

1 Scope

The standard is applicable to all business units and managed operations, including new acquisitions, admin/corporate offices and research facilities located off site; throughout the project life cycle to meet the principle outcomes & expectations listed in this standard.

- 1.1 Businesses are necessarily required to comply with host country laws & regulations.
- 1.2 New and existing projects are required to fulfil all requirements of this standard on a continuing basis.
- 1.3 A grievance is a real or imagined cause for complaint or resentment, especially unfair treatment.
- 1.4 This Performance Standard must be read in conjunction with GN41, Guidance Note on Grievance Mechanisms.

2 Principle Outcomes & Expectations

- 2.1 The business must follow a defined grievance redressal process to identify, record, acknowledge, assess & assign, investigate, resolve and close all grievances.
- 2.2 The grievance redressal process must be understood by those lodging a grievance.
- 2.3 The Grievance Mechanism (GM) shall protect the identity, legal and human rights of the grievance holder and associated persons.
- 2.4 Grievances must be investigated and resolved in consultation with grievance holder and shall be gender inclusive.
- 2.5 The GM must be accessible to all external stakeholders and sensitive to the cultural norms of the directly impacted, indigenous and vulnerable stakeholder groups.
- 2.6 All grievances must be attempted to be resolved within 30 days from identification. If not possible, the Community Liaison Officer (CLO) must update the Social Performance Manager (SPM) and the grievance holder with bimonthly progress.
- 2.7 A grievance may only be rejected after the investigation has established that there has not been any impact on the grievance holder due to the business activities or its related persons.
- 2.8 CLO must record, assess and assign the grievance to the concerned department for investigation and resolution.
- 2.9 Human Rights related grievances must be directly assigned to the location head for investigation and closure.
- 2.10 An acknowledgement receipt must be shared with the grievance holder within 24 hours of recording the grievance.
- 2.11 Grievance (rejected or resolved) shall be considered closed after the CLO has shared a closure report and grievance holder's feedback is obtained on GM process experience and outcome.
- 2.12 The SPM must monitor quarterly performance of the GM against the principle outcome & expectations and share findings with the location head, SPSC and Corporate HSES.
- 2.13 The SBU director or Project Head shall ensure the

effective implementation of this standard through the SPM and CLO.

3 Process

Concept & Prefeasibility

- 3.1 The SPM shall appoint a site-based CLO for coordinating the GM process at site.
- 3.2 An objective GM process to formally identify, record, acknowledge, assess & assign, investigate, resolution and closure shall be devised.
- 3.3 Project teams must be trained on the aspects of communication, GM process and the cultural norms of stakeholders.
- 3.4 A locally translated GM procedure manual must be provided to the user groups, employees and workers.

Feasibility

- 3.5 The CLO shall implement engagement to increase the reach and access of the grievance mechanism to the user groups.
- 3.6 The CLO must organize annual workshop/s to build the capacity of the user groups towards the purpose, process and limitations of the Grievance Mechanism.
- 3.7 The CLO must implement a dedicated channel to identify and process the grievances from resettling communities and their host communities.

Construction to Closure

- 3.8 Employees and business partners must receive training with an annual refresher on their duty to identify and report grievances to CLO.

4 Structure, Record and Review

- 4.1 SBU Director shall sign off the locally translated user guidance manual.
- 4.2 SBU Director and SPSC shall approve quarterly & annual GM performance reviews.
- 4.3 CLO must maintain an updated grievance register including the process status of the grievances.
- 4.4 CLO must keep records of acknowledgement, update, investigation, closure and feedback reports for the purpose of quarterly analysis.
- 4.5 The SPSC and management shall conduct an annual review of effectiveness against the principle outcomes and expectations, plus an external review once every three years.



Andrew Lewin

Group Head HSE & Sustainability