



**SANDFIRE** RESOURCES NL

## GRIEVANCE MECHANISM PROCEDURE

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### 1. INTRODUCTION

The purpose of this document is to formalise the management of grievances from Sandfire’s stakeholders to minimise the social risks to the business. The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

### 2. SCOPE

The grievance mechanism procedure applies to all external stakeholders of our operations and exploration activities. This procedure does not cover grievances raised by internal stakeholders, such as employees, who are to refer to Sandfire’s internal grievance standard located on Sandfire’s intranet.

Specific and localised grievance mechanisms may need to be put in place for future development projects, which take into account local language and customs.

### 3. DEFINITIONS

Term	Definition
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the company in a formal manner.
Grievance Mechanism	A formalised way to accept, assess, and resolve community complaints concerning the performance or behaviour of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors.
External Stakeholders	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.

### 4. GRIEVANCE REPORTING CHANNELS

Sandfire will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external stakeholders to vocalise their grievances formally include:

- **Telephone**  
Stakeholders can call Sandfire’s head office on (08) 6430 3800 and request to speak to a stakeholder contact officer.
- **Email**  
Grievances can be sent to [sustainability@sandfire.com.au](mailto:sustainability@sandfire.com.au).
- **Face to face**  
Stakeholders can voice their grievance to any Sandfire employee who will then escalate using the correct process.
- **Online form**  
Stakeholders can complete a grievance form located on our website [www.sandfire.com.au](http://www.sandfire.com.au).



### 5. ROLES AND RESPONSIBILITIES

Role/ Position Title	Responsibility
Grievance Owner	<ul style="list-style-type: none"><li>Employee investigating the grievance and liaising with the external stakeholder/s.</li><li>Developing resolutions and actions to rectify any issues.</li><li>Follow up and track progress of grievance.</li><li>Document any interactions with external stakeholders.</li></ul>
Stakeholder Contact Officer	<ul style="list-style-type: none"><li>Receive grievances and assign a grievance owner.</li><li>Makes sure the grievance mechanism procedure is being adhered to and followed correctly.</li><li>Maintains grievance register and monitor any correspondence.</li><li>Monitor grievances/trends over time and report findings to the Sustainability Committee.</li><li>Raise internal awareness of the grievance mechanism among employees and contractors.</li></ul>
Employees	<ul style="list-style-type: none"><li>Receive grievances in person.</li><li>Report grievance to the Stakeholder Contact Officer by lodging the Grievance Lodgement Form.</li><li>May provide information and assistance in developing a response and close out of a grievance.</li></ul>

### 6. GRIEVANCE MECHANISM PROCESS

The figure below describes the process that will be used to resolve any grievances:





**6.1 Receive Grievance**

**In Person/ over the phone**

If a grievance is received face to face or over the phone and the stakeholder wishes to address the grievance formally, it is the responsibility of the employee who receives the grievance to complete a Grievance Lodgement Form (see Appendix 1). Once the form is completed the employee will then pass the form on to the stakeholder contact officer for processing.

**Electronic**

The stakeholder contact officer receives all grievances that come through via email or Sandfire’s website. The stakeholder contact officer will review the grievance form and process the grievance in accordance to this procedure.

**6.2 Record**

All formal grievances will be logged in the External Grievance Register (see Appendix 2) and Grievance Lodgement Forms will be saved in Sandfire’s intranet for record of correspondence.

**6.3 Screen**

The stakeholder contact officer is responsible for assigning a grievance owner to liaise with the external stakeholder/s and work on a resolution. Grievances will be screened depending the level of severity in order to determine who the grievance owner will be and how the grievance is approached. See below table categorising the different levels:

Category	Description	Grievance Owner
Level 1	When an answer can be provided immediately and/or Sandfire are already working on a resolution. (Only formal grievances to be lodged in the External Grievance Register)	Stakeholder Contact Officer
Level 2	One off grievances that will not affect the reputation of Sandfire.	Supervisor level or above
Level 3	Repeated, extensive and high profile grievances that may jeopardise the reputation of Sandfire.	Executive level

**6.4 Acknowledge**

A grievance will be acknowledged, by the grievance owner, within two working days of a grievance being submitted. Communication will be made either verbally or in written form (stakeholders will outline their preferred method of contact on the Grievance Lodgement Form, see Appendix 1).

The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

**6.5 Investigate**

The grievance owner is responsible for investigating the grievance. The investigation may require the grievance owner to make site visits, consult employees, contact external stakeholders and complete other activities. Records of meetings, discussions and activities all need to be recorded



during the investigation. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

#### **6.6 Act**

Following the investigation the grievance owner will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The grievance owner is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the grievance owner feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

#### **6.7 Follow up and close out**

The grievance owner will make contact with the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder the grievance owner will verify that the outcome was satisfied and also gather any feedback on the grievance process. Minutes of the meeting will be recorded and saved in Sandfire's intranet.

If required the grievance owner may need to follow up with the external stakeholder on numerous occasions to confirm all parties are satisfied.

### **7. APPEAL**

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the grievance owner needs to escalate the matter to the executive management team. The executive team will review the grievance and all documentation gathered throughout the investigation and determine whether further actions are required to resolve the grievance. Sandfire are fully committed to resolving an external stakeholder's grievance so if Sandfire are unable to resolve a complaint or a stakeholder is unhappy with the outcome, Sandfire may seek advice from other independent parties.

### **8. REPORTING**

The Sustainability committee will receive quarterly updates on stakeholder grievances. Information outlining the number of grievances, time to resolution and outcomes of grievances will be communicated. Grievances will also be reported in Sandfire's annual Sustainability Report available publicly. Sandfire will evaluate and update the Grievance Mechanism procedure every two years (or when required) to continually improve its stakeholder engagement.

### **9. STORING OF GRIEVANCES**

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed in Sandfire's intranet to ensure privacy and confidentiality is maintained for all parties involved.

### **10. REFERENCE DOCUMENTS**

Grievance Standard

The UN Guiding Principles on Business and Human Rights 2009 (the 'Ruggie Principles')



## **APPENDIX 1    GRIEVANCE LODGEMENT FORM**



Grievance Lodgement Form

<b>Name:</b>		<input type="checkbox"/> Please do not use my name when talking about this concern in public.	
<b>Company: (if applicable)</b>			
<b>Date:</b>		<b>Time:</b>	
<b>Preferred Contact Method:</b>	<input type="checkbox"/> Telephone <input type="checkbox"/> Email <input type="checkbox"/> Mail Please provide contact details: _____		
<b>Supporting Documents Attached?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No		

<b>Please provide details of your grievance</b>	
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What outcome are you seeking?	
Additional Information	

Claimant Signature: .....

Date: .....

Sandfire Signature: .....

Date:.....

**Office Use only**

Stakeholder Reference:	NGO	<input type="checkbox"/>	Government –Commonwealth	<input type="checkbox"/>
	Neighbour - Pastoralist	<input type="checkbox"/>	Government – State	<input type="checkbox"/>
	Neighbour – Port	<input type="checkbox"/>	Government – Local	<input type="checkbox"/>
	Neighbour – Other	<input type="checkbox"/>	Contractor	<input type="checkbox"/>
	Indigenous	<input type="checkbox"/>	Consultant	<input type="checkbox"/>
	Other	<input type="checkbox"/>		<input type="checkbox"/>
	Comment:			



## **APPENDIX 2    EXTERNAL GRIEVANCE REGISTER**

