

供应链尽责管理申诉机制

Supply Chain Due Diligence Management Appeal Mechanism

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，中色卢安夏铜业有限公司（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。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》¹⁹，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。本申诉机制同时作为公司矿产供应链警示信号²⁰信息的重要收集渠道，通过申诉收集的相关警示信号信息将纳入公司警示信号审查工作，为矿产供应链风险识别范围的确认提供事实依据和数据支撑。

To promptly identify and address potential risks in the company's supply chain that may fuel conflicts or human rights abuses, and ensure smooth communication between internal and external stakeholders and the company, CNMC Luanshya Copper Mines Plc. (hereinafter referred to as "the Company") has formulated this grievance mechanism in accordance with the Company's *Responsible Management Policy for Mineral Supply Chains*. In addition, the Company participates in the *Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain* issued by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters. This is aimed at effectively resolving disputes, enhancing communication, coordination and cooperation among all parties, conveying the demands and expectations of all sides, and building a responsible, resilient and sustainable mineral supply chain. This grievance mechanism also serves as a key channel for collecting early warning information related to the Company's mineral supply chain. The early warning information gathered through grievances will be incorporated into the Company's early warning review procedures, providing factual evidence and data

¹⁹ 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/>

²⁰ 关于矿产供应链警示信号的分类与说明，详见《中国矿产供应链尽责管理指南》相关章节。

support for defining the scope of risk identification within the mineral supply chain.

1. 可以对哪些问题提起申诉？ What issues can be appealed?

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》（第二版）或公司《供应链尽责管理政策》中的要求。
- 4) 发现公司矿产供应链存在潜在警示信号线索，需向公司反馈并提请审查的。

Appeals that meet the following criteria will be accepted:

- 1) They relate to the company's due diligence management of mineral supply chains.
- 2) The company's business activities or business relationships have caused or may cause adverse impacts on stakeholders.
- 3) Commercial activities or business relations that violate *the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains (Second Edition) (Version 2.0)*, or the *Company's Supply Chain Due Diligence Policy*.
- 4) There are identified clues of potential red flags in the company's mineral supply chain that require reporting to the company for review.

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。

Appeals falling into any of the following categories will not be accepted:

- 1) Appeals unrelated to the company's due diligence management.
- 2) Appeals lacking sufficient evidence or witnesses to substantiate the reported issues.
- 3) Malicious appeals or those filed to gain competitive advantages.
- 4) If the appealed issues are beyond the scope of the company's internal resolution mechanisms, we will actively coordinate with external organizations to address them.

2. 谁可以提起申诉? **Who can file an appeal?**

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,均可向公司供应链尽责管理联合办公室提起申诉。

Any individual or organization, including but not limited to corporate clients, suppliers, affected community residents and employees, may file a complaint with the Joint Office for Supply Chain Due Diligence Management of the Company.

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。

If a complaint is submitted by a third-party organization or individual acting on behalf of the affected parties, such organization or individual shall clearly state the parties they represent and provide valid proof of their right of representation.

3. 如何提起申诉? **How to file an appeal?**

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。

Complainants shall fill out the *Supply Chain Due Diligence Complaint Form* shown in Appendix One, with no restrictions on language. The completed form shall be submitted to the Company's Joint Office for Supply Chain Due Diligence via email or post.

邮箱/Email: Luochunhui@cnmc-clm.com.cn

地址/Address: PLOT 867C, INDEPENDENCE AVENUE, LUANSHYA,
ZAMBIA

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》²¹进行申诉。

Complainants may also file appeals through the *Mediation and Consultation Mechanism for the Mining Industry and Mineral Value Chain* established by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters.

4. 保密与反打击报复 **Confidentiality and Anti-Retaliation**

4.1 公司对申诉人身份、申诉内容、调查过程等信息严格保密，仅限指定工作人员因履职接触，严禁向被申诉方及无关方泄露。

4.1 The Company shall keep strictly confidential the complainant's identity, complaint details, investigation process and other relevant information. Such information shall only be accessed by designated staff for the performance of their duties, and any disclosure to the respondent and irrelevant parties is strictly prohibited.

4.2 The Company prohibits all forms of retaliation. Anyone who retaliates against complainants, witnesses or investigators shall be held strictly accountable by the Company, and remedial measures will be taken accordingly.

4.2 公司严禁任何形式的打击报复，对申诉人、证人、调查人员实施打击报复的，公司将严肃追责并采取补救措施。

4.3 申诉人可选择匿名或要求保密，公司全程予以保护。

4.3 Complainants may choose to remain anonymous or request confidentiality, and the Company shall provide full protection throughout the process.

附件 1 《供应链尽责管理申诉书》

Appendix 1: Complaint Form for Supply Chain Due Diligence Management


中色卢安夏铜业有限公司
CNMC Luanshya Copper Mines Plc.
2025 年 12 月 15 日
15th December, 2025

附件/Attachment: