



GRIEVANCE MECHANISM PROCEDURE

Prepared by: Hervé Omboye – Environment & Social Manager	Checked by: Ghyslain Pothier – E&S Performance Lead Corporate	Approved By: Bhavin Vyas – VP Environment & Social/HSE
Emission date: February 16, 2018	Rev.: 00	Last revision date: --

TABLE OF CONTENTS	1	INTRODUCTION.....	1
	1.1	Objective	1
	1.2	Grievance Mechanism Principles	1
	2	GRIEVANCE POLICY	2
	3	ROLES AND RESPONSIBILITIES	2
	3.1	Overview	2
	3.2	Roles and Responsibilities	2
	3.3	Training	8
	4	COMMUNICATING THE GRIEVANCE MECHANISM.....	8
	4.1	Overview	8
	4.2	Key Messages	8
	5	TYPES OF GRIEVANCES.....	8
	5.1	Grievances Managed through the Grievance Mechanism.....	8
	5.2	Grievances Managed through the Compensation Plan	9
	6	GRIEVANCE MECHANISM PROCEDURE	9
	6.1	STEP 1: Submitting a Grievance	11
	6.2	STEP 2: Recording Grievances	11
	6.3	STEP 3: Acknowledgement.....	11
	6.4	STEP 4: Analysis, Investigation, Consultation and Developing a Resolution	11
	6.4.1	Escalation of Grievances	13
	6.5	STEP 5: Providing a Response and Agreement on Next Steps.....	14
	6.5.1	What to do if Proposed Resolution is Rejected by Grievant.....	14
	6.5.2	Rejecting a Grievance	14
	6.6	STEP 6: Resolution and Follow Up	15
	6.7	Monitoring.....	15
	6.8	Review, Feedback and Reporting.....	15
	7	GRIEVANCE CONTACT INFORMATION.....	15



TABLES	Table 1.1 Grievance mechanism principles	1
	Table 3.1 Grievance Management Roles and Responsibilities.....	4
	Table 6.1 Grievance categorisation and response	12
	Table 6.2 Escalation of Grievances	13
	Table 7.1 Contact details	16

PLATES	Plate 1 Grievance mechanism process.....	10
--------	--	----

APPENDICES	APPENDIX A – GRIEVANCE SUBMISSION FORM	
	APPENDIX B – GRIEVANCE REPORT FORM	

ACKNOWLEDGEMENT:

This Grievance Mechanism Procedure is a living document. It has been developed under the inspiration of AECOM that drafted the Grievance mechanism for GSEZ Airport project.

1 INTRODUCTION

1.1 Objective

The purpose of the Grievance Mechanism is to ensure a legitimate, accessible and consistent mechanism for receiving, investigating, consulting on, responding to and resolving formal complaints or concerns that may arise as a direct result of GSEZ Nkok operations.

The Grievance Mechanism will be implemented in a timely and transparent manner. This procedure provides measures so that the impacts of GSEZ Nkok operations on stakeholders and local communities can be monitored and, if needed, operations or policies can be adjusted to reduce adverse impacts.

All staff members who are in direct contact with the local community should familiarise themselves with this document. It is of particular relevance to:

- GSEZ Nkok E&S Manager, who will be receiving grievance from stakeholders;
- The various Department Leads whom will have to be part of the grievances analysis and solution finding.

The Grievance Mechanism presented in this document is available to all operation affected stakeholders.

It should be noted that workers' grievances will be handled in a separate Workers' Grievance Procedure. This Grievance Mechanism Procedure is also not for incident reporting but may manage grievances arising from incidents. Incident reporting is managed as part of a separate Project Health and Safety Reporting System.

1.2 Grievance Mechanism Principles

The Grievance Mechanism is based on the following principles from the IFC Performance Standards (2012) as shown in Table 1.1

Table 1.1 Grievance mechanism principles

Responsibility	Task
Accessibility	<ul style="list-style-type: none">• Accessible to all affected stakeholders. Factors that affect accessibility to the mechanism include: location, access to technology, language barriers, literacy.
Regular communication	<ul style="list-style-type: none">• Grievance Mechanism should be publicised to all stakeholders.• Information will be provided in a format and language readily understandable to the local population.
Transparency	<ul style="list-style-type: none">• Process will be transparent, readily understandable and appropriate for all affected stakeholders, in particular vulnerable populations.• Indicate at the outset who is expected to use this procedure.• Assure potential users that there will be neither costs nor retribution associated with logging a grievance.
Efficiency	<ul style="list-style-type: none">• Publicly communicate and adhere to a timeframe in which all recorded complaints will receive a response.• Grievant will be made aware of when they can expect to be contacted and/ or receive a response to their complaint.
Fairness	<ul style="list-style-type: none">• Measures will be put in place to ensure fairness of process for affected parties.• If a resolution cannot be reached, an independent third party will mediate between the Mineral Port and the grievant.
Written records	<ul style="list-style-type: none">• All grievances will be formally recorded/ documented in the Stakeholder Consultation and Grievance Mechanism System (SCGMS).



2 GRIEVANCE POLICY

GSEZ Nkok values stakeholder engagement at all levels and recognises that one of the pillars of sustainable development is achieving and maintaining a project's social license to operate. Engagement with the communities in which we operate is a long-term commitment, which requires equitable and transparent means of communication. This engagement is a mainstay of GSEZ Nkok's aspirations for continuous improvement, facilitating the identification, monitoring and mitigation of the social and environmental impacts of projects.

To that end, and as an integral part of Nkok's Stakeholder Engagement Plan (SEP), GSEZ Nkok has developed a Grievance Mechanism based on Good International Industry Practice (GIIP), including IFC Performance Standards, and examples across various industries and from traditional or customary means for resolving grievances.

All operators working for GSEZ Nkok will appropriately implement and manage grievances through this Grievance Mechanism, and ensure that all stakeholders have access to this mechanism and are not discriminated against in relation to raising a grievance. Stakeholders should be reassured that if they raise a grievance against GSEZ Nkok, they will be protected from retribution of any kind.

3 ROLES AND RESPONSIBILITIES

3.1 Overview

GSEZ Nkok E&S Manager, will be responsible for supervising the implementation of the Grievance Mechanism throughout the life of Nkok site.

Community representatives (Neighbourhood Chiefs, Municipal administrators) will also be involved in the management of grievances, helping to ensure that the mechanism is understood by all community members, providing support to community members to lodge grievances as necessary, and providing support for conflict resolution in case of appeals.

Upon the implementation of this procedure at Nkok, the E&S Manager will initiate the engagement process with stakeholders including community representatives that will have a role in the implementation of the Grievance Mechanism. If these community representatives have not already been identified prior to the procedure's implementation, GSEZ Nkok Team will identify them. They should be unbiased and trusted community members who can assist in the mediation and resolution of grievances.

3.2 Roles and Responsibilities

Grievance management roles and responsibilities, as well as monitoring and reporting responsibilities, are presented in Table 3.1. The responsibilities outlined for each role are not prescriptive and it is anticipated that the responsibilities will evolve as the nature of the operations progresses.

In addition to the roles outlined below, a select group of managers and staff may be given the authority to implement steps and actions when required to resolve certain issues directly with a grievant, without the need for referral. The types of issues that can be resolved directly will be agreed in advance with GSEZ Nkok E&S/HSE Team and Business Head. The delegation of authorisation to selected staff to resolve grievances directly will be the responsibility of GSEZ Nkok O&M Head.

Table 3.1 Grievance Management Roles and Responsibilities

Title	Role	Responsibilities	Reporting
<i>GSEZ Nkok</i>	Provide assistance and direction to GSEZ Nkok O&M Head, and monitor the implementation of the Grievance Mechanism in line with overall GSEZ Nkok procedures and policies.	<ul style="list-style-type: none"> • Initiate the engagement with the Mayor of 3rd district's office and neighbourhood chiefs. • Oversee initial communication of the Grievance Mechanism to communities to Community Representatives and Mayor of 3rd district's office representative on the Grievance Mechanism and ethics of the process. • Oversee and assist the appointment of community representatives ensuring there is sufficient representation of disadvantaged and vulnerable groups (ensure woman, minority ethnic groups, landless and migrants are sufficiently represented). • Oversee the implementation of the Grievance Mechanism on a monthly basis to ensure that there are no outstanding grievances and check if assistance from GSEZ Nkok is required. • Involve GSEZ Nkok Business Head or other GSEZ Nkok Management team in resolution of complex grievances where necessary. • For any complaints or concerns raised verbally (by phone or in person), explain the Grievance Mechanism process to the grievant and request that they complete a Grievance Submission Form for Local Communities (Appendix A) (with assistance if needed). • Upon receipt of a grievance, complete GSEZ Nkok Grievance Report Form. • Manage all communications with grievant. • Ensure Grievance Submission Forms for Local Communities are available with community representatives and at agreed locations. • Collect Grievance Submission Forms on a weekly basis from Community Representatives. • Review Grievance Submission Forms received to ensure they have been correctly completed. • Investigate grievances to ensure they are valid, with support from Community Representatives and the Mayor of 3rd district, as necessary. • Review the process with the aim of improving the Grievance Mechanism or identifying problems encountered while implementing the procedure to allow for improvement. 	<ul style="list-style-type: none"> • Weekly reporting to GSEZ Nkok O&M Head. • Contributes to the preparation of annual Grievance Monitoring Report.
<i>GSEZ Nkok E&S/HSE Team</i>			

Title	Role	Responsibilities	Reporting
<i>GSEZ Nkok Community Liaison Officers</i>	Will act as liaison between GSEZ and surrounding communities and assist the E&S/HSE team in the management grievances that are the responsibility of GSEZ Nkok.	<ul style="list-style-type: none"> • Assist in the process to select community representatives. • Assist in the initial engagement between GSEZ Nkok, the stakeholders, Mayor and neighbourhood chiefs. • For grievances that are the responsibility of GSEZ Nkok assist the E&S/HSE team in : <ul style="list-style-type: none"> ○ The management of all communications with grievant ○ The investigation and resolution of claims in line with the Grievance Mechanism Procedure. 	<ul style="list-style-type: none"> • As required to GSEZ Nkok E&S Manager and O&M Head.
<i>GSEZ Nkok O&M Head</i>	He reports to the CEO and manages GSEZ Nkok E&S/HSE Team.	<ul style="list-style-type: none"> • Oversee that the necessary staff, resources and systems are in place to allow effective internal communication of the Grievance Mechanism and to enable the Grievance Mechanism to be implemented. • Provide on-going advice and support to GSEZ Nkok E&S Manager and advise CLOs or operational teams, where relevant, to develop a grievance resolution proposal. • Work alongside GSEZ Nkok E&S Manager, corporate management and communications teams to develop resolutions for grievances that pose a significant risk to GSEZ Nkok's reputation and/ or that attract broad media coverage. • Oversee resolutions for grievances that require a change in operational practices or policies by working with the operations team and providing necessary training or appropriate information to facilitate a change in operational practices or policies. • Implement and monitor the use of GSEZ Nkok's internal corporate requirements for environmental and social management by contractors and sub-contractors. 	<ul style="list-style-type: none"> • Reviews the quarterly Grievance Monitoring Report. • Reviews the annual Grievance Monitoring Report
<i>Local Community</i>			

Title	Role	Responsibilities	Reporting
<i>Community Representatives</i>	One community representative per neighbourhood. Neighbourhood Chief will represent the neighbourhood close to Nkok. Community representatives will act as local points of contact to assist the community members in understanding Grievance Mechanism and submitting grievances.	<ul style="list-style-type: none"> Support the implementation of the Grievance Mechanism by communicating it to community members so that it is understood and used appropriately. Distribute the Grievance Submission Forms for Local Communities to community members. Assist illiterate members of their community to complete the Grievance Submission Forms. Review of Grievance Submission Forms received to ensure they have been correctly completed and submit to GSEZ Nkok within 48 hours of the grievance being lodged by the grievant. Assist in communicating to the grievant when their grievance has been resolved or rejected and who they should contact should they wish to appeal the response to their grievance. Provide feedback to GSEZ Nkok on the procedure. 	<ul style="list-style-type: none"> Attend project meetings (when invited) Feedback on community's perception and use of the Grievance Mechanism to GSEZ Nkok (when requested).
<i>Mayor of 3rd district (or his representative)</i>	Spokesperson for local community. Liaises between Community Chiefs and GSEZ Nkok.	<ul style="list-style-type: none"> For any grievances raised directly to the Mayor, explain the Grievance Mechanism process to the grievant and request that they complete a Grievance Submission Form (with assistance if needed). Assist GSEZ Nkok in the investigation of grievances and provide advice on resolving grievances where requested. Act as mediator in the case of an appeal and provide third party facilitation, when required. 	<ul style="list-style-type: none"> Attend project meetings (when invited). Contribute to annual review of Grievance Mechanism. Feedback as required on Grievance Mechanism to GSEZ Nkok.

3.3 Training

GSEZ Nkok E&S/HSE Team will hold an induction on how to implement and manage the Grievance Mechanism to all management and staff in direct contact with communities. They will also be trained on how to actively listen for and register grievances. Training will also be provided on grievance management ethics.

Community members involved in the implementation of the Grievance Mechanism (Neighbourhood Chiefs and the Mayor) will be trained by GSEZ Nkok on the procedure and protocol for filing a grievance.

4 COMMUNICATING THE GRIEVANCE MECHANISM

4.1 Overview

Stakeholders will be informed about the Grievance Mechanism by GSEZ E&S Team through consultation activities, such as public meetings and letters/ leaflets, as well as through ad-hoc engagements. Special consideration will be given to vulnerable and harder-to-reach groups.

GSEZ E&S Team will undertake the initial engagement with the local community to disclose the Grievance Mechanism. Ongoing communication of the Grievance Mechanism to community members will also be realised. The community representatives will also be involved in communicating the Grievance Mechanism to their community members.

4.2 Key Messages

When communicating the Grievance Mechanism to project affected stakeholders, as a minimum the responsible party should communicate the following:

- Who is eligible to use the mechanism?
- What can be classified as a grievance (provide examples)?
- How and where to file a grievance?
- Steps for resolving grievances including grievance investigation process.
- Different types of responses typically provided to the grievant, including timing of responses.
- How the mechanism works in comparison to third party mediation or litigation?

5 TYPES OF GRIEVANCES

5.1 General Grievances

A number of commonly anticipated grievances may be raised by stakeholders affected by GSEZ Nkok's operation including but are not limited to:

- Noise and pollution;
- Roads and traffic;
- Job allocation (e.g. no or insufficient jobs created for local communities)...;

The types of grievances outlined above will be dealt with through the Grievance Mechanism and GSEZ Nkok will be required to follow the procedure and process outlined in the Grievance Mechanism for their resolution.

5.2 Grievances Requiring Compensation

Compensation will deal with grievances that are caused by operations or construction related activities and that relate to:

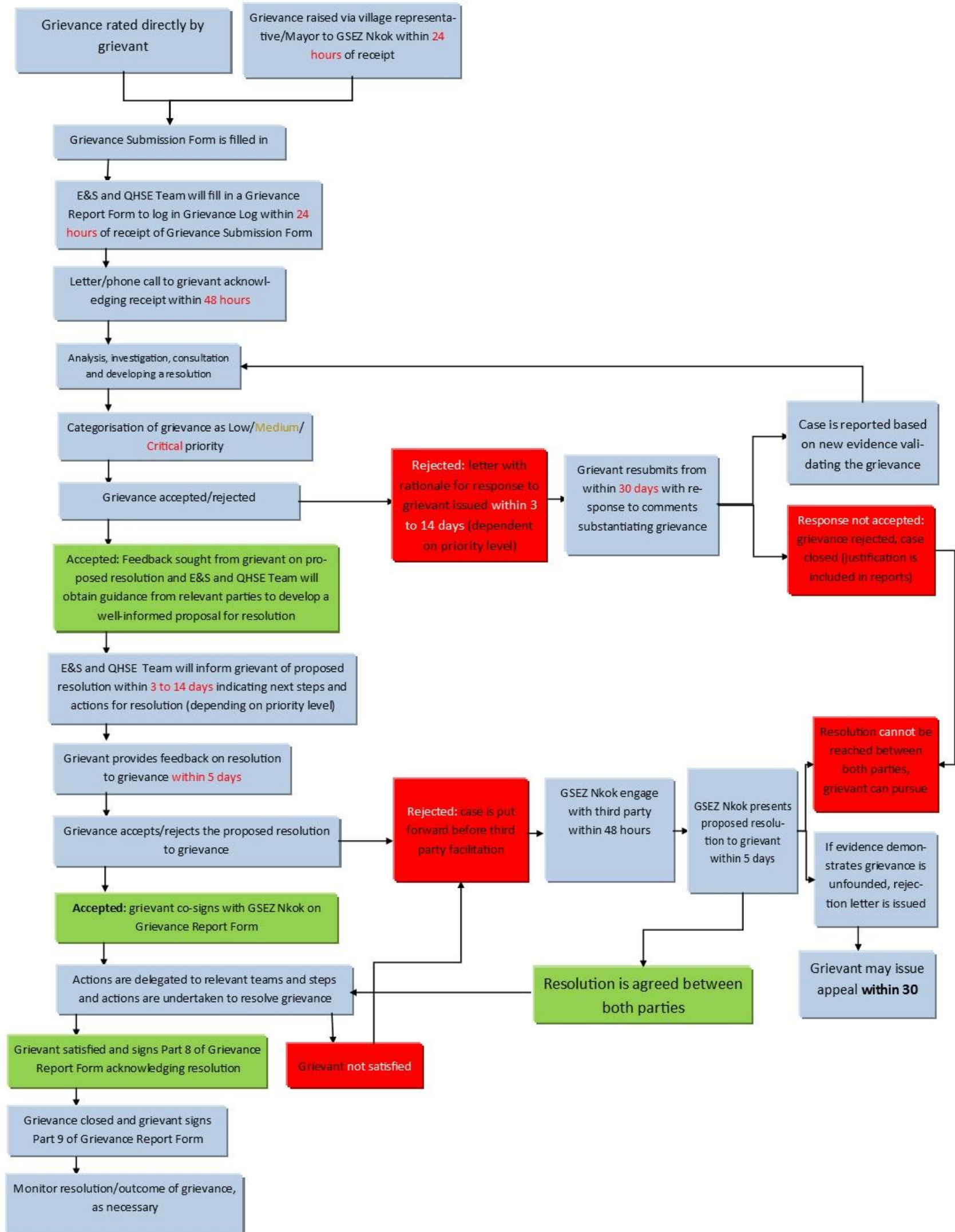
- Accidental damage to buildings, structures, equipment, machinery, land, livestock, water resources and graves.
- Accidental clearance of vegetation or structures outside of the site's boundary.
- Road traffic accidents that impact crops, land, buildings or structures.
- Damage to land or crops from spillages.

6 GRIEVANCE MECHANISM PROCEDURE

The Grievance Mechanism involves a number of steps moving from grievance submission and investigation throughout to grievance resolution. The Grievance Mechanism process is described in detail in Section 6.1 to Section 6.8 and presented graphically in Plate 1.

The Grievance Mechanism process may be updated as the Project progresses based on feedback from community members and GSEZ Nkok staff, and Plate 2 will be updated as necessary.

Plate 1 Grievance mechanism process



6.1 STEP 1: Submitting a Grievance

Stakeholders can lodge grievances in writing using the Grievance Submission Form for Local Communities (see Appendix A). If a stakeholder is unable to submit a written grievance, they can submit a grievance verbally, and a staff member of GSEZ Nkok E&S/HSE team, appointed personnel, Mayor or neighbourhood Chief will record the grievance on their behalf.

A Grievance Submission Form must be submitted for the resolution process to begin.

Grievance Submission Forms will be made available at designated points such as at the main control gate of Nkok, at the Mayor's Office and with the neighbourhood chiefs or at other readily accessible points.

Stakeholders will be able to lodge a grievance at the main security control gate or by telephone or letter. Grievances may also be lodged with Neighbourhood Chiefs or the mayor who will pass the grievance on to GSEZ Nkok.

Provisions should be made for stakeholders who wish to communicate their grievances verbally, are unable to write, wish to remain anonymous or feel uncomfortable approaching a Neighbourhood Chief or otherwise, to access the Grievance Mechanism and lodge a grievance (e.g. grievance call line, submission boxes in remote areas).

Neighbourhood Chiefs and the Mayor's representative(s) will be trained in the protocol for completing the Grievance Submission Form and can assist stakeholders wishing to make a grievance but shall not negotiate on GSEZ Nkok's behalf. The Neighbourhood Chiefs or Mayor representative will **assist illiterate stakeholders** in completing the Grievance Submission Form.

Neighbourhood Chiefs or Mayor representative are responsible for submitting the Grievance Submission Form to GSEZ Nkok within **24 hours**.

6.2 STEP 2: Recording Grievances

Upon receiving a Grievance Submission Form, GSEZ Nkok E&S/HSE Team will begin filling out a new Grievance Report Form (Appendix B), which will be used to log the grievance in the Grievance Log. All grievances should be logged within **24 hours** of being submitted. The Grievance Log is the SCGMS which will be used for logging, tracking all grievances and monitoring the implementation of the Grievance Mechanism.

6.3 STEP 3: Acknowledgement

The grievant will receive acknowledgement that their grievance has been received and logged within **48 hours** of the grievance being recorded in the SCGMS.

A copy of the Grievance Report Form and letter of acknowledgement will be generated and provided to the grievant (if possible), stating the date the grievance was received, and when GSEZ Nkok is likely to provide a formal response to the grievant.

If it is not possible to physically deliver the copy of the Grievance Report Form and letter of acknowledgement to the grievant, then the grievant will be informed verbally (most likely a telephone call to the grievant) and a record of this communication will be made in the SCGMS. The grievant will also be informed that a copy of the Grievance Report Form and acknowledgement letter will be kept on record and provided to him/ her, when requested.

6.4 STEP 4: Analysis, Investigation, Consultation and Developing a Resolution

GSEZ Nkok E&S/HSE Team will assess the significance of the grievance and categorise it in accordance with the following categories:

- **Low Priority:** a local, isolated or one-off complaint.
- **Medium Priority:** widespread and/or ongoing complaint, e.g. noise, vibration and dust during operations.

- **Critical Priority:** potential for significant breach of GSEZ Nkok policies (including national permits and international conventions that GSEZ Nkok is committed to complying with) and/ or negative media attention.

This categorisation will be updated and refined as required.

Table 6.1 outlines the timeframe and types of response for different categories of grievances. GSEZ Nkok E&S/HSE Team will aim to close the grievance within the response timeframes outlined in Table 6.1, or within at least 30 days of receiving a grievance, as far as possible.

When developing a response to a grievance GSEZ E&S/HSE Team should consult with relevant parties (this could include management team members, GSEZ Nkok staff, Neighbourhood Chiefs, witnesses, the Mayor of Ntoum’s 3rd district) to obtain guidance and further information in order to develop a well-informed proposal for resolution. The grievant may also be approached by GSEZ Nkok E&S/HSE Team to provide more details during the investigation or to discuss potential next steps. Furthermore, it is advisable that the source of a grievance is assessed where possible (e.g. a property that was damaged).

Any consultation with stakeholders during the investigation of a grievance should be noted in the SCGMS. If the grievance is complex and requires a more lengthy investigation then the grievant should be notified in writing and verbally with reasons for the delay.

Once enough information has been gathered and the root of the grievance is identified, clear, time-bound and measurable steps to resolve the grievance should be proposed to the grievant verbally and in writing. The proposed resolution must be recorded in the SCGMS using the Grievance Report Form.

Table 6.1 Grievance categorisation and response

Grievance Priority	Description	Response Timeframe	Type of Response
Low Priority	Local, isolated or one-off complaint.	Grievance response within 14 days	GSEZ Nkok E&S/HSE Team to coordinate internal response to grievance.
Medium Priority	Widespread and/ or ongoing complaint, i.e. noise, vibration and dust during operation.	Grievance response within 7 days	GSEZ Nkok E&S/HSE Team to involve relevant staff to investigate complaint.
Critical Priority	Potential for significant breach of GSEZ Nkok policies and/ or negative media attention.	Grievance response within 3 days	GSEZ Nkok E&S/HSE Team will refer grievance to GSEZ Nkok Business Head, who will liaise internally with Department Leads to organise priority team to investigate the complaint as a matter of urgency. GSEZ Nkok Business Head may decide to halt activities for the investigation and to allow time for mitigation to be determined.

6.4.1 Escalation of Grievances

The escalation metrics outlined in Table 6.2 will be followed in the event that the targeted response timeframes are not met.

Table 6.2 Escalation of Grievances

Grievance Priority	Escalation Chain	Updated Response Time Frame
Low Priority	14 days: Notify E&S Manager	4 days
	21 days: Notify GSEZ Nkok O&M Lead	2 days
	23 days: Notify GSEZ Nkok Business Head	1 day
	24 days: Notify GSEZ Corporate E&S Performance Lead	Same day
Medium Priority	7 days: Notify E&S Manager	3 days
	10 days: Notify GSEZ Nkok Business Lead	2 days
	12 days: Notify GSEZ Nkok O&M Head	1 day
	13 days: Notify GSEZ Corporate E&S Performance Lead	Same day
Critical Priority	3 days: Notify GSEZ Nkok O&M Head	1 day
	4 days: Notify GSEZ Corporate E&S Performance Lead	Same day

6.5 STEP 5: Providing a Response and Agreement on Next Steps

GSEZ Nkok E&S/HSE Team will communicate the outcome(s) of the investigation to the grievant and request feedback on the resolution. This initial response will include a summary of what actions are planned to resolve the grievance and when they are likely to be implemented, or an explanatory note clarifying why action is not required. The response will be in writing, although a verbal response will also be provided where appropriate.

The grievant will be asked to give their feedback on the proposed course of action within **five** working days. If the grievant is in agreement with the next steps, they will co-sign with GSEZ Nkok in Section 3 of the Grievance Report Form (Appendix B) to acknowledge agreement on the proposed actions for resolution.

Agreement should be recorded in the SCGMS and the actions delegated to appropriate personnel by the Department Lead or Business Head. Although the resolution of the grievance cannot be time-bound, the appropriate steps and actions to resolve the grievance should be completed in a thorough and prompt manner.

6.5.1 What to do if proposed resolution is rejected by grievant

Any rejection by the grievant should immediately be reported to GSEZ Nkok Business Head. If the category of the grievance is critical it should be immediately reported to GSEZ Corporate Head.

If the grievant does not agree with the proposed actions, then the case may be put before a designated appropriate third party in order to find an alternative resolution. GSEZ Nkok must inform the grievant that their case is being put forward to a third party prior to this occurring. If the grievant is not happy with their grievance being put forward to the proposed third party they may suggest an alternative third party to seek guidance regarding grievance resolution. This will be dealt with on a case-by-case basis.

GSEZ Nkok will engage with the selected third party within **48 hours** of the grievant rejecting the proposed resolution. All background information on the grievance will be provided in order to allow the third party to have a full understanding of the grievance. The third party will be responsible for reviewing the proposed resolution put forward by GSEZ Nkok, and will deliberate

internally regarding what is the best course of action for grievance resolution. The proposed resolutions will be put forward to GSEZ Nkok for discussion. Once GSEZ Nkok and the third party agree on the proposed resolution it will be put forward to the grievant.

A meeting between GSEZ Nkok, the grievant and the third party will be held within **5 days** of the grievant receiving the revised proposed resolutions to discuss and agree a way forward. During the meeting, the grievant will be invited to provide feedback to GSEZ Nkok.

All actions will be logged in the Grievance Report Form (Appendix B) and the SCGMS. If no steps can be agreed, then litigation may be sought.

6.5.2 Rejecting a Grievance

Decision to reject a grievance must be approved by GSEZ Nkok E&S Manager, O&M and Business Head.

If evidence or a lack of evidence demonstrates the grievance is unfounded, a letter of rejection including the rationale behind the decision will be provided to the stakeholder. The grievance may only be resubmitted for appeal once, must be resubmitted within 30 days, and must address the comments provided by GSEZ Nkok in the rejection letter. If the grievance is rejected again after being resubmitted for appeal, it may not be raised again unless there is new substantiating evidence.

If a grievance is rejected, consideration should be given as to whether this grievance is arising from a misperception due to a lack of information. Should this be the case, GSEZ Nkok E&S/HSE Team, Neighbourhood Chiefs and the Mayor will provide relevant information to the individual, and efforts should be made to share this with the broader community to prevent similar grievances arising in the future.

6.6 STEP 6: Resolution and Follow Up

When corrective actions are agreed upon between GSEZ Nkok and the grievant, relevant personnel assigned to the case will be responsible for ensuring that they are implemented.

It is the responsibility of GSEZ Nkok E&S/HSE Team to inform the grievant on the progress of implemented corrective actions. If the grievant is satisfied with the steps that have been taken they must sign-off Section 4 of the Grievance Report Form (Appendix B) to signify the closing of the case. If the completed actions have not resolved the issue to the satisfaction of the grievant, the latter and GSEZ Nkok must identify where the shortcoming was and/or propose further steps. The date of the follow-up and whether or not the grievance was resolved, and any further action shall be noted in the SCGMS.

6.7 Monitoring

GSEZ Nkok E&S/HSE Team will provide daily reports to GSEZ Nkok O&M Head on any grievances raised that day and status of existing grievances using the form provided in Appendix B. A weekly Grievance Monitoring Report summarising grievances that have occurred and actions taken, as well as trends, will be submitted to GSEZ Nkok Business Head.

Active monitoring by GSEZ Nkok of the outcome/ resolution of individual grievances may be required depending on the severity of the grievance; however, this will be agreed between general management on a case-by-case basis.

All staff involved in grievance management will have access to the Grievance Log, which can be used to track existing grievances.

6.8 Review, Feedback and Reporting

Weekly reporting on the grievance mechanism will be made to GSEZ O&M Head.

A regular system for reviewing and providing feedback to management and other stakeholders, such as a bi-annual Steering Committee meeting, should be implemented. Additionally, to ensure continuous improvement, the Grievance Mechanism should be adjusted where needed based on feedback from stakeholders and staff involved in the Grievance Mechanism implementation. Any changes should be communicated to all relevant parties.

7 GRIEVANCE CONTACT INFORMATION

The contact details for GSEZ Nkok where stakeholders can lodge a grievance are shown in Table 7.1.

Table 7.1 Contact details

Detail	Contact
Contact name	Hervé Omboye
Telephone number	02 26 86 99
Email	herve.omboye@olamnet.com

**APPENDIX A – GRIEVANCE SUBMISSION
FORM FOR LOCAL COMMUNITIES AND
STAKEHOLDERS**

Grievance Submission Form for LOCAL COMMUNITIES and STAKEHOLDER

Please use this form to report any concerns that you have about GSEZ Nkok Operation, and provide information about any impacts or damage that have occurred, or ways that you would like us to improve.

1. Your Information

We would like to know your name and contact information so that we can speak to you about the grievance, and to provide you with information about how we will respond to make improvements. If you would like to submit this complaint anonymously please leave this section blank.

Name (Last, First): _____

Gender: Male Female

Village: _____

Address: _____

Occupation: _____

Phone Number: _____

2. Your complaint

Please describe the concern or complaint that you have, providing as much information as possible about any impacts or damage, including when and where they occurred.

3. Proposed Solution

Please provide suggestions on how you would like us to resolve your grievance.

3. Recorder's Information

If someone completed this form on behalf of the grievant please provide your information

Name (Last, First): _____ **Phone Number:** _____

APPENDIX B – GRIEVANCE REPORT FORM

Grievance Report Form for GSEZ Nkok

Grievance Number: _____

Submission Date: _____

Status of Report

Grievance Number: _____

Open Closed

Report completed by: _____
Please Print Name Position Date

Acknowledgement that grievance has been received sent to Grievant within 48 hours:

Yes No Date _____

1st Response Date: _____

2nd Response Date (for appeals) _____

Date resolution actions completed and grievance closed _____

Part 1 – Details of Grievant

(To be completed based on information provided in Grievance Submission Form).

Name (Last, First): _____

Gender: Male Female

Village: _____

Address: _____

Occupation: _____

Phone Number: _____

Previous Grievances

Has a written report been previously submitted to GSEZ Nkok by grievant? Yes No

If yes, give grievance record number: _____

Recorder's Information (details of third party submitting grievance on behalf of grievant if relevant)

Name (Last, First): _____ Phone Number: _____

Part 2 – Details of Grievance

- a. **Description of grievance as provided by grievant** (to be completed based on information provided in Grievance Submission Form).

- b. **Grievance type** (list all): _____

Does grievance relate to a claim for compensation due to accidental damage or temporary disturbance to economic activity?

- Yes Follow process outlined in the Compensation Plan to address grievance.
- No Complete remainder of Grievance Report Form.

Part 3 - Analysis and Investigation

- a. **Significance of grievance** **Low Priority** **Medium Priority** **Critical Priority**

Explanation (provide justification for rating e.g. is this a one of or recurring incident, does it involve risks to company reputation or breach of policies or regulations):

- b. **Response timeframe:** ____ days

- c. **Witnesses associated with case (list all)**

TABLE 1	
Name	Number

- d. **Details of staff involved in investigating and responding to grievance** (list all)

TABLE 2				
Name	Position/ Department	Company	Email / Tel.	Date engaged

- e. **Details of external stakeholders consulted in relation to grievance** (list all).

TABLE 3					
Name	Title	Company / Village	Contact Tel.	Date engaged	Meeting Notes Reference*

*Upload meeting minutes to the SCGMS and give the reference here.

f. Description of findings from initial investigation:

g. Based on initial investigation is grievance valid?

- Yes Go to Part 4
- No Give reasons and go to Part 5

Reasons for rejection of grievance _____

Part 4 – Resolution Proposal

a. Resolution Proposal Provided by Grievant

Suggestions from grievant on how they would like grievance to be resolved (based on information given in submission form).

b. Resolution Proposal Provided by GSEZ Nkok

Proposed resolution from GSEZ Nkok (include details of all actions to be taken by named staff or third parties to resolve grievance, timeframe for implementation, and any recommended changes to operational practices or policies). *Include details of any consultations held to develop resolution proposal in Table 2 and Table 3 above.*

TABLE 4						
Response # (first, second, third etc)	Action(s)	Change to Policies or Practices needed?	Timeframe	Responsible Party (name and company of individual)	Monitoring requirements	Status <ul style="list-style-type: none"> • Proposed • Agreed • Rejected • Under implementation • Complete

Part 5 – First Response & Follow-Up

For **valid grievances** the response should communicate the outcome of the investigation and proposed resolution to the grievant and request feedback on the proposed resolution.

For **non-valid grievances** a letter of rejection including the rationale behind the decision should be sent to the grievant.

- a. **Date first response given to grievant** _____
- b. **How was the response provided to grievant** (tick all that apply)
 - Phone
 - In person
 - Letter (attach copy)
 - Email (attach copy)
- c. **Grievant feedback on first proposed response** (to be received within five days)
 - Grievant agrees with proposed response: Go to Part 8a.
 - Grievant rejects proposed response. Go to Part 6.

Part 6 - Grievance Appeal

For appeals against a grievance deemed non-valid complete section 6A and B.

For appeals against a proposed resolution to a grievance complete section 6C to G.

- a. If a grievance is deemed not to be valid and is therefore rejected the grievant may submit an appeal for their grievance to be reconsidered. The appeal should be submitted within 30 days of them receiving the initial response. Reasons for appeal (including new evidence) must be provided and recorded below. This section should be completed by **GSEZ Nkok** based on information and evidence provided by the grievant.

Additional or new evidence. *Please list and attach any additional documents relevant to the grievance.*

- b. **Review of appeal by GSEZ Nkok**

Considering new evidence detailed in part 6 (a), is grievance valid?

- Yes Grievance remains open. Complete Part 4, Part 7 and Part 8.
- No Give reasons and go to Part 7.

Reasons for rejection of grievance _____

c. Reasons given by grievant for rejection of first proposed response:

d. Alternative solutions to resolve grievance proposed by grievant or GSEZ Nkok:

e. Alternative solution proposed accepted by both parties?

- Yes Add new actions to Table 3 (Part 4) and go to Part 7.
- No Complete remainder of this section.

f. Third party consultation

If a grievant has rejected the proposed response to their grievance and no alternative resolution can be agreed between GSEZ Nkok and the grievant, the issue must be referred to a third party. The details of any third parties consulted should be recorded in Table 3 (Part 3). The third parties' proposed resolutions should be recorded below.

Proposed resolution given by designated third party *Please list and attach any additional documents relevant to the grievance and minutes of meetings with third parties.*

g. Alternative solution proposed by third party accepted by GSEZ Nkok and grievant?

- Yes Add new actions to Table 4 (Part 4) and go to Part 7.
- No Give reasons and go to Part 7.

Reasons for rejection of third party proposal

Part 7 – Second Response & Follow-Up

For **valid grievances**:

- Where a revised resolution is being proposed: the response should communicate the revised proposed resolution to the grievant and request feedback on the proposed resolution.
- Where no revised resolution is being proposed: the response should communicate that no revised resolution has been found and the grievant can pursue to litigation if they choose.

For **non-valid grievances** a letter should be sent to the grievant that explains why the decision to reject the grievance is being upheld despite any new evidence that was provided.

a. **Date second response given to grievant** _____

b. **How was the response provided to grievant** (tick all that apply)

- Phone
- In person
- Letter (attach copy)
- Email (attach copy)

c. **Grievant feedback on second proposed response** (to be received within five days)

- Grievant agrees with proposed response: Go to Part 8a.
- Grievant rejects proposed response. Go to Part 8b.

Part 8 – Grievance Acknowledgement

a. **Grievant Acknowledgement of Acceptance**

I, _____, (full name of grievant) hereby acknowledge that I have read or heard and understand the response to my grievance given by _____ (full name of staff providing response) on _____ (date response was given).

Signature of Grievant*: _____

**If the grievant cannot sign use finger print*

b. **No Resolution**

If no resolution for the grievance can be agreed between the grievant and GSEZ Nkok, the grievant may pursue to litigation or further third party mediation. The outcome of this process, if pursued, should be recorded here and the grievance record updated once any additional actions have been implemented and the grievance is considered closed.

Details of results of litigation process including any actions assigned to GSEZ Nkok: *Update Table 4 with actions as required.*

Part 9 – Grievance Close

Has action been properly implemented according to the above specifications?

Yes

No

Signature of Grievant

Date

If the response to this question is no, the grievance remains open and supplementary consultation and actions should be undertaken and recorded in Tables 2, 3 and 4.

Date Closed: _____

Signature of GSEZ Nkok personnel