

# KMC人权尽职调查公开报告（摘要版）

## KMC Public Disclosure on Human Rights Due Diligence (Summary)

发布主体 Issuing Entity	Kamativi Mining Company (KMC)
公开目的 Purpose of Disclosure	对外披露KMC人权尽职调查方法、突出人权风险与影响、已采取措施及申诉补救机制运行情况。 To publicly disclose KMC's human rights due diligence approach, material human rights risks and impacts, measures taken, and the operation of the grievance and remedy mechanism.
主要依据 Key References	《KMC人权尽职调查报告》 KMC Human Rights Due Diligence Report. 《KMC人权风险影响评估报告》 KMC Human Rights Risk and Impact Assessment Report. 《KMC申诉与合规报告》 KMC Grievance and Compliance Report.
覆盖期间 Coverage Period	2025年1月1日—2025年12月31日 January 1, 2025 – December 31, 2025
发布频次 Publication Frequency	原则上每年公开一次；如发生重大人权影响事件，将在适当范围内及时更新摘要。 Annually in principle; timely summary updates will be issued as appropriate in the event of a material human rights impact incident.

**说明：**本文件为公开摘要版，供公司官网及对外沟通使用。为保护个人隐私、商业机密、现场安全及相关权利持有人免受进一步伤害，完整受控版报告未在公开版中全文披露；必要时，KMC将通过定向沟通、社区会议或书面说明向相关方进一步说明。

**Note:** This document is a public summary for the company website and external communications. To protect personal privacy, commercial confidentiality, on-site safety, and rightsholders from further harm, the full controlled version is not disclosed in the public edition. Where necessary, KMC will provide further details to relevant parties via targeted communication, community meetings, or written briefings.

## 一、公司承诺与治理框架

### I. Company Commitment and Governance Framework

KMC承诺尊重并促进国际公认人权，遵循《联合国工商企业与人权指导原则》(UNGPs)、国际劳工组织(ILO)八项核心公约、OECD尽职调查指南以及IRMA《负责任采矿标准》相关要求，将人权要求嵌入招聘、用工、承包商管理、社区沟通、安全管理和申诉补救流程。公司已建立由高级管理层牵头、综合部门统筹、业务、物流、安全生产、机电、采矿及选厂等部门协同参与的人权尽职调查治理框架。

KMC is committed to respecting and promoting internationally recognized human rights, in line with the UN Guiding Principles on Business and Human Rights (UNGPs), the eight core ILO Conventions, the OECD Due Diligence Guidance, and the IRMA Standard for Responsible Mining. Human rights requirements are embedded in recruitment, employment, contractor management, community engagement, safety management, and grievance and remedy processes.

- **管理承诺：**公司反对童工、强迫劳动、歧视、骚扰和报复。

**Management Commitment:** The company prohibits child labor, forced labor, discrimination, harassment, and retaliation.

- **制度基础：**公司已发布人权政策声明、反歧视管理规定、反人口贩运程序、自由择业控制程序、薪酬福利控制程序、申诉控制程序等制度。

**Institutional Foundation:** The company has issued policies including a Human Rights Policy Statement, Anti-Discrimination Rules, Anti-Trafficking in Persons Procedures, Free Choice of Employment Procedures, Remuneration and Benefits Procedures, and Grievance Handling Procedures.

- **闭环管理：**对识别出的不利影响实施"预防—制止/减轻—补救—跟踪—披露"的持续改进机制。

**Closed-Loop Management:** A continuous improvement mechanism of "Prevent – Stop/Mitigate – Remedy – Monitor – Disclose" is applied to identified adverse impacts.

## 二、尽职调查范围与方法

### II. Due Diligence Scope and Methodology

本公开摘要综合KMC人权尽调、风险影响评估和申诉合规报告形成，覆盖KMC在津巴布韦Kamativi矿区直接控制的运营活动及关键业务关系，重点关注员工、承包商/供应商、周边社区及其他相关利益相关方。

This public summary is compiled from KMC's human rights due diligence, risk and impact assessment, and grievance compliance reports. It covers directly controlled operations and key business relationships at the Kamativi Mine in Zimbabwe, focusing on employees, contractors/suppliers, neighboring communities, and other relevant stakeholders.

- **评估对象：**员工、女性员工、承包商/供应商、社区居民、客户及其他相关方。

**Assessment Subjects:** Employees, female employees, contractors/suppliers, community members, customers, and other relevant parties.

- **主要方法：**文件和记录审查、结构化访谈、焦点小组讨论、标准化问卷、利益相关方映射、申诉数据分析、二维风险矩阵评分。

**Key Methods:** Document and record review, structured interviews, focus group discussions, standardized questionnaires, stakeholder mapping, grievance

data analysis, and two-dimensional risk matrix scoring.

- **咨询样本：**共覆盖 566 名相关方，其中员工 418 人、承包商/供应商 80 人、社区居民 68 人；访谈与沟通采用英语和绍纳语，并视需要提供协助。

**Consultation Sample:** A total of 566 stakeholders were engaged, including 418 employees, 80 contractors/suppliers, and 68 community members. Interviews and engagement were conducted in English and Shona, with assistance provided as needed.

- **显著性判定：**结合发生可能性与影响严重程度识别突出人权议题，并对涉及妇女、儿童、残障人士及其他弱势群体的风险提高关注权重。

**Significance Determination:** Material human rights issues are identified based on likelihood and severity of impact, with heightened weighting for risks affecting women, children, persons with disabilities, and other vulnerable groups.

### 三、已识别的突出人权风险与影响

### III. Identified Material Human Rights Risks and Impacts

综合评估结果显示，当前报告期内KMC重点关注以下五类突出议题：

The consolidated assessment identifies five material human rights issues as key focus areas for KMC in the reporting period:

编号 No.	突出风险/影响 Material Risk/Impact	受影响群体 Affected Groups	公开摘要说明 Public Summary Description	优先级 Priority
R1	承包商和供应商用工权利 Labor rights of contractors and suppliers	承包商、供应商 员工 Contractor and supplier employees	部分外包岗位曾存在合同签署不规范、工资发放不及时、培训不足等风险。 Risks including non-standard contract signing, delayed wage payment, and insufficient training existed in some outsourced positions.	高 High

编号 No.	突出风险/影响 Material Risk/Impact	受影响群体 Affected Groups	公开摘要说明 Public Summary Description	优先级 Priority
R2	社区水资源影响 Community water resource impacts	周边社区居民 Neighboring community members	旱季取水和生产活动可能对社区日常用水带来压力，妇女承担更高家庭用水负担。 Dry-season water abstraction and operations may strain community domestic water supply, with women bearing a higher burden of household water collection.	高 High
R3	弱势群体参与不足 Insufficient participation of vulnerable groups	妇女、残障人士、边缘化群体 Women, persons with disabilities, marginalized groups	部分弱势群体获取信息、参与表达和使用申诉渠道的便利性仍需提升。 Access to information, participation, and grievance channels for some vulnerable groups needs improvement.	中-高 Medium-High
R4	平等机会与反歧视 Equal opportunity and anti-discrimination	员工及社区相关方 Employees and community stakeholders	跨文化、性别与工作机会公平方面仍存在持续改进空间。 Continuous improvement is needed in cross-cultural, gender, and equal employment opportunity practices.	中 Medium
R5	申诉渠道知晓与使用 Awareness and use of grievance channels	员工与社区成员 Employees and community members	部分员工和社区成员对申诉机制、流程和时限认知不足。 Some employees and community members lack awareness of grievance mechanisms, procedures, and timeframes.	中 Medium

#### 四、已采取的主要行动及阶段性效果

#### IV. Key Actions Taken and Interim Results

针对上述突出风险，KMC已实施以下重点措施，并持续跟踪其效果：

In response to the above material risks, KMC has implemented the following key measures and continues to monitor their effectiveness:

编号 No	主要措施 Key Measures	阶段性效果 Interim Results	后续重点 Next Steps
R1	建立/强化供应商与承包商评估、合同审查、入场培训和现场抽查机制；对不符合要求情形实施限期整改。 Establish/strengthen contractor/supplier assessment, contract review, onboarding training, and on-site auditing; require timely corrective actions for non-compliance.	承包商合同覆盖率和首次培训覆盖率达到100%；完成2轮现场抽查；整改闭环率92%。 100% contractor contract coverage and initial training; 2 rounds of on-site audits completed; 92% corrective action closure rate.	继续完善供应链尽调工具，将人权要求前移至招采与准入环节。 Further refine supply chain due diligence tools and embed human rights requirements into procurement and onboarding.

编号 No	主要措施 Key Measures	阶段性效果 Interim Results	后续重点 Next Steps
R2	建设社区支持性供水设施，设立社区联络点，建立季度沟通和供水监测机制。 Construct community water supply facilities, set up community liaison points, and establish quarterly engagement and water monitoring mechanisms.	2处太阳能井投入运行；组织3次季度沟通会议；水相关投诉已受理并跟进。 2 solar-powered boreholes operational; 3 quarterly community meetings held; water-related complaints received and addressed.	持续监测旱季影响，强化与社区共享信息和快速响应。 Continue monitoring dry-season impacts, strengthen information sharing and rapid response with the community.
R3	改进宣传材料可视化和多语言设计；提升评估人员包容性意识；优化无障碍表达与反馈渠道。 Enhance visual and multilingual design of outreach materials; build assessors' inclusivity awareness; optimize accessible feedback channels.	相关覆盖持续扩大，社区中妇女和残障人士反馈参与度有所提升。 Expanded coverage; increased feedback participation by women and persons with disabilities in the community.	进一步提高弱势群体参与率与反馈可得性。 Further increase participation and feedback accessibility for vulnerable groups.
R4	制定并推进反歧视管理要求，开展多语言培训和公平机会引导，推动女性发展支持。 Develop and implement anti-discrimination requirements, deliver multilingual training and equal opportunity promotion, and support women's development.	报告期内收到并处理相关个案，处理时效较快；女性管理人员占比开始提升。 Relevant cases received and resolved promptly; female management representation increased.	继续提升多元、公平与包容（DEI）管理成熟度。 Further advance maturity in Diversity, Equity, and Inclusion (DEI) management.
R5	扩展热线、邮箱、意见箱、二维码等渠道；明确处理时限；培训受理人员并加强宣传。 Expand channels including hotline, email, suggestion boxes, and QR codes; clarify response timeframes; train handlers and strengthen outreach.	共收到29件投诉/申诉，年内处理26件，整体解决率90%，平均处理周期15天；截至年末仍有3件持续跟进，预计于2026年一季度完成；未报告报复事件。 29 complaints/grievances received; 26 closed in the year (90% resolution rate), average 15-day handling time; 3 ongoing as of year-end, targeted for Q1 2026 closure; no retaliation reported.	加强承包商与社区宣传，完善复杂事项快速响应和根因分析。 Strengthen outreach to contractors and the community; improve rapid response and root-cause analysis for complex matters.

## 五、申诉与补救机制

### V. Grievance and Remedy Mechanism

KMC面向员工、承包商、供应商、分包商、社区成员及其他相关权利持有人运行可及、保密、透明且反报复的申诉与补救机制。

KMC operates an accessible, confidential, transparent, and anti-retaliatory grievance and remedy mechanism for employees, contractors, suppliers, subcontractors, community members, and other relevant rightsholders.

- 机制运行数据会通过公司官网、季度社区会议、KMC工人委员会等渠道摘要披露。

Mechanism performance data is disclosed in summary form via the company website, quarterly community meetings, and the KMC Workers' Committee.

- 对涉及重大人权或环境影响的事项，KMC将在保护当事人安全和隐私的前提下向直接受影响方进行定向通知。

For matters involving material human rights or environmental impacts, KMC will issue targeted notifications to directly affected parties while safeguarding their safety and privacy.

- 机制数据会被定期分析，用于识别趋势、优化流程，并为管理改进和预防类似问题复发提供依据。

Mechanism data is regularly analyzed to identify trends, optimize processes, and drive management improvements to prevent recurrence.

**主要渠道/Main Channels:**

直属上级口头报告、意见箱书面提交、邮箱、电话、行业平台（RMI 等）。

Verbal report to line supervisor, written submission via suggestion box, email, telephone, industry platforms (e.g., RMI).

邮箱/Email: KMC@scyahua.com | 外部邮箱 External Email: esg@scyahua.com

热线/Hotline: +263 773 718 612

**语言与可及性/Language & Accessibility:**

可使用英语、Shona、Ndebele、中文等语言；

Available in English, Shona, Ndebele, Chinese, and other languages;

对不会书写者、未成年人监护人、孕妇、残障人士及非识字群体提供必要协助。

Assistance provided for non-literate individuals, guardians of minors, pregnant women, persons with disabilities, and illiterate groups.

<p><b>处理原则/Handling Principles:</b></p> <p>事实准确、公平公正、保密、及时、无报复。紧急事项通常在5个工作日内给予初步响应，一般事项通常在20个工作日内给予初步响应，并按程序完成调查、反馈与闭环。</p> <p>Factual accuracy, fairness, confidentiality, timeliness, and non-retaliation. Initial response within 5 business days for urgent matters and 20 business days for routine matters, with investigation, feedback, and closure completed per procedure.</p>
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## 六、2026年持续改进重点

### VI. 2026 Continuous Improvement Priorities

改进方向 Improvement Area	主要动作 Key Actions	计划时间 Planned Timeline
承包商与分包商覆盖不足 Insufficient coverage of contractors and subcontractors	将申诉机制和人权要求纳入入场必训，并在主要作业区域增设多语言海报。 Integrate grievance mechanism and human rights requirements into mandatory onboarding training; install multilingual posters in main work areas.	2026年3月 March 2026
社区渠道使用不便 Inconvenient community access to channels	指定社区联络员，定期开展居民告知和利益相关方会议。 Appoint community liaisons; conduct regular resident briefings and stakeholder meetings.	2026年5月 May 2026
复杂/环境类事项处理效率 Efficiency in handling complex/environmental matters	建立环境投诉快速响应机制和应急预案，必要时引入第三方优先服务。 Establish rapid response and emergency protocols for environmental complaints; engage third-party priority services where needed.	2026年8月 August 2026
满意度与根因分析不足 Insufficient satisfaction surveys and root-cause analysis	对闭环案件实施更标准化的满意度调查，并完善标签化根因分析。 Implement standardized satisfaction surveys for closed cases; enhance tagged root-cause analysis.	2026年8—12月 August – December 2026
一线管理能力建设 Frontline management capacity building	开展一线管理者冲突调解和申诉初步处理专项培训。 Deliver specialized training for frontline managers on conflict mediation and initial grievance handling.	2026年3月 March 2026

## 七、信息披露边界与外部沟通

### VII. Disclosure Boundaries and External Communication

本摘要报告旨在满足公开披露、社区沟通和利益相关方理解的需要，不替代完整受控版尽职调查和申诉档案。为兼顾透明度与风险控制，KMC在公开披露中遵循以

下原则：

This summary report is intended for public disclosure, community engagement, and stakeholder understanding, and does not replace the full controlled due diligence and grievance files. To balance transparency and risk management, KMC adheres to the following principles in public disclosure:

- **公开披露包括：**尽调方法、突出人权议题、主要行动、阶段性效果、申诉机制和持续改进计划。

**Disclosed items:** due diligence methodology, material human rights issues, key actions, interim results, grievance mechanism, and continuous improvement plan.

- **不公开或删减的信息包括：**个人身份信息、具体个案敏感细节、执法互动信息、商业秘密以及可能影响现场安全或造成进一步伤害的信息。

**Withheld or redacted information:** personally identifiable information, sensitive case details, law enforcement interactions, commercial secrets, and information that could compromise on-site safety or cause further harm.

- **对被删减信息，**KMC 将保留删减依据和版本记录，并通过社区会议、书面告知或定向沟通向直接受影响权利持有人进一步说明。

For redacted information, KMC will retain records of redactions and versions, and provide further explanation to directly affected rightsholders via community meetings, written notices, or targeted communication.

- **如后续形成外部监测发现和改进建议，**KMC将按适用要求另行公开摘要，并向相关利益相关者和权利持有人说明改进计划。

If external monitoring findings and improvement recommendations emerge,

KMC will issue a separate public summary as required and communicate the improvement plan to relevant stakeholders and rightsholders.

## 八、反馈与联系方式

### VIII. Feedback and Contact Information

反馈邮箱/Feedback Email	<a href="mailto:KMC@scyahu.com">KMC@scyahu.com</a> .
ESG联络邮箱/ESG Contact Email	<a href="mailto:esg@scyahu.com">esg@scyahu.com</a> .
披露渠道/Disclosure Channels	公司官网相关ESG/人权页面、季度社区会议、工人委员会沟通及必要的专门公告。 Relevant ESG/Human Rights pages on the company website, quarterly community meetings, Workers' Committee engagement, and targeted announcements as necessary .

KMC将持续根据利益相关方反馈、内部审计、社区沟通和申诉数据分析结果，不断改进人权尽职调查与补救实践。

KMC will continuously improve its human rights due diligence and remedy practices based on stakeholder feedback, internal audits, community engagement, and grievance data analysis.

Kamativi Mining Company

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本摘要基于公司2025年相关报告整合形成

This summary is compiled from the company's 2025 relevant reports