



**MINES & RAFFINERIES
MINING & REFINING
GAC**

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EGA-GAC CORPORATE DOCUMENT

COMMUNITY COMPLAINTS MANAGEMENT POLICY

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1. POLICY

In accordance with World Bank "Operational Policies", the IFC's Performance Standards and AFDB's Operational Safeguards, GAC has implemented a complaints mechanism to formalize the process for addressing community concerns aiming to harmoniously resolve complaints/disputes that may arise from GAC activities in a timely manner.

2. BACKGROUND

When stakeholder complaints are identified and addressed appropriately incidents that potentially could have had serious and negative impacts for the project, the company and its local interests can be prevented and GAC's reputation enhanced.

A complaints redress mechanism has been put in place whereby stakeholders have the opportunity to express their concerns and their complaints to GAC for timely and transparent resolution.

According to the International Finance Corporation, if the Company anticipates ongoing risks to or adverse impacts on affected communities, the company will establish a complaints mechanism to receive and facilitate resolution of the affected communities concerns and complaints about the company's environmental and social performance.

3. DEFINITIONS OF TERMS, ABBREVIATIONS AND ACRONYMS

"**Concern**" Worry or unease regarding some aspects of GAC operations or programs.

"**Dispute**" - A disagreement, argument or a debate.

"**Complaint**" - An actual or supposed circumstance that is regarded as being caused by GAC activities.

"**Grievant**" - Any stakeholder who approaches the Company with a complaint directly linked to GAC activities.

"**Stakeholder**" An individual or group of individuals that can be affected or potentially affected by all GAC mining activities (local communities, community based organizations, key interest groups and non-governmental organizations, government agencies, Media and other mining and natural resource companies and their stakeholders).

"**Demand**" - An insistent request from a stakeholder.

4. ABBREVIATIONS

AfDB – African Development Bank

CEO – Chief Executive Officer

CR – Community Relations

CLO - Community Liaison Officer

EXCOM – Executive Committee

GAC – Guinea Alumina Corporation

HS – Health & Safety

HSSEC – Health, Safety, Security, Environment and Communities

IFC – International Finance Corporation

SCM – Supply Chain Management

WB – World Bank

5. RESPONSIBILITIES

Community Relations:

1. For the overall complaints management procedure to include evaluation and taking action as required for complaints, concerns and requests.
2. To work with HS to develop a complaints procedure training module for induction for all staff and contractors.
3. To coordinate actions with legal services if necessary.

HSSEC Director:

1. To review and provide direction as required on formal complaints responses.
2. Ensure that HS works with CR to develop a training module on the complaints procedure.

Human resources:

Ensure that concerns and complaints from employees related to community issues are forwarded to CR without reference to potential impact or severity to include any expressed concern from a community member to human resources.

Supply Chain Management / Contracts:

1. Ensure that contractors submit all community complaints they come across in the field to CR without there being any reference to the impact or any judgment of complaints raised.
2. To assist with contract related community issues.

Security:

1. Report all potential community issues to CR without reference to potential impact or severity to include any expressed concern from a community member to security.
2. To assist with security related community issues.

Finance:

Facilitate the payment of complaints -related compensations in a timely manner as part of complaints closeout.

Projects:

1. Ensure that contractors comply with GAC complaints procedure.
2. To assist in the coordination with contractors for the resolution of community complaints that involves them.
3. Providing CR any potential community issues brought forward by contractors.

GAC EXCOM:

1. Providing specifics and guidance on an as required basis to assist resolution of stakeholder complaints or concerns.
2. Assist in the resolution of complaints at the government level if required.

GAC CEO

1. Ensure that project planning includes a social plan and procedures for handling complaints and concerns.
2. Ensure that contractors have a complaints procedure and that they comply with GAC complaints procedure.
3. Report all potential community issues to CR without reference to potential impact or severity to include any expressed concern from a community member to project personnel.
4. To provide guidance for project related community issues.

Governance and Compliance

1. On an as required basis review complaints and recommend the CEO and CR Team on legal ramifications of the issues.
2. Keep senior management informed as required.

6. BUSINESS RATIONALE

To assist and avoid community unrest and impact on operation and to further GAC's objectives in line with IFC, WB and AfDB principles.

The objectives of the complaints procedure are to:

- Minimize insofar as possible community issue impact on GAC operations and GAC reputation.
- Formalize the process for addressing community concerns.
- Guarantee adequate and prompt responses to stakeholder complaints.
- Provide a quick and simple means for the resolution of disputes.
- Involve the local stakeholders in the process of resolving complaints.

The complaints procedure aims to harmoniously resolve complaints/disputes that may arise from GAC activities.

The complaints procedure is based on the following principles.

- Transparency
- Fairness
- Accessibility.

7. REFERENCED DOCUMENTS

- GAC Community Complaints Procedure & Flowchart