

Appendix E
Community and Environmental Grievance Procedure

1.0 **INTRODUCTION**

1.1 **PURPOSE**

This document outlines Euromax Resources' Community and Environmental Grievance Procedure for the Ilovitza Project. This procedure is meant to address local grievances brought to the attention of Euromax Resources (i.e., grievances from communities, local governments, local public and private sector, non-governmental organizations, and concerned individuals).

1.2 **OBJECTIVES**

To ensure that formal grievances are promptly addressed by Euromax, this grievance procedure is designed to quickly, systematically and formally address concerns about a hazard, an incident, or other action or inaction that has the potential to harm people or the environment.

2.0 **GRIEVANCE TOOLS & ORGANIZATION**

2.1 **THE GRIEVANCE FORM (Attachment 1)**

Grievances may be received in written form, verbally, by e-mail and it is important that they are all treated equally. Grievance Forms will be used to initiate the community and environmental grievance procedure and will be maintained by the Euromax Community Relations (CR) team. These forms will be available at the Information Centre in Ilovica and within the offices at Strumica and Skopje and online. At all locations, the designated Company Representative in Grievance submission (i.e. Community Relations, Media Relations, Receptionists) will ensure that all of the fields in the form are filled out before submission to the CR team. The Company Representative will assist the Grievant in filling in the form, if needed. The CR team will assign a Registry number to each Grievance form and will document the appropriate grievance response on the form. The Grievance form will therefore capture the following information:

Part 1:

- (a) The full name of the person who reports the grievance (the Grievant) and the company representative who receives it;
- (b) The date the grievance was received and recorded on the Grievance Form;
- (c) A detailed description of the nature of the grievance, including photographs where appropriate;
- (d) Date on which the Grievance Response Form was signed;

Part 2 and Part 3:

- (e) Details of the proposed corrective action and where relevant, the parties who were consulted in determining the most appropriate course of action;

Part 4:

- (f) Details of the corrective actions taken, identifying who carried these out and the date on which this occurred;
 - (g) The dates on which the verbal response and the written response were provided to
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the grievant; and

(h) The date the grievance was closed-out.

The Grievant will be asked to sign and date the Grievance Response Form to confirm receipt/close-out of the Project response.

To the extent that any grievant does not wish to sign the Grievance Form or have their personal data recorded, then it will be explained that the resolution of the Grievance will not be recorded either. It will also be explained that this is for data protection reasons.

2.2 THE GRIEVANCE REGISTRY

Euromax Grievance Registry will be maintained by the Community Relations (CR) team. The CR Coordinator is responsible for receiving the Grievance Form, ensuring that records are up to date, and that these grievances are documented in the Grievance Registry. This Grievance Registry contains all of the information written on a Grievance Form. This is done to keep a record of the grievances and to ensure grievances are addressed in a timely manner and for analyzing trends.

2.3 RESPONSIBILITIES OF COMPANY REPRESENTATIVES

2.3.1 Community Relations (CR) Coordinator

The Community Relations Coordinator reports to the Country Manager and is responsible for the following tasks in the grievance procedure:

- Entering the details of all Grievance Forms into the Grievance Registry for tracking and analyzing trends;
- Monitoring and controlling the flow of Grievance Forms from the date the grievance is received to the date the grievance is closed out;
- Maintaining the Grievance Registry; and
- Providing weekly progress reports at Management Meetings and monthly progress reports to the Country Manager.

2.3.2 Country Manager

The Country Manager is accountable for all aspects of the grievance processing and handling process and reports to the Chief Executive Officer (CEO), senior management and Board of Directors of Euromax. Specifically, the Country Manager is responsible for:

- Reviewing all grievance resolution recommendations submitted and determining what action if any will be taken to resolve any grievance;
 - Managing the overall grievance procedure, with particular attention to ensuring responses to grievances are provided in a timely manner;
 - Supervising the Community Relations Coordinator, with particular attention to ensuring that the Grievance Registry is kept up to date; and
 - Consulting with Municipal Governmental authorities as required (e.g., when there are broader community or environmental grievances).
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3.0 THE GRIEVANCE PROCEDURE PROCESS

This section details the process that Euromax will follow for documenting and resolving community and environmental grievances that have been submitted to the company.

Please refer to Attachment 2, the Euromax Grievance Procedure Flow Chart.

3.1 RECEIVING AND REVIEWING GRIEVANCES

3.1.1 Grievance Submission - Step 1

To begin the Grievance procedure process, a Grievance Form must be formally submitted to the Company (Attachment 1). Company representatives, as detailed in Section 2.3, shall assist persons in filling out the form.

Euromax will be required to consider any grievance that has been submitted on a completed Grievance Form in accordance with this procedure. Incomplete Grievance Forms or grievances that are not formally submitted according to this procedure may not be considered by Euromax. The CR Coordinator will have discretion in accepting incomplete or informally submitted grievances but will make attempts to complete the form fully with the Grievant.

The Grievant will be given a copy of the completed Grievance Form for his/her records, and will be notified of the date on which the Grievance Form is registered in the company's Grievance Registry.

3.1.2 Grievance Registry Recording – Step 2

Completed Grievance Forms collected by the designated Company Representative must be forwarded to the Community Relations Coordinator within 3 business days.

The CR Coordinator will record the details of the Grievance Form into the Grievance Registry and ensure that the appropriate departments (e.g., Health, Safety & Environmental Department, Procurement, Human Resources, etc. and Country Manager) have received copies of the Grievance Form.

3.1.3 First Review Process: Grievance Analysis and Review - Step 3

The CR Coordinator and relevant operational and management personnel will review all Grievance Forms for completeness of information. Involvement of both operational personnel and top management in this review will result in a broader understanding of the issues and will facilitate rapid and appropriate recommendations that will reduce the risk of the submission of repeated or numerous grievances related to a single concern or issue. Recommendations will take into consideration Company policy, past experience, current issues and potential outcomes. These recommendations will be made to the Country Manager who will be responsible for resolving each grievance in a timely manner.

3.2 GRIEVANCE RESPONSE DEVELOPMENT

3.2.1 First Review Process: Grievance Response - Step 4

In consideration of the recommendations made to the Country Manager, the CR Coordinator will submit a formal written response to the Grievant within 14 days of the date on which the Grievance Form was recorded in the Grievance Registry. The formal written response will include the rationale for the response and next steps and actions, if any, to be taken by Euromax to resolve the grievance.

If the Grievant accepts Euromax's formal response, this decision will be documented with the Grievant's signature on the Grievance Response Form, as described in Section 3.4 of this procedure. In this case, the Grievance Response Form will be returned to the CR Department for final documentation in the Grievance Registry.

If the Grievant rejects Euromax's formal response, the process moves to Section 3.3 of this grievance procedure.

3.3 Second Review Process – Step 5

If the Grievant rejects Euromax's formal response, the CR Coordinator will inform the management personnel involved in the first review process (Step 3) and the Country Manager. This grievance will then go through a second review process in order to review the merits of the rejection and determine whether other options could be considered by the Company with the Grievant.

During this second review process either another formal written response will be provided to the Grievant in 30 days or it may be decided to hold a meeting with Company representatives and the Grievant. Formal notes documenting the meeting will be issued and signed by the attending representatives. The outcomes of this meeting will be recorded, and if agreement is reached between the Company and the Grievant, the agreement will be captured on the Grievance Form (Attachment 1) with signature of the Grievant. The CR Coordinator will then proceed to Section 3.4 (Step 6) of this procedure.

If no agreement can be reached, then Euromax may work to identify an unbiased third party to facilitate mediation of the dispute. If the Grievant remains unsatisfied after mediation they may pursue other options (such as Administrative or legal) at his/her discretion. The CR Coordinator will proceed to Section 3.4 of this procedure for close-out following all reasonable attempts to resolve the grievance.

3.4 COMPLETING ACTIONS AND GRIEVANCE CLOSE-OUT-Step 6

Following the completion of action specified in the Grievance Response Form, photos and/or other documentary evidence will be collected by the CR Department to form a comprehensive record of the grievance and how it was resolved.

Where the formal written response identifies actions to resolve the grievance, the Grievant will confirm the work or activity has been completed by signing the Grievance Response Form (Attachment 1). The CR Coordinator will record the completion of the actions and the date of the signature of the Grievant into the Grievance Registry.

If no agreement can be reached with the Grievant, after following the steps of the Grievance Mechanism, the Grievance Form will include the rationale for close-out and will be signed by the Country Manager's line manager. The CR Coordinator will record the rationale and close-out decision into the Grievance Registry.¹

4.0 MONITORING

The CR Coordinator will prepare on a quarterly basis a summary grievance report to determine if there are any recurring grievances that suggest a need for changes in company policies, procedures or activities.

The Country Manager will periodically review the adequacy of the grievance process procedure and agree to modifications following consultation with members of the management team, the CEO and the Company Board of Directors.

¹ It is important to record all efforts to resolve the grievance. If the grievant remains unsatisfied after all reasonable avenues are explored then that must be noted but ultimately the record is closed. There could be a special section of the registry dedicated to these types of grievances so even though they are closed they may be reopened in the future if circumstances change.

Attachment 1: Euromax Community & Environmental Grievance Form

Attachment 2: Euromax Grievance Procedure Flow Chart

