时采取保护性措施，并在《申诉处理记录表》标注“紧急”。

Note: For urgent or high-risk situations, including risks to personal safety or security, protective measures shall be taken immediately, and the case shall be marked "Urgent" in the Grievance Case Register.

5.3.7 申诉方对调查报告或行动措施不满意的，可再次提出申诉。公司将开展进一步的调查和研究，确定需要深入开展的行动方案并予以实施。

5.3.7 If the complainant is dissatisfied with the investigation report or the measures taken, the complainant may file a further grievance. KMC shall conduct further investigation and review, determine the additional actions required, and implement them.

5.3.8 如申诉方仍与公司改进行动无法达成一致，可采取寻求企业以外的解决途径，包括但不限于聘请外部专家参与审查、转交给第三方进行调解或司法途径。

5.3.8 If the complainant and KMC are still unable to agree on the improvement actions, the complainant may pursue avenues for resolution outside KMC, including, but not limited to, engaging an external expert to participate in the review, referring the matter to a third party for mediation, or pursuing a judicial remedy.

5.3.9 公司按半年度内部、按年度对外披露申诉统计（数量、类型、解决率、平均处理周期、通过补救措施解决的比例），并分享制度层面的改进措施。披露采用去标识化方式，保护个人隐私与商业机密。

5.3.9 KMC shall disclose grievance statistics internally on a semiannual basis and externally on an annual basis, including the number and types of grievances, resolution rate, average handling time, and proportion resolved through remedies. KMC shall also share system-level improvements. Disclosures shall be de-identified to protect personal privacy and confidential business information.

5.3.10 定期跟踪与评估。在申诉完成后的 1 年内进行评估改善情况，以确保纠正措施的长期有效性，并通过反馈调整流程。

5.3.10 Periodic Follow-Up and Evaluation: Within one year after a grievance is closed, KMC shall evaluate the status of improvements to ensure the long-term effectiveness of corrective measures and shall use feedback to adjust the process.

5.3.10.1 申诉中识别的系统性问题应输入公司风险登记册与纠正/预防措施（CAPA）， 由责任部门在管理评审中汇报闭环状态。

5.3.10.1 Systemic issues identified through grievances shall be entered into KMC's risk register and corrective and preventive action (CAPA) system. The responsible department shall report the status of action closure during management review.

5.3.11 申诉记录保存。所有申诉记录应至少保管 5 年，并定期分析申诉的类型、频次和解决结果，以识别潜在的系统性问题并采取预防措施。

5.3.11 Retention of Grievance Records: All grievance records shall be retained for at least five years. KMC shall periodically analyze the types and frequency of grievances and their resolution outcomes to identify potential systemic issues and take preventive action.

5.3.12 与权利相容的补救

5.3.12 Rights-Compatible Remedies

补救应以停止侵害、恢复权利为目标，优先次序与示例：

Remedies shall aim to stop the harm and restore affected rights. The following forms of remedy are listed in order of priority, with examples:

复位/复工或替代安排；

Restoration, reinstatement to work, or an alternative arrangement;

补偿/赔偿（含经济与非经济损失）；

Compensation and/or damages, including economic and non-economic loss;

康复（医疗/心理/培训）；

Rehabilitation, including medical care, psychological support, or training;

道歉与解释；

Apology and explanation;

保证不再发生（制度修订、培训、监督与问责）。

Guarantees of non-recurrence, including procedure revisions, training, monitoring, and accountability.

所有补救须与申诉人协商确认，并在《申诉处理记录表》记录。

All remedies shall be confirmed in consultation with the complainant and recorded in the Grievance Case Register.

5.4 无报复政策与信息保密

5.4 Policy on Non-Retaliation and Information Confidentiality

5.4.1 公司在处理申诉时将遵循事实、程序、保密、及时原则。 申诉处理人员对申诉人信息严格保密。 申诉材料按机密级资料严格管理，未经公司可持续发展委员会批准，不得调阅。严禁将申诉材料转到被申诉方手中，保护申诉人的合法权益，防止对申诉人的打击报复。报复行为包括但不限于：欺凌、福利的终止或者非法撤回、补偿减少、工作绩效评估不佳、被排除在公司活动或会议之外、诽谤人格等、纪律处分、不当解雇、工作中的冷处理等方式。

5.4.1 KMC shall handle grievances in accordance with the principles of fact-based decision-making, procedural integrity, confidentiality, and timeliness. Grievance handlers shall maintain strict confidentiality with respect to complainant information. All grievance materials shall be classified and managed as confidential information and shall not be accessed without the approval of KMC's Sustainable Development Committee. Under no circumstances shall grievance materials be handed to the respondent. KMC shall safeguard the complainant's

lawful rights and interests and prevent retaliation against the complainant. Retaliation includes, but is not limited to, bullying; termination or unlawful withdrawal of benefits; reduced compensation; adverse performance evaluations; exclusion from KMC activities or meetings; defamation or attacks on character; disciplinary action; improper dismissal; ostracism in the workplace; or other adverse treatment.

5.4.2 针对下级投诉/检举上级，为防止上级利用职务之便对下级进行打击报复，综合部将会酌情考虑实际情况，必要时与被投诉/检举人的上级进行协商，对当事人之一进行工作岗位调动。

5.4.2 Where a subordinate lodges a grievance or makes a report against a supervisor, the Administration Department shall assess the circumstances to prevent the supervisor from using their position to retaliate against the subordinate. Where necessary, the Administration Department shall consult the respondent's next-level supervisor and arrange a job reassignment for one of the parties.

5.4.3 如果内部申诉人认为受到了任何违反本政策的报复行为，可以向其主管领导或公司综合部负责人提出申述；外部申诉人则可通过行业协会、所在国家司法机构等提出投诉。对严重泄密、导致申诉人合法权益受到损害的，移交司法机关处理。

5.4.3 If an internal complainant believes that they have been subjected to retaliation in breach of this policy, they may report the matter to their immediate supervisor or the head of KMC's Administration Department. External complainants may raise the matter through an industry association, a competent judicial authority in the relevant country, or another appropriate external channel. Any serious breach of confidentiality that harms the complainant's lawful rights and interests shall be referred to the competent judicial authorities.

5.4.4 对任何报复行为（包括但不限于威胁、降薪、解雇、排挤、污名化、撤回福利），一经查实，按照公司纪律与合同条款严肃处理；对外部承包商可暂停付款/停止合同/列入黑名单。

5.4.4 Where any act of retaliation is substantiated—including, but not limited to, threats, pay reduction, dismissal, exclusion or ostracism, stigmatization, or withdrawal of benefits—KMC shall take strict action in accordance with its disciplinary rules and applicable contract terms. Measures against an external contractor may include suspension of payment, termination of the contract, or placement on KMC's contractor exclusion list.

6 组织与职权

6 Organization and Authority

6.1 牵头制度与渠道管理、开箱与登记、回执出具、对外公开、年度评审。

6.1 Administration Department: Lead management of the Procedure and grievance channels; open grievance boxes and register grievances; issue acknowledgments of receipt; manage public disclosure; and coordinate the annual review.

6.2 后勤部：受理外部申诉、统计披露、与社区/传统领袖沟通。

6.2 Logistics Department: Accept and handle external grievances, compile and disclose grievance statistics, and communicate with communities and traditional leaders.

6.3 工人委员会：受理内部员工申诉、参与调查与回避。

6.3 Workers' Committee: Accept and handle internal worker grievances, participate in investigations, and apply conflict-of-interest screening and recusal requirements.

6.4 升级路径：当承办部门存在利益冲突或申诉人要求更高层级复核时，升级至分管副总/总经理；若仍无法解决，引入独立第三方调解或转司法。

6.4 Escalation: Where the responsible department has a conflict of interest or the complainant requests a higher-level review, the matter shall be escalated to the Supervising Deputy General Manager or the General Manager. If the matter remains unresolved, KMC shall engage an independent third party to mediate or refer the matter to the competent judicial authorities.

7 注意事项

7 General Requirements

所有申诉应基于诚信提出。匿名申诉应尽可能提供事实依据；所有处理人员须接受反报复与保密培训。

All grievances shall be submitted in good faith. Anonymous grievances shall provide factual information to the extent reasonably practicable. All personnel involved in grievance handling shall receive training on non-retaliation and confidentiality.

8 附件

8 Attachments

8.1 《申诉表》

8.1 Grievance Form

8.2 《申诉处理记录表》

8.2 Grievance Case Register

8.3 《拒绝请求记录表》

8.3 Rejected Grievance Request Register

附件 1 / Attachment 1

申诉表

Grievance Form

<table>
<tr><td>收讫回执编号
Acknowledgment of Receipt No.</td><td colspan="2"></td><td>日期
Date</td><td colspan="2"></td></tr>
<tr><td>申诉人
Complainant</td><td></td><td>所属单位
Organization / Affiliation</td><td></td><td>申诉时间
Date / Time Submitted</td><td></td></tr>
<tr><td>是否属于弱势群体
Member of a Vulnerable or Marginalized Group?</td><td></td><td>已提供便利措施
Reasonable Accommodation(s) Provided</td><td></td><td>语言
Language</td><td></td></tr>
<tr><td>是否匿名
Submitted Anonymously?</td><td></td><td>是否紧急
Urgent?</td><td colspan="3"></td></tr>
<tr><td rowspan="2">申诉内容及其依据
Grievance Details and Supporting Grounds</td><td>申诉内容
Grievance Details</td><td colspan="4"></td></tr>
<tr><td>申诉依据
Grounds for Grievance</td><td colspan="4"></td></tr>
</table>

附件 1（续） / Attachment 1 (continued)

申诉表

Grievance Form

<table>
<tr><td rowspan="3">调查情况及其措施
Investigation Findings and Measures</td><td>调查情况
Investigation findings</td><td colspan="2"></td></tr>
<tr><td>建议解决方案
Proposed Resolution</td><td colspan="2"></td></tr>
<tr><td>协调结果
Outcome of Consultation</td><td colspan="2"></td></tr>
<tr><td colspan="2">申诉信息处理单位：
□ 后勤部 □ 工人委员会
申诉信息梳理人员（签字）：
年 月 日
Responsible Grievance Intake Unit:
□ Logistics Department □ Workers' Committee
Grievance Intake Officer (signature):
Date (YYYY-MM-DD): ____ / ____ / ____</td><td colspan="2">申诉处理责任人或小组（签字）：
年 月 日
Assigned Grievance Officer or Team (signature):
Date (YYYY-MM-DD): ____ / ____ / ____</td></tr>
<tr><td colspan="4">申诉处理评价： □ 满意 □ 不满意
Evaluation of Grievance Handling: □ Satisfied □ Dissatisfied</td></tr>
<tr><td colspan="4">意见和建议（可选择性填写）：
Comments and Recommendations (optional):</td></tr>
<tr><td colspan="4">申诉人签字：
Complainant Signature:
年 月 日
Date (YYYY-MM-DD): ____ / ____ / ____</td></tr>
</table>

附件 2 / Attachment 2

申诉处理记录表

Grievance Case Register

预计完成日期 Expected completion date		阶段性告知日期 Interim Update Date(s)	
补救类型（多选） Type(s) of Remedy (select all that apply)		纳入 CAPA/风险登记册 Entered in the CAPA and/or Risk Register? (Y/N)	

序号 No.	申诉人/单位 Complainant / Organization	申诉时间 Date / Time Submitted	申诉内容 Grievance Summary	申诉依据 Grounds / Supporting Evidence	受理审批意见 Intake Decision / Approval Comments	处理措施 Actions and Remedy	处理责任人 Assigned Case Owner	完成时间 Closure Date

附件 3 / Attachment 3

拒绝请求记录表

Rejected Grievance Request Register

序号 No.	请求人/单位 Requester / Organization	请求时间 Date / Time Submitted	请求内容 Request Summary	拒绝理由（不在范围/证据不足/重复） Reason for Rejection (Out of Scope / Insufficient Evidence / Duplicate Submission)	事件处理人 Case handler	外部救济路径已告知（Y/N） External Remedy / Recourse Options Communicated (Y/N)	备注 Notes