
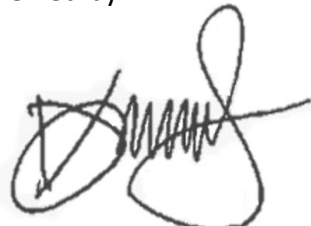



Document Change Notice (DCN)		QMS-DC-F001 Rev: 00
DOCUMENT CHANGE NOTICE (DCN) #: ESH-105 Date: 22/12/2025		
<input checked="" type="checkbox"/> Addition (New Document) <input type="checkbox"/> Revision (Modify Existing Document) <input type="checkbox"/> Deletion (Remove Existing Document)		
Title of Document : External Grievance Mechanism Procedure		
Document Number : ESH-GRV-P001		
Old Revision number was : N/A New Revision Number is : 00		
Clause was: <hr/> Before Changing Content was:	Change to: <hr/> After Changing Content is: New established Procedure	
Reason of change:		
Recommended Effective Date: 1/1/2026 <input checked="" type="checkbox"/> Permanent Change <input type="checkbox"/> Temporary Change <input type="checkbox"/> Condition of validity, valid from _____	Note: 1) The DCN# will be assigned by the individual department Example: QMS-001 (QMS Department) MD-001 (Manufacturing Department) 2) The initiator shall submit the document (addition, modification or delete) together with this DCN for review/approval 3) The DCN shall be filed at QMS department	
Prepared by:  Name: Nursyahira Faghira Designation: Sr. S&H Executive Date: 22/12/2025	Reviewed by:  Name: Nur Fadhli Kasthalani Designation: ESH Manager Date: 22/12/2025	Approved by:  Name: Teng Kim Chuan Designation: Director Date: 22/12/2025

Document Code: ESH-GRV-P001

External Grievance Mechanism Procedure		ESH-GRV-P001 Rev: 00
1. PURPOSE	<p>This procedure establishes a formal external grievance mechanism for external stakeholders, including but not limited to communities, contractors, subcontractors, suppliers and other interested parties, to raise complaints or express concerns related to Jingxing Holdings (M) Sdn. Bhd. operations, projects or business activities.</p> <p>The mechanism ensures grievances are addressed in a fair, transparent, confidential and timely manner, in alignment with the Company's Environmental and Social Management System (ESMS), international standards and applicable Malaysian laws.</p> <p>JXM employee grievances related to working conditions and terms of employment are not covered under this procedure. They are managed separately under the Employee Grievance Handling</p>	
2. SCOPE	<p>This procedure applies to all grievances raised by external stakeholders, including but not limited to:</p> <ul style="list-style-type: none"> • Local communities affected by company operations or projects; • Contractors, subcontractors and suppliers; • NGOs or advocacy groups; • Customers, clients and other business partners. <p>Types of grievances include (not limited to):</p> <ul style="list-style-type: none"> • Hiring-related concerns; • Unplanned project impacts and infrastructure damage; • Environmental and social commitments; • Safety, health or environmental hazards; • Ethical misconduct or contractor non-compliance. 	
3. REFERENCE	N/A	
4. ABBREVIATION	<p>4.1. HR = Human Resource 4.2. CLT = Community Liaison Team 4.3. CLL = Community Liaison Leader 4.4. CLO = Community Liaison Officer 4.5. ESMS = Environmental and Social Management System 4.6. GM = Grievance Mechanism</p>	
5. APPENDIX	<p>Appendix 5.1 – External Grievance Mechanism (EGM) Flow Chart Appendix 5.2 – External Grievance Mechanism Process Appendix 5.3 – External Grievance Form Appendix 5.4 – External Grievance Log</p>	
6. RESPONSIBILITIES	<p>a) Senior Management is responsible for reviewing and approving final resolutions of grievances and ensuring that adequate resources—including personnel, time, and financial support—are allocated for effective grievance management. They oversee the overall implementation of this procedure, monitor compliance with applicable laws and regulations, and support the CLO and CLT in ensuring that all grievances are handled fairly, transparently, and in accordance with JXM's ethical standards.</p> <p>b) The CLO acts as the primary point of contact for receiving and documenting grievances from external stakeholders. The CLO records all grievance details in the Grievance Form, issues an acknowledgement receipt to the complainant,</p>	

External Grievance Mechanism Procedure		ESH-GRV-P001 Rev: 00
	<p>and conducts an initial assessment to determine the appropriate course of action.</p> <p>c) The CLO coordinates with Senior Management, the CLT, and assigned action owners throughout the grievance process—ensuring confidentiality, impartiality, and timely resolution. The CLO is responsible for hosting meetings, preparing and maintaining meeting minutes, and serving as the sole custodian of all grievance-related records. The CLO also facilitates communication between all relevant parties to ensure smooth coordination, timely updates, and consistent follow-up until closure.</p> <p>d) In fulfilling these duties, the CLO upholds JXM’s credibility and integrity, ensuring that stakeholder relationships are preserved through fair, transparent, and respectful grievance management.</p> <p>e) The CLT supports the CLO in the grievance handling process. The team shall consist of key decision-makers from departments such as Management, Project, Procurement, ESH, HR&A, and QMS. The CLT assists in reviewing grievances, providing technical or departmental input, and recommending appropriate corrective or preventive actions. They ensure that decisions are made collectively, fairly, and in line with company policies and stakeholder commitments.</p> <p>f) The Assigned Action Owner is appointed by the CLO to manage specific grievances from investigation to resolution. This includes conducting fact-finding activities, implementing corrective and preventive measures, and coordinating with the CLO and relevant departments to ensure timely completion. The Assigned Action Owner shall update the CLO on progress, delays, or any challenges faced, and ensure all documentation and evidence are properly maintained and submitted for recordkeeping.</p> <p>g) External stakeholders, including but not limited to contractors, suppliers and affected community members, are responsible for submitting grievances with accurate and complete information through the prescribed reporting channels. They may be required to provide additional information, clarification, or supporting evidence as and when requested to facilitate effective review and resolution.</p> <p>h) Contractors may be required to establish and implement grievance procedures, aligned with JXM’s External Grievance Mechanism (EGM).</p>	
<p>7. GRIEVANCE SUBMISSION CHANNELS</p>	<p>a) Grievances may be submitted free of charge, either verbally or in writing, through the Company’s prescribed channels. Complainants are encouraged to provide clear and complete information to facilitate effective investigation and resolution.</p> <p>The complainant may submit a grievance through any of the following channels:</p> <ol style="list-style-type: none"> i. Verbal submission to the Community Liaison Team (CLT) or authorized personnel. 	

External Grievance Mechanism Procedure		ESH-GRV-P001 Rev: 00
	<p>ii. Written submission via the official grievance form, email or letter.</p> <p>b) Submission Channels:</p> <p>Telephone : 03-3853 0018</p> <p>Email : feedback@jingxing.com.my</p> <p>Letter : No. 2, Jalan Neutron 2, Taman Perindustrian Mahkota Utama, 42700 Banting, Kuala Langat, Selangor Darul Ehsan, Malaysia</p> <p>Walk-in / In-person : JXM Office – Community Liaison Officer (CLO)</p> <p>c) The Company recognises that external stakeholders may sometimes prefer to submit grievances anonymously due to concerns about confidentiality, sensitivity of the matter or personal safety. In such cases, anonymous submissions can be made through the designated grievance channels with complete information (e.g., email, letter, telephone).</p> <p>d) The Company recognises that external stakeholders may sometimes prefer to submit grievances anonymously due to concerns about confidentiality, sensitivity of the matter or personal safety. In such cases, anonymous submissions can be made through the designated grievance channels with complete information (e.g., email, letter, telephone).</p> <p>e) While anonymity may limit the Company’s ability to seek clarification, all anonymous submissions will be reviewed and assessed in good faith.</p> <p>f) Anonymous grievances containing sufficient details (e.g., date, time, location, parties involved or supporting evidence) shall be treated with the same seriousness, confidentiality and procedural rigor as formally identified grievances.</p> <p>g) The CLO will evaluate the credibility of the anonymous grievance and determine appropriate follow-up actions. Investigations will be conducted based on the information and evidence available.</p> <p>h) Anonymous reporting does not absolve responsibility for substantiated complaints. Appropriate corrective or preventive actions will be taken in accordance with this procedure and applicable laws.</p> <p>i) All grievances, including anonymous submissions, must be made in good faith. Submissions later found to be intentionally false or misleading may result in necessary actions.</p>	

External Grievance Mechanism Procedure		ESH-GRV-P001 Rev: 00
8. PROCEDURE	<p>1) The CLO shall promptly receive and acknowledge any grievance or feedback submitted by external stakeholders by using ESH-GRV-F001 External Grievance Form. An official verbal acknowledgement within 1 working day and written acknowledgement within 3 days shall be issued by the CLO within three (3) working days from the date of report.</p> <p>2) Upon receipt of a grievance, the CLO shall document the details in the ESH-GRV-F001 External Grievance Form and formally record it in the ESH-GRV-L001 External Grievance Log. Each grievance shall be assigned a unique case number and all related communications, supporting documents and consultation records shall be attached and securely maintained by the CLO or any personnel appointed by Senior Management.</p> <p>3) Grievance is screened and assessed within 3 working days. The CLO shall assess the nature of the grievance and determine the appropriate course of action for resolution. The CLO will identify the responsible grievance owner and collaborate with them to ensure suitable actions are taken. Where necessary, the CLO may escalate the matter to CLT and/or higher management level for further review and decision.</p> <p>4) Upon completion of the investigation, if the grievance is determined to be unrelated to JXM's operations, the CLO shall communicate the outcome to the complainant, providing a clear explanation and justification.</p> <p>5) If grievance is valid, it will be classified into one of the following categories:</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Grievance Assessment Criteria</p> <ul style="list-style-type: none"> • Level 1 Complaint: A complaint where potential impacts and/or consequences are low that can be resolved quickly (e.g., a Project vehicle damaging other's property) • Level 2 Complaint: A complaint which is widespread and repeated (e.g., dust from Project vehicles) • Level 3 Complaint: A complaint that could potentially result in a serious breach of National laws and regulations or affect Government and Project image and performance (e.g., inadequate offshore waste management). </div> <p>6) The CLO shall coordinate the investigation of grievances received from external stakeholders, determine appropriate actions and prepare responses.</p> <p>7) The CLO shall screen and categorize each grievance to identify the relevant department or personnel needed for input, support and to assign the appropriate grievance owner.</p> <p>8) Based on investigation, the CLO shall recommend corrective and preventive actions to the CLT for assessment. If needed, escalate the matter to Top</p>	

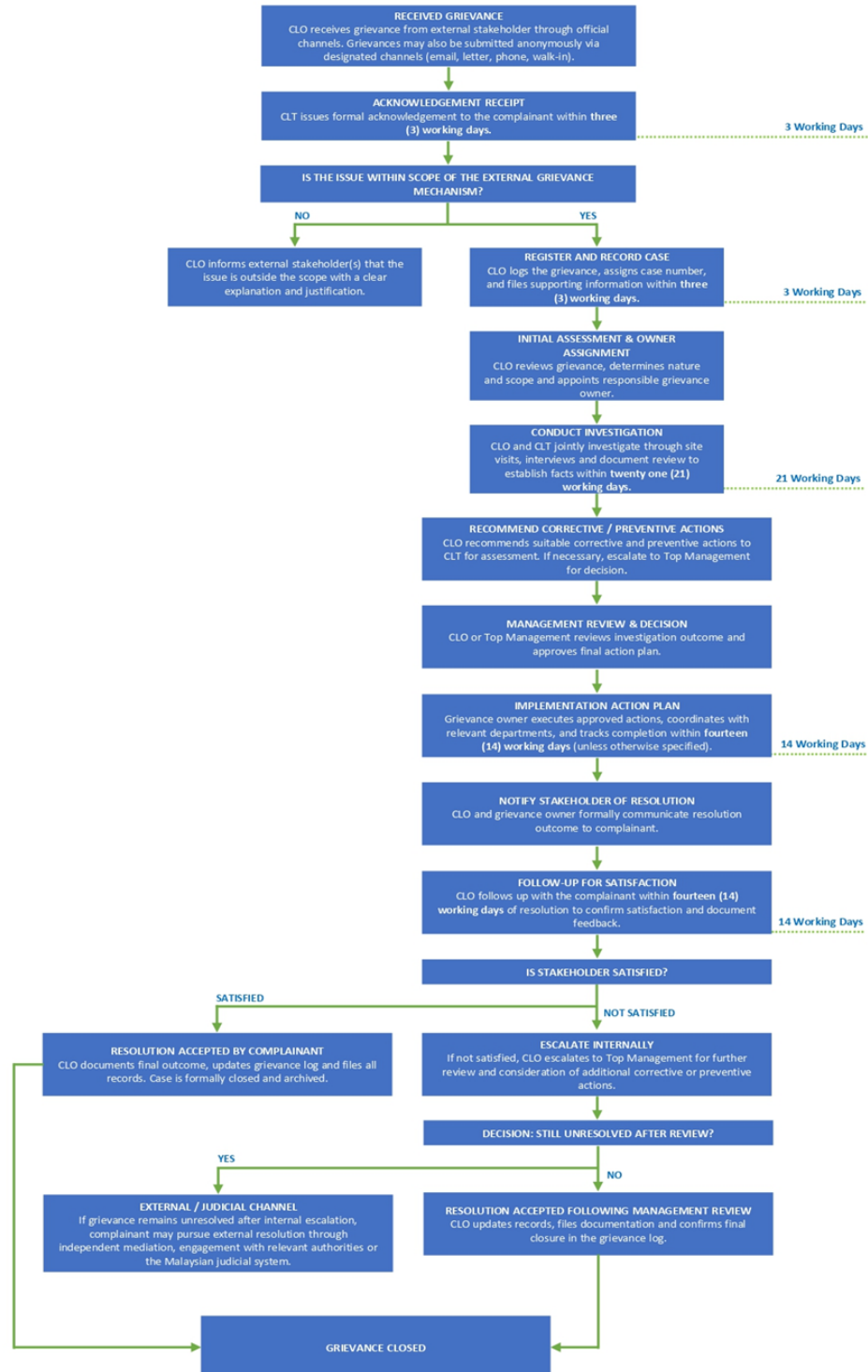
External Grievance Mechanism Procedure		ESH-GRV-P001 Rev: 00
	<p>Management for final decision and resolution confirmation.</p> <p>9) The CLT shall complete the investigation within fourteen (14) working days, which may include site inspections, interviews and review of supporting documents.</p> <p>10) All actions and decisions arising from a grievance, including outcomes, responsibilities and target completion dates, shall be recorded in the ESH-GRV-L001 External Grievance Log.</p> <p>11) Supporting activities such as meetings, discussions, consultations, or site visits shall be documented and retained in the investigation file. All records shall be maintained in a controlled manner to ensure traceability, completeness and accessibility</p> <p>12) The CLO shall communicate the grievance and investigation findings to the complainant to ensure awareness and understanding of the issue.</p> <p>13) The CLO shall manage the grievance through to resolution, ensuring accountability and traceability throughout the process.</p> <p>14) Based on the findings, the CLO shall develop an action plan outlining the steps required to resolve the grievance and assign action owner. Identified action shall be implemented within twenty (20) working days unless otherwise specified.</p> <p>15) The CLO shall assign responsibilities to relevant departments, parties or individuals within JXM and monitor progress to ensure adherence to deadlines.</p> <p>16) All supporting documentation and records shall be maintained to ensure completeness, traceability and accessibility.</p> <p>17) Upon corrective actions identified, the CLO shall communicate with the complainant for acknowledgment.</p> <p>18) The CLO shall contact the external stakeholder(s) to confirm status of the resolution and to gather feedback on the grievance after identified action implemented.</p> <p>19) All interactions with the external stakeholder shall be documented and the records shall be maintained by the CLO.</p> <p>20) The grievance shall be considered as “closed” when a resolution satisfactory to all parties has been achieved and all relevant documentation has been properly recorded and retained.</p> <p>21) If the grievance remains unresolved after internal review, it shall be escalated to appropriate external parties or other available avenues, such as regulatory authorities, mediation or arbitration services, industry bodies or legal action in accordance with applicable laws and regulations.</p>	

External Grievance Mechanism Procedure		ESH-GRV-P001 Rev: 00
9. EXTERNAL APPEAL AND ESCALATION	<p>a) If the external community and stakeholder is dissatisfied with the resolution or disagrees with the proposed actions, the assigned action owner, in coordination with the CLO shall escalate the matter to senior management. Senior management shall review the grievance, including all documentation collected during the investigation and determine whether further actions are required.</p> <p>b) External community and stakeholders may have the right to pursue resolution through the Malaysian judicial system if they are not satisfied with the proposed solution.</p> <p>c) JXM is committed to resolving genuine grievances raised by external stakeholders. If the grievance remains unresolved or the stakeholder remains dissatisfied, JXM may seek guidance or assistance from independent parties, such as community leaders, elected representatives or other relevant authorities.</p> <p>d) All actions taken during the appeal and escalation process shall be documented and retained in a controlled manner to ensure traceability, accountability and accessibility for future reference.</p>	
10. RELATED DOCUMENT	N/A	

EXTERNAL GRIEVANCE MECHANISM FLOW CHART

Appendix 5.1
ESH-GRV-P001
Rev: 00

External Grievance Mechanism Flowchart



External Grievance Mechanism Process

Appendix 5.2
 ESH-GRV-P001
 Rev: 00



Received Grievance

External stakeholders may submit grievances or feedback through any of the following official channels. Anonymous submissions are also accepted.

- Tele. : 03-3853 0018 (CLO)
- Email : feedback@jingxing.com.my
- Letter : No. 2, Jalan Neutron 2, Taman Perindustrian Mahkota Utama, 42700 Banting, Kuala Langat, Selangor Darul Ehsan, Malaysia
- Walk-in : JXM Office

Upon receipt, the Community Liaison Officer (CLO) logs the grievance and issues an acknowledgement within **three (3) working days**.



Register of Grievance

All grievances are officially recorded in the Grievance Register by the CLO.

- **Log and Acknowledgement:** Each case receives a unique reference number and acknowledgement copy is shared with the complainant.
- **Scope Verification:** CLO determines if the issue falls within the mechanism's scope.
 - If within scope, proceed to review and investigation.
 - If not within scope, CLO informs the complainant in writing with justification.

Completed within **three (3) days** of registration.



Review & Action Plan

The Community Liaison Team (CLT) conducts fact-finding through site visits, interviews and document review within **three (3) weeks**.

- **Action Planning:** CLO and CLT recommend corrective or preventive measures to management.
- Top Management reviews and approves the final action plan.
- Draft response is prepared and shared with the complainant for transparency.



Grievance Case Resolved

The Grievance Owner executes the approved action plan within **two (2) weeks** (or as otherwise specified).

CLO informs the complainant of the resolution and confirms completion.

- **Follow-up:** CLO conducts satisfaction follow-up within two (2) weeks after resolution.
 - **If Satisfied** Case closed and archived.
 - **If Not Satisfied** Escalated to Top Management for further review or reconsideration.

If **unresolved** after internal review, the complainant may pursue external or judicial channels (mediation, authority or court).



Monitor

- CLO periodically monitors resolved grievances to ensure effectiveness of implemented actions and identifies recurring issues for improvement.

External Grievance Form	Appendix 5.3 ESH-GRV-P001 Rev: 00
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EXTERNAL GRIEVANCE FORM	ESH-GRV-F001 Rev: 00
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Grievance Form PART 1 Contact and Details
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Complaint number:
Date: Recorded by:
Complainant details (Tick the box for anonymity <input type="checkbox"/>)
Name: Category [community/ contract worker/ supplier/ contractor]: Telephone number: Address: Preferred method of contact:

Grievance Log PART 2 Description of grievance(s)

Describe the grievance below.
Mode of communication (written/ verbal/ meetings/ mediator): Date of grievance: Date of acknowledgement:

Signatures

Recorder: Claimant: Date:

Grievance Closed Out PART 3 Resolution

Describe the steps taken to resolve the grievance and the outcome.
Department: Mode of communication for reply (meeting/ written/ verbal/ display): Date closed:

Signatures

Complainant: Project representative: Date:
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