

申诉管理程序

Appeal Management Procedure

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1. 目的

1. Purpose

为了加强公司黄金供应链的合规性管理，根据《LBMA 负责任黄金指南》的要求，确保公司供应链不存在侵犯人权、诈骗、恐怖分子筹资及洗钱等行为，本公司制定了相关的审查制度，各供应商均应当全力配合公司尽职调查项目组进行审查。允许相关人员向公司提出其认为与供应链合规性管理不相符合的情况进行申诉，公司会采取相应的措施进行调查并妥善处理。

In order to strengthen the compliance management of the company's gold supply chain, in accordance with the requirements of the LBMA Responsible Gold Guidance, and to ensure that the company's supply chain does not engage in human rights violations, fraud, terrorist financing, and money laundering, the company has established relevant review systems, and all suppliers should fully cooperate with the company's due diligence project team for review. Allow relevant personnel to file complaints with the company regarding situations they believe are not in line with supply chain compliance management, and the company will take appropriate measures to investigate and handle them properly.

2. 适用范围

2. Scope

本程序内容适用于任何员工和外部利益相关方，包括任何单位、政府组织、非政府组织、个人等。

The content of procedure document is applicable to any employee and external stakeholders, including any unit, government organization, non-governmental organization, individual, etc.

3. 引用文件依据

3. Reference document

《LBMA 负责任黄金指南》第 9 版 & 《福建金玉德尚精炼科技有限公司黄金供应链尽

职调查管理政策》

《LBMA Responsible Gold Guidance》9th Edition

《FUJIANJINYUDESANG Gold Supply Chain Due Diligence Policy》

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，成员由合规总监、合规官、合规专员组成，工作组负责对申诉的处理。

The company has established an appeal handling team, consisting of the compliance director, compliance officer, and compliance specialist. The team is responsible for handling appeals.

5. 工作程序

5. Work procedure

5.1 申诉渠道及信息收集

5.1 Appeal channels and information collection

5.1.1 公司设立联系/申诉渠道：

5.1.1 Establish contact/appeal channels for the company:

合规官：陈佳鑫 / Compliance Officer: Mr Jiaxin Chen

申诉电话 / Appeal hotline: 0591-62199999-9077

申诉邮箱 / Appeal Email: chenjiaxin@decent9999.cn

5.1.2 在福建金玉德尚精炼科技有限公司集团官网：<http://www.houdejin.com/> 中予以公布，电话、电子邮箱用于接收相关的询问和申诉。

5.1.2 On the official website of Fujian Jinyudeshang Refinery Technology Co., Ltd.: <http://www.houdejin.com/>, It will be publicly announced, and telephone and email will be used to receive relevant inquiries and appeals.

5.1.3 由公司合规专员定期查看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。

5.1.3 The company's compliance officer shall regularly review information received from relevant parties regarding concerns related to the responsible supply chain, including mining, trade, processing, and export situations.

5.2 申诉内容要求

5.2 Requirements for appeal

5.2.1 相关人员可通过我司的官网下载【供应链尽责管理申诉书】填写相应的申诉，也可以通过自行提交申诉证据的形式进行申诉，亦可口头咨询相应的政策、疑问及调查问卷。

5.2.1 Relevant personnel can download the "Supply Chain Responsibility Management Appeal Form" from our company's official website to fill out the corresponding appeal. They can also submit their own appeal evidence, or verbally consult on relevant policies, questions, and survey questionnaires.

5.2.2 为有效处理申诉, 对我司的供应链管理提起申诉须包括以下内容:

5.2.2 In order to effectively handle appeals, appeals against our supply chain management must include the following:

1) 具体说明提起申诉的对象及理由;

1) Provide specific details on the object and reasons for filing an appeal;

2) 附上相关的书面证据;

2) Attach relevant written evidence;

3) 具体说明在提出申诉之前是否采取了相应的措施。

3) Please specify whether appropriate measures were taken before filing the appeal.

5.3 申诉的分类

5.3 Classification of appeals

公司需对收到的申诉信息经过初步调查后进行分类, 将其划分为一般信息、特殊

/重要申诉信息和不予受理申诉信息。

The company needs to conduct a preliminary investigation and classify the received appeal information into general information, special/important appeal information, and non accepted appeal information.

1) 一般信息: 相关人员针对公司供应链管理政策具体实施提出的疑问以及供方的调查问卷等。

1) General information: Questions raised by relevant personnel regarding the specific implementation of the company's supply chain management policies, as well as survey questionnaires from suppliers.

2) 特殊/重要申诉信息:

2) Special/Important Appeal Information:

- 管理不符合 LBMA 的要求的申诉;
- Manage appeals that do not meet LBMA requirements;
- 对供应商的采购涉及公司所识别的高风险区域;
- The procurement of suppliers involves high-risk areas identified by the company;
- 对供应商的采购不符合公司制定的供应链管理政策。
- The procurement of suppliers does not comply with the company's supply chain management policies.

3) 不予受理的申诉信息:

3) Unacceptable appeal information:

- 出于主观恶意(包括琐碎的、无理取闹的或似乎是为了获得竞争优势)而提起的申诉;
- Appeal raised out of subjective malice (including trivial, unreasonable, or seemingly aimed at gaining a competitive advantage)
- 提出的申诉缺乏具有说服力的客观证据的支持。
- The appeal lacks convincing objective evidence to support it.

5.4 申诉的处理

5. 4 Handling of appeals

5. 4. 1 关于匿名申诉

5. 4. 1 Anonymous appeals

我司支持匿名申诉，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处理，如涉嫌违法犯罪，立即报案并移送司法机关处理。

Our company supports anonymous appeals, and the appeal handling team shall not disclose the appellant's information to anyone outside the working group. Any appeal content that may involve the appellant's information shall be kept confidential. If the appeal content has a vested interest in a member of the working group, the working group shall immediately request the member to avoid suspicion. If any retaliation against the appellant is found, the company will take serious and severe measures against the relevant employees in accordance with the company's articles of association. If they are suspected of illegal activities, they will be immediately reported and transferred to the judicial authorities for handling.

5. 4. 2 申诉处理流程

5. 4. 2 Appeal Handling Process

5. 4. 2. 1 申诉处理小组应在收到申诉后 10 个工作日内确认收到申诉，并进行审核，确认接受或拒绝申诉：

5. 4. 2. 1 The appeal handling team shall confirm receipt of the appeal within 10 working days after receiving it, conduct a review, and confirm acceptance or rejection of the appeal:

1) 如果申诉被拒绝，应向申诉方说明理由，并记录在【供应链尽职管理申诉记录表】，不得采取进一步行动。

1) If the appeal is rejected, the reasons should be explained to the appellant and recorded

in the Supply Chain Due Diligence Management Appeal Record form:, and no further action shall be taken.

2) 对重要申诉则由申诉处理小组在决定受理后 30 个工作日内对申诉内容进行调查、审核和裁决，工作小组应当尽可能在截止日期前完成工作。如遇到申诉内容较为复杂，需要更多的时间进行调查的，申诉处理小组应当采取合理的措施，包括：

2) For important appeals, the appeal handling team shall conduct investigations, reviews and rulings of the appeal content within 30 working days after deciding to accept it. The working group should complete the work as much as possible before the deadline for investigation, If the appeal content is complex and requires more time for investigation, the appeal handling team should take reasonable measures, including:

- 召开一次或多次会议以做出合理决定；
- Hold one or more meetings to make reasonable decisions;
- 咨询专家；
- Consult an expert;
- 请求申诉方或其他人提供更多信息。
- Request the complainant or others to provide more information.

申诉方不配合申诉处理小组的工作可被视为中止该程序的理由，申诉处理小组应当协商一致决定是否中止申诉程序；

The failure of the appellant to cooperate with the work of the appeal handling team may be considered as a reason for suspending the procedure, and the appeal handling team shall decide through consultation whether to suspend the appeal procedure;

5. 4. 2. 2 申诉决定应当以书面形式传达到申诉方，无法书面传达的方可通过其它方式如电话传达；

5. 4. 2. 2 The appeal decision shall be conveyed in writing to the appellant, and if it cannot be conveyed in writing, it may be conveyed through other means such as telephone;

5. 4. 2. 3 申诉决定内容应当包括：申诉决定、做出申诉决定的时间以及建议。

5. 4. 2. 3 The content of the appeal decision should include: the appeal decision, the time

when the appeal decision was made, and recommendations.

5. 4. 2. 4 申诉处理小组应当定期对申诉处理结果进行总结, 并对申诉内容、处理方式和处理结果在公司官网进行公示。

5. 4. 2. 4 The appeal handling team shall regularly summarize the results of the appeal handling, and publicize the content, handling methods, and results of the appeal on the company's official website.

5. 4. 3 申诉结果公示

5. 4. 3 Announcement of Appeal Results

合规专员每月初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, 合规官负责全程监督风险减缓措施的实施并定期向合规总监汇报进度, 在风险减缓措施实施完成后, 由合规总监在 7 个工作日内评估措施的有效性并作出总结和评价。

At the beginning of each month, the compliance specialist summarizes the results of risk management and publishes the appeal content, handling methods, and results on the company's official website. The compliance officer is responsible for supervising the implementation of risk mitigation measures throughout the process and reporting progress to the compliance director regularly. After the implementation of risk mitigation measures is completed, the compliance director evaluates the effectiveness of the measures within 7 working days and makes a summary and evaluation.

5. 4. 4 申诉的记录

5. 4. 4 Record of appeals

申诉处理小组应将收到的申诉及处理情况记录在【供应链尽职管理申诉记录表】, 包括:

The appeal handling team should record the received appeals and their handling status in the 'Supply Chain Due Diligence Management Appeal Record Form', including:

1) 何人何时提交申诉;

1) Who submitted the appeal and when;

- 2) 申诉的类型、主题以及随申诉提交的其他相关信息;
- 2) The type, topic, and other relevant information submitted with the appeal;
- 3) 接受或拒绝申诉的决定;
- 3) The decision to accept or reject the appeal;
- 4) 申诉的处理结果。
- 4) The handling result of the appeal.

6. 使用记录表单

6. Use Record Form

6.1 【供应链尽职管理申诉书】

6.1 [Appeal Form for Supply Chain Due Diligence Management]

6.2 【供应链尽职管理申诉记录表】

6.2 [Supply Chain Due Diligence Management Appeal Record Form]