



GRIEVANCE MECHANISM POLICY



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Purpose and Objectives

Avesoro recognises the relevance of an effective grievance management program in ensuring project sustainability. As such Avesoro commits to maintaining a robust and accessible Grievance Mechanism to provide prompt and effective redress for those who have been adversely impacted by activities of its various Projects. The goal of the Community Grievance Mechanism is to **receive, assess, fairly and promptly respond and effectively resolve grievances.**

Scope

A grievance mechanism has been developed to receive complaints from individuals, Project Affected Persons (PAPs), groups and organisations. It applies to complaints arising due to actions (or lack of action) of the Avesoro or its contractors.

The mechanism is used on a day-to-day basis and is periodically reviewed and revised based on experience gained during its implementation. The terms 'complaint' and 'grievance' are used interchangeably for the purposes of the mechanism.

The Grievance Mechanism has the following objectives:

- To promote awareness of ways to make a complaint amongst affected stakeholders.
- To provide affected stakeholders with access to a fair and transparent mechanism for making a complaint and obtaining redress or seeking resolution of any dispute that may arise due to Project activities, without cost or fear of reprisal.
- To endeavour to reach agreement with complainants on appropriate and mutually acceptable remedial actions collaboratively, using dialogue and negotiation.
- To promptly implement agreed remedial actions to minimize adverse impacts and prevent complaints escalating.
- To acknowledge receipt and keep the parties of any complaint informed about progress towards resolving it.
- To ensure that complaints are properly registered, tracked and documented, with due regard for confidentiality.
- To monitor trends and patterns in complaints as a tool for assessing the effectiveness of Project environmental and social management plans and, where warranted, to initiate improvements.

The Grievance Mechanism is not intended to prejudice a complainant's recourse to outside judicial or administrative remedies at any time.

The Grievance Management Process

This section briefly describes the process that BMMC follows when a complaint regarding the Project's activities is received, timeframes for responding and resolving the issue and possible avenues for third party dispute resolution.

Publicising the grievance mechanism

The Grievance Mechanism and ways of making a complaint is part of the on-going formal and informal stakeholder engagements. It is widely publicised within the Project area during community engagements, associated with the mine planning within the concession area. Information about where complaints can be lodged is being incorporated into all disciplines and departments. Information is also placed on public notice boards, radios and communicated verbally at community and public meetings.



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Making a complaint

Complaints are made in person or through a trusted representative such as the Country Director, GM CR department or clan chief. Complaints are also submitted verbally (face-to-face, by phone) or in writing (letter, SMS, e-mail) or directly with the Project offices or the local administration.

Grievance management steps

The grievance management process has five steps:

1. Receiving, registering and acknowledging receipt of a complaint;
2. Investigating, verifying and determining resolution options;
3. Agreeing resolution actions with the complainant;
4. Implementing the agreed remedial action; and
5. Verifying the outcome with the complainant and closure.

Many members of host and affected communities are not able to read or write, consequently, particular attention is paid to having face-to-face dialogue and direct interaction with complainants to ensure that processes, decisions and outcomes are thoroughly understood. For complex matters, or where the parties are otherwise unable to reach agreement on an acceptable resolution, the Project and the complainant mutually agree to proceed to a third party dispute resolution process.

System for periodic review and reporting.

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