KMC 申诉与合规公示摘要

KMC Grievance and Compliance Public Summary

卡玛蒂维矿业有限公司
KAMATIVI MINING COMPANY (PRIVATE) LIMITED

报告期 2025 年 9 月 1 日至 2026 年 8 月 31 日　信息更新至 2026 年 10 月 8 日
Reporting period 1 September 2025–31 August 2026　Updated to 8 October 2026

本摘要向员工、承包商人员、社区及其他相关方披露 KMC 申诉机制的运行、主要诉求、公司回应和改进安排。统计按申诉实际接收日期计入报告期；2026 年 9 月新增事项及期后调查另行说明。

This summary informs employees, contractor personnel, communities and other stakeholders about KMC's grievance mechanism, the concerns raised, the Company's responses and planned improvements. Cases are counted by their actual receipt date. September 2026 cases and subsequent survey findings are reported separately.

1 申诉概况 Grievance overview

申诉类别 Grievance category	本期新增 New cases	登记结案 Recorded as closed
劳动与人权 Labour and human rights	22	22
职业健康与安全 Occupational health and safety	1	1
社区与利益相关方 Community and stakeholders	1	1
法律合规与商业道德 Legal compliance and business ethics	1	1
合计 Total	**25**	**25**

期初与期末未结案件均为 0 件，本期重启 0 件，新增案件登记结案率为 100%。登记结案反映办理状态，不等于所有诉求得到支持、申诉人全部满意或后续补救和监测已经结束。收到新证据、合理异议或发现措施失效时，公司复核并视情况重新调查。

There were no open cases at the start or end of the period and no reopened cases. The recorded closure rate for new cases was 100%. Closure describes handling status; it does not mean that every claim was upheld, every complainant was satisfied or all remedy and monitoring were complete. New evidence, reasonable objections or ineffective measures trigger review and, where necessary, reinvestigation.

申诉来自 KMC 员工 19 件、求职或离职人员 3 件、承包商员工 2 件及社区成员 1 件。社区车辆超速事项按问题性质列入职业健康与安全类别。申诉数量较少或未登记申诉，不作为相应群体或领域不存在风险的依据。

KMC employees submitted 19 cases, job applicants or former employees three, contractor employees two and a community member one. The community speeding complaint is classified under occupational health and safety. Few or no recorded grievances do not establish the absence of risk.

2 主要诉求与公司回应 Concerns and responses

薪酬休假与生活服务 Pay and employee welfare

针对工资绩效、休假待遇及餐食诉求，公司开展标准解释和核查，调整餐食安排并监督工时和休息。离职结算中发现的未休假折现款已补付，经人事与财务核实；后续检查将纳入休假余额和款项核对。

KMC reviewed concerns about pay, performance, leave and meals, explained applicable criteria, adjusted meal arrangements and monitored working hours and rest. Outstanding payment for untaken leave in a termination settlement was paid and verified by Human Resources and Finance. Further checks will cover leave balances and payment reconciliation.

工作场所行为 Workplace conduct

对不公平待遇及骚扰相关诉求，公司采取标准解释、自愿协商、行为辅导和政策培训。部分当事人接受解释或协商安排，公司继续跟踪职场行为和报复风险，保留其他合法救济途径。

Concerns about unfair treatment and harassment were addressed through explanations, voluntary dialogue, conduct coaching and policy training. Some parties accepted the explanations or dialogue arrangements. KMC continues to monitor workplace conduct and retaliation risks, while preserving access to other lawful remedies.

社区交通安全 Community road safety

社区车辆超速事项经调查确认后，公司按纪律程序处理，对相关驾驶人员开展交通安全再培训，并持续检查驾驶行为。

Following confirmation of the community speeding complaint, KMC took action under its disciplinary procedure, provided refresher road-safety training to the drivers concerned and continued checks on driving behaviour.

费用争议与承包商相关诉求 Fee dispute and contractor concerns

费用争议因现有证据不足、补充材料要求未获回复而完成本阶段办理并登记结案，收到新证据后复核。另一起承包商交通及待遇诉求，现有信息未显示所述情节与 KMC 或其分包商有关，公司保留补充信息和复核途径。

The fee dispute was recorded as closed after the current handling stage because evidence was insufficient and a request for further material received no response; new evidence will prompt review. For a separate contractor transport and entitlement grievance, available information did not indicate a connection with KMC or its subcontractors. Further information and review remain available.

合规管理及其他劳动事项 Compliance and other labour matters

本期 25 件申诉中未登记明确涉及贿赂或腐败的举报；该统计仅反映申诉记录。2026 年 8 月底，矿区光伏项目承建方发生员工罢工，随后达成和解意向并签署自愿复工确认书。KMC 通过电力采购关系和项目沟通跟踪和解履行、劳动权益及报复风险；该事项未另计入 25 件申诉。

None of the 25 grievances was explicitly registered as a bribery or corruption report; this statement is limited to grievance records. In late August 2026, workers of the contractor building the on-site photovoltaic project went on strike. A settlement understanding and voluntary return-to-work confirmations followed. Through its power-purchase relationship and project engagement, KMC will monitor settlement implementation, labour rights and retaliation risks. This matter is not counted as an additional grievance.

3 申诉渠道与办理保障 Access and safeguards

渠道 Channel	联系方式及使用方式 Contact and access
公司邮箱 Company email	KMC@scyahua.com
电话及即时通讯 Phone and messaging	+263773718612 电话、WhatsApp 及短信 Phone, WhatsApp and SMS
集团升级渠道 Group escalation	esg@scyahua.com 可直接反映或申请复核，无需事先取得雇主、主管或社区代表同意。 Direct reporting or review without prior permission from an employer, supervisor or community representative.
当面或口头报告 In person or orally	联系主管、综合部、工人委员会或社区联络人员；可绕过被投诉的主管。 Contact a supervisor, General Administration, the Workers' Committee or community liaison personnel. A supervisor who is the subject of a complaint may be bypassed.
信函及意见箱 Letters and suggestion boxes	意见箱设于选厂一车间中控室外墙、二车间化验室外墙、员工食堂及社区商业街，每周五开箱。 Boxes are on the outer wall of the Workshop 1 control room, the outer wall of the Workshop 2 laboratory, at the staff canteen and on the community commercial street. They are opened every Friday.

紧迫危险请同时通过电话或当面报告，公司立即安排保护和调查。申诉免费受理，可实名或匿名提交，支持中文、英语、绍纳语和恩德贝莱语，并提供口述记录、翻译及线下协助；申诉人可选择可信任的代表参与。

Report urgent danger by telephone or in person as well, so that protection and investigation can begin immediately. Grievances are received free of charge, with or without a name. Support is available in Chinese, English, Shona and Ndebele, including oral recording, interpretation and in-person assistance. Complainants may choose a trusted representative.

综合部统一登记和协调办理，按程序确认收讫、说明承办人及预计时限，经调查后反馈结论和复核途径；延期时说明原因及下一次反馈时间。涉及办理人员的事项实行回避，补救履行及回访分别跟踪。

General Administration registers and coordinates cases, acknowledges receipt and explains the case handler and expected timeframe. Investigation findings and review options are communicated to the complainant. Delays are explained with a revised feedback date. Conflicts of interest require recusal; remedy implementation and follow-up are tracked separately.

公司保护申诉人及证人的身份和敏感信息，禁止威胁、惩罚性调岗、解雇或其他报复，不强迫当事人与被投诉人对质。申诉人可直接寻求劳动、行政、司法或其他合法救济，无需先完成内部程序；补救不以撤诉、放弃权利或作出满意评价为条件。

KMC protects complainant and witness identities and sensitive information, prohibits threats, punitive transfers, dismissal and other retaliation, and does not compel confrontation with the person complained against. Complainants may directly seek labour, administrative, judicial or other lawful remedies without first completing the internal process. Remedy is not conditional on withdrawing a complaint, waiving rights or giving a favourable satisfaction rating.

4 机制评审与后续改进 Review and improvements

2026 年 9 月 1 日至 10 日的人权尽职调查取得 338 份有效问卷，其中员工问卷 109 份、承包商员工 164 份、社区成员 65 份。调查反映，承包商人员和社区成员对安全反映问题的信任低于渠道知晓程度，并担心身份暴露、不利对待及结果反馈。公司据此改进渠道与保护措施；调查反馈不计入本期申诉数量，也不等同于已确认违规或案件满意度。

Human rights due diligence on 1–10 September 2026 obtained 338 valid questionnaires: 109 from employees, 164 from contractor employees and 65 from community members. Contractor personnel and community members reported greater awareness of channels than confidence in reporting safely, with concerns about identification, adverse treatment and outcome feedback. KMC is using these findings to improve access and protection. Survey responses are not counted as grievances, confirmed violations or case satisfaction ratings.

2026 年 9 月另接收 2 件社区相关事项，均已登记结案，纳入 2026 年 9 月 1 日至 2027 年 8 月 31 日的下一报告年度，保留新信息复核及安全反馈安排。

Two additional community-related matters received in September 2026 were recorded as closed. They belong to the next reporting year, 1 September 2026–31 August 2027, with arrangements for review of new information and safe feedback retained.

下一年度重点安排 Priorities for the next reporting year

2026 年 10 月 15 日前完成首轮案件与补救跟踪；10 月底前完成重点案件复核、渠道测试及相关业务检查，并开展主管和受理人员培训。重点核对结果送达、措施履行、当事人意见及保密条件。

KMC will complete the first round of case and remedy tracking by 15 October 2026, followed by priority-case reviews, channel tests and operational checks by the end of October, alongside training for supervisors and intake staff. Checks will cover outcome delivery, implementation, the parties' views and confidentiality.

2026 年 11 月底前，邀请工人委员会、承包商人员、社区及弱势群体参与机制共同评价，反馈公司对相关意见的回应；此后按季度检查渠道运行和改进效果。

By the end of November 2026, KMC will invite the Workers' Committee, contractor personnel, communities and vulnerable groups to jointly evaluate the mechanism and will explain its responses to their input. Channel operation and the effectiveness of improvements will be reviewed quarterly thereafter.

按程序在结案后 30 日内回访，重点措施实施后 6 个月内复核，分别评价措施完成和补救效果；紧迫风险立即处置。下一年度结果于 2027 年 8 月 31 日汇总，年度报告于 2027 年 9 月 30 日前完成。

Under the procedure, KMC will follow up within 30 days of closure and review priority measures within six months of implementation, assessing completion and remedy effectiveness separately. Urgent risks will be addressed immediately. Annual results will be consolidated by 31 August 2027 and the next report completed by 30 September 2027.

公开信息与意见反馈 Public information and feedback

欢迎通过本摘要所列渠道，就办理公平性、保密、补救效果及机制改进提出意见，或申请可公开的监管合规事项与处置摘要。公司通过网站及员工、承包商和社区可获取的方式提供信息。本摘要按主题匿名汇总，不披露申诉人、证人姓名、可识别身份的案件编号及敏感细节。

Please use the listed channels to comment on fairness, confidentiality, remedy or improvements, or to request disclosable summaries of regulatory compliance matters and responses. KMC provides information through its website and means accessible to workers, contractors and communities. This summary groups matters by theme and excludes complainant and witness names, identifying case numbers and sensitive details.

公司网站 Company website http://www.kamativi.cn/

资料来源：《KMC 申诉与合规报告》2026 年 10 月 8 日更新版。
Source: KMC Grievance and Compliance Report, updated 8 October 2026.