

# KMC 申诉管理程序

## KMC Grievance Mechanism Procedure

### 一、目的

#### I. 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 promptly identify and address various environmental and social risks and potential impacts that may exist within Kamativi Mining Company Limited (KMC), continuously enhance the company's management capabilities and transparency, establish harmonious and mutually beneficial relationships with all stakeholders, and safeguard their legitimate rights and interests, this Grievance Mechanism Procedure is hereby established.

This procedure is designed to establish and operate KMC's operational-level grievance mechanism, ensuring it is legitimate, accessible, predictable, equitable, transparent, and rights-compatible.

### 二、适用范围

#### II. Scope of Application

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 stakeholders of KMC, including but not limited to workers (including employees, contractors, and subcontractors), suppliers, affected communities, partners, agents, and any individual or group who is affected or perceives themselves to be affected by the company's operations.

## 2.1 利益相关方参与年度评审

### 2.1 Stakeholder Engagement in Mechanism 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 establishment and update of this mechanism shall be led by the General Affairs Department, in collaboration with the Logistics Department and the Workers' Committee, and with the meaningful participation of representatives from affected communities, contractors, and vulnerable groups in the design and review process. Reviews shall be conducted at least annually (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 evaluate: channel effectiveness, timeliness of resolution, complainant satisfaction, remedy implementation rate, recurrence rate, accessibility (e.g., language, physical access, cost), and recommendations for improvement. The findings of the review 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 Prior to any major changes, the company shall engage in meaningful consultation with stakeholders and publicly communicate updates regarding the

mechanism and its channels.

### 三、名词解释

#### III. 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:

Refers to a formal complaint or concern raised by stakeholders regarding actual or perceived adverse impacts or suspected violations of laws and regulations, social performance, environmental protection, human rights, ethical business conduct, or security management arising from the company's operations.

##### 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 / Remediation:

Measures to counteract or make good an adverse impact, which may include ceasing the harm, restitution, compensation, rehabilitation, apologies, and guarantees of non-repetition.

### 四、职责

#### IV. Responsibilities

综合部 Admin 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。  Leading system and channels, unpacking and registration, issuance of receipts, public disclosure, annual review.
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后勤部 SupportDepartment	受理外部申诉、统计披露、社区沟通。 Handling external complaints,statistical disclosure,andcommunitycommunication.
工会 Trade union	受理内部员工申诉、参与调查并监督利益冲突回避 Handle internal employee Grievances, participate in investigations and supervise the avoidance of conflicts of interest.
分管副总/总经理 Deputy General Manager/General Manager in charge	负责升级复核与资源保障；必要时引入独立第三方 Responsible for upgrade review and resource guarantee; introduce independent third parties when necessary.

## 五、作业程序

### V. Operational Procedures

#### 5.1 申诉的内容

##### 5.1 Subject Matter 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、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）、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 raise concerns, suggestions, or grievances regarding violations of laws, regulations, and social responsibilities caused, contributed to, or directly linked to the company's products, the mining, trading, processing, import/export of responsible minerals, operations, and business relationships. This particularly includes requirements for supply chain due diligence, such as: child labor/underage labor, human rights abuses, workplace harassment and gender-based violence (GBV), adverse environmental or social impacts, unfair or unjustified dismissal, forced labor, modern slavery, bribery, money laundering, discrimination (including but not limited to race, color, age, gender, sexual orientation, ethnicity, religion, marital status, disability, pregnancy, etc.), unknown mineral origins, and incidents involving any public or private security providers. Additionally, stakeholders affected during the planning or implementation of the company's reclamation and closure processes may also express their demands or file grievances through this mechanism.

5.1.2 可接受满足以下条件的申诉：

5.1.2 Eligibility Criteria for Grievances:

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 Related to the company's social performance, supply chain due diligence, including any identified actual or potential risks and impacts.

5.1.2.2 指出管理系统的缺陷、不一致或不足。

5.1.2.2 Identifies flaws, inconsistencies, or deficiencies 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 Includes sufficient objective evidence to reasonably support the complainant's allegations.

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 Violates the documented policies and requirements of KMC.

5.1.2.5 本着诚信提交。

5.1.2.5 Submitted in good faith.

5.1.3 不接受以下条件的申诉：

5.1.3 Ineligible Grievances:

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 Not related to the company's social performance 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 Related to issues beyond the company's control, influence, or responsibility.

5.1.3.3 缺少合理支持申诉的足够客观证据。

5.1.3.3 Lacks sufficient objective evidence to reasonably support the grievance.

5.1.3.4 未本着诚信提交。

5.1.3.4 Not submitted in good faith.

5.1.4 机制公开：

5.1.4 Public Awareness and Disclosure:

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 The company shall publicly disclose the summary of the grievance mechanism, all available channels, scope of eligibility, processing timelines, complainant rights, and access to external remedy pathways (including IRMA/RMI/RCI platforms) on its official website, public notice boards, and community announcements, and shall

update them annually.

## 5.2 申诉方式

### 5.2 Grievance 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 Verbal report to a supervisor.

5.2.1.2 写申述信投入意见箱。

5.2.1.2 Submit a written grievance via the 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 grievance hotline: +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 Channels:

Corporate Social Responsibility public email (esg@scyahua.com).

#### 5.2.3 行业申诉方式：

##### 5.2.3 Industry Grievance Mechanisms:

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

5.2.3.1 RCI (Responsible Critical Mineral Initiative): <https://www.cccmc.org.cn/>

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

5.2.3.2 RMI (Responsible Minerals Initiative): <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 Before and after the IRMA audit (from the self-assessment phase through the corrective action period), the company shall provide links and contacts for IRMA-related feedback channels in its public announcements, encouraging stakeholders to report directly to the IRMA-designated platform when necessary.

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 bear any costs or fees associated with filing a grievance.

5.2.4.2 申诉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 choose a language they understand to file a grievance, either under their real name or anonymously.

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 initiated by an individual or a group. The complainant has the right to freely decide whether they need a representative and may freely choose their 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 necessary information, advice, and expertise to engage in the grievance process under equitable, informed, and respectful conditions, and retains the right to withdraw from the process at any time.

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 or accommodations from the company 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 Operational Management Requirements 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 The company strictly prohibits charging any fees for processing grievances.

5.2.5.2 意见箱放置在不被监控地段，尊重员工选择匿名申述的权利。

5.2.5.2 Suggestion boxes shall be placed in areas without CCTV surveillance to protect employees' right to file anonymous grievances.

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 The company shall not interfere with the complainant's choice of representation.

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 The company shall provide necessary support and reasonable accommodations based on the complainant's needs, provided the request is reasonable and within the company's capacity. Support shall be tailored for complainants with special needs (e.g., language barriers, cultural differences, or disabilities).

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 resolving the grievance must complete the "Grievance Form" based on the actual investigation. The form must include the description of the grievance, investigation findings, proposed resolution, coordination outcomes, and the implementing department. If the complainant is identified, they must sign the "Grievance Form" to confirm. If a grievance is deemed ineligible, the reasons must be explained and recorded in the "Record of Ineligible Grievances".

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 shall have access to necessary case-related information (provided that privacy and commercial confidentiality are not compromised).

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 The company may provide the complainant with referrals or financial assistance for legal, translation, or technical advice (depending on the specific case and local resources).

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 choose a representative to participate in key milestone meetings and sign documents on their behalf.

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 The company shall maintain the confidentiality of the detailed "Grievance Form". Anonymous grievances shall strictly not be publicized in a manner that could identify the complainant.

5.2.6 可及性承诺

## 5.2.6 Accessibility Commitments

5.2.6.1 公司不收取任何费用；受理匿名/实名。

5.2.6.1 Processing is completely free of charge; both anonymous and identified grievances are accepted.

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: English, Shona, Ndebele, Chinese. For non-literate complainants, Community Liaison Officers (CLOs) can assist in verbally recording the grievance.

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: Suggestion boxes and notice boards are installed in communities, offices, camp gates, and processing plant notice areas. Boxes shall be jointly opened and recorded every Friday by the General Affairs Department and the Workers' Committee.

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 Provide reasonable accommodations (e.g., accompaniment, accessible pathways, translation) for vulnerable groups (including minors under guardianship, pregnant women, persons with disabilities, and non-literate individuals). The General Affairs Department shall check and document the accommodations provided on the "Grievance Register".

5.3 申诉程序与时限：

### 5.3 Grievance Procedure and Timelines:

5.3.1 受理与登记（3 个工作日内）：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 Receipt and Registration (Within 3 working days): Within 3 working days of opening the box/receiving the grievance, the General Affairs Department shall log it and issue an "Acknowledgement of Receipt" (including case number, assigned handler, target completion date, complainant rights, and available 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 verbal reporting to a supervisor: Report to the immediate department head. Any manager who is capable of resolving the issue shall do so promptly and inform their superior. Unresolved issues shall be escalated to the next management level.

5.3.2 筛选与分流（5 个工作日内）：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 Routing (Within 5 working days): Upon receiving the materials, the General Affairs Department fills out the "Grievance Form," assigns a responsible unit/person, and completes the eligibility review (checking scope, evidence sufficiency, and need for emergency response). A conflict of interest check and recusal process must be conducted. External grievances are routed to the Logistics

Department; internal grievances are routed to 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 (Within 15 working days): Conduct the investigation, ensure at least one face-to-face or equivalent consultation with the complainant, and outline feasible remedial options and estimated timelines.

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 Resolution and Remedy (Within 5 working days): Finalize the "Grievance Register" and the remediation plan. If ineligible, provide written justification and inform the complainant of the appeals process or external access to remedy.

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

5.3.5 Appeal / Review (Within 15 working days): If dissatisfied, the complainant may appeal once. The case will be reviewed by senior 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 Closure and Follow-up (Within 30 days): Monitor the implementation of the remedy, and complete a follow-up visit and complainant satisfaction log within 30 days of case closure.

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/high-risk situations (e.g., imminent physical or safety risks),

immediate protective measures shall be taken, and the case marked as "Urgent" in the Grievance 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 remains dissatisfied with the investigation or actions taken, they may escalate the grievance. The company will conduct further research to determine and implement a deeper action plan.

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 an agreement still cannot be reached, the complainant may seek non-company resolution pathways, including but not limited to engaging external experts for review, third-party mediation, or judicial mechanisms.

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 The company shall disclose aggregated grievance statistics (volume, type, resolution rate, average processing time, and percentage resolved via remedy) internally on a semi-annual basis and externally on an annual basis. Institutional-level improvements shall also be shared. All disclosures must be de-identified to protect personal privacy and commercial confidentiality.

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 Regular monitoring and evaluation. An assessment of the improvements shall be conducted within one year post-closure to ensure the long-term effectiveness of

corrective measures and refine the process through feedback.

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 must be entered into the company's risk register and Corrective and Preventive Action (CAPA) system. The responsible department shall report the closed-loop status during management reviews.

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 Record Retention. All grievance records shall be retained for at least five years. Data on grievance types, frequencies, and outcomes shall be periodically analyzed to identify potential systemic issues and enact preventive measures.

5.3.12 与权利相容的补救

5.3.12 Rights-Compatible Remedy

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 rights. The hierarchy and examples include:

a) 停止与预防：立即停止造成损害的行为，采取保护措施；

a) Cease and prevent: Immediately halt the behavior causing the harm and take protective measures;

b) 复位/复工或替代安排；

b) Restitution / Reinstatement or alternative arrangements;

c) 补偿/赔偿（含经济与非经济损失）；

c) Compensation (including economic and non-economic damages);

d) 康复（医疗/心理/培训）；

- d) Rehabilitation (medical, psychological, or training support);
- e) 道歉与解释;
- e) Apologies and explanations;
- f) 保证不再发生（制度修订、培训、监督与问责）。
- f) Guarantees of non-repetition (policy revision, training, enhanced supervision, and accountability).
- g) 所有补救须与申诉人协商确认，并在《申诉处理记录表》记录。
- g) All remedies must be mutually agreed upon with the complainant and documented in the Grievance Register.

#### 5.4 无报复政策与信息保密

##### 5.4 Non-Retaliation Policy and 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 The company shall adhere to the principles of factuality, procedural justice, confidentiality, and timeliness when handling grievances. Handlers must maintain strict confidentiality of the complainant's identity. Grievance files are managed as strictly confidential materials and cannot be accessed without approval from the Sustainability Committee. It is strictly forbidden to share grievance materials with the subject of the complaint to protect the complainant's legal rights and prevent retaliation or reprisal. Retaliatory actions include, but are not limited to: bullying,

unlawful termination or withdrawal of benefits, reduction of compensation, unjustified poor performance evaluations, exclusion from company activities/meetings, character defamation, unwarranted disciplinary action, unfair dismissal, or workplace ostracism.

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 In cases of grievances or whistleblowing against a superior, to prevent the superior from abusing their position to retaliate, the General Affairs Department will assess the situation and, if necessary, consult with higher management to arrange a temporary or permanent job transfer for one of the involved 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 they have suffered retaliation in violation of this policy, they may escalate the issue to their direct supervisor or the head of the General Affairs Department. External complainants may seek recourse through industry associations or national judicial authorities. Severe breaches of confidentiality resulting in harm to the complainant's legal rights will be referred to judicial authorities for prosecution.

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 Any confirmed act of retaliation (including threats, pay cuts, dismissal, marginalization, stigmatization, or withdrawal of benefits) will be met with severe disciplinary action under company policy and contract terms. For external contractors, this may result in suspension of payments, contract termination, or blacklisting.

## 六、组织与职权

### VI. Roles and Responsibilities

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 Lead the system and channel management, box opening, registration, issuance of acknowledgments, public disclosure, and annual reviews.

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 Support Department: Handle external grievances, execute statistical disclosure, 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: Handle internal employee grievances, participate in investigations, and manage recusal protocols.

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 Path: In cases involving conflicts of interest within the handling department, or upon the complainant's request for higher-level review, the case shall be escalated to the Vice President or General Manager. If unresolved, independent third-party mediation or judicial mechanisms shall be introduced.

## 七、注意事项

### VII. Important Notes

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 must be submitted in good faith. Anonymous grievances should provide as much factual basis as possible. All handling personnel are required to undergo anti-retaliation and confidentiality training.

## 八、附件

### **VIII.Attachments**

8.1 《申诉表》

8.1 "Grievance Form"

8.2 《申诉处理记录表》

8.2 "Complaint Handling Record Form"

8.3 《拒绝请求记录表》

8.3 Record of Rejected Requests

Kamativi Mining Company (Private) Limited

Executive Director: 

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