



# Community Relations and Development (CR&D)

## Grievance Redress Mechanism (GRM)

### 1.0. Introduction

The Grievance Redress Mechanism is a Marampa Mines Limited (“MML”) process that enables any affected person to make a complaint or a suggestion about the way MML’s activities impact the community or themselves as an individual. They may take the form of specific complaints for damages/injury, concerns about routine project activities, or perceived incidents for impacts. Identifying and responding to grievances supports the development of positive relationships between MML and affected communities and other stakeholders. Grievances can be made by individuals, households or groups, including villages.

**For staff grievances, please refer to MML’s internal policy available from HR.**

Grievances can be an indication of growing stakeholder concerns (real or perceived) and can escalate if not identified and resolved. The management of grievances is therefore a vital component of stakeholder management and an important aspect of risk management, because it underpins the social acceptability of MML’s activities. This Grievance Redress Mechanism therefore provides a formal and ongoing avenue for dialogue. It enables stakeholders to engage with MML, whilst the monitoring of grievances allows for the identification of any potential escalation of conflicts or disputes.

The lodging of complaints and/or concerns regarding MML activities can be made under the Grievance Redress Mechanism at no cost to the affected party, and with the assurance of a fair and timely treatment of the issue at hand. The GRM is to be made accessible to all affected parties, including vulnerable groups such as female-headed households, disabled individuals, and “settlers” who lack full land rights.

There will be some grievances expressed verbally by the population but discussed only among villagers. Some grievances may emerge in the form of rumours, resulting in louder protestation. To avoid such problems, it is important to inform the population about the grievance process and how to make a well-documented grievance.

The complainant may want to raise a concern in confidence. Confidentiality must be respected, where the complainant requests that their identity not be disclosed and has plausible reasons for requesting anonymity. Therefore, details of submission and allegations will be kept confidential by the Head of Department (HoD) responsible for investigating such concerns. If a situation arises where it will not be possible to resolve the matter without revealing the person’s identity (e.g. where the complainant is required to give evidence in court), prior consent from the complainant must be obtained.

### 2.0. The Grievance Reporting Procedure

The aim of the grievance procedure is to ensure that grievances are properly channelled, that once received are acknowledged when lodged, and that the complainant knows what to expect in terms of response and when.



CR&D works to ensure the GRM's purpose is communicated to visitors to the MML Information Centre in Lunsar, as well as made accessible to them, so that they are aware of the process, know about their right to submit their grievances, and understand how the mechanism works and how their grievances will be addressed. CR&D staff are trained on the Grievance Redress Mechanism, conflict management and resolution, and interest-based negotiation.

1. In most cases, a grievance or complaint starts when an affected person phones or speaks to CR&D staff or Grievance Officer, who will record the complaint using the Grievance Form.
2. All completed grievance forms should be signed by the complainant. Since the signature is often a thumb print signature, it will be required that a witness co-signs the grievance document to confirm proper identification.
3. The complainant accepts that, by making a formal grievance he or she will not undertake any action that will affect MML's operations but will await the outcome of the grievance process.
4. A preliminary investigation of all complaints will be carried out by the CR&D Department. There are four (4) possible outcomes to these preliminary investigations:
  - a) The complainant recognises that the grievance has no basis and signs to this effect. Grievance is documented, signed by both parties, and considered resolved.
  - b) The complaint is accepted, and the CR&D staff resolves the grievance. Grievance is documented, signed by both parties, and considered resolved.
  - c) The complaint requires further investigation. In this case the complaint goes to the CR&D Department Director who identifies the appropriate Head of Department that can address the grievance. It is for the relevant Head of Department to investigate the complaint, and in consultation with the CR&D Director to take any remedial action and signs the form to conform that the grievance is resolved.

If the complainant does not agree with the remedial action, the Head of CR&D will present the case to Community Development Agreement (CDA) Steering Committee, the governing body of the CDA, which is tasked with intervening in such instances, as per item H of Annex 3 of the CDA. The Steering Committee either endorses the proposed remedial action and commits to explain it to the complainant; or decides on a revised remedial action with the MML representatives present. MML undertakes the remedial action and both parties sign the form to confirm that the grievance is resolved.
  - d) In the case that MML and the Steering Committee do not come to an agreement, the complainant has the option of pursuing legal action.

### 3.0. Publicising the Grievance Procedure

It is a requirement under international standards that grievance procedure should be both transparent and accessible. To meet these conditions, MML stakeholders must be aware of the existence of the Grievance procedure, and how they use it. Such information is to be made readily available through posters, information sheets, public meetings and discussions with community leaders.



MARAMPA MINES LIMITED (MML) GRIEVANCE HANDLING PROCEDURE

Steps	Process	Description	When	Who	Comments
Step 1a	Grievance recorded. Complainant recognises that the grievance has no basis and signs to this effect. Grievance is fully documented, signed by both parties, considered resolved	Grievance is fully documented, signed by both parties and recorded	1 working day	CR&D Staff	Grievance is fully documented, signed by both parties and recorded  CR Director acknowledges receipt of the grievance form
Step 1b	Grievance recorded. Complaint accepted and resolved by CR&D staff. Grievance is fully documented, signed by both parties, considered resolved	Grievance is fully documented, signed by both parties, considered resolved	1 working day	CR&D staff	Grievance is fully documented, signed by both parties and recorded
Step 2 (If required)	(If complaint is not resolved). Grievance recorded and transferred to CR&D Department. Preliminary Investigation	Grievance is fully documented, signed by both parties and recorded	5 working days	CR&D staff	Grievance is fully documented, signed by both parties and recorded  Head of CR&D acknowledges receipt of the grievance form

Step 3 (If required)	Complaint requires further investigation. Head of CR&D identifies the appropriate Head of Department (HoD), who investigates the complaint, and in consultation with the Head of Department of CR&D takes any remedial action that may be necessary	The complainant is informed of the remedial action and signs the form to confirm that the grievance is resolved and recorded	5 working days	CR&D Staff  Head of Department of CR&D Identifies the relevant HoD	Grievance is fully documented, signed by both parties and recorded  Head of CR&D acknowledges receipt of the grievance form
Step 4 (If required)	Complainant does not agree with the remedial action. Head of CR&D will present the case to the Steering Committee (SC). The SC endorses the remedial action, and commits to explain to the complainant; or decides on new remedial action with the MML representatives present	MML informs the complainant who agrees to the remedial action. MML undertakes the remedial action and both parties signed, and that the grievance is resolved and recorded	4 months	CR&D staff  HoD of CR&D	Grievance is fully documented, signed by both parties and recorded  Head of CR&D acknowledges receipt of the grievance form
Step 5 (If required)	In the case that MML and the Steering Committee do not come to an agreement, the complainant has the right the option of pursuing legal action	CR&D Department informs Legal Department	1 day	CR&D Staff  CR&D Director  HoD  Steering Committee	Grievance is fully documented, signed by both parties and recorded