



Sierra Rutile Limited (SRL)

Grievance Mechanism – Sierra Leone

DOCUMENT HISTORY				
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1 Introduction

Sierra Rutile Limited (SRL) seeks to build strong relationships with stakeholders and manage the impact of its business activities on communities. Nevertheless, it recognises that complaints will occur from time to time. This procedure details SRL's local level grievance mechanism to ensure public complaints (referred to as 'grievances') are received and addressed in a prompt and respectful manner.

1.1 Aims and objectives

This procedure specifies the scope, procedural steps and roles and responsibilities for handling grievances and engaging with complainants. Specifically, the objectives of the grievance mechanism are to:

- establish a prompt, consistent and respectful mechanism for receiving, investigating and managing grievances from community stakeholders;
- ensure proper documentation of complaints and any corrective actions taken; and
- contribute to continuous improvement through the analysis of trends and development of action plans to address recurring issues.

SRL will consider all grievances received, regardless of whether they stem from real or perceived issues and whether the complainant is identified or anonymous. Any stakeholder or their representative(s) will have access to this mechanism at no cost. The statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process.

2 Scope

This procedure is open to all stakeholders who consider themselves affected by SRL activities, with a special focus on community-related issues. Although anonymous submissions may be more difficult to resolve, they will be treated in the same manner as complaints where the complainants are identified, to the extent reasonably possible.

There are no restrictions on the type of issue a stakeholder can raise via this mechanism. However, when a complaint is received that is more appropriately handled under a separate SRL process (*i.e.*, employment or business integrity related issues) it will be re-directed so as to prevent parallel processes being followed.

SRL reserves the right to not address a complaint which it reasonably considers amounts to no more than general, unspecified and therefore un-actionable dissatisfaction with SRL, is malicious or vexatious in nature, or concerns a matter for which SRL has no formal responsibility (for example, a matter under government control).

3 Background

SRL requires each site or project to design and document a locally appropriate mechanism to receive, resolve and respond to grievances from external stakeholders. The SRL Grievance Mechanism, as documented in this procedure, has been developed to be locally appropriate and compliant with the Environmental Protection (Mines and Minerals) Regulations of 4 July 2013, as it relates to grievance management.

4 Procedure

The procedure outlined below constitutes the SRL Grievance Mechanism.

The following stages in the process pertain to the 'first order mechanism' for direct resolution of grievances between SRL and a complainant. Second and third order referral options, when direct resolution with a complainant cannot be reached, are detailed in section 4.4 below.

4.1 Lodgement

Stakeholders are directed to submit grievances to the designated SRL Grievance Officers, in person or via telephone as follows:

Area 1	Grievance Officer Community Affairs Office	Tel: +232 30 948 066/ +232 30 948 70/ +232 948 071
Sembehun Project	Grievance Officer Sembehun Project Team	Tel: +232 30 948 065/ +232 30 948 075

Alternatively, stakeholders can submit grievances to one of the following contact points, who will then forward the grievance to SRL to be dealt with via this procedure:

- Paramount Chiefs
- Chiefdom Grievance Committee
- Village Grievance Committee
- Town Chief
- Section Chief

All grievances lodged to a third-party will be collected by a SRL Grievance Officer. Alternatively, if a complaint is being lodged against Community personnel, including any Grievance Officer, these should be provided directly to SRL's Internal Audit department, who will manage the grievance in accordance with this procedure.

Complaints submitted via other mechanisms cannot be guaranteed to be treated in accordance with this procedure.

4.2 Receipt and acknowledgement

All Grievances submitted to SRL, directly or via a third party, will be forwarded immediately to a SRL Grievance Officer.

Once a complaint is received by the SRL Officer, he/she shall provide the complainant with a completed Grievance Form within 2 working days of receipt of the grievance and advised of the estimated time-frame within which a response will be provided.

The complainant is to be advised of the voluntary nature of the process; the option to proceed on an anonymous basis and/or request that certain information be kept confidential, and the option to opt out or withdraw the grievance at any stage.

4.3 Assess and record

Once a grievance is lodged a record will be created in the SRL Grievances Register.

All grievances shall be categorised in accordance with the process and incident levels documents in the SRL Guideline - Hazard, Incident and Emergency Classification. The Grievance Register records shall be updated once an investigation has been undertaken and subsequent steps taken, through to close out.

Once the grievance is evaluated the process for investigation will be determined. In some instances the Grievance Officer may be able to address the grievance directly with the complainant. Where this is not possible, or where further information is required to verify or understand the nature of the grievance, the Grievance Officer will determine an appropriate course of action to investigate the grievance.

If investigation is required, the Grievance Officer will determine the required stakeholders to engage in the investigation, or he/she will refer the investigation to a specific department.

4.4 Referral – criminal conduct, violence or serious human rights violations

Grievances believed to involve credible allegations of any criminal conduct, violence or serious human rights violations shall be referred to the SRL CEO and General Counsel to determine the relevant authorities to which the grievance shall be referred.

Such allegations may be identified from the outset, during investigations or at a later stage of the grievance process; regardless of the timing, the obligation to consider referral options still applies.

Subject to any legal obligations to report criminal conduct, the complainant's consent should be obtained prior to disclosing any information that personally identifies the complainant to authorities. If such criminal activities involve member(s) of staff, the Grievance Officer will escalate internally to the HR department.

4.5 Investigate

Investigations shall be undertaken in a timely manner, in accordance with a target time frame that has been indicated to the complainant.

Where an investigation is assigned to another department, the Head of Department shall nominate a designated person to action the investigation request and/or propose remedial actions.

Any complaint involving the Head of Department shall be escalated to his/her Line Manager by the Grievance Officer. If a complaint is against the Grievance Officer(s), the complaint must be escalated to his/her Line Manager for investigation. SRL Grievance Officers will not investigate alleged criminal activities.

If it is determined that an investigation, once commenced, may go beyond the target timeframe to complete, the complainant shall be advised of this and a new target time-frame provided.

The outcome of the investigation shall be communicated to the complainant through a SRL Grievance Officer, unless a need is identified for other SRL personnel to be present.

4.6 Respond

Where a credible grievance is identified, a plan to remedy the issue(s) shall be developed. This will then be proposed to the complainant. Where there are numerous complainants or affected parties, efforts to engage appropriate representatives in the resolution process shall be made.

If a complainant is not satisfied they can appeal the decision to the Grievance Officer and SRL may review and propose alternative resolution options. If actions are agreed, these can be implemented and the grievance moved to close-out. If a mutually agreeable outcome cannot be attained and the complainant wishes to pursue the grievance further, it can be referred to a second order mechanism (see 4.4).

4.7 Close out

Once agreed actions have been taken, the complainant (s) (and other stakeholders, where appropriate) should be consulted to determine whether satisfactory resolution of the grievance has occurred.

The grievance should then be recorded as “closed out” if a satisfactory resolution has been acknowledged by all relevant parties. A SRL Grievance Form shall be signed and/or a formal letter acknowledging resolution presented to SRL, with copies sent to other key stakeholders involved in the complaint.

If all parties cannot agree to a satisfactory resolution, the grievance should be referred to the second or third order mechanisms (as detailed below) and recorded as “Referred”.

The corresponding entry in the SRL Grievance register shall be updated to indicate the grievance has been closed-out or referred, and any relevant documents attached.

4.8 Referral – unresolved grievances

There may be instances where a resolution cannot be reached between the SRL and the complainant and the grievance needs to be referred beyond this first order mechanism. In such cases, the grievance shall be referred to a second or third order mechanism, as detailed below:

Grievance referral levels and options

First order	The First Order Mechanism is for issues that can be resolved directly between the site and the complainant through a process of direct consultation and/or mediated dialogue to seek mutually agreed solutions.
Second order	<p>Second Order Mechanisms are for issues that cannot be resolved directly between the site and the complainant. The Second Order Mechanism involves a Grievance Committee that is governed by an agreed upon third party and includes appropriate external representation.</p> <p>The second order mechanisms currently available are:</p> <ul style="list-style-type: none"> • Village Grievance Committee • Chiefdom Grievance Committees • Section Chief • Town Chief
	<p>For resettlement-related grievances:</p> <ul style="list-style-type: none"> • SRL Operational Areas Village Resettlement Committee • Chiefdom Resettlement Committee for SRL Operational Areas

Third order	<p>The Third Order Mechanism is for issues that are referred to official agencies or the statutory judicial processes. This is a legal determination that must be authorized by SRL General Counsel to ensure appropriate documentation is in place in the event the Company needs to make an appeal or protest a court decision.</p> <p>The third order mechanisms currently available are:</p> <ul style="list-style-type: none"> • Paramount Chief(s) • Formal legal jurisdiction of Sierra Leone <p>For resettlement-related grievances:</p> <ul style="list-style-type: none"> • Inter-Ministerial Resettlement Committee
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5 Duty of confidentiality

SRL is committed to protecting the identity of complainants and to handling personal information in accordance with legal requirements. This duty also extends to all employees or representatives of SRL or its Contractors who participate in the grievance mechanism process.

Information about a complaint will be shared within SRL on a need-to-know basis and only to the extent necessary to complete a step under this procedure. SRL will not share personal information with third parties unless required by law or authorised by the complainant.

6 Protection of retaliation

Retaliation is any adverse action taken against a complainant, employee or contractor whose purpose is to frustrate the operation of this Procedure. SRL will not tolerate such conduct. When concerns about retaliation or victimisation are raised, they will be investigated by SRL.

7 Internal monitoring and reporting

SRL's Grievance Register shall be regularly updated and provided to management on a monthly basis in the week following the end of each month. SRL's department responsible for community affairs will:

- monitor the status of open grievances to ensure they are being resolved within target time-frames (and followed up when this has not occurred); and
- monitor trends in grievance types and identify underlying systemic issues.

8 Communication

SRL seeks to foster trust in the process and its outcomes. To this end it will communicate this procedure in a locally appropriate manner to stakeholders. Information about the grievance mechanism, including the avenues for submitting a grievance, will be made publicly available in a format appropriate to prevailing literacy levels. This information shall be regularly shared during public presentations or discussions, and where possible, physically disseminated and displayed within relevant communities.

Confidentiality will be respected and SRL will take all reasonable steps to protect parties to the process from retaliation.

The Grievance Mechanism will be subject to periodic review based on engagement with stakeholders to ensure the process remains effective.

9 Roles and responsibilities

Roles and responsibilities under this procedure are as follows:

Role	Responsibility
Community Relations and Social Development Manager	Accountable for the implementation of this procedure. Responsible for the overall implementation of this procedure. This includes serving as custodian of the complaints process, monitoring the handling of complaints, and suggesting changes to policies or practices based on lessons learned.
Community Relations and Social Development group – all team members	Responsible for ensuring stakeholders relevant to their respective areas are aware of this Grievance Mechanism. Responsible for ensuring any grievances submitted pertaining to their respective areas is handled in accordance with this procedure.
Grievance Officer (GO)	Responsible for co-ordinating the receipt and response to a complaint and serving as the main point of contact with the complainant. This includes receiving and reporting complaints, delegating to the appropriate department for investigation; maintaining the Grievance Register, supporting the resolution of complaints; and liaison with complainants; ensure resolution is appropriately communicated and recorded.
Complaint owner	Responsible for investigating and proposing resolution of complaint. This includes conducting investigations, proposing resolutions, and implementing corrective actions in co-ordination with the Grievance Officer (GO). The Complaint Owner may be the GO in some instances; otherwise it is the applicable managers or designated person to whom the complaint is relevant.
Village Grievance Committee for SRL Operational Areas	<p>A Committee established to support the grievance process of their particular community/village; they can receive village-level grievances to be directed to SRL. They also act as a body for referral of grievances that cannot be resolved directly between SRL and a complainant. This Committee includes the Town Chief; Youth Leader, Women’s Leader; Religious Leaders, School Head teacher and a Representative of the CRC.</p> <p>The SRL Grievance Officer must track and capture data on a weekly basis through engagement with an agreed committee member.</p>
Chiefdom Grievance Committee	<p>A Committee established to support the grievance process at the Chiefdom level.</p> <p>They can receive village-level grievances to be directed to SRL. They also act as a body for referral of grievances that cannot be resolved by the Village Grievance Committee. This Committee includes the Paramount Chiefs, Chiefdom Speakers, Section Chiefs, Town Chiefs, Chiefdom Imams, Chiefdom Pastors, Chiefdom Youth Leaders and Ward Councilors. The SRL Grievance Officer must track and capture data on a weekly basis through engagement with an agreed committee member.</p>
Relating to resettlement-specific grievances	

<p>Chiefdom Resettlement Committee for SRL Operational Areas</p>	<p>A Chiefdom Resettlement Committee consists of key stakeholders headed by the Paramount Chief. Its key function is to support, participate and guide SRL on the relocation process covering communities within SRL Operational Areas. The committee will actively participate and engage in consultative discussions with Village Grievance Committee, SRL and Regional authorities to ensure grievances related to relocation are successfully achieved. This Committee is composed of the PC, Chiefdom Speaker, Section Chief, Section Speaker, Town Chiefs, Chiefdom Clerk and the Sierra Leone Police.</p>
<p>Inter-Ministerial Resettlement Committee</p>	<p>The Inter-Ministerial Resettlement committee comprising of key Ministries, Departments and Agencies of the Government of Sierra Leone that will be involved in a relocation project. This committee may deal with high level grievances and complaints relating to resettlement.</p>

APPENDICES A Terms and definitions

Term	Definition
Complainant	An individual, group or organisation who submits a complaint to SRL.
Complaint	See grievance
Contractor	An individual or firm that has entered into a contract to provide goods or services to SRL. The term covers parties directly contracted by SRL and those contracted by a contractor of SRL, also referred to as subcontractors.
Complaint form	A form used to capture information about an incoming grievance.
Grievance	Grievances are public complaints, submitted via the locally established grievance mechanism, alleging specific or general damage, conduct, negative impact or dissatisfaction arising in connection with SRL business activities.
A “closed” grievance	A grievance is “closed” when a resolution satisfactory to both parties has been reached. In certain situations, however, the client may “close” a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt.
Grievance Mechanism	A grievance mechanism is an established process to receive, record, investigate and resolve grievances.
Grievance Register	A register for maintaining information about grievances received.
Stakeholders	Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

B SRL Grievance Fact Sheet

Sierra Rutile Limited (SRL) seeks to build strong relationships with stakeholders and manage the impact of its business activities on communities. This includes recognising that complaints may arise from time to time.

The following are questions and answers on SRL Grievance Mechanism:

Question: What is the SRL Grievance Mechanism?

Answer: The SRL Grievance Mechanism is a process dedicated to receiving, recording, investigating and resolving community and public complaints.

Grievances are community complaints alleging specific or general damage, conduct, negative impact or dissatisfaction arising in connection with SRL business activities.

However, issues such as the distribution of casual jobs and employment, the amount of SRL surface rent and Agricultural Development Fund (ADF) paid, allocation of contracts and Community Development Agreement (CDA) funds do not fall under the grievance procedure.

Question: How do you lodge a grievance?

Answer: Stakeholders are directed to submit grievances to the designated SRL Grievance Officers, in person or via telephone as follows:

Area 1	Grievance Officer Community Affairs Office	Tel: +232 30 948 066/ +232 30 948 70/ +232 948 071
Sembehun Project	Grievance Officer Sembehun Project Team	Tel: +232 30 948 065/ +232 30 948 075

Alternatively, stakeholders can submit grievances to one of the following contact points, who will then forward the grievance to SRL to be dealt with via the grievance procedure:

- Paramount Chiefs
- Chiefdom Grievance Committee
- Village Grievance Committee
- Town Chief
- Section Chief

All grievances lodged to a third party will be collected by a SRL Grievance Officer. Alternatively, if a complaint is being lodged against SRL Community Relations and Social Development Department personnel, including any Grievance Officer, these should be provided directly to SRL's Internal Audit Department, situated at the Plant Site.

Question: What can you expect when a grievance is lodged?

Answer: Once a complaint is received by the SRL Grievance Officer, he/she shall provide the complainant with a completed Grievance Form within 2 working days of receipt of the grievance and advised of the estimated time frame within which a response will be provided.

Investigations into the complaint will be undertaken and the outcome of such investigation shall be communicated to the complainant through an SRL Grievance Officer.

Where a credible grievance is identified, a plan to remedy the issue(s) will be developed. If a complainant is not satisfied with the remedy they can appeal the decision to the Grievance Officer and SRL may review and propose alternative resolution options. If actions are agreed, these can be implemented and the grievance considered closed out.

A second order mechanism, which involves the village and the chiefdom grievance committees, will be applied if the grievance is not resolved by the first order mechanism.

A third order mechanism is for issues that are referred to official agencies (NMA, EPA etc) or the statutory judicial processes for resolution.

Question: What if the complaint is of a sensitive nature?

Answer: SRL is committed to protecting the identity of complainants and to handling personal information in accordance with legal requirements.

SRL will not share personal information with third parties unless required by law or authorized by the complainant.

Question: Is there any option of making an anonymous complaint?

Answer: The option is open to the public and the community to make an anonymous complaint to SRL. Confidentiality will be respected and SRL will take all reasonable steps to protect parties to the process from retaliation.

Note: The SRL Grievance Procedure is also available for communicating concerns about SRL's security arrangements and the conduct of its security personnel.

All stakeholders have the right to submit a complaint without any cost to them.

C Grievance mechanism flow chart



* Grievances against Community department / personnel should be directed to the Internal Audit department to determine how to be assigned and investigated.

D Grievance form



SIERRA RUTILE LIMITED – GRIEVANCE FORM

Reference No (to be completed by SRL):

Grievance received by:

Grievance referred to:

Complainant(s) Name*

Date:

Signature:

** Complainant can remain anonymous or request not to have identity disclosed to third parties without consent*

- I wish to raise my complaint/grievance anonymously I don't mind if my identity is disclosed
 I request my identity not be disclosed outside SRL without consent (except for legal reasons)

Contact Information - Please mark how you wish to be contacted (mail, telephone, e-mail).

By Letter:

By Telephone:

By E-mail :

other (please specify)

Preferred Language for verbal communication

English

Mende

Krio

DESCRIPTION OF GRIEVANCE OR COMPLAINT

Date(s) of incident/grievance	
Location(s)	
Details of what happened	

Who has been impacted?
How have they been impacted and what is the current situation?
What would complainant like to see happen to resolve the problem?
Additional notes

- One-off incident/grievance
- On-going (currently experiencing problem)
- Happened more than once (how many times?)

INVESTIGATION AND OTHER ACTIONS

Investigation Outcome	By Whom (Department and Name of complaint owner)
Follow-up Action (If required)	By Whom (Department and Name of complaint owner)

Final Decision/Action	By Whom (Department and Name of complaint owner)

STATUS AND REFERRAL Please tick appropriate box(s)

- Resolution agreed and complaint closed (complete sign-off section below)
- Complainant cannot be reached
- Resolution NOT reached
- SRL referring to second-order mechanism (i.e. Village or Chiefdom Grievance Committee)

Please provide details :

- SRL referring to third-order mechanism (i.e. Paramount Chief(s) or formal legal jurisdiction)

Please provide details:

- Complainant expressed intention to access legal redress in the Court of Law
- Other (please specify)

CLOSE-OUT Complainant Signature

I agree to the Final Resolution

Designated SRL representative Signature

Date

Witness
