文件编号：JR-SCDD-GRI-S-001-2025-V01	**文件名称：**供应链尽责管理申诉机制	**版本：**V01 **执行日期：**2025 年 12 月 5 日
制定部门：嘉润供应链尽责管理联合办公室	**审核人：**冯文元	**批准人：**齐连成

适用说明：本申诉机制适用于新疆嘉润资源控股有限公司（简称“嘉润”或“公司”）铝供应链尽责管理体系。公司作为玛纳斯县亿丰实业有限公司（简称“亿丰”）的唯一受托加工方，供应链尽责管理工作通过两个层次推进：公司厂区内部管控及通过《委托加工协议补充协议》督促亿丰对其上游供应商实施管理。本申诉机制适用于上述两个层次的申诉事项，涉及亿丰上游供应链的申诉须同步告知亿丰。

新疆嘉润资源控股有限公司

供应链尽责管理申诉机制

修订内容

版本号	修订日期	更改内容
V01	2025 年 12 月 5 日	初始版本

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，嘉润根据公司《供应链尽责管理政策》制定本申诉机制。此外，公司参与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》，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。

特别说明：鉴于公司作为亿丰的唯一受托加工方，氧化铝原料由委托方采购，公司不与上游矿山、贸易商存在直接合同关系。因此，凡涉及亿丰上游供应商的申诉，公司将在受理后同步书面通知亿丰，要求亿丰配合开展调查，并依据公司与亿丰签署的《委托加工协议补充协议》采取相应措施。

一、可以对哪些问题提起申诉？

1. 符合以下条件的申诉将会被受理：

1) 与公司铝矿产供应链尽责管理相关的事项；
2) 公司商业活动或者业务关系（包括公司厂区内部管控及亿丰实业上游供应链活动）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》（第三版）、《中国

矿产供应链尽责管理指南》（第二版）或公司《供应链尽责管理政策》中的要求。

2. **属于以下任意一项的申诉不会被受理：**

1) 与公司矿产供应链尽责管理无关的事项；
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。

二、谁可以提起申诉？

1. 任何个人或团体，包括但不限于公司客户、供应商（包括亿丰实业及其上游供应商）、受影响的社区居民、员工等，均可向公司供应链尽责管理联合办公室提起申诉。
2. 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。

三、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尽责管理联合办公室。

申诉通道：
电话：09946339091
邮件：1556650125@qq.com
邮寄地址：新疆维吾尔自治区昌吉回族自治州玛纳斯县塔河工业园区嘉润产业园　供应链尽责管理联合办公室

同时，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》进行申诉（https://www.cccmc.org.cn/kcxfzzx/zyzx/al/）。

四、申诉处理流程

1) 登记受理：联合办公室在收到申诉后 2 个工作日内完成登记，对申诉事项进行初步分类，判断是否属于本机制受理范围。对不予受理的申诉，应书面说明理由并告知申诉者。
2) 调查核实：对受理的申诉，联合办公室组织相关部门开展调查核实，调查方式包括文件审查、人员访谈、现场核查等。调查期限一般不超过 15 个工作日，复杂事项可延长至 30 个工作日，并向申诉者说明延期理由。
3) 利益相关方意见征询：在形成申诉处理决定前，联合办公室就申诉解决方法征询相关利益相关方的意见，包括但不限于受影响社区代表、供应商代表、员工代表、民间社会组织等。征询方式可采用座谈会、问卷调查、个别访谈等，征询过程应做好书面记录。利益相关方意见作为处理决定的重要参考依据，对未

采纳的意见应说明理由。

4) 处理决定：根据调查结果和利益相关方意见，联合办公室提出处理建议，报尽责管理委员会审议后作出处理决定。处理决定包括但不限于要求整改、暂停合作、终止合作、采取补救措施等。

5) 反馈闭环：处理决定在作出后 5 个工作日内书面反馈给申诉者。申诉者对处理结果有异议的，可在收到反馈后 10 个工作日内申请复核，联合办公室在收到复核申请后 15 个工作日内作出复核决定并告知申诉者。

6) 归档留存：全部申诉材料、调查记录、利益相关方征询记录、处理决定和反馈记录由联合办公室归档保存，保存期限不少于 5 年。

五、申诉处理效果跟踪与监测

1) 监测指标：联合办公室建立申诉处理效果监测指标体系，定期跟踪以下指标：（1）申诉受理率：受理申诉数/收到申诉总数×100%；（2）按期办结率：在规定期限内办结的申诉数/受理申诉总数×100%；（3）申诉者满意度：申诉者对处理结果满意的申诉数/已反馈申诉总数×100%（通过满意度调查获取）；（4）整改完成率：已完成整改的事项数/要求整改事项总数×100%；（5）重复申诉率：同一事项重复申诉数/申诉总数×100%；（6）利益相关方意见征询覆盖率：开展利益相关方意见征询的申诉数/受理申诉总数×100%。

2) 跟踪机制：联合办公室每季度对申诉处理情况进行汇总分析，形成季度申诉处理分析报告，报送尽责管理委员会。每年对申诉机制的有效性进行年度评估，评估内容包括申诉渠道知晓度、处理及时性、申诉者满意度、整改效果等，评估结果作为机制改进的重要依据。年度评估报告向利益相关方公开。

3) 持续改进：根据监测指标和评估结果，联合办公室及时发现申诉机制运行中存在的问题，制定改进措施，持续优化申诉处理流程，提高申诉机制的有效性和公信力。改进情况纳入年度尽责管理报告，向利益相关方公开披露。

本机制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

<table>
<tr><th colspan="4">供应链尽责管理申诉书</th></tr>
<tr><td>申诉者名称（可匿名）</td><td></td><td>是否要求保密</td><td>☐ 是　　☐ 否</td></tr>
<tr><td>联系电话</td><td></td><td>电子邮箱</td><td></td></tr>
<tr><td>是否为受委托的第三方</td><td>☐ 是　　☐ 否</td><td>如是，受何人或何团体委托（请附受委托证明）</td><td></td></tr>
<tr><td>冲突回避</td><td colspan="3">如需回避特定人员，请列出姓名：</td></tr>
<tr><td colspan="4">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）：</td></tr>
<tr><td colspan="4">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地帮您解决问题）：</td></tr>
<tr><td colspan="4">申诉者代表签名：
申诉日期：</td></tr>
</table>

Document No.: JR-SCDD-GRI-S-001-2025-V01	**Document Title:** Supply Chain Due Diligence Grievance Mechanism	Version: V01 Effective Date: December 5, 2025
Issuing Department: Jiarun Supply Chain Due Diligence Joint Office	Reviewer: Feng Wenyuan	Approver: Qi Liancheng

Applicability Note: This Grievance Mechanism applies to the aluminum supply chain due diligence system of Xinjiang Jiarun Resources Holdings Co., Ltd. (hereinafter 'Jiarun' or the 'Company'). The Company serves as the sole toll processor for Manasi County Yifeng Industrial Co., Ltd. (hereinafter 'Yifeng Industrial'). Supply chain due diligence is implemented through two levels: internal plant controls, and supervision of Yifeng Industrial's upstream supplier management through the Supplementary Agreement to the Toll Processing Contract. This Grievance Mechanism applies to grievances at both levels. Grievances involving Yifeng Industrial's upstream supply chain shall simultaneously be communicated to Yifeng Industrial.

Xinjiang Jiarun Resources Holdings Co., Ltd.

Supply Chain Due Diligence Grievance Mechanism

In order to promptly identify and address risks such as conflict financing or human rights abuses that may exist in the Company's supply chain, and to ensure smooth communication between the Company and its internal and external stakeholders, Jiarun has established this Grievance Mechanism in accordance with the Company's Supply Chain Due Diligence Policy. In addition, the Company participates in the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain, with a view to effectively resolving disputes, strengthening communication, coordination and cooperation among all parties, conveying the expectations and concerns of stakeholders, and building a responsible, resilient, and sustainable mineral supply chain.

Special Note: Given that the Company serves as the sole toll processor for Yifeng Industrial, with alumina raw materials purchased by the client, the Company has no direct contractual relationship with upstream mines or traders. Therefore, for all grievances involving Yifeng Industrial's upstream suppliers, the Company will, upon acceptance, simultaneously notify Yifeng Industrial in writing, require Yifeng Industrial to cooperate with the investigation, and take appropriate measures pursuant to the Supplementary Agreement to the Toll Processing Contract entered into between the Company and Yifeng Industrial.

I. What Issues Can Be Grieved?

1. The following grievances will be accepted:

— Matters related to the Company's aluminum mineral supply chain due diligence;

— The Company's business activities or business relationships (including internal plant controls and upstream supply chain activities of Yifeng Industrial) have caused or may cause negative impacts on stakeholders;

— The Company's business activities or business relationships are in violation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition), the Chinese Due Diligence Guidelines for Mineral Supply Chain (2nd Edition), or the Company's Supply Chain Due Diligence Policy.

2. The following grievances will NOT be accepted:

— Matters unrelated to the Company's mineral supply chain due diligence;

— Inability to provide sufficient evidence or witnesses to support the issues raised;

— Malicious grievances or grievances filed to gain a competitive advantage;

— If the issues raised fall outside the scope of matters resolvable through the Company's internal mechanism, the Company will actively coordinate with external bodies to seek resolution.

II. Who Can File a Grievance?

— Any individual or group — including but not limited to the Company's customers, suppliers (including Yifeng Industrial and its upstream suppliers), affected community residents, employees, etc. — may file a grievance with the Company's Supply Chain Due Diligence Joint Office.

— If a grievance is submitted by a third-party organization or individual representing an affected party, that organization or individual shall clearly state whom they represent and provide clear evidence of their representative authority.

III. How to File a Grievance?

The complainant should complete the Supply Chain Due Diligence Grievance Form (see Annex I) in any language. The grievance form should be submitted to the Company's Supply Chain Due Diligence Joint Office by email or by post.

Grievance Channels:
Tel: 09946339091
Email: 1556650125@qq.com
Mailing Address: Jiarun Industrial Park, Tahe Industrial Zone, Manas County, Changji Hui Autonomous Prefecture, Xinjiang Uyghur Autonomous Region — Supply Chain Due Diligence Joint Office

Alternatively, complainants may also file a grievance through the CCCMC Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain (https://www.cccmc.org.cn/kcxfzzx/zyzx/al/).

IV. Grievance handling process

1) Registration and Acceptance: The Due Diligence Management Joint Office shall complete registration within 2 working days of receiving a grievance, conduct preliminary classification of the grievance matter, and determine whether it falls within the scope of acceptance of this mechanism. For grievances that are not accepted, the reasons shall be stated in writing and communicated to the complainant.
2) Investigation and Verification: For accepted grievances, the Due Diligence Management Joint Office shall organize relevant departments to conduct investigation and verification, including document review, personnel interviews, on-site inspections, etc. The investigation period shall generally not exceed 15 working days; for complex matters, it may be extended to 30 working days, and the reasons for extension shall be explained to the complainant.
3) Stakeholder Consultation: Before forming a grievance handling decision, the Due Diligence Management Joint Office shall consult the opinions of relevant stakeholders on grievance resolution methods, including but not limited to affected community representatives, supplier representatives, employee representatives, civil society organizations, etc. Consultation may be conducted through seminars, questionnaire surveys, individual interviews, etc., and written records shall be maintained during the consultation process. Stakeholder opinions serve as an important reference basis for handling decisions, and reasons shall be provided for opinions that are not adopted.
4) Handling Decision: Based on the investigation results and stakeholder opinions, the Due Diligence Management Joint Office shall propose handling recommendations, which shall be submitted to the Due Diligence Management Committee for deliberation before a handling decision is made. Handling decisions include, but are not limited to, requiring rectification, suspending cooperation, terminating cooperation, and taking remedial measures.
5) Feedback Closure: The handling decision shall be communicated in writing to the complainant within 5 working days after it is made. If the complainant has objections to the handling result, they may apply for review within 10 working days of receiving the feedback; the Due Diligence Management Joint Office shall make a review decision within 15 working days of receiving the review application and inform the complainant.
6) Archiving and Retention: All grievance materials, investigation records, stakeholder consultation records, handling decisions and feedback records shall be archived and retained by the Due Diligence Management Joint Office for a period of not less than 5 years.

5. Tracking and monitoring of grievance handling effectiveness

1) Monitoring Indicators: The Due Diligence Management Joint Office shall establish a monitoring indicator system for grievance handling effectiveness and regularly track the following indicators: (1) Grievance acceptance rate: number of accepted grievances / total number of grievances received × 100%; (2) On-time completion rate: number of grievances completed within the prescribed period / total number of accepted grievances × 100%; (3) Complainant satisfaction: number of grievances with which the complainant is satisfied with the handling result / total number of grievances with feedback provided × 100% (obtained through satisfaction surveys); (4) Rectification completion rate: number of matters for which rectification has been

completed / total number of matters requiring rectification × 100%; (5) Repeat grievance rate: number of repeat grievances for the same matter / total number of grievances × 100%; (6) Stakeholder opinion consultation coverage rate: number of grievances for which stakeholder opinion consultation was conducted / total number of accepted grievances × 100%.

2) Tracking Mechanism: The Due Diligence Management Joint Office shall conduct quarterly summary and analysis of grievance handling, produce a quarterly grievance handling analysis report, and submit it to the Due Diligence Management Committee. An annual assessment of the effectiveness of the grievance mechanism shall be conducted each year, covering awareness of grievance channels, timeliness of handling, complainant satisfaction, rectification effectiveness, etc. The assessment results serve as an important basis for mechanism improvement. The annual assessment report shall be made public to stakeholders.

3) Continuous Improvement: Based on monitoring indicators and assessment results, the Due Diligence Management Joint Office shall promptly identify problems in the operation of the grievance mechanism, formulate improvement measures, continuously optimize the grievance handling process, and enhance the effectiveness and credibility of the grievance mechanism. Improvement status shall be included in the annual due-diligence management report and publicly disclosed to stakeholders.

This mechanism shall take effect on the date of its approval by the Company.

Annex I: Supply Chain Due Diligence Grievance Form

<table>
<tr><th colspan="4">Supply Chain Due Diligence Grievance Form</th></tr>
<tr><td>Complainant Name (anonymous permitted)</td><td></td><td>Confidentiality Required</td><td>☐ Yes ☐ No</td></tr>
<tr><td>Contact Tel</td><td></td><td>Email</td><td></td></tr>
<tr><td>Third-party Representative</td><td>☐ Yes ☐ No</td><td>If yes, on behalf of whom
(please attach authorization)</td><td></td></tr>
<tr><td colspan="2">Conflict of Interest Avoidance</td><td colspan="2">If certain persons should be recused, please list their names:</td></tr>
<tr><td colspan="2">Facts and evidence of the negative impact suffered (or potentially suffered), and any other information supporting the grievance
(additional pages may be attached along with supporting evidence):</td><td colspan="2"></td></tr>
<tr><td colspan="2">Your demands, and the preferred resolution approach
(clear and actionable demands help us resolve your issue more quickly):</td><td colspan="2"></td></tr>
<tr><td colspan="4">Complainant Representative Signature:
Date of Grievance:</td></tr>
</table>