

金隆铜业有限公司

供应链合规管理申诉机制

为了及时识别和处理公司供应链可能存在的助长冲突或人权侵害等风险，保障内外部利益相关方与本公司的顺畅沟通，金隆铜业有限公司（以下简称“公司”）根据公司《矿产供应链尽责管理政策》制定本申诉机制。

1. 可以对哪些问题提起申诉？

符合以下条件的申诉将会被受理：

- 1) 与公司矿产供应链尽责管理相关。
- 2) 公司商业活动或者业务关系对利益相关方已经造成或可能造成了负面影响。
- 3) 公司商业活动或者业务关系违反了《经济合作与发展组织关于来自受冲突影响和高风险区域的矿石的负责任供应链尽职调查指南》、《中国矿产供应链尽责管理指南》、《LBMA 负责任白银指南》或公司《矿产供应链尽责管理政策》中的要求。

属于以下任意一项的申诉不会被受理：

- 1) 与公司尽责管理无关。
- 2) 无法提供充分证据或证人以支持指出的问题。
- 3) 恶意申诉或为获得竞争优势而发起的申诉。
- 4) 如果申诉的问题不属于公司内部机制所能够解决的范畴，我们将积极协调外部机构解决。

2. 谁可以提起申诉？

任何个人或团体，包括但不限于公司客户、供应商、受影响的社区居民、员工等，均可向公司供应链合规管理办公室提起申诉。

如果申诉由代表受影响方的第三方团体或个人提出，该机构或个人应明确说明其所代表的对象，并提供具备代表权的明确证据。

3. 如何提起申诉？

申诉者应填写附件一所示《供应链尽责管理申诉书》，语种不限。申诉书应通过电子邮件或邮寄至公司供应链合规管理办公室。

邮箱: jcc@jinlongcopper.com

地址: 中国安徽省铜陵市金山西路 1 号

申诉者亦可通过中国五矿化工进出口商会的《采矿业和矿产价值链调解磋商机制》¹以及 LBMA、RMI、RJC 合作开发的 Minerals Grievance Platform 进行申诉操作², 我们积极参与行业开展的制度化机制, 以期有效地解决争议问题, 加强各方的沟通、协调与合作, 传递各方的诉求和期望, 构建负责任、有韧性和可持续的矿产供应链。

4. 申诉处理流程

收到申诉材料后, 公司供应链合规管理委员会 (以下简称“委员会”) 通常按以下步骤采取行动:

第一步: 供应链合规管理办公室 (以下简称“办公室”) 向申诉者确认收到申诉材料 (实时)。

第二步: 办公室按照第一条申诉受理条件审查材料, 决定是否受理。办公室将是否受理的决定书面 (包括电子邮件或纸质文书) 通知申诉者。如果申诉者提供的信息不足以开展调查, 办公室将建议其在 30 天内提供更多信息, 否则无法受理。如果决定不予受理, 同时说明不予受理原因, 并将处理结果报送委员会 (收到材料后 7 个工作日内)。

第三步: 如果决定受理申诉, 委员会根据申诉内容组织委员会相关成员启动申诉调查程序, 以便与申诉相关方 (申诉者、被申诉对象, 以及可能存在的其他利益相关方) 展开合作, 深入全面了解申诉中提出的问题, 识别与申诉相关的更多利益相关方, 完成调查报告并提交给申诉者、被申诉对象和公司委员会 (决定受理申诉后 60 个工作日内)。

第四步: 解决争端。委员会联合申诉者和被申诉对象, 对争端提出双方都能接受的解决方案和程序, 推动双方达成书面共识。

第五步: 申诉者和被申诉对象合作执行达成共识的解决方案, 委员会负责监督执行。

第六步: 申诉者和被申诉对象双方接受解决方案的执行结果, 并签署执行结果确认

¹ 中国五矿化工进出口商会的《采矿业和矿产价值链调解磋商机制》, 可参考:
<https://www.cccmc.org.cn/kcxfzxx/zyzx/al/>

² Minerals Grievance Platform 是由 LBMA、RMI、RJC 共同开发的在线申诉平台, 可参考:
<https://www.mineralsgrievanceplatform.org/>

书，委员会决定结案。如果经过一轮或者几轮磋商，申诉者和被申诉对象中的任何一方不接受解决方案（第四步），或者不接受解决方案的执行结果（第五步），则可以寻求公司以外的解决途径，如第三方争端解决机构或专家等，公司内部申诉程序自动终结。办公室将申诉程序的最终结果通知申诉者、被申诉对象和公司委员会。

第七步：针对所有被受理的申诉，办公室将申诉书、调查报告、解决方案的书面共识、执行结果确认书等相关文件一并存档保管。

5. 冲突回避机制

申诉采用冲突回避机制，如委员会、办公室的任何人员与申诉者存在利益冲突，应回避申诉解决的过程。

本办法经公司审议批准之日起生效。

附件一《供应链尽责管理申诉书》



附件：

供应链尽责管理申诉书

申诉者名称（可匿名）		是否要求保密	
联系电话		电子邮箱	
是否为受委托的第三方		如是，受何人或何团体委托（同时附受委托证明）	
冲突回避	（如需要回避公司供应链合规管理委员会、合规管理办公室的特定人员，请列出其姓名）		
所遭受（或可能遭受）负面影响的事实和证据，以及其他任何能够支持申诉的信息（可附页，并附申诉证据）：			
您的诉求，以及实现诉求所希望采用的解决方案（明确且可操作的诉求能够帮助我们更快的帮您解决问题）			
申诉者代表签名：			
申诉日期：			

Jinlong Copper Co., Ltd.

Supply Chain Compliance Grievance Mechanism

To promptly identify and address risks in the company's supply chain that may contribute to conflict or human rights violations, and to ensure smooth communication between internal and external stakeholders, Jinlong Copper Co., Ltd. (hereinafter referred to as the "Company") has established this grievance mechanism in accordance with its "Mineral Supply Chain Due Diligence Policy".

1. What issues can be accepted?

Grievance that meet the following criteria will be accepted:

- 1) related to Jinlong's mineral supply chain due diligence;
- 2) business activities or business relationships have caused or may cause negative impacts;
- 3) business activities or business relationships violate the requirements of *The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*, *Chinese Due Diligence Guidelines for Minerals Supply Chain*, *LBMA Responsible Siver Guidance* or its *Mineral supply chain Due Diligence Policy*.

Grievance will NOT be accepted under any of the following:

- 1) not related to the Jinlong's supply chain due diligence ;
- 2) unable to provide sufficient evidence or witnesses to support the issues;
- 3) vicious grievance or to gain competitive advantages;
- 4) if the grievance do not fall within our internal mechanisms' scope, we will actively coordinate with an external organization to resolve it.

2. Who can file a grievance?

Any individual or group, including but not limited to our customers, suppliers, affected community residents, employees, etc., may file a grievance with the Joint Office of Supply Chain Due Diligence.

Suppose a third-party group or individual files grievance representing affected parties, they should clearly state who they represent and provide clear evidence of their authority.

3. How to file a grievance?

The complainant should complete the *Supply Chain Due Diligence Grievance Form* shown in Annex I in any language and send it to the Joint Office of Supply Chain Due Diligence by e-mail or post.

Email: jcc@jinlongcopper.com

Address: 1# Jinshan Road, Tongling, Anhui, P.R.China

The complainant may also file a complaint through the *Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain* of the China Chamber of Commerce for Metals, Minerals & Chemicals Importers & Exporters (CCCMC)³, as well as the *Minerals Grievance Platform*⁴ jointly developed by the LBMA, RMI, and RJC. We actively engage in institutionalized mechanisms within the industry to effectively resolve disputes, enhance communication, coordination, and cooperation among all parties, convey the demands and expectations of all parties, and build a responsible, resilient, and sustainable minerals supply chain.

4. Grievance Handling Process

Upon receiving a grievance, the Supply Chain Compliance Management Committee (hereinafter referred to as the "Committee") will typically follow these steps:

Step 1: The Supply Chain Compliance Management Office (hereinafter referred to as the "Office") confirms receipt of the grievance to the complainant in real time.

Step 2: The Office reviews the materials against the acceptance criteria (Section 1) and decides whether to accept the grievance. The complainant will be notified in writing (via email

³ Note: CCCMC- Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain, please refer to <https://www.cccmc.org.cn/kcxfzx/zyzx/al/>

⁴ The Minerals Grievance Platform is an online complaint platform jointly developed by the LBMA, RMI, and RJC. For reference, please visit: <https://www.mineralsgrievanceplatform.org/>

or physical document). If insufficient information is provided, the Office will request additional details within 30 days; otherwise, the grievance cannot be processed. If rejected, the reasons will be explained, and the outcome will be reported to the Committee (within 7 business days of receipt).

Step 3: If accepted, the Committee initiates an investigation to collaborate with relevant parties (complainant, subject of the grievance, and other stakeholders), comprehensively understand the issues raised, identify additional stakeholders, and submit an investigation report to the complainant, subject, and Committee (within 60 business days of acceptance).

Step 4: Dispute Resolution. The Committee facilitates negotiations between the complainant and the subject to develop mutually acceptable solutions and procedures, aiming for a written agreement.

Step 5: The complainant and subject jointly implement the agreed solution under the Committee's supervision.

Step 6: Both parties confirm the resolution by signing an Implementation Outcome Acknowledgement. If either party rejects the solution (Step 4) or its execution (Step 5), external resolution pathways (e.g., third-party dispute resolution agencies or experts) may be sought, and the internal process terminates. The Office will notify all parties of the final outcome.

Step 7: For all accepted grievances, the Office archives the grievance form, investigation report, written agreement, and acknowledgement.

5. Conflict of Interest Avoidance

A conflict of interest avoidance mechanism applies. Any Committee or Office member with a conflict of interest must recuse themselves from the grievance resolution process.

This mechanism takes effect upon approval by the Company.

Annex I - Supply Chain Due Diligence Grievance Form



Annex I

Supply Chain Due Diligence Grievance Form

Name (or anonymity)		Confidentiality	
Contact No.		Email	
If you are third-party or not?		If yes, who you are representing for (authorization letter needed)	
Recuse	If you need to recuse someone from the Jinlong's Supply Chain Compliance Management Committee or Joint Office, please list their names:		
<p>Facts and evidence of negative impacts have caused (or may cause) and any other information that would support the complaint: (proof of the complaint needs to be attached)</p>			
<p>Your request and the solution you prefer: (a clear and actionable request will help us to solve your problem faster)</p>			

Signature:

Date: