



**Kelington Group Berhad  
(KGB)**

**GRIEVANCE PROCEDURES**  
申诉程序

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# TABLE OF CONTENTS

## 目录

		Page 页数
<b>GRIEVANCE PROCEDURES 申诉程序</b>		
A1	POLICY ON GRIEVANCE PROCEDURES 申诉程序政策	2
B1	OBJECTIVE 目的	3
B2	SCOPE 范围	4
B3	TYPE & DEFINITION OF GRIEVANCES 申诉的类型和定义	4
B4	METHODS OF GRIEVANCE REPORTING 申诉报告方法	5
B5	PROCEDURE ON ADDRESSING A GRIEVANCE 申诉处理程序	7
B6	PROTECTION AGAINST RETALIATION 防止报复	8
B7	INVESTIGATION PROCEDURE 调查程序	9
B8	FEEDBACK TO EMPLOYEES OR MEMBERS OF THE PUBLIC 对员工或公众的反馈	10
B9	RETRACTION OF GRIEVANCE 撤销申诉	10
B10	IMPLEMENTATION OF THIS GRIEVANCE PROCEDURES 申诉程序的实施	10
B11	GRIEVANCE PROCEDURES REVIEW 申诉程序复核	11
B12	PRIVACY 隐私	11
 <b>APPENDICES 附录</b>		
 APPENDIX A: GRIEVANCE PROCEDURES REPORTING STRUCTURE 附录 A：申诉程序报告结构		
	- For Employee 对于员工	12
	- For Members of the Public 对于公众	14
 APPENDIX B: ROLES AND RESPONSIBILITIES 附录 B：角色和职责		
		16
 APPENDIX C: GRIEVANCE PROCEDURES CHECKLIST FORM (prior to raising a grievance) 附录 C：申诉程序检查表 (提出申诉前)		
		18

# GRIEVANCE PROCEDURES 申诉程序

## A1. POLICY ON GRIEVANCE PROCEDURES 申诉程序政策

Kelington Group Berhad (“KGB” or the “Company”) and its group of companies (collectively referred to as the “Group”) is committed to ensuring that every part of its operation is carried out professionally in accordance with relevant laws, rules, regulations, business ethics and conduct, and recognise that all employees have an important role to play in achieving this goal.

Kelington 集团公司（简称“KGB”或“公司”）及其子公司（统称为“集团”）致力于确保按照相关法律、法规、规章、商业道德和规范专业地开展每一项业务，并且认识到，所有员工在实现这一目标的过程中都发挥重要作用。

To this end, KGB has established an independent reporting channel and mechanism for whistleblowing to report any wrongdoings or serious irregularities via the whistleblowing procedures and hotlines respectively.

为此，KGB 已经建立了独立报告渠道和机制，用于通过举报程序和热线举报任何不当行为或严重违规行为。

KGB also is committed to provide mechanisms for employees to raise their grievance in matters involving work relations and conditions which will be part of the Human Resource Procedures. In addition, this Grievance Procedures is also established and intended as a mechanism for the member of the Public to raise any concern or complaint in their dealing with or in relation to the Group.

KGB 还致力于为员工提供涉及工作关系和条件事项的申诉机制，该机制将作为人力资源程序的一部分。此外，本申诉程序还旨在作为公众向该集团提出关切或投诉的机制。

For clarity, this Grievance Procedures does not involve matters in relation to wrongdoings or serious irregularities covered under the scope of KGB’s whistleblowing procedures. Hence, the establishment of this grievance procedures is to complement whistleblowing procedures and other human resources related procedures such as Code of Ethics and Conduct, Conflicts of Interest Policy and KGB’s Human Rights Policy.

为了明确，本申诉程序不涉及 KGB 的举报程序范围内的不当行为或严重违规行为相关事项。因此，本申诉程序的建立是为了补充举报程序和其他人力资源相关程序，比如道德和行为准则、利益冲突政策和 KGB 的人权政策。

As such, the Management of KGB has formulated this Grievance Procedures that will:

因此，KGB 的管理层制定了本申诉程序，本申诉程序将：

- Govern the process through which employees may raise grievances arises between employees and the Group;  
规范员工提出与集团之间的申诉的流程；
- Govern the process through which the public may raise any grievance including concern or complaints in their dealing with or in relation to the Group;  
规范公众提出与集团的往来或关系中的申诉的流程，包括关切或投诉；

- Establish a mechanism for responding to employees grievances in relation to human resource matters and to any grievance including concern or complaints in their dealing with or in relation to the Group;  
建立用于回应员工关于人力资源事项的申诉以及员工与集团的往来或关系中的任何申诉的机制，包括关切或投诉；
- Prohibit retaliation against employees raising grievances in relation to human resource matters; and  
禁止针对提出人力资源事项相关申诉的员工进行报复；
- Establish procedures for addressing the grievances and to minimize its occurrence and reoccurrence.  
建立用于解决申诉并最大限度减少申诉的发生和再发生的程序

All employees of the Group must follow this Grievance Procedures which forms part of Human Resource Procedures of KGB.

集团的所有员工必须遵守本申诉程序，本程序构成 KGB 的人力资源程序的一部分。

All employees shall cooperate with any review and investigation initiated pursuant to this Grievance Procedures, if any, including any Domestic Inquiry carried out by Human Resource Department.

所有员工应配合按照本申诉程序启动的审查和调查，包括人力资源部实施的国内调查。

In addition, the public may raise any grievance including concern or complaints in their dealing with or in relation to the Group under this Grievance Procedures.

此外，公众可以按照本申诉程序提出与集团的往来或关系中的任何申诉，包括关切或投诉。

The Head of Human Resources at KGB Headquarters, Chief Operating Officer (COO) and Chief Executive Officer (CEO) of KGB shall have overall responsibility for the implementation of this Grievance Procedures. The administration of this Grievance Procedures is to be carried out by Human Resource Department at KGB Headquarters. The Head of Human Resources shall exercise the oversight function over the administration of this Grievance Procedures.

KGB 总部的人力资源负责人、KGB 的首席运营官 (COO) 和首席执行官应总体负责本申诉程序的实施。本申诉程序由 KGB 总部的人力资源部管理。人力资源负责人应对本申诉程序的管理行使监督职能。

## **B1. OBJECTIVE 目的**

**B1.1** The objective of this Grievance Procedures prescribes the KGB's policy on Grievance Procedures. It is the desire of KGB that the grievance arising between an employee and the Group; or between the members of the public and the Group; to be settled as amicably and as quickly as possible. The Grievance Procedures is developed with the following objective:

本申诉程序的目的规定了 KGB 的申诉程序政策。公司希望尽可能友好且快速解决员工与集团或者公众与集团之间的申诉。申诉程序的目的如下：

- (a) to provide a mechanism for employees to raise a grievance;  
为员工提供申诉机制；
- (b) to educate our employees to recognize the types of grievance;  
教育员工认识申诉的类型；

- (c) to provide a mechanism for the public to raise any grievance including concern or complaints in their dealing with or in relation to the Group; and  
为公众提供用于提出与集团的往来或关系中的申诉的机制，包括关切或投诉；
- (d) to ensure adequate procedures are available to address the grievance and prevent or minimize its occurrence and recurrence.  
确保可以运用充分程序来解决申诉并防止或最大限度减少申诉的发生和再发生。

## **B2. SCOPE 范围**

- B2.1 This Grievance Procedures applies to all employees of KGB including all subsidiaries and members of the public at large.  
本申诉程序适用于 KGB 集团的所有员工，包括所有子公司的员工和公众

## **B3. TYPE & DEFINITION OF GRIEVANCES 申诉的类型和定义**

- B3.1 Below is the example of the type/definition of grievances and the following list is not exhaustive.  
以下例举了申诉的类型/定义，以下列表并不详尽。
- B3.2 Infrastructure 基础设施：  
Concern or complaints on the safety, adequacy and comfort of working conditions;  
对工作条件的安全、充分性和舒适性的关切或投诉；
- B3.3 Company operated vehicle 公司车辆：  
Concern or complaints on the conduct and usage of company operated vehicles;  
关于公司车辆的运行和使用的关切或投诉；
- B3.4 Personal relation 人际关系：  
Concern or complaints in relation to working relations amongst employees or with superior;  
关于员工之间或员工与上级之间的工作关系的关切或投诉；
- B3.5 Contractual rights 合同权利：  
Concern or complaints in relation to employment, contracts and statutory obligations; and  
关于雇佣、合同和法定义务的关切或投诉；
- B3.6 Human and labour rights 人权和劳动权：  
Concern or complaints in relation to breach of basic human and labour rights such as cases of sexual harassment and discrimination of gender, religion and place of origin.  
关于违反基本人权和劳动权的关切或投诉，比如性骚扰和性别、宗教和来源地歧视等案件。

## B4. METHODS OF GRIEVANCE REPORTING 申诉报告方法

B4.1 Employee should try to resolve the disputes or minor problems at their lowest level harmoniously and informally.

员工应尽可能私下和谐解决最低层面的争执或次要问题。

Alternatively, methods of raising a grievance can be made either via:

或者，员工可以使用本申诉程序附录 C 中的申诉程序检查表，通过以下方式向直接上司/部门负责人 (HOD) / 本国人力资源部 (LCHR) / KGB 总部人力资源部 (HRHQ) 提出申诉：

- Email; or  
电子邮件；或
- Letter; or  
信件；或
- Phone call  
电话

by the employee to the immediate superior / Head of Department (HOD) / Local Country Human Resource Department (LCHR) / Human Resource Department at KGB Headquarters (HRHQ) using the Grievance Procedures Checklist Form as per Appendix C of this Grievance Procedures. The completed Grievance Checklist form is to be sent to the following channels:

填妥的申诉检查表应发送到以下渠道：

- ✓ 'Grievance Box' placed at your Local Country Human Resource Department (LCHR) and/or at Human Resource Department at KGB Headquarters (HRHQ);  
设置在本国人力资源部和/或 KGB 总部人力资源部的“申诉箱”；
- ✓ Grievance Procedures email at **[grievance@kelington-group.com](mailto:grievance@kelington-group.com)**;  
申诉程序电子邮箱 **[grievance@kelington-group.com](mailto:grievance@kelington-group.com)**；
- ✓ Grievance Procedures letter to be sent to KGB Group Headquarters:  
申诉信发送到 KGB 集团总部：

Kelington Group Berhad  
3, Jalan Astaka U8/83, Seksyen U8,  
Bukit Jelutong Industrial Park,  
40150 Shah Alam,  
Selangor Darul Ehsan, Malaysia

- ✓ Grievance Procedures Hotline at **+603 7845 8751**;  
申诉程序热线 **+603 7845 8751**;

B4.2 However, in the event of a serious grievance, employee is advised to raise the grievance directly to the Immediate Superior / HOD / LCHR / HRHQ at the soonest available opportunity.

然而，如果发生严重申诉，建议员工尽快直接向直接上司/HOD/LCHR/HRHQ 提出申诉。

B4.3 For any verbal grievance made, it shall then transfer into a written document as it shall be the grievance evidence for future record reference.

口头申诉应形成书面文件，作为未来备案参考的申诉证据。

B4.4 In the event the employee is incapable to write or report his/her grievance, he/she can seek help from employee representative / trusted friend, whichever the employee feels comfortable to assist them in writing or to act as a witness to raise the grievance.

如果员工没有能力书写或报告申诉，可以寻求员工代表/可信朋友的帮助，协助他们以书面形式提出申诉或者作为申诉见证人。

B4.5 Employee shall provide their details such as their name, employee number, designation and department when raising or reporting a grievance.

员工在提出或报告申诉时应提供个人信息，比如姓名、工号、职位和部门等。

B4.6 The members of the public shall also provide their details such as their name, occupation and designation, contact number when raising a grievance i.e. concern or complaints.

公众在提出关切或投诉时也应提供个人信息，比如姓名、职业、职位、联系电话等。

The members of the public can use the following method in raising their grievance which can be made either via:

公众可以使用本申诉程序的附录 C 中的申诉程序检查表，通过以下方法提出申诉：

- Email; or  
电子邮件；或
- Letter; or  
信件；或
- Phone call  
电话

using the Grievance Procedures Checklist Form as per Appendix C of this Grievance Procedures.

The completed Grievance Checklist form is to be sent to the following channels:

填妥的申诉检查表应发送到以下渠道：

- ✓ Grievance Procedures email at **[grievance@kelington-group.com](mailto:grievance@kelington-group.com)**;  
申诉程序电子邮箱，**[grievance@kelington-group.com](mailto:grievance@kelington-group.com)**；
- ✓ Grievance Procedures Hotline at **+603 7845 8751**;  
申诉程序热线**+603 7845 8751**；
- ✓ Grievance Procedures letter to be sent to the Human Resource Department at KGB Headquarters or KGB Subsidiaries:  
申诉信发送到 KGB 集团总部或 KGB 子公司的人力资源部：

**Headquarters 总部：**

Kelington Group Berhad  
3, Jalan Astaka U8/83, Seksyen U8,  
Bukit Jelutong Industrial Park,  
40150 Shah Alam,  
Selangor Darul Ehsan, Malaysia

**Singapore 新加坡：**

Kelington Engineering (S) Pte Ltd  
29, Mandai Estate,  
#07-08 Singapore 729932

**Taiwan 台湾:**

Kelington Group Berhad, Taiwan Branch  
馬來西亞商科藝工程有限公司台灣分公司  
1F, No 137, Sec 5, Xinglong Road,  
Jhubei City, Hsinchu Country,  
Taiwan R.O.C. 30274  
30274 台灣新竹縣竹北市興隆路五段 137 號 1 樓

**China 中国:**

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Pudong Shanghai, PR China 201203  
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201203

**B5. PROCEDURES ON ADDRESSING A GRIEVANCE 申诉处理程序**

- B5.1 Every grievance shall be treated with strictest confidentiality and the employee or the members of public who raises a grievance in good faith via the channel described in this Grievance Procedures (hereinafter referred to as “the complainant”) shall be safeguarded from all forms of unfair or unwarranted treatments. There shall be no repercussion or punitive action against the complainant for reporting a grievance.  
每一项申诉都应保密处理，通过本申诉程序所述的渠道善意提出申诉的员工或公众成员（以下称为“投诉人”）应受到保护，不受任何形式的不公平对待或无端对待。不应因为提出申诉而针对投诉人采取惩罚行动或对其造成不利影响。
- B5.2 An employee has the absolute right to report a grievance in the workplace and this right is fully supported by the Company. As a general rule “If you have a grievance, do not keep quiet and keep it to yourself. You are allowed to report the grievances directly to Immediate Superior / HOD / LCHR and/or HRHQ.”  
员工拥有在工作场所提出投诉的绝对权利，公司完全支持该权利。作为一般规则，“如果你有冤屈，不要保持沉默。直接向上司/HOD/LCHR 和/或HRHQ 报告。”
- B5.3 Employee shall officially bring a grievance to the attention of the Immediate Superior / HOD at the earliest opportunity within fourteen (14) days from the date of occurrence. This is because it may be more difficult to gather accurate evidence to address the grievance if the matter was left unreported for long period of time.  
员工应在发生之日后的十四（14）天内尽早正式向直接上司/HOD 提出申诉。这是因为，如果长期不报告问题，就可能更加难以收集用于解决申诉的确凿证据。
- B5.4 When reporting a grievance, the complainant is advised to keep a record of all incidents that are relevant such as the name of the alleged employee’s involved (if any), date(s), time, place(s) of incident, a description of the incident, name of witnesses (if any) to support the investigation.  
在报告申诉时，投诉人应保存所有相关事件的记录，比如涉嫌员工的姓名（如果有）、事件的日期、时间和地点、事件描述以及证人姓名（如果有），以支持调查的展开。
- B5.5 If the grievance raised involves the Immediate Superior, then the employee should immediately report to the HOD.  
如果提出的申诉涉及直接上司，员工应立即向 HOD 报告。
- B5.6 Below steps shall be executed when a grievance reported by the employee is not addressed:  
如果不处理员工提出的申诉，应执行以下步骤：



Step 1 第 1 步:

If the employee does not receive any feedback or response within five (5) working days from his/her Immediate Superior / HOD, he/she may approach or write his/her grievance to LCHR and/or HRHQ for further action.

如果员工在五（5）个工作日内没有收到直接上司/HOD 的反馈或回应，则可以联系或致函给 LCHR 和/HRHQ 寻求进一步行动。

Step 2 第 2 步:

If the matter is not being responded within another five (5) working days after reference made to LCHR and/or HRHQ, the employee may take up the matter to the Chief Operating Officer (COO) and/or Chief Executive Officer (CEO) in writing.

如果在向 LCHR 和/或 HRHQ 举报后的五（5）个工作日内没有得到回应，员工可以致函给首席运营官（COO）和/或首席执行官（CEO）。

Step 3 第 3 步:

COO and/or CEO shall decide within ten (10) working days and the decision made is final.

COO 和/或 CEO 应在十（10）个工作日内做决定，该决定是最终决定。

**B5.7 Below steps shall be executed when a grievance reported by the members of the public is not addressed:**

如果不处理公众成员提出的申诉，应执行以下步骤：

Step 1 第 1 步:

If the members of the public do not receive any feedback or response within five (5) working days upon submission of email / upon calling the grievance procedure hotline / submission of letter to KGB Headquarter or KGB subsidiaries, the complainant then escalate for further action by contacting the Human Resource Department at KGB Headquarter or KGB subsidiaries. Grievance Procedures Hotline at **+603 7845 8751**;

如果公众成员在发出电子邮件/拨打申诉热线/致函 KGB 总部或 KGB 子公司后的五（5）个工作日内没有收到反馈或回应，则投诉人可以联系 KGB 总部或 KGB 公司的人力资源部寻求进一步行动。申诉热线 **+603 7845 8751**；

Step 2 第 2 步:

If the matter is not being responded within another five (5) working days after reference made to the Human Resource Department at KGB Headquarter or KGB subsidiaries, the complainant may take up the matter to the Chief Operating Officer (COO) and/or Chief Executive Officer (CEO) in writing.

如果在向 KGB 总部或 KGB 子公司的人力资源部举报后的五（5）个工作日内没有得到回应，投诉人可以致函给首席运营官（COO）和/或首席执行官（CEO）。

Step 3 第 3 步:

COO and/or CEO shall decide within ten (10) working days and the decision made is final.

COO 和/或 CEO 应在十（10）个工作日内做决定，该决定是最终决定。

**B6. PROTECTION AGAINST RETALIATION 防止报复**

**B6.1 Retaliation includes, but not limited to, any forms of abuse, threat, intimidation, termination or retraction of benefits, demotion, victimization, social exclusion, and defamation.**

报复包括但不限于任何形式的虐待、威胁、恐吓、终止或撤销福利、降职、侵害、社会排斥和诽谤。

- B6.2 Retaliation against employees or members of the public who have, in good faith, properly reported the grievance or against employees or members of the public who have cooperated with a duly authorized investigation, is strictly prohibited.  
严禁针对善意妥当提出申诉的员工或公众成员或者配合正式调查的员工或公众成员实施报复。
- B6.3 After a grievance is reported, the Company shall strive to protect the identity of the employee or members of the public who reported the grievance, and ensure confidentiality of all communications. Protection shall be given during and after investigation as and when necessary and appropriate.  
在提出申诉后，公司应努力保护提出申诉的员工或公众成员的身份，并确保所有通信保密。应在调查期间和调查后给予必要和适当的保护。
- B6.4 Where there is a risk of potential retaliation the Company shall maintain confidentiality of the employee or members of the public until the issue is resolved or the risk has been effectively mitigated.  
如果有潜在报复风险，公司应将员工或公众成员的身份保密，直到解决问题或者有效减轻了风险。
- B6.5 Retaliation is a misconduct and any party who commits retaliation may be subject to disciplinary actions.  
报复是不当行为，实施报复的任何当事人都会受到纪律处分。
- B6.6 Employee or members of the public who has been retaliated against shall report directly to KGB's whistleblowing channels i.e. whistleblowing email and hotline maintained by Corporate Compliance and Integrity Department (CCID) i.e. whistleblowing email at **ccid@kelington-group.com** and whistleblowing hotline at **+603 7845 5696**.  
遭受报复的员工或公众成员应直接向 KGB 的举报渠道报告，即公司合规和诚信部（CCID）保持的举报电子邮箱和热线电话，分别为 **ccid@kelington-group.com** 和 **+603 7845 5696**。

## **B7. INVESTIGATION PROCEDURES** 调查程序

- B7.1 The time limit specified in paragraph B5: Procedures In Addressing a Grievance may be extended by mutual consent between the Group and the complainant.  
以上 B5：申诉解决程序中规定的时限在集团与投诉人的相互同意下可以延期。
- B7.2 The LCHR and/or HRHQ upon receiving the grievance report from the complainant shall consult the COO and CEO for initiation of investigation, if warranted.  
LCHR 和/或 HRHQ 在收到投诉人的申诉报告后，应与 COO 和 CEO 协商确定是否开展调查。
- B7.3 In the event of the complainant made a request to engage a third party investigation for the grievance, the Company will consider the request by engaging an independent counsellor / legal advisor.  
如果投诉人请求聘请第三方开展调查，公司将聘请独立顾问/法律顾问考虑该请求。
- B7.4 If an employee leaves the Group or not being cooperative in the midst of the investigation, the Company shall proceed in their absence and to reach a conclusion based on the available evidence where decision shall be made accordingly.

如果员工在调查期间离职或者不配合调查，公司应继续进行调查，根据可用证据得出结论，并相应作出决定。

**B8. FEEDBACK TO EMPLOYEES OR MEMBERS OF THE PUBLIC 对员工或公众的反馈**

**B8.1** The employees or members of the public shall be informed of the outcome of the investigation or if remediation action is taken to resolve the grievance.  
应将调查结果告知员工或公众成员，或者如果采取补救行动来解决申诉，也应告知员工或公众成员。

**B8.2** Where a grievance is investigated, a letter detailing the findings and justifications for the grievance shall be provided to the employee or members of the public. All decisions shall be fully justified in writing to the employee or members of the public.  
如果对申诉进行调查，应向员工或公众成员发出信函，详述申诉调查结果和合理解释。应以书面方式向员工或公众成员充分说明所有决策的正当性。

**B8.3** Although the Company encourages employees or members of the public to raise a grievance immediately, the employee or members of the public are expected to act in good faith.  
虽然公司鼓励员工或公众成员立即提出申诉，公司期望员工或公众成员善意行事。

**B8.4** If the grievance made is proven after investigation or inquiry to be malicious or in the event that the employee or members of the public found to have reported with wilful dishonesty and in bad faith, the Company reserves the rights to take the appropriate disciplinary actions against the employee or members of the public.  
如果在调查或询问后证明申诉是恶意的或者员工或公众成员有意诬告，公司保留对该员工或公众成员采取适当纪律处分行动的权利。

**B9. RETRACTION OF GRIEVANCE 撤销申诉**

**B9.1** If an employee or members of the public decides to withdraw the grievance at any stage of investigation, he/ she has to write in formally to the related personnel as stated in clause B4.1.  
如果员工或公众成员在调查的任何阶段决定撤回申诉，则必须正式致函 B4.1 条中所述的相关人员。

**B10. IMPLEMENTATION OF THIS GRIEVANCE PROCEDURES 申诉程序的实施**

**B10.1** This Grievance Procedures shall be accessible to employees via:  
本申诉程序应通过以下方式对员工公开：

(a) Communication;  
传达；

(b) Education; and  
教育；和

(c) Training.  
培训。

B10.2 The Company shall provide training programme to both Management and employees regularly such as during orientation/ assembly/ briefing/ refresher at least once in every two years, in which employees could be educated in the area of handling a grievance and the reporting mechanism in place.

公司应定期向管理层和员工提供培训，比如在入职介绍会/员工大会/简报会/进修培训期间，而且至少每两年提供一次培训，在培训中教育员工了解申诉处理和报告机制。

**B11. GRIEVANCE PROCEDURES REVIEW 申诉程序复核**

B11.1 The Company shall revise and update this Grievance Procedure as and when it deemed appropriate; and at least once in every two years.

公司应在适当时修订和更新本申诉程序；至少每两年修订和更新一次。

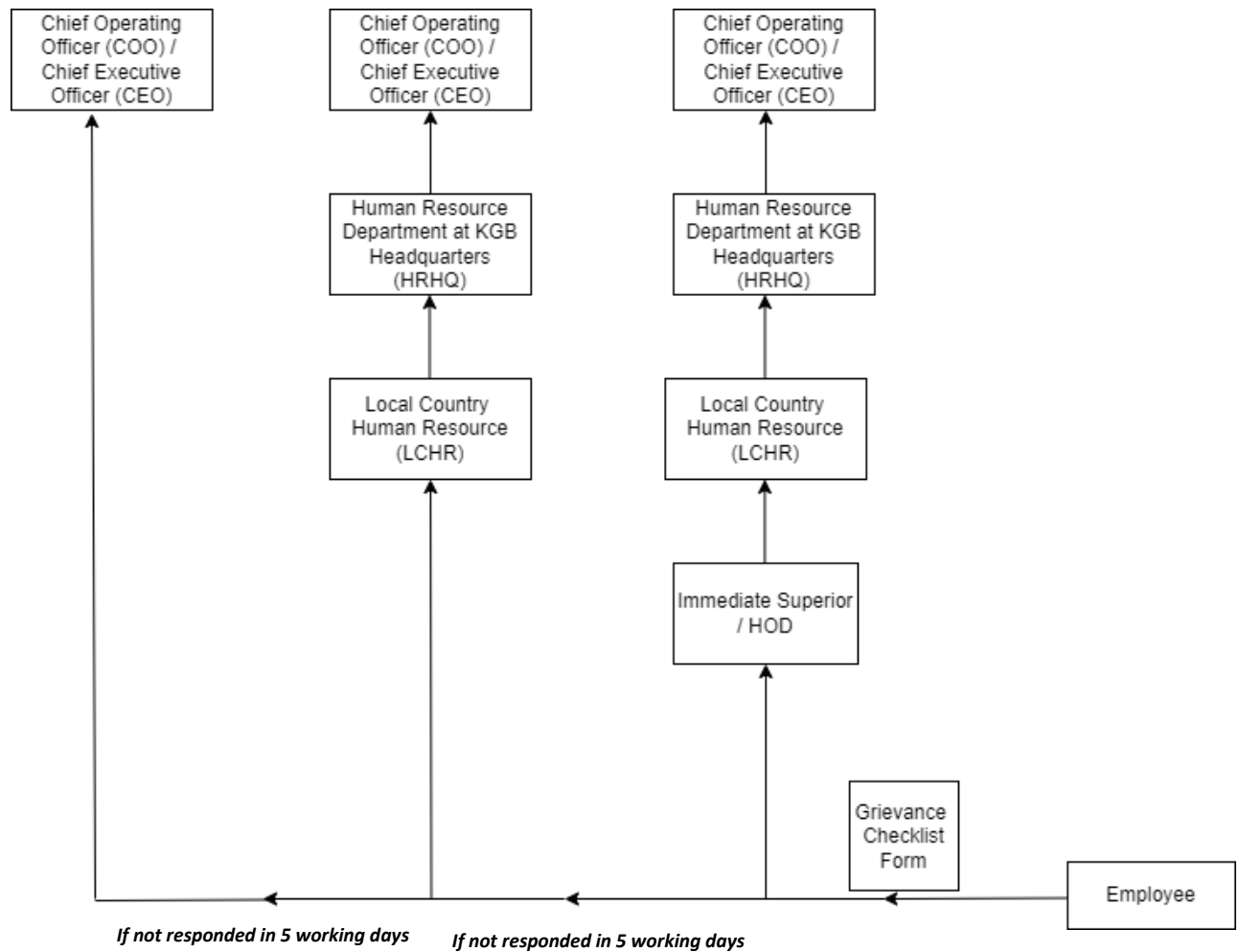
**B12. PRIVACY 隐私**

B12.1 The Company is committed to protect the privacy of the persons involved to the fullest extent possible and in accordance with applicable laws. Any personal data obtained, as part of this Grievance Procedures will only be used for the purposes explained in this Grievance Procedures and will only be provided to those who have a need to know about these data for these purposes or to comply with the law or an important public interest.

公司致力于按照相关法律最大限度地保护相关人的隐私。作为本申诉程序的一部分获得的个人数据将只用于本申诉程序所述的目的，而且将只提供给为了这些目的而需要知晓这些数据的人员，或者用于遵守法律或维护重要的公共利益。

## APPENDIX A: GRIEVANCE PROCEDURES REPORTING STRUCTURE

### FOR EMPLOYEE

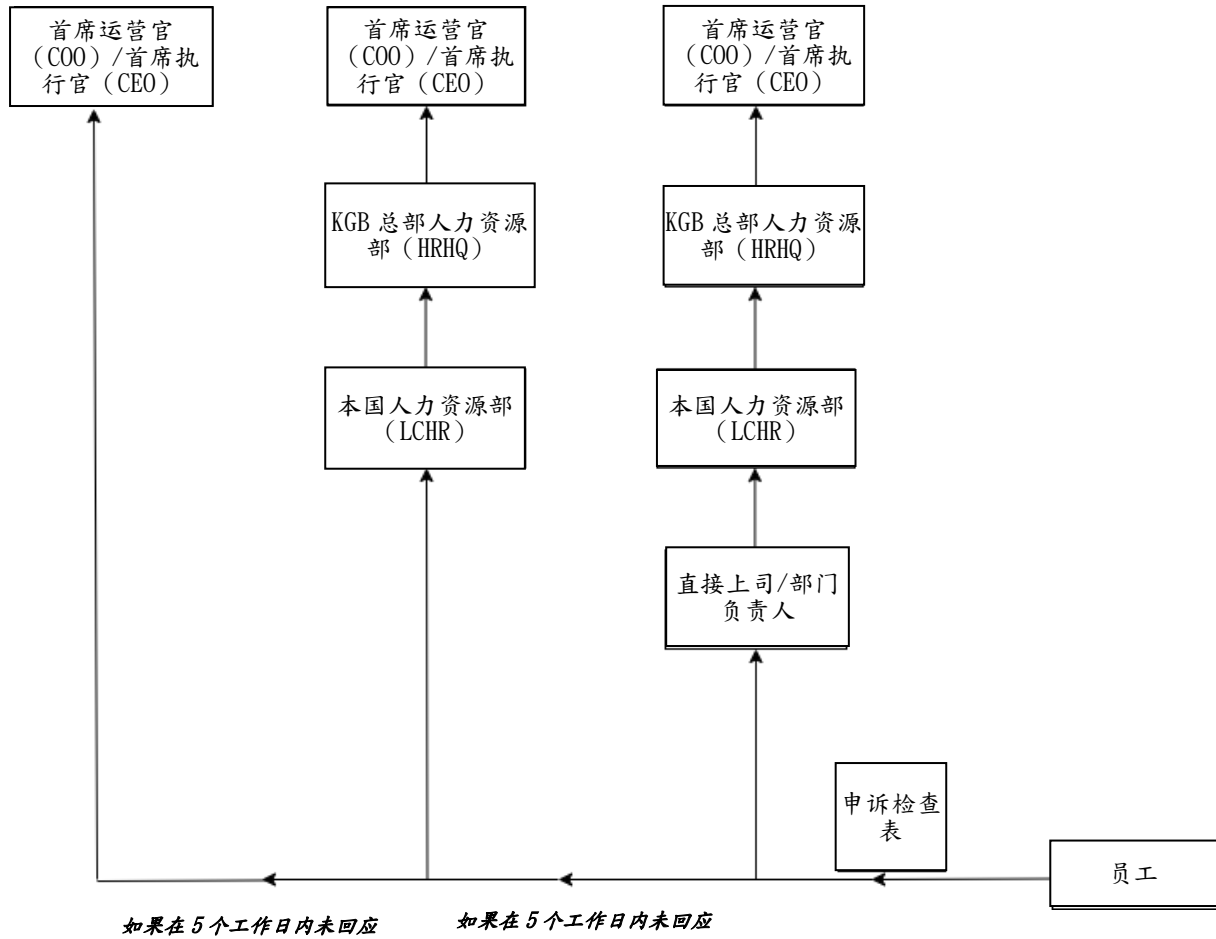


**Note:**

*Employee should report directly to the Immediate Superior / HOD. However, the employee could also directly contact the LCHR and/or HRHQ in the event that the Immediate Superior / HOD was not able to respond to the matter within 5 working days. In addition, the employee could directly contact the Chief Operating Officer (COO) and/or Chief Executive Officer (CEO) of KGB in the event that the HRHQ did provide any feedback or response within another 5 working days.*

## 附录 A：申诉程序报告结构

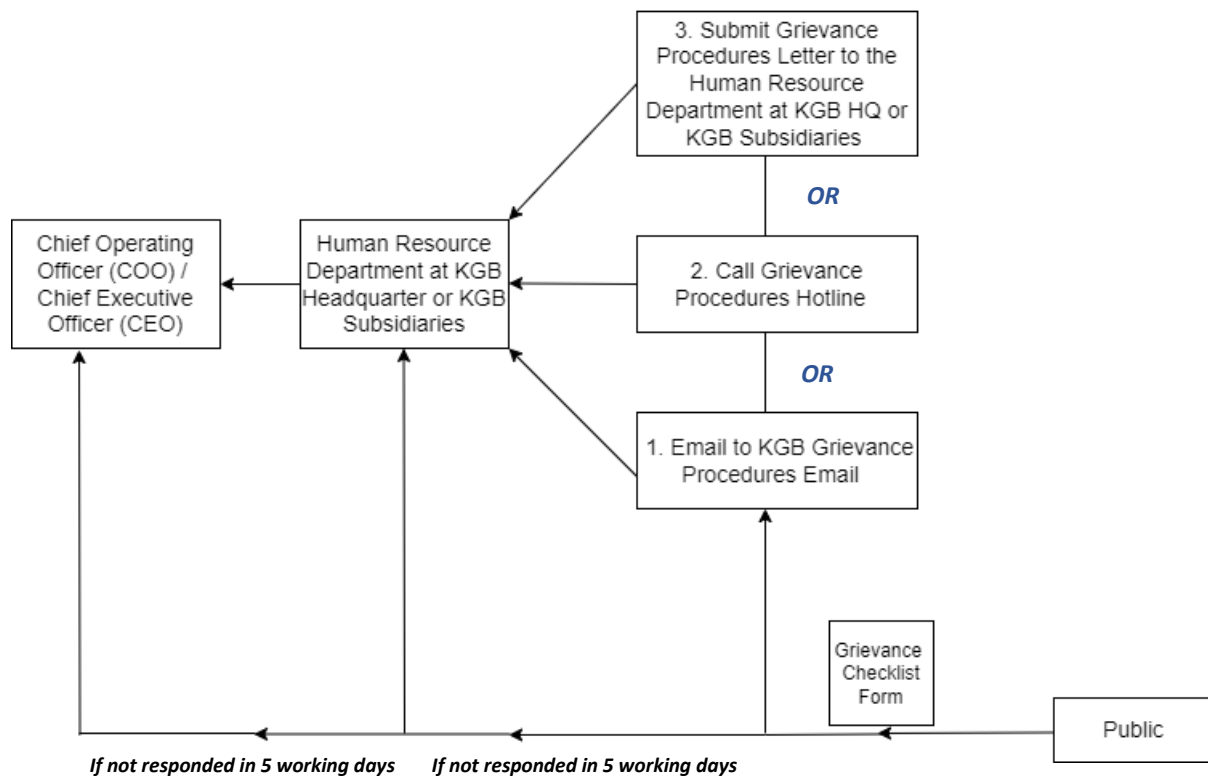
### 对于员工



#### 注：

员工应该直接向直接上司/部门负责人报告。但是，如果直接上司/部门负责人不能在 5 个工作日内回应，员工也可以直接联系 LCHR 和/或 HRHQ。此外，如果 HRHQ 在 5 个工作日内不给予反馈或回应，员工可以直接联系首席运营官 (COO) 和/或首席执行官 (CEO)。

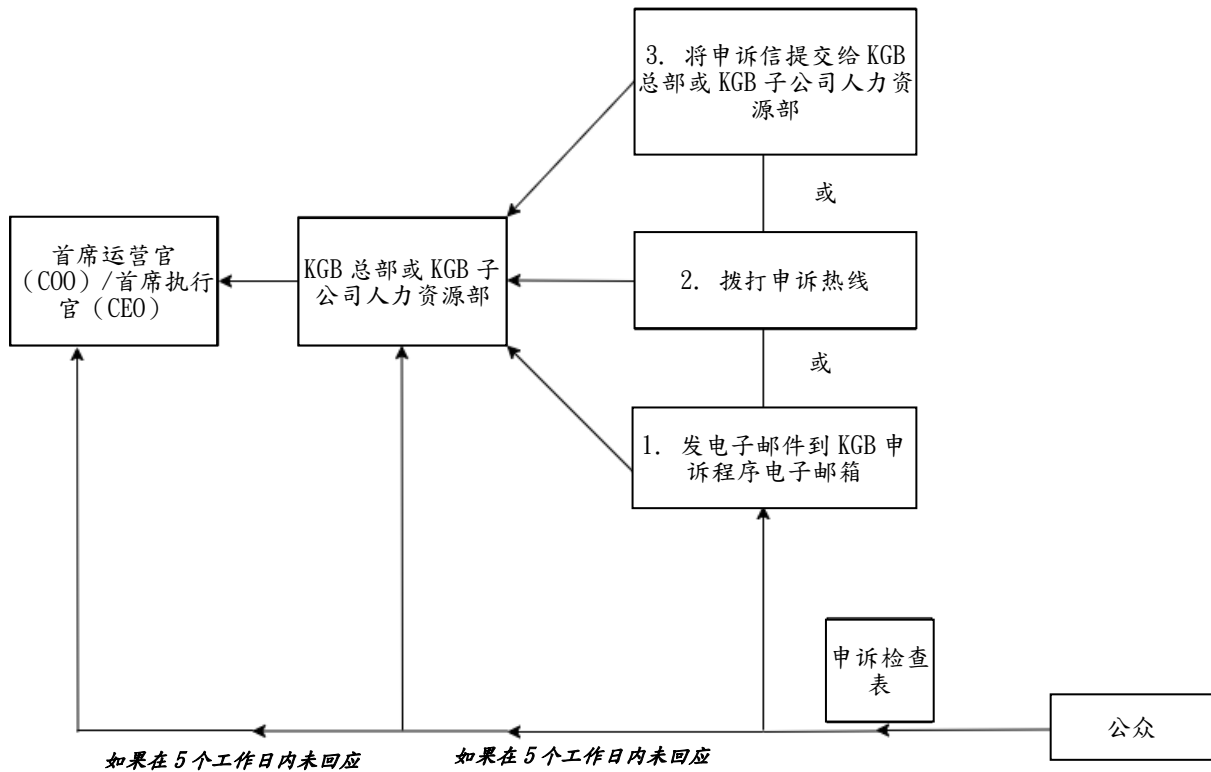
**FOR MEMBERS OF THE PUBLIC**



**Note:**

*The members of the public should report directly via email / grievance procedure hotline / submission of letter to KGB Headquarter or KGB subsidiaries. However, in the event that the complainant does not receive any feedback or response within five (5) working days, the complainant can further escalate for further action by contacting the Human Resource Department at KGB Headquarter or KGB subsidiaries. Grievance Hotline at +603 7845 8751 by KGB HQ or KGB subsidiaries. In addition, if the matter is not being responded within another five (5) working days after reference made to the Human Resource Department at KGB Headquarter or KGB subsidiaries, the complainant may take up the matter to the Chief Operating Officer (COO) and/or Chief Executive Officer (CEO) in writing.*

## 对于公众成员



### 注：

公众成员应通过电子邮件/申诉热线/致函方式直接向 KGB 总部或 KGB 子公司报告。但是，如果投诉人在五（5）个工作日内没有收到反馈或回应，投诉人可以联系 KGB 总部或 KGB 子公司的人力资源部寻求进一步行动。KGB 总部或 KGB 子公司的申诉热线为+603 7845 8751。此外，如果在联系 KGB 总部或 KGB 子公司的人力资源部后的五（5）个工作日内没有得到回应，投诉人可以致函给首席运营官（COO）和/或首席执行官（CEO）。



**APPENDIX 附录 B: ROLES AND RESPONSIBILITIES 角色和职责**

Role 角色	Responsibilities 职责
<p><b>Chief Operating Officer 首席运营官 (COO) / Chief Executive Officer 首席执行官 (CEO)</b></p>	<ul style="list-style-type: none"> <li>• Review reports and any matters arising there from or in connection there with, and establish whether there is sufficient ground for further action; 审查报告和相关事项，确定是否有足够的理由采取进一步行动；</li> <li>• Recommend, if need be, procedures to be put in place to manage reports that require immediate or urgent action; 需要时，建议采取的程序，以管理需要立即采取行动的报告；</li> <li>• Initiate investigations when required; and 必要时启动调查；</li> <li>• Review and report to the Board of Directors the results of the investigations and recommendations for corrective or remedial actions, or (case the case may be), administrative or disciplinary actions to be taken. 审查并向董事会报告调查结果和纠正或补救行动的建议，或（视情况而定）需要采取的行政或纪律处分行动。</li> </ul>
<p><b>Human Resource Department at KGB Headquarters KGB 总部人力资源部 (HRHQ)</b></p>	<ul style="list-style-type: none"> <li>• Furnish a quarterly report to COO and CEO of KGB Headquarters stating the number and nature of grievance issues received the results thereof, follow up action and the unresolved issues across the Group; 向 KGB 总部的 COO 和 CEO 提交季度报告，说明收到的申诉问题数量和性质以及处理结果、跟进行动以及 KGB 集团的未解决问题；</li> <li>• Be accessible to employees who wish to raise any grievance in matters related to Human Resource; 接待希望提出人力资源相关申诉的员工；</li> <li>• Administer, implement and oversee ongoing compliance with this policy; 管理、实施和监督本政策的持续执行；</li> <li>• Assist the COO and CEO, in administrative and, if directed by the Board, to investigative work including conduction of Domestic Inquiry; 协助 COO 和 CEO 的管理工作，以及按照董事会的指示开展调查工作，包括国内调查；</li> <li>• Ascertain that the relevant immediate superior and LCHR promptly execute the corrective and / or remedial actions recommended; and 确定相关直接上司和 LCHR 立即执行建议的纠正和/或补救行动；</li> <li>• Attend, in confidence, to inquiries about this policy and provide advice to persons who are considering lodging a grievance matter under this policy. 保密处理有关本政策的询问，向正在考虑按照本政策提出申诉的人员提供建议</li> </ul>
<p><b>Local Country Human Resource Department 本国人力资源部 (LCHR)</b></p>	<ul style="list-style-type: none"> <li>• Furnish a quarterly report to HRHQ and Local Country Manager stating the number and nature of grievance issues received the results thereof, follow up action and the unresolved issues at the local country entity; 向 HRHQ 和本国经理提交季度报告，说明收到的申诉问题数量和性质以及处理结果、跟进行动以及本国子公司的未解决问题；</li> <li>• Administer, implement and oversee ongoing compliance with this policy in relation to the local country entity; 管理、实施和监督本政策有关本国子公司的持续执行；</li> <li>• Be accessible to employees who wish to raise any grievance in matters related to Human Resource; 接待希望提出人力资源相关申诉的员工；</li> <li>• Make the necessary arrangement for domestic inquiry if needed; and</li> </ul>

	<p>必要时为国内调查作出必要安排；</p> <ul style="list-style-type: none"> <li>• Ascertain that the relevant supervisors promptly execute the corrective and / or remedial actions recommended. 确定相关主管人员立即执行建议的纠正和/或补救行动。</li> </ul>
<p><b>Immediate Superior / HOD</b> 直接上司/部门负责人</p>	<ul style="list-style-type: none"> <li>• Be accessible to employees who wish to raise any grievance in matters related to Human Resource; 接待希望提出人力资源相关申诉的员工</li> <li>• Assist to investigative work including participate in domestic inquiry if needed; and 协助调查工作，包括必要时参与国内调查；</li> <li>• Promptly execute the corrective and / or remedial actions recommended. 立即执行建议的纠正和/或补救行动。</li> </ul>
<p><b>Corporate Compliance and Integrity Department</b> 公司合规与诚信部 (CCID)</p>	<ul style="list-style-type: none"> <li>• Managing the whistleblowing hotline based on the prescribed hours if needed in relation to aggravated grievance matters that becomes whistleblowing matters; 关于成为举报事项的严重申诉事项，根据规定的工作时间管理举报热线；</li> <li>• Promptly receive, record (if the disclosure is made orally), a report and any matter arising there from or in connection therewith; and 立即接收、记录（如果口头作出披露）报告以及报告引起的或与之相关的事项；</li> <li>• Ensure that documents related to reports are retained in a safe, secure and proper manner. 确保安全妥善保存有关报告的文件。</li> </ul>
<p><b>Employee / Members of the Public (The Complainant)</b> 员工/公众成员（投诉人）</p>	<ul style="list-style-type: none"> <li>• To raise a concern in relation to grievance / lodging a grievance matter orally or in writing and submit it to the immediate superior / HOD in relation to this grievance procedures; 提出有关申诉的关切/口头或书面提出申诉，并将其提交给与本申诉程序有关的直接上司/部门负责人；</li> <li>• To assist in the information/evidence gathering stage; 协助调查/证据收集工作；</li> <li>• To assist in the investigation/domestic inquiry stage if required; and 必要时，协助调查/国内调查工作；</li> <li>• To appear as a witness if required. 必要时作为证人出席。</li> </ul>

## APPENDIX C: GRIEVANCE PROCEDURES CHECKLIST FORM



### GRIEVANCE PROCEDURES CHECKLIST FORM (Prior to raising a grievance)

#### 1. Personal information

- a) Your name:
- b) Your occupation and designation:
- c) Your preferred phone number:
- d) Your preferred e-mail address:
- e) Best time for communication with you:
- f) Best way of communication with you:       Phone                       E-mail                       Physical

#### 2. Report of grievance in accordance with paragraph B3.0

- a) What is the grievance you want to report?
- b) When did the incident occur?
- c) Where did it occur?
- d) Who are the persons involved?
- e) Do you think it will happen again?       No                       Yes, when:

#### 3. Personal action

- a) How did you involve in the situation?
- b) Do you know of any other person(s) who are aware of the situation, not being personally involved?       No                       Yes
- c) Do you have any physical evidence, which can be handed over?       No                       Yes

## 附录 C: 申诉程序检查表



# 申诉程序检查表 (提出申诉前)

### 1. 个人讯息

a) 姓名:

b) 职业和职位:

c) 首选电话号码:

d) 优选电子邮箱:

e) 最佳沟通时间:

f) 最佳沟通方式:  电话  电子邮件  当面

### 2. 按照 B. 30 段的申诉报告

a) 你想要报告的不满是什么?

b) 事件在什么时间发生的?

c) 事件在哪里发生的?

d) 相关人是谁?

e) 你认为会再次发生吗?  否  是, 时间:

### 3. 个人行动

a) 你是如何卷入这个情况?

b) 你是否知道没有亲自涉入的其他知情人?  否  是

c) 你是否拥有实际证据可以移交?  否  是