

Annexure 2:

<b>Debswana External Grievance Management Procedure</b>	
<b>Policy Owner</b>	Head of Corporate Affairs
<b>Policy Reference</b>	PO-CS-0012
<b>Effective Date</b>	01 September 2022
<b>Related Procedures/Guidelines or Policies</b>	Debswana Social Performance Policy (GCA/CA/007) Debswana CSI Procedure (PROC/GCA/CSI/001) Integrated Incident Management Procedure Risk Management Procedure Debswana Sponsorships Guidelines Debswana Human Rights Policy Debswana O.D.O.T Strategy 2024 Social Way version 3.0 Building Forever Strategy ECOHS Policy

**1. PURPOSE**

This procedure is developed to guide Debswana operations in complying with the requirements of the Social Way Framework version 3 and manage external grievances. It defines processes, roles and responsibilities for registering and addressing grievances brought to the company by external stakeholders.

The correct management of grievances is a vital part of maintaining the Social License to Operate (SLO), managing risks and impacts and managing our reputation. The desired outcome is a process where stakeholders are comfortable sharing information and engaging the company in dialogue.

**2. OBJECTIVES**

Grievance management is an effective way for both reinforcing positive long-term relationships with stakeholders and to detect issues early that may result in risks to the business if not addressed. The Procedure’s objectives are to:

- 2.1 Ensure unwanted events with negative impacts on external stakeholders are dealt with swiftly and appropriately.
- 2.2 Allow Debswana operations to identify and correct issues before they occur or escalate into more serious problems.
- 2.3 Offer an additional means to track and monitor impacts and risks.
- 2.4 Provide insight into stakeholders’ understanding (or misunderstanding) of Debswana policies, activities and processes.
- 2.5 Provide an efficient and low cost means of resolving disputes and remedy, where appropriate.
- 2.6 Avoid tension and conflict with stakeholders resulting from neglect or mismanagement of grievances.

**3. SCOPE**

This Procedure is intended to assist Debswana operations to screen all grievances and further investigate all screened-in grievances. All grievance investigation process and closeout should align with the Group Standard on Integrated Incident Management.

The scope of this Procedure is to provide guidance on effective management of grievances from external stakeholders, aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

#### 4. DEFINITIONS

- 4.1. **Social Way:** A best practice governing framework or social management system based on a five-point maturity model ranging from basic, reactive, compliance, proactive to resilient.
- 4.2. **Social Performance:** A discipline that aims to minimise negative impacts and maximise socio-economic benefits to host communities in order to secure our social license to operate.
- 4.3. **Incident:** An unwanted event which instantaneously or over the course of time harms or otherwise negatively impacts (internal and/or external) people, the environment, company assets (i.e. plant, property, or equipment) and or the company's reputation. It is an unwanted event, which leads or may lead to the actualisation of risk.
- 4.4. **Issues:** Are questions, requests for information, or general perception. If not addressed well, issues may become grievances. Issues do not have to register as grievances, but they should be recorded so that emerging trends can be identified and addressed before they escalate.
- 4.5. **Learning From Incidents (LFI):** An investigating process used for all incidents, independent of consequence level and consequence type. The LFI process consist of related steps which ensure incidents are reported, investigated, learnings are shared, and corrective and preventative actions are communicated and closed out in a constant manner. This will ensure that, as a business, Debswana operations collectively learn from incidents, and the effectiveness of controls is continually reviewed and improved to prevent similar incidents (repeats) from occurring.
- 4.6. **Incident with social consequence (s):** An unwanted event related to site activities that has an adverse impact on the health or well-being of external stakeholders, or results in damage to their property, assets, or livelihoods. An incident with social consequences may arise from a site's technical failure or accident, or a failure to anticipate, prevent or mitigate an impact. All incidents with social consequences should be investigated under the LFI process.
- 4.7. **Grievance:** a specific allegation or complaint relating to the site, its policies, activities, real or perceived impact or the behavior of its employees or contractors. Grievances are an expression of dissatisfaction with the company on the part of stakeholders. Grievances can be expressed through physical action (e.g. protests, road blockages, land invasions), verbally (in the course of discussion with site staff) or in writing.
- 4.8. **Actual consequence rating:** a consequence rating assigned to all incidents, based on the actual unwanted event, i.e. what actually happened.
- 4.9. **Potential consequence rating:** a consequence rating assigned to incident, based on a reasonable worst-case scenario: i.e. what could have happened.
- 4.10. **Preliminary consequence rating:** a preliminary (actual and potential) consequence rating is assigned to an incident before LFI investigation, based on the preliminary and often incomplete information available at the time.
- 4.11. **Final consequence rating:** a final (actual and potential) consequence rating is assigned to an incident after LFI investigation based on all information collected as part of the LFI investigation.
- 4.12. **Near-miss:** A condition where the release of the hazard and/ or exposure to hazard in an uncontrolled manner does not result in harm (i.e. no injury, ill health, damage, etc.)
- 4.13. **Hazard:** Source or situation with the potential for harm.
- 4.14. **Grievance process:** the process for receiving, recording and resolving grievances.
- 4.15. **Social Consequence Rating:** A tool used as part of SHIRA and incident and grievance management to determine the social consequence rating of incidents and potential impacts on external stakeholders, based on an assessment of scale, vulnerability and remediability.

#### 5. RESPONSIBILITIES

In order to better manage grievances, each site will have a site-level grievance management procedure to ensure oversight, the right level of governance will be set up through a hierarchy of responsibilities.

##### 5.1. General Manager

- 5.1.1. Has overall responsibility for implementation of the grievance management procedure.
- 5.1.2. Ensure necessary staff, resources and systems are in place to allow effective internal communication on the grievance procedure.
- 5.1.3. Provide assistance to the Corporate Affairs Manager, relevant Heads of Department and Business Partners in developing actions to resolve the grievance.

- 5.1.4. Work alongside the Social Performance team, Corporate Affairs Manager, relevant departments and Debswana Corporate Centre to develop resolutions for Level 4 or 5 grievances.
- 5.1.5. Oversee implementation of corrective actions where incidents or grievances identify a need for changes to operational practices.

## **5.2. Corporate Affairs Manager**

- 5.2.1. Supervising the implementation of the procedure by all departments and business partners.
- 5.2.2. Works with heads of department to ensure that actions to resolve social incidents and grievances are assigned to relevant personnel across departments.
- 5.2.3. Monitoring social incidents and grievances to identify any trends or recurring issues that require corrective actions.
- 5.2.4. Quarterly reporting on social incidents and grievances to the SPMC, General Manager, site ExCo and Head of Corporate Affairs.
- 5.2.5. Ensuring all other departments and business partners are sensitised and trained on the Procedure.
- 5.2.6. Supervising communication and training about the Procedure amongst external stakeholders.
- 5.2.7. Making sure that the site General Manager, Head of Corporate Affairs, Debswana Managing Director and Group Head of Social Performance are notified of any Level 4 or 5 incidents or grievances.

## **5.3. Social Performance Team**

- 5.3.1. Sensitise internal and external stakeholders about the Procedure as part of stakeholder engagement activities.
- 5.3.2. Avail platforms for receiving social incidents and grievances from communities.
- 5.3.3. Ensure that all incidents and grievances are recorded with necessary details in Isometrix within reasonable timelines.
- 5.3.4. To provide guidance in deliberation of Human Rights related incidents and grievances.
- 5.3.5. Track follow-up actions to make sure that investigations, notifications to stakeholders and corrective actions are all carried out within reasonable timeframes.
- 5.3.6. Manage all communications with grievant or stakeholders involved in social incidents.
- 5.3.7. Assist the Corporate Affairs Manager to compile quarterly reports on Incidents and Grievances to the SPMC, General Manager and ExCo.
- 5.3.8. Feedback to Corporate Affairs Manager any recommendations about improving the Procedure based on stakeholder feedback to allow for continuous improvement.

## **5.4. Heads of Department**

- 5.4.1. Are trained on the Social Incidents and Grievance Procedure and ensure all personnel in their department have also completed training and know how to report incidents or grievances following this Procedure.
- 5.4.2. Oversee the implementation of the Incident and Grievance Procedure within their department.
- 5.4.3. Spearhead the development of resolutions for grievances concerning their department.
- 5.4.4. Ensure that all incidents and grievances of consequence level 4-5 as per the Anglo-American risk matrix are investigated with the LFI method and lessons are shared with peers within the group.
- 5.4.5. Ensure that relevant people within the agreed timelines do investigations.
- 5.4.6. Shall be responsible for the quality of the investigation and shall define actions to prevent recurrence.
- 5.4.7. Shall ensure that within one (1) week of signing the LFI report, the social and human rights risks are reviewed.

## **5.5. Line Managers**

- 5.5.1. Shall ensure that their teams are trained on the Incident and Grievance Procedure and that the procedure is correctly followed so that any incidents/grievances are reported to them and captured in the system within reasonable timelines.
- 5.5.2. Shall log all incidents and grievances reported to them by their line reports into the management system.
- 5.5.3. Work with relevant teams to investigate incidents and grievances and ensure that the investigation is completed within the agreed timelines and full details of the investigation and findings are logged in the incidents and grievance management system.
- 5.5.4. Discuss the incident or grievance with the person responsible and agree on actions and solutions to prevent reoccurrence.
- 5.5.5. Define actions to prevent reoccurrence alongside relevant teams and get required sign-off for actions to address the incident/grievance from relevant management.
- 5.5.6. Shall review the incidents/grievances under their team's responsibility on a weekly basis to ensure closure of the actions is progressing in line with agreed timelines.

#### **5.6. Employees and Business Partners**

- 5.6.1. Employees and business partners will be trained on the Incidents and Grievance Procedure and will report and manage grievances in line with this procedure.
- 5.6.2. All direct or business partner employees will report incidents or grievances to their line manager immediately.
- 5.6.3. Shall discuss any incidents or grievances received or observed with the person responsible for the incidents or grievances to discuss possible resolutions to prevent reoccurrence.
- 5.6.4. Shall participate in grievance and incident investigations as required and assist in finding a resolution to the incident or grievance.

#### **5.7. Members of the Community**

- 5.7.1. Visitors and members of the community that notice incidents or have grievances shall submit the grievance to the business in line with this Incidents and Grievance Procedure.
- 5.7.2. Shall participate in incident or grievance investigation as required and work with Debswana staff to find a resolution to the incident or grievance.

#### **5.8. Third party investigation panels**

- 5.8.1. Third parties i.e. (Government departments, civil society and Non-Governmental Organizations) may on occasion be consulted by either the company or the specific site Mine, the Aggrieved or both for remediation on issues that need neutral intervention.
- 5.8.2. The existing Government third party process will be used for applicable incidents.
- 5.8.3. For Resettlement the Inter-ministerial Committee shall be the contact point for referrals and guidance.

### **6. GRIEVANCE MANAGEMENT PROCEDURE**

#### **6.1. OVERVIEW**

- 6.1.1. All grievances must be reported to the line manager who must capture the grievance on the formal system i.e. Isometrix or the Social Performance grievance log.
- 6.1.2. The steps involved in managing incidents and grievances from initial reporting to response and close out is shown below in; 16.0 Figure 1; Social Incidents and Grievance management process flow.
- 6.1.3. Registration and investigation details for incidents must be captured in the incident management system, i.e. Isometrix and grievances on the Grievance log accompanied by the registration and closeout forms where applicable.
- 6.1.4. Social incidents and grievances must be discussed at relevant Social Performance meetings.

#### **6.2. GRIEVANCE REGISTRATION**

The following platforms are available for external stakeholders to register grievances:

- 6.2.1. **Social Performance stand-by line;** Each site will set up a mobile phone line for the reporting of incidents and grievances. The mobile phone rotates amongst the Social Performance team

- on a weekly basis. Callers are called back to ensure call costs are borne by the company and not the aggrieved.
- 6.2.2. **Grievance boxes;** 'Mail' boxes are placed at all the gazetted villages within the Zone of Influence and are positioned conveniently in the villages.
- 6.2.3. **Electronically** via email. Each site will ensure that it sets up an email address and communicate it to stakeholders. [Eg: complaints@debswana.bw](mailto:complaints@debswana.bw)
- 6.2.4. **In person:** Debswana has an open-door policy for walk-ins by community members or other interested and affected stakeholders. The first point of call for members of the community who wish to submit grievances in person would be the security check point at the Sites where security personnel will assist in either contacting the Social Performance team to come and assist or helping the community member fill in a form.
- 6.2.5. **Through Debswana Employees** - Any employee that receives a grievance from a member of the community shall report the grievance to a member of the Social Performance team who will record it in the Incident and Grievance Management System.
- 6.2.6. Via a **Letter:** Stakeholders can register their complaints through a letter addressed specifically to the Site for which the grievance is meant. A letter shall be acknowledged within seven (7) working days of receipt.
- 6.2.7. **Ethics hotline;** There is a group-wide whistleblowing mechanism toll-free line **0800600100**. This is designed for anonymous complaints regarding ethics and behavior.

### 6.3. GRIEVANCES REGISTRATION

Initial formal recording of an incident or grievance on Isometrix or the offline grievance registration form see annex 1, and the Social Performance grievance log. The Social team, i.e. SP officers, Social Way Champions or any relevant and trained employee can perform this step. During this process, an assessment with a social lens is applied to rate the severity of the incident or grievance using the consequence rating matrix.

- 6.3.1. **Screening** - Grievance will be screened depending on the level of severity in order to determine the grievance owner and how the grievance is approached. This is inclusive of self reported grievances.
- 6.3.2. **Relay to relevant personnel** - The relevant function is notified of the incident/grievance. Based on the rating/nature, a response time is set.
- 6.3.3. **Investigation** - The grievance owner together with the stakeholder contact officer is responsible for investigation of the grievance. The investigation may require the grievance owner to make site visits. Records of meeting, discussions and activities need to be recorded during the investigation.
- 6.3.4. **Data Collection** - Collection of human evidence, physical evidence and documentary evidence
- 6.3.5. **Data Analysis** - 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
- 6.3.6. **Act** - The grievance owner is responsible for assigning action, monitoring actions undertaken and meets deadlines. Once all actions have been completed and the grievance owner feels the grievance has been resolved, the grievance owner will contact the Corporate Affairs office to further advise the external stakeholder/s vis the preferred method of contact.
- 6.3.7. **Findings, Feedback & Closing** - Findings of the investigation findings are communicated to the aggrieved or affected. Should the aggrieved agree to the company's resolution to the social incident or grievance, the sign off a closeout form.
- 6.3.8. **Appeal (If applicable)** - Shall the aggrieved reject findings and seek to appeal, the next step would be to approach top site management, Debswana BU head or alternative external remediation within relevant functions of Government, NGO's, the business community or whomever they find fit to appeal to.

### 6.4. RESPONSE TIMES

The maximum acknowledgement time for all incidents or grievances is seven (7) **workings days**. Next steps for the resolution will be shared within **14 working days**, depending on the severity rating.

Participatory Monitoring: Resolution for some incidents and grievances may require a longer period for remediation. Reasonable timeframes with agreed KPIs by the aggrieved and the investigating team shall be set. Communication records shall be kept until closure.

**6.5. EXCEPTIONS**

Although Social Performance assures resolution of community members’ concerns with regards to the Site’s activities and impacts, a few exceptions shall be made in terms of resolution to public grievances. During the review and analysis of reported grievances, it will be determined on a case-by-case basis whether a registered grievance follows the general procedure or is referred to the relevant process or authority to handle it. There are internal systems that are followed for the resolution of grievances concerning the below;

- 6.5.1. **Vehicle - animal collisions:** Resolutions governed by the National Road Traffic Act, c/s 100 (2)(b) of Cap.69:01, through Botswana Police Service
- 6.5.2. **Human – Wildlife conflicts:** To be assessed on a case-by-case basis with inferences from the Safety & Sustainability Department.
- 6.5.3. **Debswana – Business partners’ labour issues:** Resolutions to be guided by contractual obligations entered into by the respective business partner and Debswana and lead by Supply Chain Department
- 6.5.4. **Mine Hospital grievances:** Addressed by the Hospital Grievance mechanism.

**6.6. REPORTING, MONITORING AND REVIEW**

- 6.6.1. A trend analysis shall be made on a quarterly basis. Recurring grievance’ trends shall inform decision making for corrective action.
- 6.6.2. Grievances will be reported to the site Management, Debswana Corporate Centre and De Beers on a monthly basis.
- 6.6.3. Social Way Champions will serve as focal departmental representation to lead investigations in agreed timeframes with the aggrieved
- 6.6.4. Various Government Ministries and the existing Resettlement Inter-Ministerial committee shall be the point of contact for third party appeals panel. Departments out of the Inter-Ministerial Committee shall be consulted or engaged as and when.
- 6.6.5. In reporting Human Rights related incidents and grievances, the grievance log shall provide a tab for salient Human Rights.

**6.7. KEY PERFORMANCE INDICATORS**


- 6.7.1. Number of new grievances/incidents (per category) received quarterly shall indicate awareness of the process
- 6.7.2. An average knowledge against a set annual target of the grievance process by stakeholders through annual perception surveys.
- 6.7.3. Demonstrated use of the platforms to record new grievances by stakeholders.
- 6.7.4. Timely (as indicated and agreed by investigation lead and the aggrieved) closure or progress to close grievances. Documented or evidenced progress made to close grievances

**7. AMMENDMENT HISTORY**

Issue No	Effective Date	Date Last Revised	Amendment Details
01	13/09/2016	30/08/2016	To clear the inconsistencies in the definition of what constitutes an “incident” across Social Performance, Environment, Health and Safety, confusion over the difference between complaints and grievances, confusion over the different categories of social incidents/complaints/grievances, when to tick the human rights box and how to ensure social incidents/complaints/grievances are given the right

			consequence rating.
02	01/11/2018	31/10/2018	To simplify the process flow and grievance forms for stakeholders to easily comprehend the handling of social incidents and grievances. To incorporate the new Anglo Social Incidents process and rating matrix as prescribed in the updated (December 2017) SEAT Tool 4A. To combine social incidents and grievances procedure.
03	01/10/19	30/09/19	To include more defined grievance management KPIs, strengthen third party reporting and response times.
04	31/10/2020	01/09/2020	Alignment with Social Way V3, IFC PS 1 & UNGP's and also incorporating PDCA cycle

**8. CONTACT**

	TITLE	NAME	SIGNATURE	DATE
ORIGINATOR	Corporate Affairs Manager – Social Performance	R. Tswiio		22/08/2022
APPROVAL	Head of Corporate Affairs	R. Mothibatsela	<i>Rachel Mothibatsela</i>	22/08/2022