



# **负责任矿产供应链申诉机制**

## **Responsible Mineral Supply Chain Grievance Mechanism**

**Aug. 2025**

## 一 目的

### Purpose

为了及时处理负责任矿产供应链的风险与隐患，保证内外部利益相关方与上海锦源晟新能源材料集团公司（以下简称“锦源晟”或“公司”）顺畅沟通，锦源晟致力于采取公开透明的方法处理与矿产开采、运输、贸易、进出口和加工有关的利益相关方的申诉，以促进锦源晟与利益相关方的沟通，维护锦源晟与利益相关方的权益。锦源晟承诺采纳中国五矿化工进出口商会（CCCMC）发布的《中国负责任矿产供应链尽责管理指南》（第二版）（以下简称“中国指南”）、经济合作与发展组织（OECD）发布的《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》（第三版）（以下简称“OECD 指南”）、锦源晟《负责任矿产供应链尽责管理政策》以及《负责任矿产采购的供应商标准》制定本申诉机制。

In order to timely deal with the existing and potential risks of the responsible mineral supply chain, to ensure smooth communication between internal and external stakeholders and the Shanghai Jayson New Energy Material Group Co., Ltd. (hereinafter referred to as “Jayson” or “Company”). Jayson is committed to adopting an open and transparent method to handle grievances from affected stakeholders regarding the mining, logistics, trade, import and export and processing of minerals, so as to promote communication with stakeholders and protect the rights of Jayson and stakeholders. Jayson is committed to establishing a grievance mechanism by adopting the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Second Edition) (hereinafter referred to as “China Guidelines”) which was issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers and Exporters (“CCCMC”), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition) (hereinafter referred to as “OECD Guidance”) which was issued by the Organization for Economic Cooperation and Development (“OECD”), Jayson Due Diligence Policy for a Responsible Mineral Supply Chain and Jayson Suppliers

Standard for Responsible Mineral Sourcing.

## 二、申诉与沟通范围

### Grievance and Communication Scope

适用于基于产品、负责任矿产供应链、运营行为、业务关系等与本公司存在直接或潜在联系的利益相关方，包括但不限于：

Applicable to stakeholders who have direct or potential connections with the Company based on products, responsible mineral supply chain, operations, business relationships, etc., including but not limited to:

1、公共部门（包括政府部门）及其代表；

The public sectors (including government) and their representatives;

2、其他利益相关方，包括客户、供应商、媒体、非政府组织（NGO）、投资者、员工、社区居民等。

Other stakeholders, including customers, suppliers, media, non-governmental organizations (NGOs), investors, employees, community residents, etc..

锦源晟接受满足以下全部条件的申诉：

Jayson accepts grievances that meet all of the following conditions:

1、与锦源晟负责任矿产供应链尽责管理相关；

Related to Jayson's Responsible Mineral Supply Chain Due Diligence;

2、因负责任矿产供应链尽责管理缺失造成利益相关方利益受损；

Damage to the interest of stakeholders due to the deficiency of Responsible Mineral Supply Chain Due Diligence;

3、违反《OECD 指南》、《中国指南》、锦源晟《负责任矿产供应链尽责管理政策》以及《负责任矿产采购的供应商标准》以及锦源晟负责任矿产供应链尽责管理其他相关政策要求；

Violation of the requirements of OECD Guidance, China Guidelines, Jayson Due Diligence Policy for a Responsible Mineral Supply Chain, Jayson Suppliers Standard for Responsible Mineral Sourcing and other related policies on requirements of Responsible Mineral Supply Chain Due Diligence;

4、具有足够合理客观的证据支持申诉。

Sufficient reasonable and objective evidences to support the grievance.

锦源晟不接受以下任一条件的申诉：

Jayson does not accept grievances under any of the following conditions:

1、与锦源晟负责任矿产供应链尽责管理不相关；

Not related to Jayson's Responsible Mineral Supply Chain Due Diligence;

2、无法提供充分证据以支持指出的问题；

No sufficient evidences to support the grievance;

3、恶意申诉；

Malicious grievance;

4、对于超出锦源晟内部机制解决范畴的申诉，锦源晟不能接受申诉，但将协调外部机构予以处理。

If the grievance goes beyond the scope of Jayson's internal mechanism, Jayson shall not accept it. However, Jayson would ask an external agency for assistance.

### 三、申诉与沟通渠道

#### Grievance and Communication Channels

任何有关上述范围的申诉与沟通信息，请优先以邮件的方式发送至本公司社会责任受理邮箱，其它形式的申诉可能会影响受理的取证确认。申诉受理邮箱：[ESG@shjayson.com](mailto:ESG@shjayson.com)。

Any grievance and communication information related to the above scope, please first

send email to Social Responsibility email address of the Company, other forms of grievance may affect the acceptance of the confirmation of evidence. Email address for grievance: [ESG@shjayson.com](mailto:ESG@shjayson.com).

## 四、信息提交要求

### Information 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《供应链尽责申诉书》（注：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，而导致该申诉无法被认定有效。）：

For grievance or communication information submitted by complainants (including individuals and organizations represented by them, the same below), the following conditions shall be met, or the attached Grievance Letter on Supply Chain Due Diligence shall be filled directly (Note: If necessary information is missing, the grievance may not be considered valid due to insufficient evidence or difficult verification when accepting).

- 1、 写明申诉人的姓名（也可匿名）、单位（如有）以及是否要求保密，如有保密要求则本公司予以保密；

State the name of the complainant (which may also be anonymous), the organization (if any) and whether the complainant requires confidentiality, and if so, the Company will keep confidentiality;

- 2、 如果申诉是由派出代表提交的，须提供授权人的信息以及联系方式，包括有效的电话号码与邮箱地址；

Information and contact information of the authorized person, including a valid telephone number and email address, if the complaint is submitted by a dispatched representative;

- 3、 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；

Detail the grievance or communication and provide supporting evidence that will facilitate the effective resolution of the grievance or communication.

Suggestions for solutions that the complainants consider feasible are welcome;

4、申诉信息尽可能以中文、英文和法文表述，采用其它语言可能会影响申诉处理进度及回复。

Grievance information should be expressed in Chinese, English and French as far as possible. Using other languages may affect the timing of processing and response of the grievance.

## 五、申诉与沟通流程

### Grievance and Communication Process

本申诉与沟通机制通过以下六个步骤开展工作：

The grievance and communication mechanism works through the following six steps:

#### 步骤一：接受申诉或沟通

##### Step 1: The Acceptance of Grievance or Communication

受理申诉与沟通的工作人员负责记录申诉与沟通内容，并确保把相关内容记录在《供应链尽责申诉处理意见书》中。

The staff in charge of accepting grievance and communication is responsible for recording grievances and communications and ensuring that they are recorded in the Opinion Letter on Grievance Handling of Supply Chain Due Diligence.

#### 步骤二：初步评估

##### Step 2: Preliminary Assessment

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。

Initially assess whether the content of the grievance and communication is in line with

the scope of this Grievance and Communication Mechanism, and communicate the related information to the relevant leaders and departments of the Company.

### 步骤三：申诉确认

#### Step 3: Confirmation of Grievance

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 of receipt of the grievance and communication, send a written response to the complainant confirming receipt of the grievance and providing steps and timing for resolution.

### 步骤四：申诉回应

#### Step 4: Response of Grievance

申诉调查将在接到申诉之后立刻开展，在申诉开始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。

The grievance investigation will be carried out immediately after receiving the grievance, and the investigation report or action report related to the grievance will be completed within one month from the start of the grievance, and a response conclusion will be formed.

回应的内容将会有三种方式：

There will be three types of responses:

1、不符合申诉范围，申诉不成立，驳回；

If it does not conform to the scope of the grievance, the grievance is not valid and shall be rejected;

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；

Accept the grievance, but the Company does not have any connection with the grievance so the Company has no need to take corrective or improvement measures;

3、接受申诉，确认需要采取纠正或改进措施。

Accept the grievance, and confirm to take corrective or improvement measures.

公司鼓励通过对话商定申诉的解决办法。如申诉处理行动有加剧不利影响的可能性，公司将通过合法程序提供补救，或在补救问题上给予合作。公司在处理申诉过程中，平等对待申诉的相关方。

The company encourages resolving complaints through dialogue. If actions to address a complaint may exacerbate adverse effects, the company will provide remedies through legal procedures or cooperate on remedial measures. During the complaint handling process, the company treats all relevant parties equally.

### 步骤五：改进行动

#### Step 5: Corrective Actions

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 the complainant is not satisfied with the investigation report or action measures, the Company will carry out further investigation and research to determine and implement the action plan that needs to be further carried out. If the complainant still cannot reach an agreement on improvement actions with the Company, the grievance may be referred to a third party for mediation or external experts may be engaged for review and consultation.

### 步骤六：监测与评价



## Step 6: Monitoring and Assessment

负责任矿产供应链尽责管理小组每个季度将收到的申诉、解决以及未解决的情况向集团社会责任管理委员会汇报；每年分析申诉解决的情况以及时限，并评估申诉与沟通机制的有效性。对于申诉处理过程的资料进行存档，并至少保存 5 年。

The Responsible Mineral Supply Chain Due Diligence Team reports quarterly grievance, resolved and unresolved issues to the Group Social Responsibility Management Committee; annually analyzes the status and timelines of grievance resolution and assesses the effectiveness of grievance and communication mechanism. Keeping records of the grievance handling process and keeping them for at least 5 years.

## 六、申诉者保护

### Protection of Complainants

#### 1、申诉者信息保密

##### Confidentiality of Complainant's Information

负责任矿产供应链尽责管理小组负责登记与处理，处理人须对申诉者的信息严格保密，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，除集团社会责任管理委员会成员外，其他任何人不得查阅，更不允许流传到申诉利益相关方。

Responsible Mineral Supply Chain Due Diligence Team is responsible for registration and handling, handling personnel must be strictly confidential to the complainant's information, is strictly prohibited to disclose the complainant's information to any other personnel. The grievance materials shall be treated as top secret information of the Company and shall not be accessed by anyone except members of the Group Social responsibility Management Committee, let alone transmitted to the stakeholders of the grievance.

#### 2、申诉者权益保护

## Protection of Complainant's Rights and Interests

公司鼓励此类申诉，并切实保护申诉者权益，严禁因申诉打击报复申诉者，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。

The Company encourages such grievance, effectively protects the rights and interests of the complainants, strictly prohibits retaliating against the complainants due to grievance, and guarantees their right to know, that is, whether the complaints are effective and the final result of disposal.

## 3、泄密与报复处理

### Dealing with leaks and retaliation

对未按上述要求保密，或打击报复申诉者的，公司将视为严重违纪行为，采取解除劳动合同，涉嫌违法犯罪的移交司法机关依法处理。本公司郑重承诺：坚决保护申诉者权益不受侵犯。

If the Company fails to keep confidential according to the above requirements or retaliates against the complainant, it will be regarded as a serious violation of discipline, and the labor contract will be terminated, and the suspected offenders will be handed over to the judicial authorities for handling according to law. The Company solemnly promise: firmly protect the rights and interests of the complainants from infringement.

上海锦源晟新能源材料集团有限公司

Shanghai Jayson New Energy Materials Group Co., Ltd.

<div> 锦源晟 JAYSON</div> <div>供应链尽责申诉书</div>			
申诉人姓名		职业	
申诉人与公司的关系			
申诉人联系方式		申诉事件发生日期	
申诉事实经过及诉求内容（可以附页提交）：			
申诉人：			
申诉日期：			
申诉确认，并回应是否符合受理条件：			
确认人：			
确认日期：			
复核：		审核：	
日期：		日期：	



供应链尽责申诉处理意见书

申诉人姓名		职业	
申诉人与公司的关系			
申诉人联系方式		申诉事件发生日期	
申诉事实经过及诉求内容（可以附页提交）：          申诉人： 日期：			
负责任矿产供应链尽责管理小组处理经过及结论（可以附页提交）：          组长： 日期：			
集团社会责任管理委员会：          主任： 日期：			
申诉人确认：          申诉人： 日期：			