GRIEVANCE MECHANISM POLICY
申诉机制政策

NORIN MINING LIMITED
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当今世界正面临各种挑战，尤其是新冠疫情对社会造成的冲击，凸显了尊重人权、应对相关风险的重要性。作为一家在国际矿业领域开展业务的公司，我们清晰地认识到我们在保障员工、员工家属和社区健康福祉方面必须发挥关键作用；我们的影响不止于公司内部，对公司外部的一系列利益相关方，包括当地社区、供应商等也都会产生深远的影响。

The challenges that the world is going through especially those highlighted by COVID-19, have brought to the fore the importance of respecting human rights and addressing risks to people. As a company working in International mining field, we have seen the critical role we have to play in ensuring the health and wellbeing of not only our workers, but also their families and communities. We also know that as a company we have an impact on a range of individuals beyond the walls of our company – namely all our external stakeholders including communities, suppliers and other actors.

我们的使命是通过负责任经营和可持续矿业实践创造价值，让人们的生活变得越来越美好。

At Norin Mining we are on a mission to create value and improve lives through responsible investment and sustainable mining.

这样的使命是我们汲取经验而不断发展和成长起来的。它使公司的运营模式发生了根本性转变，即把所有利益攸关者置于发展的中心，这也是为什么我们把尊重人权贯彻于工作之中。融入社区、尊重社区是我们工作

的关键内容，它有多种形式，包括：制定适宜的公司政策和适当的治理机制，根据《联合国工商业与人权指导原则》开展人权尽职调查，建立行之有效的投诉和申诉机制，并提升该机制运作的透明度。

This is a mission that has been developed and grown through our own experiences. This has allowed for a paradigm shift within Norin Mining so that stakeholders are placed at the centre of our development, this is why we embed human rights throughout our work. Embedding communities and respect for communities at the heart of what we do takes many forms: having appropriate governance policies in place, undertaking human rights due diligence in line with the UN Guiding Principles on Business and Human Rights (UNGP), putting in place effective complaints and grievance mechanisms and being transparent throughout operation processes.

我们致力于创建和推动申诉机制落地，遵循 UNGP 关于申诉机制的八项标准开展申诉机制建设工作，即“合法”“可获得性”“可预测性”“平等”“透明”“权利兼容”“持续的学习来源”，以及“立足参与和对话”。

We are committed to creating and promoting the grievance mechanism following the UNGP criteria, namely legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on dialogue and engagement.

在此，我们想着重强调“持续的学习来源”的重要性，分享公司从多年矿业经营活动中汲取的重要经验。这些“良好实践”正在北方矿业内部不断推广，以改善公司现有申诉机制，预防未来可能发生的申诉和负面影响。这些“经验教训”为公司制定申诉机制政策和改善流程奠定了基础，塑造了北方矿业的企业文化。我们相信，建立透明的申诉机制与我们的核心使命相一致，即通过负责任经营和可持续矿业实践创造价值，让人们的生活更加美好。我们也相信，这些来之不易的经验教训将持续推动公司遵循上述八项标准。

In this document, we would like to refer to the need for “a source of continuous learning”

and share key lessons that we have learnt from our years of mining experience. These key good practices are currently being widely disseminated within Norin Mining, with the main target of improving our grievance mechanism to prevent future grievances and harm. These “lessons” underpin our grievance mechanism policy and approach and also are shaping our corporate culture. We believe that being transparent in our grievance mechanism approach is aligned with our core mission of creating value and improving lives through responsible investment and sustainable mining. We also believe that our own hard-earned experience will further strengthen the 8 criteria above which we also adhere to.

北方矿业的良好实践：

Norin Mining’s Good Practice:

1. 我们认识到申诉机制能帮助公司提升风险前瞻性，化被动为主动，积极应对风险。

   We have identified that grievance mechanism is beneficial in order to achieve a supportive and proactive rather than a reactive and defensive approach to grievances.

2. 我们认识到有必要更好地理解和评估社会风险，深入了解项目当地情况、风险和发展机会。在整个项目生命周期，我们都需要对社会基线有更深入的研究，对社会经济和政治风险有更精准的分析。

   We have identified the need for better understanding and assessment of social risks, as well as the need to seek a deeper understanding of local contexts, risks, and development opportunities. There is a growing need requiring in-depth research on social baselines, precise analysis of socio-economic and political risks across the life cycle of a mining project.

   我们已采取具体措施，通过与经验丰富的国际咨询公司合作，加强对社会风险和当地环境的理解。外部合作伙伴正协助我们识别、评估和缓解社会风险，同时提高公司内部对社会风险的本质，以及社会风险

对公司治理、地缘政治和环境风险影响的认识。

At Norin Mining we have already taken concrete steps in strengthening our understanding of social risk, and the local milieu by working with experienced international consultancies that are helping us in identifying, measuring, and mitigating our social risk, and also raising the awareness within our company of the nature of social risk and how it impacts on governance, geopolitical and environmental risk.

3. 有效的申诉机制必须得到公司所有部门支持，包括项目运营各领域以及人力资源、法务、采购和安全环保等部门。跨团队协作至关重要，高层管理者的支持也必不可少。

To be effective, grievance mechanism must have the support of every company department. This includes all operational areas of a mine, as well as non-operational areas such as human resources, legal, procurement, HSE departments, etc. Cross-team collaboration is critical, and senior management buy-in is also essential.

4. 申诉机制不仅是社区关系等相关部门的工作，更是高层管理者的责任，需要得到公司最高管理者的监督。

Grievance mechanism is not a community relational responsibility alone, but it is a senior management responsibility that requires top leadership oversight.

5. 我们认识到，有必要采用一种数据驱动且更正式的方式来处理申诉。我们需要给予项目层面一定的灵活性，以确保始终有创新的本地化解决方案和对话空间。这在我们社区关系维护和申诉管理实践中已得到证明。

We have identified the need for a more data driven and formalised approach to grievance handling. Yet at the same time, we need to offer project levels a certain level of flexibility to always ensure a space for innovation of local solutions and

dialogue. We have found this to be very effective in our community relations and grievances management.

6. 我们还需要有更扎实稳健的申诉机制关键绩效指标，在实践中不断完善。

   We have identified that we need to have more robust key performance indicators on grievance mechanism, and to continually refine these KPIs.

7. 我们的申诉机制“可预测性”需进一步加强，要有更明确的时间框架和更高的透明度。

   Our grievance mechanism needs to be more predictable with clear time frames and be more transparent in terms of the process.

基于我们在申诉机制方面的摸索学习和经验积累，以下是公司未来 12 个月内将推广实施的申诉机制政策和标准，以完善公司总部和境外项目现有申诉机制。

Based upon our own tacit learning and experience with grievance mechanism, these are our policies and standards that we will be following over the coming 12 months at Norin Mining to strengthen our already existing grievance mechanism at both headquarters and project sites.

1. 所有项目应基于上述实践经验总结，充分考虑建立或改善面向员工、供应商和受影响社区的申诉机制的必要性，受影响社区包括：项目周边社区、交通运输沿线社区和可能受项目间接影响的社区。

   All projects shall fully consider the necessity to develop and/or ameliorate the current employee grievance mechanism, the current suppliers' grievance mechanism as well as the community grievance process targeting the impacted communities by the project based on the key lessons learned above. Impacted communities including surrounding communities of the mine site, communities

around the transportation routes, and communities may be indirectly impacted by the project.

2. 申诉机制流程应做到结构清晰、易于使用、文化适当，并清晰地传达给利益相关方，传达的信息包括但不限于：提出申诉的不同方式，如何登记、确认、调查和解决申诉，每个阶段的时间框架等。

   The grievance mechanism process shall be clearly structured, easy to use, and culturally appropriate. It will be clearly communicated to stakeholders, including but not limited to: different ways of lodging a grievance; how a grievance will be filed, acknowledged, investigated, and resolved; general timeframes for each phase.

3. 设计和制定文化适当的投诉或申诉机制时，我们会与利益相关方协商沟通，持续收集他们的反馈意见，以决定是否改善相关流程并使其更有效。

   We shall consult with stakeholders on the design of culturally appropriate complaints and grievance procedures, and also continuously seek their feedback if changes need to be made to make it more effective.

4. 所有投诉或申诉应登记在册，申诉结果和补救措施应记录在案。

   All complaints and grievances shall be formally registered, and their outcomes and remedies shall be documented.

5. 所有项目应建立申诉机制“跨职能委员会”或专项工作小组，开展申诉机制相关培训，以文化适当的方式接收、评估、调查和回应投诉或申诉。

   All projects shall ensure that cross-functional committee or collaboration is in place and trained to receive, assess, investigate and response to the complaints and grievances in a culturally appropriate manner.

6. 所有项目应充分考虑在整个项目生命周期内，针对特定突出问题建立专项申诉流程的必要性。例如：

- **并购后**——建立一个处理“历史遗留”问题的对话流程。
- **勘探期**——建立一个处理“土地准入”和环境相关问题的非正式申诉流程。
- **建设前**——建立一个处理“土地征用和安置”等问题的正式申诉流程。
- **建设期**——建立一个正式的申诉流程，以处理施工建设期比较集中的安置赔偿问题，以及噪声、粉尘、外来工人涌入、环境和景观影响等其他可能的投诉问题。
- **运营期**——建立一个正式的申诉流程，以处理就业和培训机会、承包商行为、供应链以及环境等相关投诉问题。
- **关闭期**——建立一个正式的申诉流程，从而促进公正转型。

All projects shall fully consider the necessity to develop a grievance process specifically related to certain outstanding issue throughout the project lifecycle. For example:

- **After the M&A** —— a dialogue process to address “legacy” issues.
- **Exploration** —— an informal grievance process to address land access issue and environmental issues.
- **Pre-construction** —— a formal grievance process to address land acquisition and resettlement issue.
- **Construction** —— a formal grievance process to address community complaints on resettlements, compensation, noise, dust, influx of outside workers, environmental and landscape impact, and other possible impacts caused by construction activities.
- **Operation** —— a formal grievance process to address job and training opportunities, contractor behaviours, or supply chain issues and environmental issues.

- **Closure** – a formal grievance process to address the just transition.

7. 所有项目应充分考虑建立“吹哨人制度”的必要性，为员工、合作伙伴和其他利益相关方提供举报纪律和诚信问题的渠道。

   All projects shall fully consider the necessity to develop a whistle-blower channel for employees, business partners, and other relevant stakeholders to report discipline and integrity issue.

8. 公司总部和项目现场应明确一位高层管理人员，监督申诉机制建设和执行情况，全面负责申诉机制流程的协调和运作。

   One of the senior staff members shall be appointed to oversee the development andimplementation of the grievance mechanism both at HQ as well as project sites. The senior staff member(s) shall take overall responsibility for the coordination and functioning of the grievance mechanism process.

9. 公司总部和项目现场应参照《联合国工商业与人权指导原则》第 31 条的有效性标准对申诉机制绩效开展年度评估，以确认管理措施是否适当。评估过程中，应对关键绩效指标进行评审和监测。相关评估措施应对外公开，以赢得外界对公司申诉机制的信任。

   The performance of grievance mechanism shall be evaluated every year benchmarking against the UNGP article 31 GM effectiveness criteria to determine if management measures are appropriate. Key performance indicators on the effectiveness shall be reviewed and gauged during the evaluation process. These measurements shall be made public to ensure trust in the process.

10. 我们的申诉机制流程不应阻碍任何利益相关方诉诸司法途径或其他非司法申诉机制。对任何提出投诉、申诉、举报或配合调查的人进行恐吓或报复，我们持零容忍态度。

Our grievance mechanism process shall not preclude any stakeholder from accessing judicial or other non-judicial grievance mechanisms.We have zero tolerance for intimidation or retaliation against anyone who raises a complaint or grievance, makes a report, or cooperates in an investigation.