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BUSHVELD MINERALS SA

COMMUNITIES AND STAKEHOLDERS GRIEVANCE MANAGEMENT AND RESOLUTION PROCEDURE

Version 1.0

	CAPACITY/FORUM	SIGNATURE	DATE
Drafted by	Sediko Rakolote- Group: Sustainability and Stakeholder		2020 February 03
Approved by	Sihle Mdluli- Director: Strategy and Corporate Services		08 Dec 20



1. PURPOSE

The purpose of this procedure is to manage grievances from communities and other local stakeholders in a systematic, fair, timely and transparent manner in order to promote mutual confidence and trust. The procedure is based on the following outcomes:

- **Accessibility:** Ensuring that aggrieved parties are provided with an easily accessible facility in order to submit a grievance at any Bushveld Minerals operations site.
- **Fairness:** Ensuring that the grievance resolution is fair for both the aggrieved and Bushveld Minerals and/or its subsidiaries.
- **Transparency:** Ensuring that aggrieved have full knowledge of the procedures that will be followed when submitting a grievance.

2. SCOPE

- 2.1. This procedure applies to all Bushveld Minerals operational sites and focuses solely on communities and other external stakeholders. The procedure does not incorporate employee-related grievances that are addressed through Human Resources Department.

3. PROCEDURE OF LODGING A GRIEVANCE

3.1. Lodging a grievance

- 3.1.1. A person/institution willing to submit a grievance must do so in writing and hand-deliver the grievance at the security offices at Operations and/or email to Stakeholder Relations office on site.

3.2. Receiving a grievance

- 3.2.1. Upon receiving the grievance, onsite Stakeholder Relations Office shall review the grievance to understand the full nature of the grievance and refer the grievance to the relevant onsite Head of Department that the grievance is directed to.
- 3.2.2. If the grievance/complaint is levelled against the General Manager, the grievance/complaint will automatically be escalated to Bushveld Mineral Head-Office-Sustainability and Stakeholder Relations Division
- 3.2.3. The Stakeholder Relations Office on site will notify the aggrieved person/institution within two (2) working days after receiving the grievance that the grievance was received and shall provide the aggrieved party with the name of the onsite Head of the relevant Department handling the grievance.



3.2.4. The Stakeholder Relations Office on site will notify the aggrieved person/institution that a response will be provided within fifteen (15) working days.

4. Review

4.1. The onsite Head of the relevant Department shall review the grievance to understand the full nature of the grievance.

4.2. The onsite Head of the relevant Department shall decide whether to assign an investigator to investigate further or to close the grievance by replying to the person/institution that lodged the grievance.

4.3. In the case where the onsite Head of the Department resolves that the grievance must be investigated and assigns a person to investigate, the investigator handling the grievance shall take all necessary measures to:

- ✓ Investigate and question the relevant personnel of the Department/s implicated in the grievance.
- ✓ If necessary, call the person who submitted the grievance to get more information.
- ✓ Submit his/her findings and recommendations to the Head of the relevant Department.

4.4. In assigning an investigator, the onsite Head of the relevant Department will take into consideration issues of conflict of interests.

4.5. The findings of the investigation will be communicated in writing to the aggrieved within fifteen (15) working days of lodging the grievance.

4.6. The onsite Stakeholder Relations office will be responsible to hand-deliver or email the response to the aggrieved.

5. Escalation of grievance and final provisions

5.1. If the aggrieved is dissatisfied with the response received and/or settlement conditions offered, she/he will be informed to refer the grievance, with the copy of the final response, to the General Manager for review. **(Only if the complaint is not levelled against the General Manager)**

5.2. Upon receiving the escalation of the grievance, the General Manager shall review the grievance for further investigation and response.



- 5.3.** Through the Stakeholder Relations Office, the General Manager will notify the aggrieved person/institution within two (2) working days after receiving the grievance that the grievance was received and will provide the aggrieved party with the name of the person handling the grievance.
- 5.4.** Through the Stakeholder Relations Office, General Manager will notify the aggrieved person/institution that a response will be provided within five (5) working days.
- 5.5.** Through the Stakeholder Relations Office, the aggrieved person will be informed by the General Manager that she/he may refer the grievance with the copy of the final response from him/her to Bushveld Mineral Head-Office- Sustainability and Stakeholder Relations Division if dissatisfied with the response received and the settlement conditions offered.
- 5.6.** Upon receiving the escalation of the grievance, Bushveld Mineral Head-Office- Sustainability and Stakeholder Relations Division shall review the grievance, for further investigation and response. The Sustainability and Stakeholder Relations Division will consult Bushveld Minerals-Legal and Compliance for support and advice.
- 5.7.** Bushveld Mineral Head-Office- Sustainability and Stakeholder Relations Division will notify the aggrieved person/institution within two (2) working days after receiving the grievance that his/her grievance was received and inform her/him that he/she will get a response within fourteen (14) working days.
- 5.8.** The aggrieved person will be informed by Bushveld Mineral Head-Office- Sustainability and Stakeholder Relations Division that she/he may refer the grievance with the copy of the final response from him/her to the Director of Corporate services and Strategy if dissatisfied with the response received and the settlement conditions offered.
- 5.9.** Upon receiving the escalation of the grievance, Director of Corporate services and Strategy shall review the grievance, for further investigation and response. The Director of Corporate services and Strategy will consult Bushveld Minerals-Legal and Compliance for support and advice.
- 5.10.** The Director of Corporate services and strategy will notify the aggrieved person/institution within two (2) working days after receiving the grievance that his/her grievance was received and inform her/him that he/she will get a response within seven (7) working days.



5.11. The aggrieved person will be informed by The Director of Corporate services and Strategy that she/he may refer the grievance to external mediator and or arbitrator, if dissatisfied with the response received and the settlement. The aggrieved person will be requested to inform the Director of Corporate services and strategy if she/he decides to refer the matter to external mediator and or arbitrator.

6. Records and measures

- 6.1.** Bushveld Minerals Operations- Stakeholder Division shall keep records of all grievances, all relevant correspondence and documents related to the grievance, for a minimum period of five years.
- 6.2.** At the end of each month the Head of Departments at Operations will submit grievance reports related to their Departments to the General Manager and indicate steps taken to prevent repetition of the same grievance/s.
- 6.3.** At the end of each month, the General Manager/s will inform the CEO of all grievances received at Operations, grievances resolved and grievances that are still under investigation and indicate steps taken to prevent repetition of the same grievance.
- 6.4.** Bushveld Minerals- Sustainability and Stakeholder Relations shall keep records of all grievances, all relevant correspondence and documents related to the grievances that were escalated to Head-Office for a minimum period of five years.
- 6.5.** At the end of each month, the Director of Corporate Services and Strategy must inform the CEO of all grievances escalated from Operations and resolved by Head-Office and grievances that are still under investigation and indicate steps taken to prevent repetition of the same grievance.
- 6.6.** The CEO shall inform at least once a year the Board of Directors of all grievances received, grievances resolved and grievances that are still under investigation and indicate steps taken to prevent repetition of the same grievance.

7. Contravention

7.1. Any breach of this procedure shall be regarded as refusal/failure to carry out a lawful instruction and will be dealt with as per the disciplinary policy of Bushveld Minerals and its subsidiaries.