

寒锐钴业矿产供应链尽责管理申与沟通诉机制

Grievance and Communication Mechanism for Due Diligence on Responsible Mineral Supply Chain

为了加强同受影响社区、供应链上下游企业、政府部门、非政府组织、媒体及其他相关各方的沟通与协作，及时、有效回应相关方关切，不断提高公司供应链治理能力和信息透明度，本着“诚实、守信、责任”的原则，专门建立《寒锐钴业钴供应链申诉与沟通机制》，并在公司网站上予以公开。本机制适用于南京寒锐钴业股份有限公司及其子公司。

To enhance communication and collaboration with affected communities, upstream and downstream actors in supply chain, government, NGOs, media and other stakeholders, to respond to their concerns timely and effectively, and to continuously improve Hanrui's supply chain governance capability and transparency, we establish **Grievance and Communication Mechanism for Due Diligence on Responsible Mineral Supply Chain**, based on “honesty, trustworthiness and responsibility”. This mechanism is available on our website and applicable to Nanjing Hanrui Cobalt Co., Ltd and its subsidiaries.

一、机制目的 Purpose

接收、审核、回应、报告和处理各利益相关方对供应链治理的期望和诉求，加强同外部的沟通与协作，为持续提升公司供应链治理能力搭建对话和磋商平台。

This Grievance Mechanism serves as a dialogue and consultation platform to receive, review, report, follow up and respond to expectations, complaints and concerns from various stakeholders regarding our supply chain governance, and to strengthen communication and collaboration with external parties, which contributes to continuous improvement in our supply chain governance.

二、适用范围 Scope

为确保申诉和沟通机制的有效运行，本机制仅接受诚信提供的申诉或信息，且须满足以下条件：

To ensure the effectiveness of this mechanism, we only accept complaints or concerns filed in good faith and subject to following categories:

- 1) 已识别的与本公司矿产供应链相关的风险与挑战；

Identified risks and challenges associated with Hanrui's mineral supply chain.

- 2) 本公司矿产供应链尽责管理体系和措施存在的差距和不足；

Deficiencies and imperfections in our mineral supply chain due diligence management system and measures.

- 3) 其他具有充足证据支持的涉及本公司矿产供应链的相关建议和意见。

Suggestions and advice concerning mineral supply chain that are supported by sufficient evidence.

三、申诉渠道 Channel

任何有关上述范围的申诉与沟通信息，请优先以邮件或信函的方式发送至本公司钴供应链尽责管理委员会，其他形式的申诉可能会影响受理的取证确认。

申诉受理专用邮箱：csr@hrcobalt.com；

信函收件地址/人：江苏省南京市江宁区将军大道527号

南京寒锐钴业股份有限公司钴供应链尽责管理委员会

Any relevant complaint or concern should be reported preferably to our Management Committee on Supply Chain Due Diligence: by email or letter. Confirmation of receipt may be delayed when they are voiced through other channels.

Complaints or concerns should be sent to csr@hrcobalt.com , or by mail to Cobalt Supply Chain Due Diligence Committee of Hanrui Cobalt with address below:

No.527, Jiangjun Avenue, Jiangning District,
Nanjing City,
Jiangsu Province
China

四、信息提交要求 Submission Requirements

对于申诉者（包括个人与所代表的单位，下同）所提交的申诉或沟通信息，须满足以下条件，或直接填写附件《寒锐钴业供应链尽责管理申诉单》。公司将对所搜集的信息严格保密。如必要的信息缺失，在受理时可能会因为证据不充分或难以核实，而导致申诉处理时间延长。

You must duly file complaints or concerns with following information, otherwise we have to take longer time to deal with it due to missing of critic information or insufficient evidence. You can also fill in Hanrui Cobalt Grievance Contact Form (see Annex 1). All the information collected by this mechanism is kept confidential:

1. 填写您的个人信息和联系方式；如有顾虑，您也可以进行匿名申诉，但请留下可用的联系方式，以便我们反馈处理结果；

Provide your personal information and contact details; you can also make an anonymous complaint, but please leave us available contact details so that we can give you feedback.

2. 详细说明申诉或沟通事项，并提供支持性证据，这将有助于申诉或沟通的有效解决。欢迎提供申诉人认为可行的解决措施建议；

Describe concerns or complaints in detail and provide supporting evidence which will be helpful to find an effective solution. Any possible solution proposed is encouraged and appreciated.

3. 申诉信息尽可能请以中文、英文或法文表述，采用其他语言可能会影响申诉处理进度及回复。

Your complaints or concerns should be written in Chinese, English or French. Otherwise, it may cause delay in our response if they are raised in other languages.

五、 申诉程序 Procedure:

本申诉与沟通机制通过以下六个步骤开展工作：
The Mechanism will function in line with a 6-step procedure:

步骤一 接受申诉或沟通

Step 1 Information collection

受理申诉与沟通的工作人员负责记录申诉与沟通内容，并把相关内容记录在《尽责管理申诉登记与跟踪表》中。

Person in charge of following up complaints or concerns will register them in *Tracking List of Concerns on Due Diligence Management System*.

步骤二 初步评估

Step 2 Preliminary Evaluations

初步评估申诉与沟通的内容是否符合本申诉与沟通机制的范围，并将相关信息传达给公司的相关领导和部门。

Complaints or concerns received will be assessed preliminarily to confirm whether they are within the scope of this mechanism, and then directed to relevant supervisors and departments.

步骤三 申诉确认

Step 3 Confirmation of receipt

在收到申诉与沟通事项之后的七个工作日内，向申诉者反馈书面回函，以确认收到申诉，并提供解决申诉的步骤和时间。

Within seven business days after receiving a complaint or concern, appellant will be informed of a written confirmation of receipt detailing steps and time to resolve.

步骤四 申诉回应

Step 4 Responding to grievance

申诉调查将在收到申诉后立即启动，自收到申诉之日起一个月内完成与申诉有关的调查报告或行动报告，并形成回应结论。结论分为以下三种：

An investigation will be launched immediately upon receipt of the grievance. With an eventual investigation report or an action plan drafted within one month from the date of receipt, our final response will be drafted in three ways (refer to Annex 2, "Grievance Response Form").

1. 不符合申诉范围，申诉不成立，驳回；

Complaints or concerns are beyond the scope of the grievance mechanism.

2. 接受申诉，但本公司不存在申诉问题，无需采取纠正或改进措施；

Complaints or concerns are accepted but we find that there is no such problem after investigation and corrective action is not necessary.

3. 接受申诉，确认需要采取纠正或改进措施，如需要，参照《纠正与预防措施控制程序》要求执行。

Complaints or concerns are accepted, and corrective action is necessary. The latter will be conducted corresponding to Procedure on Corrective Action and Prevention Plan.

步骤五 改进行动

Step 5 Corrective Action Plan

如申诉方对调查报告或行动措施不满意，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。如申诉者仍就与公司改进行动无法达成一致，可将申诉转交给第三方进行调解或聘请外部专家参与审查及磋商。

If you are not satisfied with the investigation report or corrective action, we will initiate further investigations, elaborate and implement in-depth action plan. If you still have

doubts, you can take recourse to a third party or an external expert for inspection or consultations.

步骤六 监测与评价

Step 6 Monitoring and Evaluation

公司钴供应链尽责管理委员将按季度统计申诉的处理情况；每年评估申诉与沟通机制的有效性。

Management Committee on Supply Chain Due Diligence analyses on a quarterly basis how these complaints or concerns have been treated, and evaluates annually the effectiveness of our grievance mechanism.

六、申诉者保护 Protection of the appealer

1) 申诉者信息保密

Confidentiality on your privacy

申诉信息由钴供应链尽责管理委员会负责登记与处理。处理人须对申诉者的信息严格保密，除分管领导外，严禁将申诉者信息透露给其他任何人员。申诉材料作为公司绝密资料处理，除分管领导外，其他任何人不得查阅，更不允许流传到申诉利益相关方。

Materials involving your personal information and your complaint or concern will only be registered and archived by person in charge of Management Committee on Supply Chain Due Diligence. They are strictly confidential and can neither be consulted by anyone else except for his/her direct supervisor, nor disclosed to any stakeholders.

2) 申诉者权益保护

Protection of your rights and interests

供应链尽责管理申诉机制的出发点是为了提升公司供应链治理能力，因此基于客观事实的申诉也是对我司治理提升的帮助，公司鼓励此类申诉，并切实

保护申诉者权益，严禁打击报复申诉者，同时保证其知情权，即申诉是否有效以及最终处置结果等信息。

Your complaints or concerns based on facts are encouraged because these contribute to strengthening Hanrui's capability of supply chain governance. Thus we protects conscientiously your rights and interests. We guarantee your right to know by communicating results of your complaints. Any retaliation against appealer is prohibited.

3) 泄密与报复处理

Reaction on Leaks and Retaliation

公司视未按上述要求保密或打击报复申诉者为严重违纪行为，将与相关人员解除劳动合同，并移交司法机关依法处理。

Any leaks of grievance information or retaliation against those who voice concerns or complaints will be considered as gross misconduct. We will terminate the labor contract with anyone who commits it, and transfer he/she to judiciary authorities.

本公司郑重承诺：坚决保护申诉者权益不受侵犯！

Hanrui commits to safeguarding rights and interests of appealers.

附件 1 《寒锐钴业供应链尽责管理申诉单》（中英）

Annex 1 Hanrui Cobalt Grievance Contact Form (CH-EN)

附件 2 《寒锐钴业供应链尽责管理申诉回复单》（中英）

Annex 2 Hanrui Cobalt Grievance Response Form (CH-EN)

附件一：

Annex1

寒锐钴业供应链尽责管理申诉单

申诉人/代表 姓名：		工作单位：	
联系电话：		联系邮箱：	
是否匿名：		联系方式：	

申诉事由（请写明申诉事件发生日期、经过，阐述申诉理由，可另附详细证据）：

申诉建议、期望和诉求：

申诉人（代表）签名：

日期：

申诉确认反馈（回复申诉单确认编号以及申诉回应期限）：

钴供应链尽责管理委员会：

日期：

Hanrui Cobalt Grievance Contact Form

Name of Appeler/Authoritee		Place of employment	
Phone		Email	
Anonymous Complaint?		Contact details:	

Please describe your complaint or concern in detail, you may attach other evidence:

Advice, demands or expectations:

Signature:

Date:

Confirmation of receipt (No. of Grievance and deadline of formal response):

Management Committee
on Supply Chain Due Diligence:

Date:

附件二:

Annex 2

寒锐钴业供应链尽责管理申诉回复单

申诉单编号:		回复日期:	
<p>1. 是否接受申诉: <input type="checkbox"/> 是 <input type="checkbox"/> 否</p> <p>2. 回复结论 (如接受申诉, 请详述调查结果及是否需要纠正及预防措施; 如驳回, 请详述驳回理由):</p> <p style="text-align: right;">钴供应链尽责管理委员会: 日期:</p>			

Hanrui Cobalt Grievance Response Form

No. of Grievance		Date of response	
<p>1. Is grievance accepted? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>2. Conclusion (If grievance is accepted, please precise the results and corrective action if applicable; if not, please clarify):</p> <p style="text-align: center;">Management Committee on Supply Chain Due Diligence: Date:</p>			