

Technical Standard – Grievance Mechanisms

Vedanta Resources Plc

Sustainability Governance System


Technical Standard

Grievance Mechanisms

Technical Standard – Grievance Mechanisms

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Technical Standard – Grievance Mechanisms

| Contents | Page |
|--|-------------|
| 1. INTRODUCTION | 4 |
| 2. SCOPE | 4 |
| 3. DEFINITIONS | 4 |
| 4. PROGRAMME REQUIREMENTS | 6 |
| 4.1. General Requirements | 6 |
| 4.2. Employee Grievance Mechanisms | 7 |
| 4.3. External Stakeholder Grievance Mechanisms | 8 |
| 4.4. Resourcing | 9 |
| 4.5. Reporting and Recording | 9 |
| 4.6. Monitoring and Evaluation | 10 |
| 4.7. Training | 10 |
| 5. ROLES AND RESPONSIBILITIES | 11 |
| 6. COMPLIANCE AND PERFORMANCE | 11 |
| 7. SUPPORTING INFORMATION | 11 |
| 8. REVIEW | 12 |
| 9. RELATED DOCUMENTATION | 12 |

Technical Standard – Grievance Mechanisms

1. INTRODUCTION

The purpose of this Technical Standard is to ensure that the programme design, risk management controls and supporting information are in place to proactively manage and maintain effective employee and other external stakeholder grievance mechanisms for the Vedanta Group.

2. SCOPE

This Standard is mandatory and applies to all Vedanta subsidiaries, operations and managed sites, including new acquisitions, corporate offices and research facilities. This Standard is applicable to the entire operation lifecycle (including exploration and planning, evaluation, operation and closure).

3. DEFINITIONS

Definitions of key terms used in this document are shown in the following table.

| Term | Definition |
|----------------|--|
| Affected Party | Stakeholders who are affected by the company or operation, both positively and negatively. Within this it is possible to distinguish between those that are directly affected and indirectly affected by the company or operation. |
| Communication | Dialogue between Vedanta and affected or interested parties. Communication is exchanging (giving and receiving) information. Communication enables Vedanta to convey the aspects, risks and opportunities of their operations, and to receive information from a range of stakeholder's concerns, questions and suggestions shared in response. |
| Consultation | Consultation is not the same as communication although both are two-way processes. Consultation is purposeful and deliberately seeks input from stakeholders in order to shape relations and the development of programmes. It involves the business, key individuals, organisations and groups affected by or interested in the development and outcomes of the issue/process being discussed. The aim is to ensure mutual understanding and for all parties to be able to manage decisions that have a potential to affect all concerned. A good consultation process needs to be supported by a strong communication programme. |
| Grievance | A concern, complaint or feeling of resentment raised by any stakeholder either affected or interested in company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations. |
| Incident | An event or chain of events which caused or could have caused injury, illness, loss of assets or potential or actual damage to relationships or reputation. |

Technical Standard – Grievance Mechanisms

| Term | Definition |
|---|--|
| Interested Party | Persons or groups who, although not affected by the Vedanta Group or operations, have an interest in or influence over Vedanta and its operations. This might include welfare organisations, non-government organisations, local businesses and political groups. |
| Operation(s) | A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices and research and development facilities. |
| Records of communication / consultation | Records of communication / consultation may include key e-mails, letters, newsletters, memorandums, complaints, opportunities for improvement, records of distribution/attendance, records of formal and informal meetings and records of commitments. Refer to <i>Employee Consultation & Participation and Stakeholder Engagement Technical Standards</i> . |
| Stakeholder | Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, lenders, employees, communities, industry, governments and interested third parties. |
| Stakeholder engagement | An umbrella term encompassing a range of activities and interactions between Vedanta and stakeholders over the life of a project that are designated to promote transparent, accountable, positive, and mutually beneficial working relationships. Stakeholder engagement includes stakeholder identification and analysis, information disclosure, communication, problem/conflict anticipation and prevention, ongoing consultation, formation of partnerships, construction of grievance resolution mechanisms, negotiated problem solving, employee involvement in project monitoring, regular reporting forums and procedures, and other related management activities. |
| Vedanta Company | A subsidiary of Vedanta Group either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.) |
| Vulnerable Groups | Individuals or groups within the project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's race, sex, language, religion, political, or other opinion, national or social origin, property, birth or other status. In addition other factors should be considered such as gender, ethnicity, culture, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources. |

Technical Standard – Grievance Mechanisms

4. PROGRAMME REQUIREMENTS

All Vedanta subsidiary companies and operations are required to follow the requirements listed below with regards to the mechanisms for handling and resolving both employee and other external stakeholder grievances.

4.1. General Requirements

Local concerns over the impact of a project can be expressed in the form of a complaint both formally or informally and can encompass relatively minor concerns as well as more entrenched, serious or long-term issues which may be described as grievances. In both cases it is important to have robust and credible local mechanisms to systematically handle and resolve any complaints that might arise from both real and perceived impacts in order that they do not escalate and present a risk to operations. If well-handled, an effective grievance mechanism can foster positive relationships and trust with employees and external stakeholders. In order to manage internal and external grievances effectively, all Vedanta operations must comply with the following:

- a) The grievance mechanism for employees shall remain separate from public grievance mechanisms;
- b) In the first instance and in order to avoid, wherever possible, a situation where a grievance occurs, Vedanta shall ensure proactive stakeholder engagement practices as described in the *Stakeholder Engagement Technical Standard* and the *Employee Consultation and Participation Technical Standard*;
- c) Grievance mechanisms shall acknowledge and address concerns over both real and perceived impacts in the same way and with the same level of care;
- d) Grievance mechanisms shall address even minor complaints, both formal and informal to avoid escalation into serious grievances;
- e) Grievance mechanisms shall be established as early as possible in the project cycle and at all Operations;
- f) Grievance mechanisms shall follow a transparent and easily understandable process;
- g) All grievance mechanisms shall be readily accessible, culturally appropriate and proactively communicated to employees and other external stakeholders as appropriate;
- h) No grievance mechanisms shall impede access to or seek to take the place of legal remedies, should these be warranted;
- i) The mechanism should not impede access to or substitute mechanisms provided through or rights to collective agreements
- j) The organisational structures and roles and responsibilities shall be established in order to resource and support grievance mechanisms for both employees and other external stakeholders;

Technical Standard – Grievance Mechanisms

- k) Arrangements shall also be implemented to ensure conformance to the requirements of the *IFC Performance Standards*; and
- l) The key IFC provisions are summarised as follows:
 - *Performance Standard 1 – Assessment and Management of Social and Environmental Risks and Impacts*. This includes establishing a grievance mechanism directed to receive and facilitate resolution of Affected Communities concerns and grievances about Vedanta’s environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. It should address concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. Vedanta will inform the Affected Communities about the mechanism in the course of the stakeholder engagement process.
 - *Performance Standard 2 – Labour and Working Conditions* – The relevant objectives of this standard are to ensure Vedanta provides a grievance mechanism for workers (and their organizations, where they exist) to raise reasonable workplace concerns, to respond to communities’ concerns related to projects and where there are Affected Communities, establish a grievance mechanism directed to receive and facilitate resolution of the Affected Communities concerns and grievances about the clients environmental and social performance.

4.2. Employee Grievance Mechanisms

- a) A grievance mechanism shall be established to allow for ongoing opportunities to receive and facilitate the resolution of concerns and grievances from employees. This mechanism shall be designed to ensure that:
 - grievances are addressed promptly, using an understandable and transparent system;
 - comments, suggestions and complaints are received, logged, followed up and signed off in an appropriate manner;
 - grievances are registered and documented, and resolutions are found in partnership with the employee(s);
 - the grievance process is objective and protects the identity of the person raising the issue (as necessary);
 - employees raising grievances are treated with respect and not subject to discrimination or disciplinary procedures;
 - if a reasonable rejection of the complaint is required, a full explanation will be provided to the complainant;

Technical Standard – Grievance Mechanisms

- if complaints cannot be resolved through the grievance mechanism, it may be necessary that complainants have recourse to other forms of redress e.g. judicial or administrative channels for dispute resolution available in the country of operation;
 - the outcome is appropriately communicated.
- b) A senior manager shall be designated as accountable for the establishment and effective implementation of the grievance mechanism. This shall be included in the job description or equivalent of the senior manager.

4.3. External Stakeholder Grievance Mechanisms

When a complaint, dispute or grievance does arise, in order that Vedanta operations respond effectively and in a timely manner, a robust grievance mechanism shall be put in place for every operation using the following criteria:

- the grievance mechanism shall allow for the widest possible understanding of complaints or grievances, covering any subject which is deemed important by stakeholders, and will ensure that all types of complaints and grievances are handled in the same way and with the same level of robustness and integrity;
- the grievance mechanism shall be scaled to the potential risk and adverse impacts to affected and interested stakeholders. This will be dictated by a risk assessment and stakeholder identification analysis discussed in the *Stakeholder Engagement Technical Standard*;
- Vedanta shall proactively inform affected communities and wider stakeholders of the details of the grievance mechanism in the course of its community and stakeholder engagement activities as described in the *Stakeholder Engagement Technical Standard*;
- the grievance mechanism shall be clear and accessible to all segments of communities including vulnerable groups, those differentially or disproportionately affected and wider stakeholders at no cost to them;
- Vedanta will respond to any stakeholder concerns or grievances promptly and thoroughly in all cases;
- communities and where appropriate respected third parties shall be involved in designing, communicating and implementing the grievance mechanism using culturally appropriate and agreed ways of communication and remedy;
- The grievance mechanism will protect those who use it, will never result in any kind of retribution and will not impede access to other remedies or alternative recourse e.g. judicial or administrative channels for dispute resolution available in the country of operation;

Technical Standard – Grievance Mechanisms

- the mechanism shall allow for different ways of making complaints and shall define a clear and transparent process for resolving complaints including regular updates for complainants;
- to mitigate perceptions that resolutions unfairly benefit the company, in almost all cases, face-to-face discussions with complainants and community members should be sought with the aim of finding resolutions in partnership and increasing ownership of solutions;
- any outcomes should be transparently communicated whilst protecting the identity of those involved wherever necessary or requested;
- responses to serious concerns or grievances shall be decided by a cross-departmental committee rather than by a single individual;
- if a reasonable rejection of the complaint is required, a full explanation shall be provided to the complainant;
- a complaint or grievance shall be regarded as a company 'Incident' and will be recorded, tracked, investigated, where necessary, and communicated appropriately across the business in order that lessons can be learnt to avoid future risks to the business;
- the operation-level mechanism shall feed into a group-level procedure so that maximum transparency of operational grievances is assured and the group can maintain oversight and implement organisational responses where necessary.

4.4. Resourcing

In order to accomplish the grievance mechanism elements described above Vedanta shall ensure the following resources are in place:

- internal organisational support and accountability for the mechanism, emphasising that concerns and grievances should be taken seriously and appropriate resolutions sought promptly;
- trained competent employees or failing that, external resources who are experienced in social and environmental management and in dealing with community concerns and complaints;
- an auditable system for receipt, recording and tracking of the process (for example a grievance log, tracking cards, database or other) shall be in place;
- a written procedure for handling grievances and conflict resolution with responsibilities assigned for each step as well as management oversight, and;
- a budget allocation to deal with grievance tracking and handling.

4.5. Reporting and Recording

Technical Standard – Grievance Mechanisms

All grievances shall be received, registered, documented and tracked within a secure database or equivalent programme with controlled access. This will assist in tracking overall trends and patterns in concerns allowing emerging issues to be flagged and understood at an early stage.

As a minimum the following information shall be recorded:

- date;
- details of complaint;
- history of other complaints / queries / questions;
- prioritisation using a common scale to assist with timelines for resolution;
- resolutions agreed with the party(ies) in question, and;
- actions implemented.

4.6. Monitoring and Evaluation

- a) The *employee* grievance mechanism shall be subject to internal monitoring and evaluation every two years to ensure its effectiveness or sooner if its efficacy comes into question.
- b) The external *stakeholder* grievance mechanism shall be subject to monitoring and evaluation both internally by the Sustainability Committee and by external stakeholders at least every two years to ensure its effectiveness or sooner if its efficacy comes into question.
- c) Vedanta shall report regularly to the public on its measures to address grievances whilst protecting the privacy of individuals.

4.7. Training

Training shall be provided for managers, all other employees, contractors and visitors in the company's policy and practices for both employee and other external stakeholder grievance mechanisms, relevant to their exposure and responsibilities which includes as a minimum:

- expected behaviours and accepted practices when interacting with employees and stakeholders in order to avoid a grievance in the first instance;
- routes available for employees to lodge a grievance;
- routes available for employees and other external stakeholders to lodge a grievance;
- roles and responsibilities for handling and resolving grievances (including key internal and external stakeholder contacts), and;
- recording and tracking procedures.

Technical Standard – Grievance Mechanisms

5. ROLES AND RESPONSIBILITIES

Vedanta Resources, subsidiaries, businesses, operations and sites shall ensure that roles and responsibilities for implementing and complying with this Standard are allocated. Key responsibilities shall be included in job descriptions, procedures and/or other appropriate documentation.

6. COMPLIANCE AND PERFORMANCE

Each Vedanta operation shall ensure they comply with the requirements of this standard. Performance against meeting the requirements of this Standard shall be assessed periodically, documented and, where required, reported to Vedanta Group. The assessment of performance shall include setting and reporting on key performance indicators (KPIs) where these have been established at Vedanta Group, Company or local level and which meet the requirements as set out in the *Sustainability Data Management Technical Standard*.

The evaluation of performance shall include, as a minimum, confirmation that:

- each operation has a grievance mechanism for both employees as well as other external stakeholders appropriate to the local context;
- grievances are logged, recording all required information, tracked, and resolutions found in consultation with the affected parties, showing evidence of close out, follow up and communication of the results;
- both employee and other external stakeholder grievance mechanism resource requirements are included as line items in annual plans, capital and operational expenditure forecasts and committee meeting agendas;
- roles, responsibilities and accountabilities have been clearly defined and documented for grievance mechanism design and grievance handling; and
- operations have evidence that they have sought feedback on grievance mechanisms to make improvements where possible.

7. SUPPORTING INFORMATION

| Reference | Description |
|---|--|
| ICMM (International Council of Mining and Metals) | The ICMM has produced many best practice documents on a range of health, safety, environment and community issues relating to mining including a Materials Stewardship Toolkit which covers Stakeholder Engagement and assessment of Stakeholder Engagement performance. |

Technical Standard – Grievance Mechanisms

| Reference | Description |
|--|---|
| | http://www.icmm.com/library |
| International Finance Corporation Performance Standards Guidance Notes | <p>The IFC has published Guidance Notes to guide the implementation of the full range of performance standards. These are available on the website. The guidance is currently being updated and draft versions are available however these have not yet been finalised and formally published.</p> <p>http://www.ifc.org/ifcext/sustainability.nsf/Content/PerformanceStandards</p> |
| International Finance Corporation Good Practice Note | <p>The IFC has published a Good Practice Note on 'Addressing Grievances from Project-Affected Communities'</p> <p>http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/p_GrievanceMechanisms/\$FILE/IFC+Grievance+Mechanisms.pdf</p> |
| ICMM (International Council of Mining and Metals) Human Rights in the Mining & Metals Industry Guide to Handling and Resolving Local Level Concerns & Grievances | <p>The ICMM has published a Guide to Human Rights in the Mining & Metals Industry specifically on Handling and Resolving Local Level Concerns and Grievances. This is a pilot testing version.</p> <p>http://www.icmm.com/page/15822/icmm-presents-new-guidance-note-on-handling-and-resolving-local-level-concerns-and-grievances</p> |

8. REVIEW

This Technical Standard shall be periodically audited and reviewed to determine its accuracy and relevance with regard to legislation, education, training and technological changes. In all other circumstances, it shall be reviewed no later than 12 months since the previous review.

9. RELATED DOCUMENTATION

A summary of the references and supporting documents relevant to this document is provided in the following table.

| Doc. Ref. | Document name |
|-----------|---|
| POL 04 | Stakeholder Engagement |
| TS 02 | Employee Consultation and Participation |

Technical Standard – Grievance Mechanisms

| Doc. Ref. | Document name |
|-----------|--------------------------------|
| TS 05 | Stakeholder Engagement |
| TS 21 | Sustainability Data Management |