

广东佳纳能源科技有限公司

Guangdong Jiana Energy Technology Co., Ltd.

供应链尽责管理申诉机制

Supply Chain Responsible Management Appeal Mechanism

第一条：目的

Article 1: Purpose

1.1 为了及时发现和处理各类风险与隐患，保障外部利益相关方与公司的顺畅沟通，提高与利益相关方参与和互动的质量，从而建立和谐互利的利益相关方关系，维护各利益相关方公司的合法权益，优化企业发展的内外部环境，特根据《广东佳纳能源科技有限公司供应链尽责管理政策》制定本管理制度。

To promptly identify and address various risks and hazards, ensure smooth communication between external stakeholders and the company, and enhance the quality of engagement and interaction with stakeholders, this management system is established in accordance with the Guangdong Jiana Energy Technology Co., Ltd. Supply Chain Due Diligence Management Policy. The system aims to foster harmonious and mutually beneficial stakeholder relationships, safeguard the legitimate rights and interests of all relevant parties, and optimize the internal and external environment for corporate development.

第二条：适用范围

Article 2: Scope of Application

1.2 本管理制度适用于基于公司产品、供应链、运营行为、业务关系而与公司存在直接或间接潜在联系的所有利益相关方（“申诉人”）。包括但不限于：

This management system applies to all stakeholders ("Complainants") who have direct or potential connections with the company based on its products, supply chain, operational activities, or business relationships, including but not limited to:

1.2.1 公共部门（包括政府部门）及其代表；

Public sector (including government entities) and their representatives;

1.2.2 公司客户，包括供应商、合作商和采购商；

Company clients, including suppliers, partners, and purchasers;

1.2.3 社会组织和媒体；

Social organizations and media;

1.2.4 股东和投资者；

Shareholders and investors;

1.2.5 公司各运营所在地的社区居民。

Local community residents in areas where the company operates.

第三条：申诉事项

Article 3: Grievance Matters

3.1 申诉人可就与公司的产品及其供应链、经营管理决策与活动、业务关系、外部非业务关系（包括政府关系）相关，且实际或可能违反适用于公司的法律法规或其他要求的情况，尤其是实际或可能违反以下各项文件中的要求的情况提出申诉：

Complainants may file grievances regarding the company's products, supply chain, operational decisions and activities, business relationships, or non-business external relationships (including government relations) that involve actual or potential violations of applicable laws, regulations, or other binding requirements—particularly those stipulated in the following documents:

3.1.1 公司《供应链尽责管理政策》；

The company's "Supply Chain Due Diligence Management Policy";

3.1.2 公司《供应商行为准则》；

The company's "Supplier Code of Conduct";

3.1.3 《中国负责任矿产供应链尽责管理指南》；

"Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains";

3.1.4 《中国对外矿业投资社会责任指引》。

"Chinese Guidelines for Social Responsibility in Overseas Mining Investments".

第四条：申诉原则

Article 4: Grievance Principles

4.1 申诉人向公司提出申诉，以及公司接受和处理申诉均遵循以下五个原则：

The submission of grievances by complainants, as well as the acceptance and handling of grievances by the company, shall adhere to the following five principles:

4.1.1 事实原则 Fact-Based Principle

申诉人应根据具体事实而非公司的战略、政策或方针提出申诉，并充分、完整地提供基于事实的证据和材料，公司接受和处理申诉则应以查清事实为基本出发点并根据查清的事实做出处理。

Complainants shall base grievances on specific facts rather than the company's strategies, policies, or guidelines, and shall provide sufficient and complete factual evidence and

materials. The company shall prioritize factual verification in accepting and handling grievances and make decisions based on the established facts.

4.1.2 关联原则 Relevance Principle

申诉人可为自身或代表其他个人、群体或组织提出申诉，申诉事项需与公司的产品及其供应链、经营管理决策与活动、业务关系、外部非业务关系相关，公司不接受也不处理与公司不存在任何关联的申诉。

Complainants may file grievances on their own behalf or on behalf of other individuals, groups, or organizations. The subject of the grievance must be related to the company's products, supply chain, operational decisions and activities, business relationships, or non-business external relationships. The company will not accept or address grievances that are unrelated to its operations.

4.1.3 程序原则 Procedural Principle

申诉人提出申诉和参与申诉应严格遵照本制度规定的程序和流程，公司接受和处理申诉也应严格按照本制度的要求进行。

Complainants shall strictly follow the procedures and processes stipulated in this system when submitting and participating in grievances. The company shall also strictly adhere to the requirements of this system in accepting and handling grievances.

4.1.4 保密原则 Confidentiality Principle

申诉人和公司均应在保密的原则下，对申诉进行严肃处理，在申诉处理过程中，申诉人和公司相关人员均应保守秘密，不在处理程序结束前就申诉进程和内容做公开披露。

Both complainants and the company shall handle grievances with strict confidentiality. Throughout the grievance process, all involved parties shall maintain secrecy and refrain from publicly disclosing the progress or content of the grievance before the resolution process is concluded.

4.1.5 及时原则 Timeliness Principle

申诉人应在知道或理应知道相关事实后的合理时间内及时提出申诉，以便调查和处理，公司在接受到申诉以后，应及时处理并给予答复，但公司不予受理自申诉人知道或理应知道相关事实超过两年的申诉。

Complainants shall submit grievances within a reasonable time after becoming aware (or should have become aware) of the relevant facts to facilitate investigation and resolution. Upon receiving a grievance, the company shall process and respond to it in a timely manner. However, the company will not accept grievances filed more than two years after the complainant knew or should have known the relevant facts.

第五条：申诉层级

Article 5: Grievance Escalation Levels

5.1 公司设立供应链管理办公室和申诉处理委员会：

The company establishes a Supply Chain Management Office and a Grievance Handling Committee:

5.1.1 公司供应链管理办公室 **Company Supply Chain Management Office**

公司供应链管理办公室是外部申诉接受、处理、答复的具体负责部门，由其协调公司相关部门提出申诉解决方案。

As the designated department responsible for receiving, processing, and responding to external grievances, the Supply Chain Management Office coordinates with relevant internal departments to develop grievance resolution proposals.

5.1.2 申诉处理委员会 **Grievance Handling Committee**

在公司可持续发展指导委员会下成立五人申诉处理委员会，由一名公司主要领导，以及国际业务、营销、品质部以及人力资源各部门一位主要负责人组成，由供应链管理办公室支持其工作。申诉处理委员会不直接接收申诉，根据申诉程序由供应链管理办公室接收申诉，并将申诉上报申诉处理委员会，由委员会成员代表公司提出申诉最终解决方案。

Under the company's Sustainable Development Steering Committee, a five-member Grievance Handling Committee shall be established, consisting of one senior company executive and one principal representative from each of the following departments: International Business, Marketing, Quality, and Human Resources. The Supply Chain Management Office shall provide operational support to the Committee. The Grievance Handling Committee does not directly accept complaints. In accordance with the grievance procedures, complaints shall first be received by the Supply Chain Management Office, which will then escalate them to the Grievance Handling Committee. The Committee members will represent the company in proposing final resolutions to the complaints.

第六条：申诉渠道

Article 6: Grievance Channels

6.1 公司申诉邮箱 **Company Grievance Email**

ESG@dowstone.com.cn

6.2 公司申诉网址 **Company Grievance Website**

<http://www.jianae.com/>

第七条：申诉程序

Article 7: Grievance Procedure

7.1 所有申诉应严格遵循一下处理程序：

All grievances shall strictly follow this handling procedure:

7.1.1 提出申诉 **Submission of Grievance**

申诉人申诉时须按照公司统一制定并提供的《供应链尽申诉书》(附件一)，说明相关事实和申诉的诉求；

Complainants must use the company's standardized "Supply Chain Grievance Form" (Appendix 1) to state facts and claims.

7.1.2 初步审查 **Initial Review**

供应链管理办公室接到申诉后，应首先研判该项申诉是否符合本管理制度第二到第四条的受理条件，并在 5 个工作日内与申诉人确认收到申诉。如不符合受理条件，则应在与申诉人确认收到申诉的同时告知申诉人该申诉不符合受理条件，且申诉终止，并应填写《供应链尽责申诉处理意见书》(附件二)；

Upon receiving a grievance, the Supply Chain Management Office shall first determine whether the grievance meets the acceptance criteria stipulated in Articles 2 to 4 of this management system. The Office must acknowledge receipt of the grievance to the complainant within 5 working days. If the grievance does not meet acceptance criteria, the Office shall notify the complainant of the non-compliance while acknowledging receipt; the grievance process shall be terminated; and the Office shall complete the "Supply Chain Due Diligence Grievance Resolution Form" (Appendix 2).

7.1.3 申诉处理 **Grievance Handling**

7.1.3.1 调查与办公室审查 **Investigation & Office Review**

如果申诉符合受理条件，供应链管理办公室在接到申诉后，应会同相关部门讨论研究，进行调查和取证，必要时获取公司高层管理的意见和支持，并应在接到申诉之日起 15 个工作日内向申诉人做出答复和处理意见。如果申诉人接受该答复即可总结该申诉；如果申诉人不接受供应链管理办公室所作答复和处理意见，则应将相关情况在 5 个工作日内向公司申诉处理委员会报告；

If the grievance meets the acceptance criteria, the Supply Chain Management Office, upon receiving the grievance, should jointly discuss and study with relevant departments, conduct investigations and gather evidence. If necessary, it should obtain the opinions and support of the company's senior management. And it should provide a response and handling opinion to the grievance within 15 working days from the date of receiving the grievance. If the complainant accepts the response and handling opinion, they can summarize the grievance; if the complainant does not accept the response and handling opinion made by the Supply Chain Management Office, the relevant situation should be reported to the Company's Grievance Handling Committee within 5 working days.

7.1.3.2 调查与委员会审查 **Investigation & Committee Review**

在申诉提交到申诉处理委员会后，供应链管理办公室应在 5 个工作日内组织申诉处理委员会召开会议，讨论是否进一步开展补充调查和取证，并应在申诉提交于申诉

处理委员会之日其 30 个工作日内再次向申诉人做出答复，提出公司层面的最终解决方案，如果申诉人接受该项方案，则申诉正式终结；

After the grievance is submitted to the Grievance Handling Committee, the Supply Chain Management Office should organize a meeting of the Grievance Handling Committee within 5 working days to discuss whether to conduct a supplementary investigation and gather evidence further. And within 30 working days from the date of submission of the appeal to the Grievance Handling Committee, the Supply Chain Management Office should again respond to the complainant, proposing the final solution at the company level. If the complainant accepts this solution, the grievance will be officially closed.

7.1.3.3 外部审查 Third-Party Review

如果申诉人对公司最终解决方案仍然不能接受，则可以寻求企业以外的解决途径，包括但不限于第三方进行调解、聘请外部专家参与审查及磋商，以及司法途径；

If the complainant does not accept the company's final resolution, they may seek external resolution channels, including but not limited to mediation through a third party; engagement of external experts for review and consultation; legal proceedings.

7.1.3.4 重新提交申诉 Resubmission of Grievances

如果同一申诉人或不同申诉人就经由本条各款处理过的相同申诉再次提出申诉的，供应链管理办公室告知其前述申诉结果，并不予接受申诉；但申诉人如对申诉结果的执行不满意，可就此再次提出申诉。

If the same or different complainants resubmit a previously adjudicated grievance under this Article, the Supply Chain Management Office shall notify the complainant of the prior resolution outcome; and decline to accept the resubmitted grievance.

第八条：申诉结果

Article 8: Grievance Resolution

8.1 接受申诉结果 Resolution Acceptance

申诉人接受答复、处理意见或解决方案后，应配合公司填写《供应链尽责申诉书》“申诉人确认”部分，承诺接受《申诉书》所列申诉结果，并不再就同一问题提出申诉或诉诸其他争端解决机制，并签名确认。

Upon accepting the response, proposed resolution, or final solution, the complainant shall complete the "Complainant Acknowledgment" section in the Supply Chain Due Diligence Grievance Form; confirm acceptance of the resolution terms as stated in the Form; agree not to pursue further claims or alternative dispute mechanisms regarding the same matter; and provide signature for verification.

8.2 文件归档 Documentation

申诉处理结果应记录为一式两份的《供应链尽责申诉处理意见书》(附件二),一份交申诉人保存,一份由公司供应链管理办公室存档。

The resolution outcome shall be formally recorded in the Supply Chain Due Diligence Grievance Resolution Form (Appendix 2) in duplicate: One copy retained by the complainant; One copy archived by the company's Supply Chain Management Office.

第九条: 申诉跟进

Article 9: Grievance Follow-Up

9.1 申诉处理结果应从两个层面加以跟进:

Grievance resolutions shall be followed up at two levels:

9.1.1 执行监视 Execution Monitoring

申诉结果得出并被申诉人接受后,由公司供应链管理办公室会同相关业务部门负责对申诉结果的执行情况进行跟踪和监督。

After resolution acceptance by the complainant, the Supply Chain Management Office shall coordinate with relevant operational departments to track and supervise implementation; and ensure full compliance with the resolution terms.

9.1.2 系统性改进 Systemic Improvement

公司供应链管理办公室应就申诉结果所显示的公司在管理制度上的改进机会向公司最高管理层提出建议。

The Supply Chain Management Office shall identify improvement opportunities in corporate management systems based on resolution outcomes; and submit recommendations to senior management for corrective actions.

第十条: 申诉者保护

Article 10: Complainant Protection

10.1 公司承诺不会因申诉行为对申诉者采取任何形式的报复,对于未能遵守保密原则导致申诉者利益受损害的雇员,公司将酌情予以处罚,严重者可解除劳动合同,送交司法机关处理。

The company expressly prohibits any form of retaliation against complainants. Employees who violate confidentiality principles, thereby causing harm to complainants, shall be subject to disciplinary actions, including but not limited to appropriate penalties as circumstances warrant; termination of employment contract in severe cases; and referral to judicial authorities where applicable.

第十一条：申诉机制与风险识别

Article 11: Integration of Grievance Mechanism and Risk Identification

11.1 申诉机制反馈需纳入风险识别流程中。

Grievance mechanism feedback shall be systematically incorporated into the company's risk identification processes.

第十二条：制度实施

Article 12: Implementation of the Policy

12.1 本制度自 2025 年 12 月实施；

This policy shall come into effect from December 2025.

12.2 本制度由公司可持续发展指导委员会最终解释并负责修改。

The company's Sustainable Development Steering Committee reserves the sole authority for final interpretation of this policy; and any subsequent modifications.

附件一：供应链尽责申诉书

Appendix 1: Supply Chain Due Diligence Grievance Form

附件二：供应链尽责申诉处理意见书

Appendix 2: Supply Chain Due Diligence Grievance Resolution Form

附件三：供应链尽责管理申诉机制流程图

Appendix 3: Supply Chain Due Diligence Grievance Mechanism

供应链尽责申诉书

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附件二：

供应链尽责申诉处理意见书

（也可以作为供应链尽责申诉记录）

申诉人姓名		职业	
申诉人姓名		职业	
申诉与公司的联系			
申诉人联系方式		申诉事件发生日期	
申诉事实经过、理由及申诉的诉求（可附页，并附申诉证据）： 申诉日期： 申诉人签名：			
供应链管理办公室处理经过及结论： 负责人： 日期：			
申诉处理委员会最终结论： 委员会主任： 日期：			
申诉人确认： 申诉人： 日期：			

附件三

Appendix 3

供应链尽责管理申诉机制流程图

Supply Chain Due Diligence Grievance Mechanism

