

**员工投诉机制**  
**Grievance Mechanism for Employee**

**中国安保技术集团有限公司**  
**China Security technology group Co., Limited**

**二〇一七年十一月**  
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### **1.0 目的 Purpose:**

本制度和流程的制定意在维护员工的合法权益，保障员工与公司管理层的有效沟通，及时发现并解决各类隐患，以建立和谐稳定的劳动用工关系，提升企业文化，增强企业创造力。

This Complaint Rule and Procedure (CRP), which is set out to protect the lawful rights of the employee, to assure the effective communication between the staff and the management, and to discover and tackle various potential problems, will contribute to establishing a harmonious and stable labor relationship, promoting the company culture and strengthening the creativity of the company.

### **2.0 适用范围 Scope of Application:**

2.1 本制度及流程适用于中国安保技术集团有限公司的全体在职员工。

The CRP is applicable to all the employees of China Security technology group Co., Limited.

2.2 本投诉制度及流程包括无记名投诉和实名投诉两种方式，员工根据需要选择合理的方式进行投诉。

There are two methods for employees to appeal under this CRP. The complainant shall choose the appropriate one as needed.

### **3.0 定义: Definitions:**

#### **3.1 投诉方式: Methods for Complaint:**

##### **3.1.1 匿名投诉: Anonymous Complaint:**

所谓匿名投诉，是指员工不期望得到公司直接答复的投诉。员工可以通过意见箱进行匿名投诉，用于对公司规章制度的咨询和对不合理现象的建议等。

Anonymous Complaint means that the complainant does not expect a direct reply from the company. Any employee may use the Complaint Box to consult the rules and regulations of company and give suggestions etc.

人力行政部会定期开启意见箱（每二周开启一次）。对员工要求合理、可以解决的投诉或建议会及时解决，并把解决方案公布在公告栏内。

HR and Personnel Administration Department (the HR) will check the Box each two weeks. For those reasonable and solvable complaints or suggestion, the HR shall solve it promptly and publicize the resolution on bulletin.

##### **3.1.2 实名投诉: Real-Name Complaint:**

所谓实名投诉，是指和投诉人利益关联密切，期望得到公司对本人答复的且需要立即解决的投诉或建议。员工可以通过电子邮箱：[yuanxueli@cstghk.com](mailto:yuanxueli@cstghk.com)，和热线电话：8610 83638786-8020 进行投诉。实名投诉需要投诉人如实填写《员工投诉表》，便于人力行政部及时处理和归档。

Real-Name complaint means that the complaint or the suggestion is closely related to the complainant's interest, so a clear and immediate reply is strongly expected. The complainant shall send an e-mail to [yuanxueli@cstghk.com](mailto:yuanxueli@cstghk.com) or call 8610 83638786-8020 to make an appeal, and the *Real-Name Complaint Form for Employee*, which HR needs to handle and file, must be filled in.

#### **3.2 投诉原则: Principle of Complaint:**

3.2.1 投诉人应根据事实进行投诉，不得存在夸大欺骗之行为。

Complainant shall make an appeal based on the fact without any fraud and exaggeration.

3.2.2 投诉受理人应对投诉记录保密，严肃认真地对待投诉事件，确保员工的正当利益不受侵害。

The complaint executive should keep it confidential and treat it seriously to ensure that no any infringement against complainant's interest will occur.

3.2.3 投诉资料需由投诉人本人如实填写。代理投诉无效。

Complainant shall complete *Real-Name Complaint Form for Employee* in person. Representative complaint is invalid.

3.2.4 投诉人应遵守投诉流程，以便于受理人了解事件真相，及时做出正确判断。

Complainant shall comply with the CRP so that the executive can understand the fact in an easier way and make the correct decision timely.

3.2.5 投诉时要求使用平实、质朴的语言，讲清事实，不要使用过多的修饰词汇，避免让受理人做出错误的判断。

A simple and plain expression in appeal is highly required, and excessive modified and decorated expression should be avoided in case of executive's misjudgment.

3.2.6 绝不允许恶意投诉，虚假投诉，以达到报复其他员工的行为，否则公司将追究到底、严肃处理，情节严重构成犯罪的需承担法律责任。

Any of malicious appeal and fraudulent appeal for retaliation against any other employee is absolutely prohibited, or otherwise the company will investigate overall and impose the relevant punishment. The infringer must bear legal liability if his act is serious enough to constitute a crime.

### 3.3 投诉范围: **Complaint Scope:**

可供员工投诉的事件范围，应当是存在或发生于在公司内部的，与工作、公司内部员工、规章制度、设备、环境等相关的各种情形，包括但不限于以下类型：

The complaint scope shall be the issues existing and occurring within the company and related to routine works, colleagues, rules and regulations, facility and working environment etc., which include but is not limited to the following circumstances:

3.3.1 对公司各项政策的执行过程和结果有异议的，包括：安全法规、工作环境、质量政策、安全保护、绩效评估、劳动合同、薪酬待遇、后勤保障、福利待遇等。

Complainant dissatisfies or disagrees on the policy implementing process and result, including security regulation, working environment, quality system policy, safety protection, performance evaluation, labor contract, salary, logistical support and welfare, etc.

3.3.2 投诉人认为受到上级领导或同事不公平、不公正对待；

Complainant regards himself to be mistreated by superior or colleague in an unfair

or inequitable manner.

### 3.3.3 举报违反公司政策、制度的各种行为;

Complainant reports on any violation behavior of disobeying the company's policy and regulation.

### 3.3.4 违反企业社会责任和违反人权的行为, 如性骚扰、种族和宗教歧视等

Complainant reports on any behavior violating the Corporate Social Responsibility and the Human Rights, such as sexual harassment, racial discrimination, sectarian discrimination etc.

## 4.0 公司职责: **Responsibilities for the Company:**

4.1 公司应成立投诉处理委员会, 由投诉人直属主管、所在的部门经理、人力行政部经理、分管副总裁组成。

The company shall establish a committee to deal with the complaint. The committee consists of Direct Supervisor, Department Manager of the Complainant, HR Manager and VP-in-charge.

4.1.1 以上投诉受理人均可在权限范围内对投诉事项进行解答。如果投诉人接受该答复, 即投诉终结。如果投诉受理人无法对投诉做出解答, 可按照本制度第五条的投诉处理程序进行处理。

Complaint executives under above-mentioned committee shall answer and reply to complainant within the scope of their respective authorities. If the complainant accepts it, the appeal will be terminated. If the executive cannot provide a resolution, then the case shall be handled according to Article 5 in this CRP.

4.1.2 如果投诉直接提交到了人力行政部, 人力行政部将负责调查、取证、提出处理意见和追踪反馈等工作。

The HR shall be responsible for investigating, obtaining the evidence, providing the resolution and following up the feedback etc., if the complaint is submitted to this department directly.

4.1.3 原则上投诉人需按照本制度及流程提出投诉, 但如果投诉人投诉的对象为自己的直属主管或者部门经理, 可以直接向人力行政部门投诉。

The complainant may appeal by following this CRP in a normal circumstance, however, he may also turn to the HR directly in case that the complaint target is his Direct Supervisor or Manager of the Department.

4.2 实名投诉应填写人力行政部提供的《员工投诉书》(附件一), 描述事实细节。

The complainant should fill in the *Real-Name Complaint Form for Employee* (see appendix) provided by the HR to describe in detail if choosing the Real-Name Complaint.

4.3 受理人应完整清晰地记录好《员工投诉书》, 记录完成后应要求投诉人签字确认。

The executive shall record the whole handling process completely and precisely on the Form and ask the complainant to confirm and sign.

4.4 投诉人在等待投诉事件处理期间，应严格遵守公司相关规章制度，保证正常的工作状态，不得散布传播消极言论和信息。

Complainant should comply with the rules and regulations of company and work as usual meanwhile shall not spread any negative words or rumor about the complaint when waiting for the feedback.

## **5.0 工作程序: Working Procedure:**

5.1 投诉人应到人力行政部领取《员工投诉书》并尽快填写完毕后交给投诉受理人，即直属主管。

The complainant shall get the Form from the HR and fill in it as soon as possible and present to the Complaint executive, the direct supervisor.

5.2 投诉受理人在接收《员工投诉书》后，应详细分析投诉事项是否符合本制度投诉范围的要求。如果投诉事项符合要求，受理人应当场对投诉事项做出详细解答。如果不能做出解答，受理人应告知投诉人，投诉内容立即交由处理程序的后一级进行解答。如投诉事项不符合要求，受理人应当场告知投诉人终止投诉。以上处理过程应在《员工投诉书》上注明。

The executive shall check the Form to confirm whether the complaint meet the standard and within the scope of this CRP. If it does, he shall answer and reply to the complainant. For fear of being unable to give the proper explanation, he shall inform the complainant while transferring the case to the next handling division immediately. If the complaint is beyond CRP, the executive shall refuse on the spot. The above-mentioned process shall be noted on the Form.

5.3 投诉人的直属主管和部门经理均可直接对投诉事项进行调查、处理。如果投诉人对处理结果满意的，即可终结投诉。如果投诉人对处理结果不满意，可继续向人力行政部提出投诉。

Both the Direct Supervisor and Department Manager of the complainant have the right to investigate and handle the complaint within their authorities. If the complainant is satisfied with the resolution, the case will be terminated. If not, the complainant shall turn to the HR.

5.4 涉及到多部门的投诉事件，由人力行政部统一协调，各部门配合完成，并在 10 个工作日内，得出最终结论。

If the complaint is related to several departments, the HR shall be responsible for coordinating the departments to work out a resolution within ten working days.

5.5 如果投诉人对人力行政部给出的处理结果不满意，可在收到投诉结果之日起 10 个工作日内，进行第二次投诉。若此期间内不再投诉，则表示该投诉人接受处理结果。投诉人进行再投诉时，分管人力资源的副总裁将负责主导投诉调查工作，同时投诉处理委员会成员应积极讨论。讨论产生的处理结果为公司内部的最终结论。投诉人不得再次提出投诉。

If the complainant is not satisfied with the resolution provided by HR, he may make a second appeal within ten working days after receiving the resolution. It shall be considered as acceptance if no further complaint occurs. For the second complaint, the VP-in-charge of HR will take over the responsibility and the committee shall continue to get involved together until working out a resolution which will be the

final conclusion. Complainant shall not make a third complaint about the same issue.

#### 5.6 投诉处理结果: Handling Result:

投诉处理人应将投诉处理过程和结果记录在《员工投诉表》(见附件),并由投诉人签字。此文件一式两份,一份由投诉人保存,一份由人力资源部存档。

The details of the complaint handling with its resolution shall be recorded on the *Real-Name Complaint Form for Employee* (see appendix) in two copies by the complaint executive, one for complainant and the other for HR.

#### 5.7 惩处机制: Disciplinary Measures:

若经过调查,公司发现投诉问题产生的原因来自于员工的失职,那么公司将以扣除工资的形式,对失职人员采取相应的惩罚措施,并保留解雇失职人员的权利。一级投诉的处罚金为 300 美元;二级投诉的处罚金为 200 美元;三级投诉的处罚金为 50 美元。

If it is found that there is an unlawful behavior by personnel after investigation, the company shall make appropriated punishment on the delinquent in the form of penalty deducted from the salary and the company reserves the right to dismiss the delinquent. For the Major Complaint (Grade I), the penalty is USD300; for the Important Complaint (Grade II), the penalty is USD200; for the Common Complaint (Grade III), the penalty is USD50.

#### 5.8 投诉纪律及保密要求: Discipline and Secrecy Regulation:

在整个投诉处理过程中,相关人员应严格秘密。如有泄密者,将依据公司的《保密条例》的相关条款处理。如有对申诉人打击报复者,公司将给予严肃处理。如触犯法律,相关人员要承担法律责任。

All the related parties should undertake confidentiality obligations and liabilities during the entire process. Any leaker and the retaliation act against the complainant will be punished according to the Confidential Agreement of the company. Anyone who breaches the law shall bear the legal liability.

#### 5.9 投诉总结及改进: Debriefing and Improvement:

在每次投诉处理完毕后,人力资源部应整理相关记录和归档,按月做好总结分析工作,报送分管副总裁审核。针对根据投诉中发现的问题,各相关部门应积极做出改进,预防类似事件再次发生。人力资源部应对改进工作进行监督。

The HR shall collect and file the relevant records for each closed appeal case and make monthly analytical summary and report to the VP-in-charge. The relevant departments shall improve their performance on the problems related to the complaint in avoid of reoccurrence, which shall be under the supervision of the HR.

#### 5.10 配合官方调查: Cooperation with official investigation

作为一个国际化公司,我公司将遵守国际行业条例和规定,以及当地国家的法律。公司将积极配合当地相关机构的调查,并在公司后续运营中保持良好沟通和协作,以求尽快解决相关问题。

As an international group company, we are committed to following international industry practices and regulations, law of the local country. The company has been actively cooperating with the investigation of all relevant institutions in the local



country, and will continue to cooperate with the relevant parties and keep communication at the same time, in order to seek solutions for the problems as soon as possible.

#### 5.11 监督和仲裁: Supervision and Arbitration:

人力资源行政部对投诉处理方案的实施过程进行跟进监督, 并在实施完毕后进行确认和回访。

The HR must supervise the entire process of resolution implementation, callback client for confirmation thereafter.

与此同时, 在处理投诉的过程中, 我公司也非常欢迎接受并将配合当地政府和机构的监督。

Meanwhile, our company is always friendly to receiving the supervision from the local governmental administration and other qualified organizations about the complaint handling process.

若投诉人对处理方案不满意, 可以再次向公司申诉。有关的争议应通过友好协商解决, 若通过协商无法达成一致, 投诉人有权向 ICoCA 或其他安保协会进行申诉。

In case the complaint is not satisfied with the resolution provided by the company, they can appeal to the company again. All disputes in connection with the complaint shall be settled friendly through negotiations. In case no settlement can be reached, the complaint retains the right to appeal to ICoCA or other security industry association.

双方有权向当地仲裁机构和法院进行申诉。

The both sides have the right to appeal to the local arbitration institute or the local law court.

#### 6.0 附件: 《员工投诉表》

Appendix: *Real-Name Complaint Form for Employee*

## 6.0 附件：员工投诉表

### 6.0 Appendix : Real-Name Complaint Form for Employee

投诉人信息 Information of the Complainant			
姓名 Name		所属部门 Department	
直属主管 Direct Supervisor		岗位 Position	
投诉事实经过及理由：Facts and Details by Complainant:			
投诉人： Signature of Complainant:		投诉日期： Date:	
投诉人直属主管处理经过及解决方案：Handling Process and Resolution by Direct Supervisor:			
受理人： Signature of executive:		受理日期： Date:	
人力资源部门处理经过及解决方案：Handling Process and Resolution by HR:			
受理人： Signature of executive:		受理日期： Date:	
分管副总裁最终结论：Conclusion by VP-in-charge:			
受理人： Signature of VP:		受理日期： Date:	
投诉人确认： Confirmation by Complainant:			
投诉人确认： Confirmation by Complainant:		确认日期： Date:	

备 注：可提供附件作为补充。

Note: Attachment can be provided as a supplement.