

广东金正龙科技有限公司

Guangdong Jinzhenglong Technology Co., Ltd.

程序文件

Procedure Document

文件名称： 负责任采购申诉机制

Document Name: Responsible Procurement Complaint Mechanism

1 目的

1 Purpose

为加强广东金正龙科技有限公司铂供应链合规性管理，根据《LPPM 负责任铂指南》的要求，确保公司的供应链无侵犯人权、冲突、洗钱及恐怖分子筹资等行为。公司制定了含铂物料的申诉制度，凡公司的供应商都应配合公司尽职调查小组的审查。各供应商应遵守国家相关法律法规，对供应的铂确保来源和去向合规。允许公司铂金和/或钯金供应链中的利益相关方（受影响人员或举报者）对采矿、贸易、加工和出口的过程中存在/潜在存在的风险进行申诉并确保得到妥善处理。

To strengthen platinum supply chain compliance management of Guangdong Jinzhenglong Technology Co., Ltd. and ensure that the Company's supply chain is free from human right violation, conflict, money laundering and terrorist financing in accordance with the requirements of the *LPPM Responsible Platinum and Palladium Guidance*, the Company has developed complaint system for materials containing platinum and palladium. All suppliers of the Company shall cooperate with the review of the due diligence team of the Company. In addition, all suppliers shall comply with relevant national laws and regulations to ensure compliance of the source and destination of the supplied platinum and palladium. Stakeholders (affected persons or whistleblowers) in the Company's platinum supply chain should be allowed to make complaint about and address risks that exist/potentially exist during mining, trading, processing and export.

2 依据

2 Basis

《LPPM 负责任铂指南》、《LPPM 负责的铂供应链尽职调查管理体系》、《广东金正龙科技有限公司铂负责任采购供应链管理政策》

LPPM Responsible Platinum and Palladium Guidance, LPPM

Responsible Platinum Supply Chain Due Diligence Management System,
Responsible Platinum Procurement Supply Chain Management Policy of
Guangdong Jinzhenglong Technology Co., Ltd.

3、适用范围

3. Scope of application

本程序适用于本公司的相关方及本公司涉及负责任矿物采购相关工作的部门、单位及人员、以及任何与我司铂供应链相关的利益相关者。

This procedure is applicable to interested parties of the Company and the departments, units and personnel of the Company in connection with the work related to responsible mineral procurement, as well as any stakeholders related to our platinum supply chain.

4 管理机构及职责

4 Management organization and responsibilities

公司设立申诉工作处理小组，成员风险总监、合规风控官、合规专员组成，工作组负责对申诉的处理。

The Company shall set up a complaint handling team composed of compliance director, compliance risk control officer and compliance specialists. The working team shall be responsible for handling the complaint.

5 工作程序

5 Working procedure

5.1 申诉信息的收集

5.1 Collection of complaint information

公司设立联系/申诉渠道：

The Company has established contact/complaint channels:

电话：0766-3812303

邮箱：JZL3812303@163.com

Tel: 0766-3812303

Email: JZL3812303@163.com

在广东金正龙科技有限公司官网 www.gdjzltech.com 中予以公布, 电话、电子邮箱用于接收相关的询问和申诉, 由公司合规专员定期查看。

The information is disclosed on the official website of Guangdong Jinzhenglong Technology Co., Ltd. www.gdjzltech.com, with telephone and e-mail used to receive relevant inquiries and complaints, and the Compliance Officer of the Company is responsible for checking such information regularly.

工作中接收到的相关方关于负责任供应链的与采矿、贸易、加工和出口情况有关的疑虑方面的信息。

Information is received from interested parties in the course of their work with regard to concerns related to the mining, trading, processing and export of responsible supply chains.

5.2 申诉的内容

5.2 Complaint content

相关方对公司的供应链管理提起申诉时, 该申诉需包含以下内容:

When an interested party files a complaint against the supply chain management of the Company, the complaint shall include the following:

具体说明向何种决定提起申诉及理由;

Specify the decision to which the complaint is filed and the reasons for it;

附相关书面证据;

Attach relevant written evidence;

具体说明在提出申诉之前采取了哪些步骤来解决问题;

Specify the steps taken to resolve the issue before the complaint is filed;

5.3 申诉信息的分类

5.3 Classification of complaint information

公司需对接收到的询问和申诉信息进行分类识别，申诉信息分为一般信息、特殊/重要申诉信息、不予受理信息。

The Company shall classify and identify the received inquiry and complaint information which is divided into general information, special/important complaint information and non-acceptance information.

5.3.1 一般信息：相关方对公司负责任矿物供应链管理的咨询、供方的调查问卷等。

5.3.1 General information: interested parties' consultation on the Company's responsible mineral supply chain management, questionnaire of suppliers, etc.

5.3.2 特殊或重要申诉信息：

5.3.2 Special/important complaint information:

管理不符合 LPPM 要求的信息；

Managing information that does not meet LPPM requirements;

对供应商的矿物采购涉及公司识别的高风险区域的信息；

Information for mineral procurement of suppliers involving high-risk areas identified by the Company;

对供应商的矿物采购不符合公司的供应链政策的信息。

Information for mineral procurement of suppliers failing to comply with the Company's supply chain policy.

5.3.3 不予受理信息：

5.3.3 Non-acceptance information:

琐碎的、恶意的、无理取闹的或似乎是为了获得竞争优势而产生的投诉。

Petty, malicious, unwarranted complaints or complaints that appear to

be made to gain a competitive advantage.

没有令人信服的客观证据支持的投诉。

Complaint not supported by convincing objective evidence.

5.4 申诉的处理

5.4 Complaint handling

5.4.1 关于匿名申诉

5.4.1 Anonymous complaint

支持匿名申诉，申诉工作处理小组不得对工作小组以外的任何人泄露申诉人信息，对于可能涉及申诉人信息的申诉内容予以保密，如申诉内容与工作小组成员有利害关系，工作小组应立即要求该成员避嫌。如发现有任何打击报复申诉人的情况，公司将对相关涉事员工按公司章程严肃从重处理，如涉嫌违法犯罪，立即报案并移送司法机关处理。

Anonymous complaint shall be supported. The complaint handling team shall not disclose the information of the complainant to anyone other than the working team. The contents of the complaint that may involve the information of the complainant shall be kept confidential. The working team shall require the members to withdraw immediately if the contents of the complaint have an interest with the members of the working team. In case of any retaliation against the complainant, the Company will seriously deal with the relevant employees in accordance with the articles of association. If they are suspected of violating the law or crime, they shall be immediately reported to the judicial authority for handling.

5.4.2 申诉处理流程

5.4.2 Complaint handling process

申诉处理小组工作组应在收到申诉后 10 个工作日内确认收到申诉，在基于申诉是否符合 5.3 的基础上确认接受或拒绝申诉。

The complaint handling working team shall acknowledge receipt of the complaint within 10 working days upon receipt of the complaint and confirm acceptance or rejection of the complaint based on compliance with 5.3.

如果申诉被拒绝，应向申诉方提供书面解释，并记录在案。不得采取进一步行动。

If the complaint is rejected, a written explanation shall be provided for the complainant and documented. No further action shall be taken.

对特殊重要申诉信息由申诉处理小组在决定受理后 45 个工作日内对申诉或投诉进行调查、审查和裁决。处理小组应尽最大努力在截止日期前完成工作。在极少数情况下可能需要额外的时间。申诉处理小组应采取合理措施，包括召开一次或多次会议，以作出合理决定。这类措施的例子包括：

With regard to special and important complaint information, the complaint handling team shall investigate, review and adjudicate the grievance or complaint within 45 working days after making the decision to accept it. The handling team shall make all endeavors to complete the work by the deadline. Additional time may be required in rare cases. The complaint handling team shall take reasonable steps, including holding one or more meetings to make a reasonable decision. Examples of such measures include:

咨询专家

Consulting experts

请求申诉方或其他人提供更多信息

Request more information from the complainant or others

申诉方不合作可被视为中止该程序的理由。申诉处理小组应协商一致决定是否中止申诉程序。

Non-cooperation by the complainant could be considered as grounds

for suspending the procedure. The complaint handling team shall decide whether to suspend the complaint procedure through consensus.

申诉决定以书面形式传达给申诉方，申诉决定应包含：

The complaint decision shall be conveyed to the complainant in writing and shall include:

申诉决定

Complaint decision

申诉决定是如何以及何时做出的

How and when the complaint decision is made

任何新的建议

Any new suggestions

合规专员定期总结风险情况处理结果，并在公司官网公示申诉内容、处理方式及处理结果，合规风控官负责全程监督风险减缓措施的实施并每日向合规总监汇报进度，在风险减缓措施实施完成后，由合规总监定期评估措施的有效性并作出总结和评价。

The Compliance Officer shall regularly summarize the risk handling results and publicize the complaint contents, handling methods and results on the official website of the Company. The Compliance Risk Control Officer shall be responsible for supervising the implementation of risk mitigation measures during the whole process and reporting the progress to the Compliance Director every day. The Compliance Director shall regularly evaluate the effectiveness of the measures and make summary and evaluation after the implementation of the risk mitigation measures is completed.

5.5 申诉的记录

5.5 Complaint record

申诉工作处理小组应将收到的申诉记录在案，包括以下内容：

The complaint handling team shall record the complaints received, including the following:

何人何时提交申诉；

Who files the complaint and when the complaint is filed;

申诉的类型、问题或主题以及随申诉提交的信息；

Type, issue or subject of the complaint and the information submitted with the complaint;

接受或拒绝决定。

Decision for acceptance or rejection.