

第三方投诉制
Grievance Mechanism
for the Third Party

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
November 2017

1. 适用范围: Scope of Procedure:

本制度和流程的制定意在维护第三方的合法权益，建立和谐稳定的社会关系。此机制适用于第三方（例如个人、当地机构和组织）投诉。第三方投诉的内容包括但不限于以下因公司行为导致的问题：

- 1.1 人权受到侵害；
- 1.2 违反企业社会责任的行为，如性骚扰、种族和宗教歧视等；
- 1.3 对公司安全控制系统、安全设施及其管理的疑惑；
- 1.4 公司的违法行为；
- 1.5 公司的不安全运作；
- 1.6 对当地环境的负面影响；
- 1.7 对当地就业产生的负面影响；
- 1.8 对当地经济产生的负面影响；

This Complaint Rule and Procedure (CRP), which is set out to protect the lawful rights and interests of the third party, to establish a harmonious and stable relationship between the company and the society. This CRP is applicable to the third party, including the individual, the local authorities and organizations etc. They can appeal against including but not limited to the following issues raised by the company conducts:

- 1.1 Human rights violations issues;
- 1.2 Any behavior violating the Corporate Social Responsibility, such as sexual harassment, racial discrimination, sectarian discrimination etc.
- 1.3 Doubts about company safety control system, safety facilities and its management;
- 1.4 Illegal actions of the company;
- 1.5 Unsafety operation of the company;
- 1.6 Impact on the local environment;
- 1.7 Impact on the local employment;
- 1.8 Impact on the local economy;

2. 投诉分类: Classification of Complaints:

根据投诉的复杂程度、严重程度和处理难度，将其分为以下三种类型：

The complaints are classified into three types based on their complexity, severity and difficulty as follows:

2.1 重大投诉（一级）:

已经引发法律诉讼、已经被媒体（报刊、网络等）曝光的投诉及 10 人以上的集体投诉、投诉发生一个月后由于我方原因仍未能得到有效解决的投诉。

2.1 Major Complaint (Grade I):

Complaint that has caused a legal action, or has been exposed by the media (for example the press and the Internet etc.), or has incurred a collective complaint by more than 10 people, or remains unresolved for more than 1 month due to company's reason.

2.2 重要投诉（二级）:

可能引发法律诉讼或被媒体曝光的投诉、处理完毕后发生二次投诉、3 人以上的集体投诉，投诉一周以后由于我方原因仍未解决的投诉。

2.2 Important Complaint (Grade II):

Complaint that may lead to a legal action or exposure by media, or the same complaint reoccurs after resolution, or has incurred a collective complaint by more than 3 people, or remains unresolved for more than 1 week due to company's reason.

2.3 一般投诉（三级）：其他所有情况。

2.3 Common Complaint (Grade III): all the other not mentioned complaints.

3 主要职责: Main Responsibilities:

3.2 事业发展部是处理第三方投诉的归口管理部门。负责组织协调、监控投诉处理过程，向公司相关部门下达投诉处理任务。负责投诉处理后的回访验证、统计分析及相关投诉信息的编写工作。

Business Development Department (BD) is designated to be responsible for dealing with the third-party complaint, including organizing, coordinating and supervising the handle of clients' complaint, issuing the complaint-handling task to relevant departments, calling back the client for verification, preparing the statistical analysis and relevant documentation.

3.3 相关责任部门负责提出责任范围内的投诉处理方案，及时解决客户投诉问题。

The related responsible department is responsible to propose a resolution and settle the complained matter promptly within its authorization.

4 投诉受理程序: Complaint Handling Procedure:

4.1 投诉形式: Methods of Complaint:

客户可以通过电子邮件（houye@cstghk.com）、电话（8610 83638786-8003）、信箱投诉或到分公司办公地点投诉。

The complainant shall send an e-mail to houye@cstghk.com, call hotline 8610 83638786-8003, or visit our overseas branch office to make an appeal.

4.2 受理流程: Handling Procedure:

事业发展部负责受理投诉，并应做好投诉记录，填写《第三方投诉处理单》（见附件）。

The BD takes the responsibility of handling the complaints, keeping the record and filling in the *Third-Party Complaint Handling Form (see appendix)*.

- 1) 如果投诉是无效的，受理人应及时与客户沟通并做好相应的解释工作，并做好信息归档工作。

If the complaint is proved to be invalid, the executive shall give a clear explanation to the complainant and file the records properly.

- 2) 如果是重大投诉或重要投诉，投诉内容应及时上报事业发展部总监，由其组建危机处理小组。小组成员包括：责任所属的相关海外分公司总经理、相关部门总监、事业发展部总监和分管副总裁组成。

Should a complaint be classified as Grade I or II, Director of BD must be notified

immediately who shall then call on a working group consisting Managing Director (MD) of related overseas branch, directors of relevant Departments, director of BD and the VP-in-charge.

3) 如果是一般投诉,则由事业发展部调查判定投诉所属责任部门。责任部门与事业发展部协商共同制定投诉处理解决方案。

As for Grade III Complaint, the BD dominates the analytical judgment of related responsible department, with which BD will consult to work out a resolution.

4.3 处理方案: Resolution:

事业发展部将投诉处理解决方案报分管副总裁审批,并就通过审批的投诉处理解决方案与投诉人进行沟通。若对方接受,则由双方在《第三方投诉处理单》上签字确认,责任部门按既定方案组织实施解决。若不接受,则需由事业发展部组织相关责任部门重新制定解决方案。The BD reports the solution to the VP-in-charge for approval and then communicate and discuss with the complainant about it. Should the third party accept, both sides will sign on the *Third-Party Complaint Handling Form* and the related departments shall implement the countersigned resolution; or otherwise, BD shall re-develop a resolution by organizing and coordinating with relevant departments.

4.4 监督和仲裁: Supervision and Arbitration:

事业发展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 BD 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.

5 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.

6 保密规定: Confidentiality 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。如有对投诉人打击报复者,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.

7 投诉总结及改进: Summarizations and Improvement:

在每次投诉处理完毕后,事业发展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。事业发展部对改进工作进行监督。

The BD 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 BD.

8 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.

9 附件:《第三方投诉处理单》

Appendix: Third-Party Complaint Handling Form

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9 Appendix : Third-Party Complaint Handling Form

投诉人信息 Information of the Complainant			
投诉人/机构/组织名称 Name of the Third Party		电话/邮箱 Tel./E-mail	
地址 Address		投诉日期 Date of Complaint	
投诉形式 Complaint Form	<input type="checkbox"/> 邮件 E-mail <input type="checkbox"/> 来电 Hotline <input type="checkbox"/> 信函 Mail <input type="checkbox"/> 亲临 On Site		
投诉事实及经过：Facts and Details Provided by Complainant:			
投诉人： Signature of Complainant:		投诉日期： Date:	
处理经过及解决方案 Handling Process and Resolution			
投诉分类：Classification of the Complaint: <input type="checkbox"/> 重大投诉（一级）Major (Grade I) <input type="checkbox"/> 重要投诉（二级）Important (Grade II) <input type="checkbox"/> 一般投诉（三级）Common (Grade III) <input type="checkbox"/> 无效 Invalid			
事业发展部记录：Records by BD:			
受理人： Signature of executive:		受理日期： Date:	
相关责任部门记录：Records by Relevant Departments:			
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:		确认日期： Date:	

备 注：可提供附件作为补充。

Note: Attachment can be provided as a supplement.