



GRIEVANCE MECHANISM PROCEDURE

2.6

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1. INTRODUCTION

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

2. SCOPE

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

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.

4. GRIEVANCE REPORTING CHANNELS

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

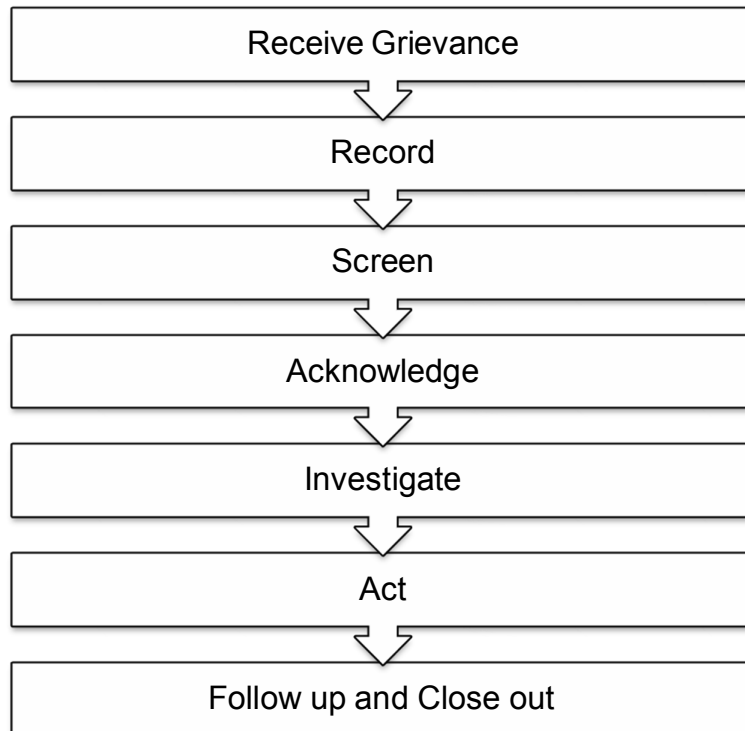
- **Email**
Grievances can be sent to hre@aeldata.com.
- **Face to face**
Stakeholders can voice their grievance to any employee who will then escalate using the correct process.

5. ROLES AND RESPONSIBILITIES

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

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 employees wishes to address the grievance formally, it is the responsibility of the employee who receives the grievance to complete a Grievance Form. Once the form is completed the employee will then pass the form on to the HR Manager for processing.

Electronic

The HR Manager receives all grievances that come through via email. The HR Manager 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 Grievance Register.

6.3 Screen

The HR Manager is responsible for assigning a grievance owner to liaise with the employees 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 AEL Data are already working on a resolution.	HR Manager
Level 2	One off grievances that will not affect the reputation of AEL Data.	Supervisor level or above
Level 3	Repeated, extensive and high profile grievances that may jeopardise the reputation of AEL Data.	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.

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, 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 stakeholder via their preferred method of contact.

6.7 Follow up and close out

The grievance owner will make contact with the stakeholder/s three weeks after the grievance is resolved. When contacting the 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.

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

7. APPEAL

If the 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. AEL Data are fully committed to resolving a stakeholder's grievance so if AEL Data are unable to resolve a complaint or a stakeholder is unhappy with the outcome, AEL Data 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 annual Sustainability Report available publicly. AEL Data 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 to ensure privacy and confidentiality is maintained for all parties involved.

Grievance Form

Initiating Action

You and your job

Full Name		Department	
Title	_____	Section	_____
Phone Number	██████	Work Address	██████

Your representative (if you have one)

Full Name		Organisation	
Phone Number	██████	Address	██████

Remedy sought

Briefly describe what you want to happen. How can matters be put right? What will resolve your grievance?

Issues and people involved

Did I have been treated unfairly or wrongly as a result of:-
(Please tick any appropriate box)

- the conduct of one or more people;
- a management decision which is wrong or unfair;
- the operation of a procedure or practice which is unfair;
- some other substantial reason.

Please give the following information (if you have it) about any people directly involved:-

Name	Job Title	Department
██████	██████	██████
██████	██████	██████
██████	██████	██████
██████	██████	██████