

Mineral Supply Chain Grievance Mechanism

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1. Objective

The grievance mechanism aims to build a communication and consultation platform for stakeholders, identify and investigate into the grievances n the mineral supply chain due diligence, and facilitate the fair and reasonable solution for the grievances.

2. Application scope

- 2.1 Applicable subject: upstream and downstream companies along the mineral supply chain, assessment organizations, assessors, industrial assessment programs (second-party/third-party assessment).
 Industry initiatives and other stakeholders.
- 2.2 Applicable standard: Annex II Risks in *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas*; Type I and II Risks in *Chinese Guidelines for Responsible Mineral Supply Chain*.
- 2.3 Applicable mineral: All minerals.

3. Responsibility

- 3.1 The grievance manager of the Assessment Center is responsible for receiving, reviewing and assessing the materials of grievance applications, reporting the application review and preliminary assessment opinions to the Grievance Handling Working Group, communicating with the applicants, and coordinating with the Grievance Handling Working Group and Grievance Expert Committee to deliberate on and deal with the grievances.
- 3.2 The Grievance Handling Working Group is responsible for investigating into and analyzing the grievances as well as providing resolutions to the grievances.
- 3.3 The Grievance Expert Committee consists of the authoritative experts in the field of mineral supply chain due diligence. When the complainant has serious disagreements or objections to the decision made by the Grievance Handling Working Group, the grievance manager submits the grievance to the Grievance Expert Committee for evaluation and judgment. Grievance Expert Committee is responsible for making the final verdict for the grievance resolution.

4. Procedure

- 4.1 Grievance Submission
 - 4.1.1 The complainant need formally submit a written *Grievance Application* and relevant supporting or evidence materials with seals (if available) via an email directing to the Assessment Center: rbc@cccmc.org.cn.
- 4.2 Review and Preliminary Assessment
 - 4.4.1 The grievance manager is responsible for reviewing the Grievance Application and relevant materials upon receipt, and sending a letter of confirmation to the complainant via email, noting the receipt of Application and relevant materials.
 - 4.4.2 The grievance manager preliminarily assesses whether the grievance is within the scope of the grievance mechanism, the complaint is clearly stated, and the evidences are sufficient and

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reliable.

4.4.3 The grievance manager submits the *Grievance Application* and preliminary assessment opinions to the Grievance Handling Working Group.

4.3 Grievance Accepted

The Grievance Handling Working Group reviews and assesses the validity of the complaint materials and preliminary assessment opinions, and informs the complainant of the acceptance in written.

- 1) After review and evaluation, a decision to reject the grievance application will be issued to the complainant if the grievance content does not fall within the scope of this mechanism.
- 2) After review and evaluation, the complainant shall be required to supplement relevant materials and information within a scheduled period for the second review if the content of the grievance application is unclear or the evidence is insufficient;
- 3) After review and evaluation, a decision to accept the grievance application will be issued to the complainant if the content of the grievance application is clear and the evidence is sufficient.

4.4 Grievance Handling

- 4.4.1 The Grievance Handling Working Group organizes the investigation, analyzes the complained issues, and provides the handling resolution to the grievance.
- 4.4.2 The grievance can be handled through dialogue, negotiation, deliberation on written materials, and expert consultation, etc.
- 4.4.3 The Grievance Handling Working Group contacts and organizes communication with the grievance object on the complaint issues, as well as relevant investigation and analysis to obtain the grievance object's response or clarification.
- 4.4.4 The Grievance Handling Working Group makes the grievance handling opinions and verdicts, and the grievance manager sends the grievance handling opinions and verdicts in written form to the complainant via email.
- 4.4.5 When the complainant has serious disagreements or objections to the decision made by the Grievance Handling Working Group, the grievance manager will submit the grievance to the Grievance Expert Committee for evaluation and judgment, and the Grievance Expert Committee will make the final verdict for the grievance resolution.
- 4.4.6 The grievance manager will send the final verdict made by the Grievance Expert Committee to the complainant in written via email.

5. Record and confidentiality

- 5.1 The Assessment Center will keep all the process information in grievance application, handling, deliberation and stakeholder communication, as well as the recordings of the corrective action plans and implementation results relating to the mineral supply chain due diligence.
- 5.2 The personnel involved in the grievance handling shall keep confidentiality of the information requested not to be disclosed.

6. Forms

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- 6.1 Grievance Application Form
- 6.2 Grievance Handling Form

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