

珠海冠宇集团供应链尽责管理申诉办法

为就矿产供应链问题搭建利益相关方沟通与磋商平台，识别与调查公司矿产供应链尽责管理领域的申诉问题，维护各利益相关方的合法权益，促进矿产供应链申诉问题得到公正、合理的处理与解决，珠海冠宇电池股份有限公司（以下简称“珠海冠宇”）依据公司《矿产原材料尽责管理政策》制定本申诉办法。

I. 适用范围

以下内容相关的申诉会被受理：

1. 与公司矿产供应链尽责管理相关；
2. 因矿产供应链尽责管理缺失造成相关方人身安全、环境权益、社区福祉或合法经济权益等利益受损；
3. 公司的矿产供应链尽责管理实践违反了《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责管理指南》、《中国矿产供应链尽责管理指南（第二版）》或公司矿产供应链尽责管理相关政策中的要求。

符合以下任意一项的申诉不会被受理：

1. 与本公司矿产供应链尽责管理无关；
2. 无法提供充分证据或合理线索以支持申诉内容；
3. 恶意申诉或为获得竞争优势而发起的申诉；
4. 重复提交且无新证据的申诉
5. 申诉的问题超出公司内部机制所能够解决的范畴，将不被接受，但将提供具有协调能力的外部机构信息，并在必要时协助申诉方对接。

II. 矿产定义

矿产指钽、锡、钨、金、钴、锂、镍、天然石墨、锰、铜、铝等。

III. 申诉处理机构

申诉管理委员会：由集团《矿产原材料管理制度》中规定的审计部、采购部、法务部等部门组成。

部门职责：审计部负责受理与转达，采购部主导调查，法务部确保合法合规。

IV. 申诉渠道

利益相关方可以通过电话、电子邮件或者信件的方式提出意见、建议或申诉。非中文申诉材料可提供英文版本。

申诉邮箱：zhgysj@cosmx.com

申诉电话：0756-6328537

通讯地址：广东省珠海市斗门区井岸镇顺宇路 1 号

申诉采用冲突回避机制，如申诉人认为公司任何人员与申诉方存在利益冲突，可在申诉书中提供相关依据并要求回避，回避申请应在申诉提交时同时提出，由委员会在 5 个工作日内裁定。

公司亦认可其他合法合规的行业申诉机制与渠道，如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》。

V. 申诉处理机制

对于接收到的申诉，公司将按照《矿产原材料尽责政策》所述各类风险应对方式，遵照“提交”、“审查与受理”、“调查”、“协商”、“补救”、“存档”的流程进行申诉处理。

提交：申诉者填写《珠海冠宇矿产供应链申诉表》后，以电子邮件、邮寄、现场提交等方式向公司提出申诉，为确保申诉过程中的有效沟通，申诉材料应包括：

1. 申诉方的姓名或名称、住址或注册地址、联系方式
2. 被申诉方的姓名或名称、住址或注册地址、可能的联系方式
3. 申诉的具体事实、申诉者的主张及理由
4. 可以充分证明申诉情况的相关材料

审查与受理：公司审计部接收到矿产供应链相关申诉后，在 5 个工作日内告知采购部，并由采购部对申诉是否符合受理标准进行形式审查，确认申诉内容是否属于受理范围后，由审计部在接受到申诉后最长不超过 15 个工作日发出受理情况通知：

1. 经审查与评估，如申诉内容不属于本机制受理范畴，向申诉申请方发出驳回申请的决定，

- 书面说明具体理由并告知外部申诉途径（如当地监管机构联系方式）；
2. 经审查与评估，如申诉申请内容不清晰或证据不充分，将在 10 个工作日内要求申诉方补充相关资料与信息，并将在补充提供材料后进行再次审查，申诉方 15 个工作日内未补充则视为放弃；
3. 经审查与评估，如申诉申请内容清晰、证据充分，向申诉申请方发出受理申诉的决定。

调查：对于矿产供应链，由采购部统筹跟踪调查，其他部门协助支持提供必要的信息，并由审计部进行监督，必要时聘请第三方机构参与，以确保公正性。对于简单案件，调查将在受理后 30 个工作日内完成，复杂案件延长期限则将向申诉方说明。

公司对于申诉案件严重性按表 1 进行划分，并指派表 2 相应层级负责：

表 1 申诉事项风险评估

		风险的严重性				
		轻微	低	中	高	严重
风险重复发生的 可能性	几乎确定	C	B	A	A	A
	非常有可能	C	B	B	A	A
	可能	D	C	B	A	A
	不太可能	D	D	C	B	A
	几乎不可能	D	D	C	B	B

表 2 各申诉等级负责人

申诉等级	调查负责层级
D	供应链尽职调查负责人
C	CSR 负责人、供应链尽职调查负责人
B	可持续发展负责人、供应链尽职调查负责人
A	总经理、可持续发展负责人、供应链尽职调查负责人

协商：在进行调查后，公司可根据具体情况，联合申诉双方及其他利益相关方开展对话协商，协调各方就解决方案达成一致。当出现以下情况时，协商进程终结：

1. 双方达成一致，共同签署《珠海冠宇矿产供应链申诉意见处理表》；
2. 双方经过一轮或者几轮磋商，申诉者和被申诉对象中的任何一方不接受解决方案，或者

不接受解决方案的执行结果，无法达成一致意见的，则可以寻其他解决途径，如第三方争端解决机构、当地劳动争议仲裁委员会、行业协会调解中心或专家等；

3. 被申诉方拒不回应，公司无法在规定时限内和被申诉方取得联系，或被申诉方拒绝协商邀请，将告知外部解决途径。

协商结束后，审计部将协商的最终结果通知申诉双方及管理者代表。

补救：在处理过程中如采取补救措施，将遵循联合国工商业与人权指导原则（实施联合国“保护、尊重和补救”框架指导原则）。同时，采取的措施在满足当地法律法规的前提下，亦会符合联合国《经济、社会与文化权利国际公约》及《公民权利与政治权利国际公约》的基本要求。包括推动各利益相关方：

1. 立即停止或采取措施调整存在问题的活动，确保问题不再对受影响方或其他相关方造成进一步的损害；
2. 按照当地法律法规要求，在协商达成的期限内，向受影响方提供适当的救济，以弥补所造成的损害；
3. 审查和改进管理流程与制度，针对调查中发现的缺陷进行调整，确保相关责任主体问责到位，并防止类似问题再次发生。

存档：针对所有被受理的申诉，采购部填写《冠宇矿产供应链尽责申诉存档卡》，与申诉书、调查报告、意见处理表、执行结果确认书等相关文件一并存档保管，相关档案的保存年限不得少于十年。参与处理申诉的人员应对要求保密的信息以及未允许公开的信息负有保密责任。未经管理者代表同意，禁止向无关人员透露，如有违反，将按照公司保密制度奖惩条例处罚。

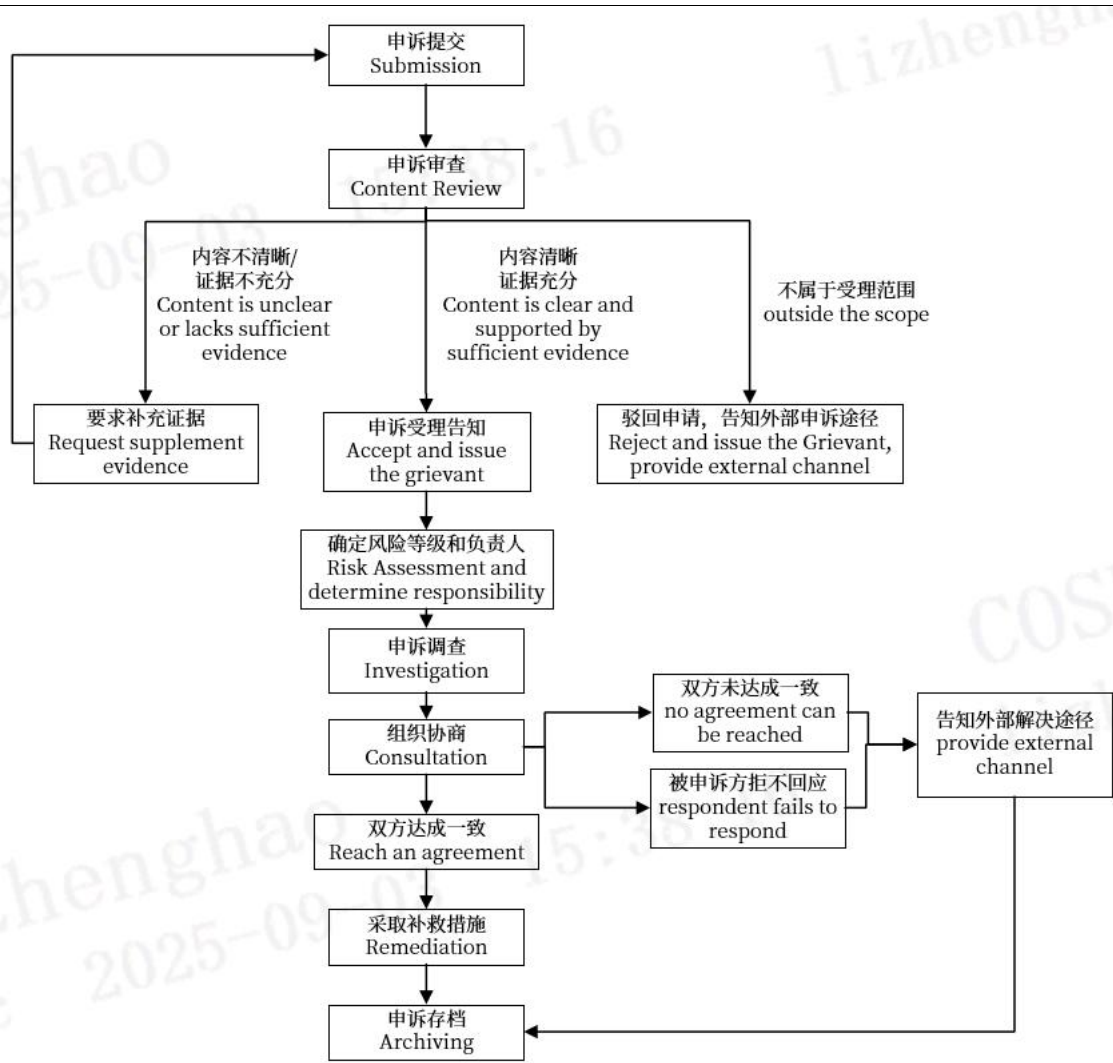


图 1 冠宇集团申诉处理流程图

VI. 申诉者保护

受理人员对申诉信息严格保密。申诉材料应作为机密级资料严格管理，未经公司管理层或分管领导批准，任何人不得调阅。仅在确保申诉人安全（隐去申诉人姓名、联系方式等直接标识）前提下，向被申诉方披露必要信息。但当司法程序或监管机构依法调阅并出具正式法律文书时，经法务部审核后可提供必要信息，并由法务部留存调阅记录并通知申诉人。

公司严禁打击报复申诉人（包括但不限于解雇、降职、威胁、骚扰、边缘化或任何不利待遇），保护申诉人的合法权益，对严重泄密、导致举报人合法权益受到损害的，移交司法机关处理。申诉人如遭遇报复，可直接向审计部负责人提交证据，公司将立即调查并追究责任人。

VII. 改进机制与预防措施

申诉事件结束后，由采购组织各相关部门进行原因分析，识别管理制度或流程中的不足，制定后续改善和预防措施，相应措施包括：

1. 加强相关人员（公司内部、供应商）培训，提升责任意识和技能水平。
2. 视申诉情况和处理结果，调整供应商绩效评价。
3. 定期审查并更新申诉机制，确保其适应性和有效性。
4. 分析申诉根因，必要时修订《矿产原材料供应商管理制度》
5. 如有披露需要，公布匿名化申诉数据（如申诉类型、处理时效、补救成果）

VIII. 生效日期

本办法自发布之日起生效

2025 年 7 月 8 日

附件

《珠海冠宇矿产供应链申诉表》

《珠海冠宇矿产供应链申诉意见处理表》

Grievance Mechanism for Supply Chain Due Diligence of Zhuhai CosMX Battery Co., Ltd.

To establish a platform for communication and consultation with stakeholders on mineral supply chain issues, identify and investigate grievances related to the company's mineral supply chain due diligence, safeguard the legitimate rights and interests of all stakeholders, and promote fair and reasonable resolution of mineral supply chain grievances, Zhuhai CosMX Battery Co., Ltd. (hereinafter referred to as "Zhuhai CosMX" or "the company") formulates this grievance mechanism in accordance with the company's Mineral Raw Materials Due Diligence Policy.

I. Scope of Application

Grievances related to the following content will be accepted:

- a. Issues related to the company's mineral supply chain due diligence.
- b. Harm caused to stakeholders' personal safety, environmental rights, community well-being, or legitimate economic interests due to deficiencies in mineral supply chain due diligence.
- c. Violations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, the Chinese Due Diligence Guidelines for Mineral Supply Chains (Second Edition), or the company's mineral supply chain due diligence policies in practice.

Grievances meeting any of the following conditions will not be accepted:

- a. Issues unrelated to the company's mineral supply chain due diligence.
- b. Inability to provide sufficient evidence or reasonable clues to support the grievance.
- c. Malicious grievances or those filed to gain competitive advantage.
- d. Repeated submissions without new evidence.

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- e. Grievances beyond the company' s internal resolution mechanism will not be accepted. However, information on external institutions with mediation capabilities will be provided, and assistance will be offered to connect the grievant with such institutions when necessary.

II. Definition of Minerals

Minerals refer to tantalum, tin, tungsten, gold, cobalt, lithium, nickel, natural graphite, manganese, copper, aluminum, etc.

III. Grievance Handling Authority

The Grievance Management Committee: Composed of departments specified in the group's Mineral Raw Materials Management System, including the Audit Department, Procurement Department, and Legal Department.

Department Responsibilities: The Audit Department is responsible for receiving and forwarding grievances, the Procurement Department leads investigations, and the Legal Department ensures legal and regulatory compliance.

IV. Grievance Channels

Stakeholders may submit opinions, suggestions, or grievances via telephone, email, or written correspondence. Non-Chinese grievance materials may be provided in English.

Email: zhgysj@cosmx.com

Telephone: 0756-6328537

Mailing Address: No. 1 Shunyu Road, Jing'an Town, Doumen District, Zhuhai City, Guangdong Province

A conflict avoidance mechanism is applied to grievances. If the grievant believes any company personnel has a conflict of interest with the grievant, relevant grounds may be provided in the grievance submission, and a request for recusal may be made. Recusal requests must be submitted simultaneously with the

grievance and will be adjudicated by the committee within 5 business days.

The company also recognizes other legitimate and compliant industry grievance mechanisms and channels, such as the Mediation and Consultation Mechanism for the Mining and Mineral Value Chain administered by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC).

V. Grievance Handling Mechanism

For received grievances, the company will follow the risk response methods outlined in the Mineral Raw Materials Due Diligence Policy and adhere to the following process: "Submission," "Review and Acceptance," "Investigation," "Consultation," "Remediation," and "Archiving."

Submission: The grievant shall complete the Zhuhai CosMX Mineral Supply Chain Grievance Form and submit it to the company via email, mail, or in-person delivery. To ensure effective communication during the grievance process, the grievance materials must include:

- a. The grievant's full name or entity name, address or registered address, and contact information.
- b. The respondent's full name or entity name, address or registered address, and possible contact information.
- c. The specific facts of the grievance, the claims made by the grievant, and the supporting reasons.
- d. Relevant materials that sufficiently substantiate the grievance.

Review and Acceptance: Upon receiving a mineral supply chain-related grievance, the Audit Department will notify the Procurement Department within 5 business days. The Procurement Department will conduct a preliminary review to determine whether the grievance meets the acceptance criteria and falls within the scope of this mechanism. The Audit Department will issue a notice regarding the acceptance status within a maximum of 15 business days after receiving the

grievance:

- a. If, after review and assessment, the grievance content is deemed outside the scope of this mechanism, a decision to reject the grievance will be issued to the grievant, accompanied by a written explanation of the specific reasons and information on external grievance channels (e.g., contact details of local regulatory authorities).
- b. If, after review and assessment, the grievance content is unclear or lacks sufficient evidence, the grievant will be requested to supplement relevant materials and information within 10 business days. The grievance will be reviewed again after the supplementary materials are provided. If the grievant fails to supplement the materials within 15 business days, the grievance will be considered abandoned.
- c. If, after review and assessment, the grievance content is clear and supported by sufficient evidence, a decision to accept the grievance will be issued to the grievant.

Investigation: For mineral supply chain grievances, the Procurement Department will oversee and coordinate the investigation, with other departments providing necessary support and information. The Audit Department will supervise the process. Third-party institutions may be engaged to ensure impartiality when necessary. For simple cases, the investigation will be completed within 30 business days after acceptance. For complex cases requiring an extension, the grievant will be notified.

The company categorizes the severity of grievance cases according to Table 1 and assigns responsibility based on the corresponding levels in Table 2.

Table 1 Risk Assessment of grievance issues

		Severity of the Risk				
		Minor	Low	Medium	High	Critical
Possibility of recurrence	Almost certain	C	B	A	A	A
	Likely	C	B	B	A	A
	Possible	D	C	B	A	A
	Unlikely	D	D	C	B	A
	Rare	D	D	C	B	B

Table 2 Investigation responsibility levels for each grade

Risk Grade	Responsibility levels
D	Supply Chain Due Diligence Manager
C	CSR Manager, Supply Chain Due Diligence Manager
B	Sustainable Development Manager, Supply Chain Due Diligence Manager
A	General Manager, Sustainable Development Manager, Supply Chain Due Diligence Manager

Consultation: Following the investigation, the company may, depending on the specific circumstances, facilitate dialogue and consultation between the grievant, the respondent, and other stakeholders to coordinate a mutually agreed resolution. The consultation process will conclude under the following circumstances:

- a. Both parties reach an agreement and jointly sign the Zhuhai CosMX Mineral Supply Chain Grievance Resolution Form.
- b. After one or several rounds of consultation, if either the grievant or the respondent refuses to accept the proposed resolution or its implementation,

and no agreement can be reached, alternative dispute resolution channels may be pursued, such as third-party dispute resolution institutions, local labor dispute arbitration committees, industry association mediation centers, or experts.

- c. If the respondent fails to respond, cannot be contacted within the specified timeframe, or refuses to participate in consultation, external resolution channels will be recommended to the grievant.

Upon conclusion of the consultation, the Audit Department will notify both parties and the management representative of the final outcome.

Remediation: If remedial measures are implemented during the process, they will adhere to the UN Guiding Principles on Business and Human Rights (implementing the UN "Protect, Respect, and Remedy" framework). Additionally, all measures will comply with local laws and regulations while aligning with the fundamental requirements of the UN International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights. This includes promoting the following among stakeholders:

- a. Immediately halting or taking measures to rectify problematic activities to ensure no further harm is caused to affected parties or other stakeholders.
- b. Providing appropriate remedies to affected parties within the agreed timeframe reached through consultation, in accordance with local laws and regulations, to compensate for damages incurred.
- c. Reviewing and improving management processes and systems, addressing deficiencies identified during the investigation, ensuring accountability of relevant responsible entities, and preventing recurrence of similar issues.

Archiving: For all accepted grievances, the Procurement Department will complete the CosMX Mineral Supply Chain Due Diligence Grievance Archiving Card and archive it along with relevant documents, including the grievance submission, investigation report, resolution form, and implementation confirmation. The retention period for such archives shall be no less than ten

years. Personnel involved in handling grievances are obligated to maintain confidentiality regarding information designated as confidential or not authorized for disclosure. Disclosure to unrelated parties is prohibited without the consent of the management representative. Violations will be penalized in accordance with the company’ s confidentiality policies and reward/penalty regulations.

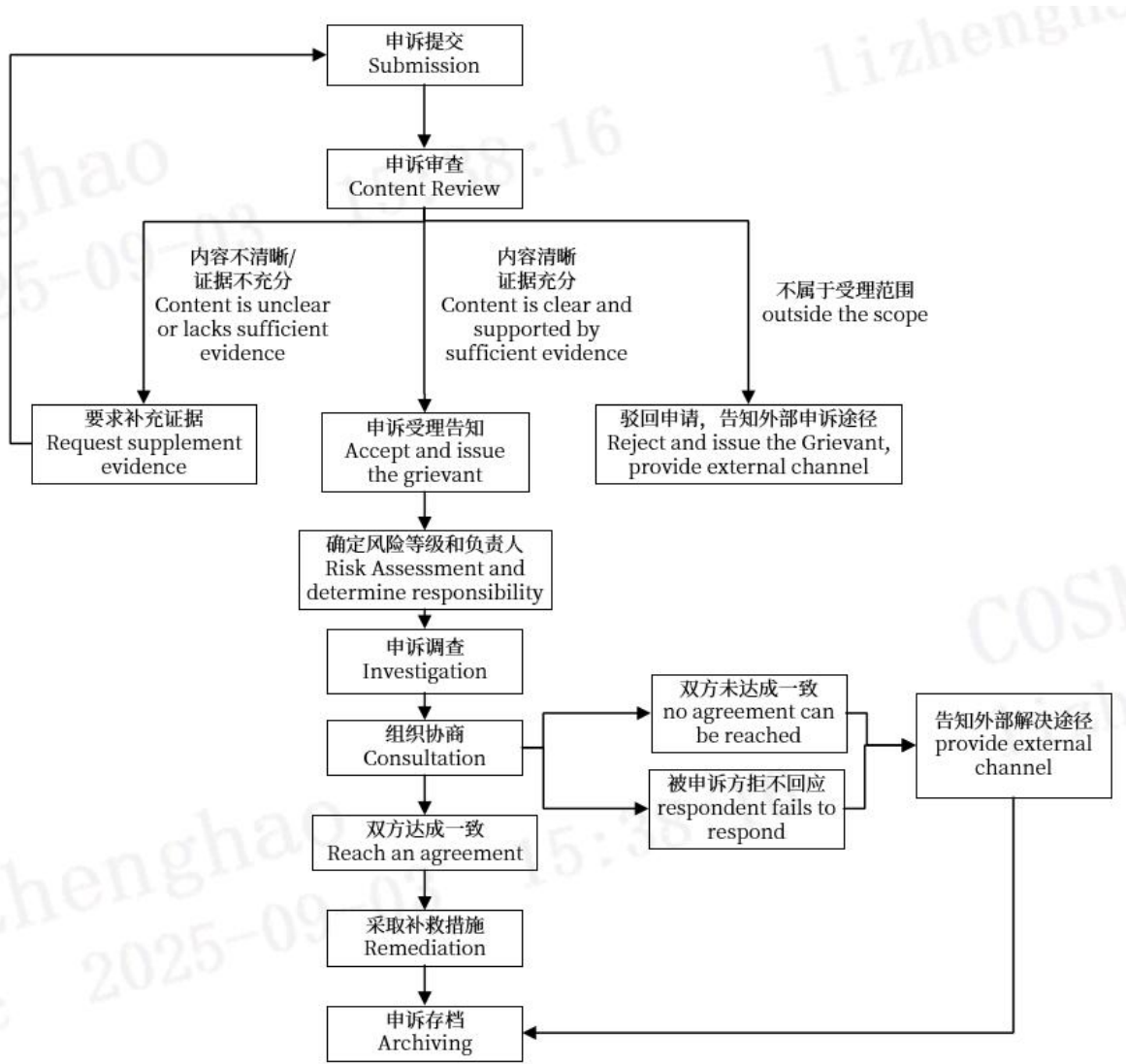


Figure.1 Zhuhai CosMX Grievance Handling Mechanism flow chart

VI. Protection of Grievants

Personnel handling grievances shall maintain strict confidentiality of all grievance-related information. Grievance materials shall be managed as confidential-level documents and may not be accessed by anyone without approval from company management or designated leadership. Necessary information will be disclosed to the respondent only under the condition that the grievant's safety is ensured (e.g., by removing direct identifiers such as the grievant's name and contact details). However, if judicial proceedings or regulatory authorities require access to such information in accordance with the law and present formal legal documents, necessary information may be provided after review by the Legal Department. The Legal Department will retain records of such access and notify the grievant.

The company strictly prohibits retaliation against grievants (including but not limited to dismissal, demotion, threats, harassment, marginalization, or any adverse treatment) and protects their legitimate rights and interests. In cases of severe confidentiality breaches that harm the grievant's legitimate rights, the matter will be referred to judicial authorities.

If a grievant experiences retaliation, they may submit evidence directly to the head of the Audit Department. The company will immediately investigate and hold responsible parties accountable.

VII. Improvement Mechanism and Preventive Measures

Upon conclusion of a grievance case, the Procurement Department will organize relevant departments to conduct root cause analysis, identify deficiencies in management systems or processes, and develop subsequent improvement and preventive measures. These measures may include:

1. Strengthening training for relevant personnel (internal employees and suppliers) to enhance awareness of responsibilities and skill levels.
2. Adjusting supplier performance evaluations based on the nature and outcome

of the grievance.

3. Regularly reviewing and updating the grievance mechanism to ensure its adaptability and effectiveness.
4. Analyzing the root causes of grievances and, if necessary, revising the Mineral Raw Materials Supplier Management System.
5. Publishing anonymized grievance data (e.g., types of grievances, processing timelines, remediation outcomes) if disclosure is required.

VIII. Effective Date

This mechanism takes effect from the date of its issuance.

July 8th, 2025

Appendices

- Zhuhai CosMX Mineral Supply Chain Grievance Form
- Zhuhai CosMX Mineral Supply Chain Grievance Resolution Form

附件一：
Attachment I：

《珠海冠宇矿产供应链申诉表》
Zhuhai CosMX Mineral Supply Chian Grievance Form

申诉方名称 Grievant Name		申诉方地址 Grievant Address	
申诉方联系方式 Grievant Contact Info.		申诉日期 Date of Grievance	
被申诉方名称 Respondent Name		被申诉方地址 Respondent Address	
被申诉方联系方式 (如有) Respondent Contact Info. (if available)		可接受的交流语言 Acceptable Language for Communication	
是否为受委托方 Authorized Representative (Y/N)		委托人名称 (附授权证明) Name of Principal (with attached proof)	
冲突回避要求 Conflict Avoidance Request			
特定保密要求 Confidentiality Requirements			

申诉内容（已遭受或可能会遭受的负面影响描述） Grievance Content (Description of actual or potential adverse impacts)
申诉方诉求（实现诉求所期望的解决方案） Grievant Claims (Desired resolution to address the claims)
申诉方签字： Grievant Signature:

附件二：
Attachment II：

《珠海冠宇矿产供应链申诉意见处理表》

Zhuhai CosMX Mineral Supply Chain Grievance Resolution Form

申诉各方经友好协商，就本表格如下内容达成一致，本次矿产供应链申诉协商流程终结。
Through friendly consultation, the parties involved in the grievance have reached an agreement on the following terms, thereby concluding the mineral supply chain grievance mediation process.

申诉方名称 Grievant Name		申诉方地址 Grievant Address	
申诉方联系方式 Grievant Contact Info.		申诉日期 Date of Grievance Submission	
被申诉方名称 Respondent Name		被申诉方地址 Respondent Address	
被申诉方联系方式 Respondent Contact Info.		沟通协商日期 Mediation Date	
申诉议题 Grievance Issue			
解决方案及协商结果 Proposed Solution and Mediation Outcome			

申诉方 Grievant:
签字 (Signature):
被申诉方 Respondent:
签字 (Signature):
冠宇负责人签字 Authorized Representative of CosMX (Signature):