

Grievance Mechanism Procedure

1 PURPOSE

The purpose of this document is to formalize the management of grievance from Tungsten Vietnam stakeholders to minimize the social and supply chain risks to the business. The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concern regarding to the circumstances of feed stock purchasing, processing, handling and export and gives transparency on how grievances will be managed internally, all of which aims to improve the responsibility in the supply chain

The grievance mechanism procedure applies to all external stakeholders of our operations as well as grievances raised by internal stakeholders, such as employees.

2 DEFINITIONS

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 formalized way to accept, assess, and resolve community complaints, concerning performance or behavior of the company, its contractors, or employees, includes adverse supply chain, environmental and social impacts.

Internal Stakeholders: Groups or individuals within a business who work directly within the business, such as employees and contractors.

External Stakeholders: Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community and the government

3 APPLICATION

This procedure applies to Tungsten Vietnam, and to the roles specifically identified in this procedure

4 POLICY

This procedure operates in accordance with the company's commitment to its RMI policy. The Grievance mechanism provides a channel that external stakeholders can raises concerns regarding the supply chain and social risks to the business.

The company will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances.

Various channels for external stakeholders to voice their grievances include:

- Telephone: Stakeholders can contact stakeholder contact officers as follows:

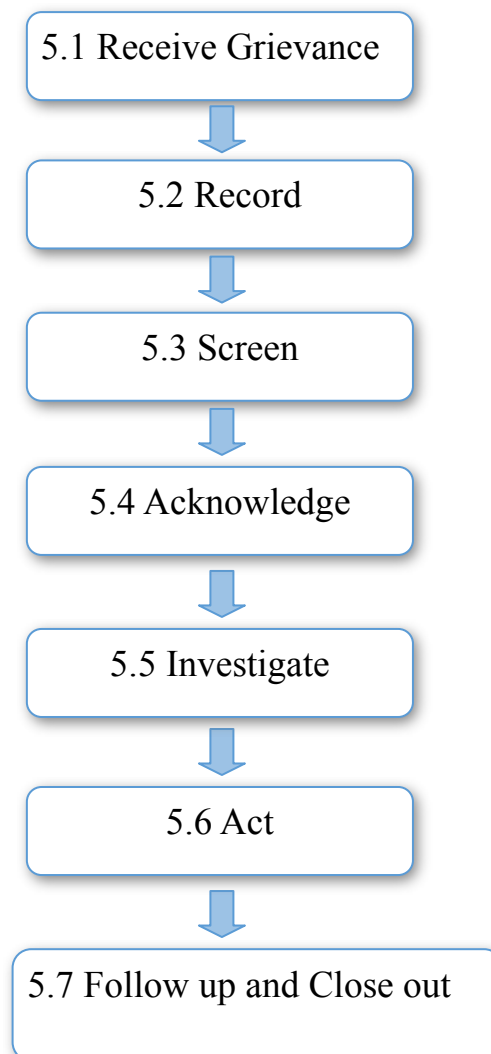
RMI Compliance Manager at +84 382729821; or
Bussiness Manager at +84 888777744.

- Email: Anonymous Grievances can be sent to:

tungstenvietnam@gmail.com or info@tungstenvietnam.com

5 PROCEDURE

The following flowchart describes the grievance mechanism procedure to resolve any grievances.



5.1 Receive Grievance

In person/over the phone

If a grievance is received face to face or over the phone and the stakeholder wishes to address the grievance formally, it is the responsibility of the employee who receives the grievance to complete the Grievance Lodgement Form (see Appendix 1). Once the form is completed the employee will then pass the form to the stakeholder contact officer for processing.

Electronic

The stakeholder contact officer receives all grievances that come through via email. The stakeholder contact officer will review the grievance form and process the grievance in accordance to this procedure.

5.2 Record

All formal grievances will be logged in the External Grievance Register (see Annex 2) for record of correspondence.

5.3 Screen

Grievances will be screened depending on the level of severity to determine the grievance owner and how the grievance is approached. The table below categorises the different levels:

In the situation that the logged grievance was related to Supervisor level or company executive, the case will be investigated by the other 2 supervisors in the company, to avoid conflict of interest and the case can be investigated transparently.

Category	Description	Grievance Owner
Level 1	When an answer can be provided immediately and/ or the company are already working on a resolution.	Stakeholder Contact Officer
Level 2	One off grievances that will not affect the company's reputation.	Supervisor Level or above
Level 3	Repeated, extensive or high profile grievances that may damage the company's reputation.	Company Executive or above

5.4 Acknowledge

A grievance will be acknowledged by the stakeholder contact officer, within five working days upon receipt of a grievance. Communication will be made either verbally or in written form.

Stakeholders will outline their preferred method of contact on the Grievance Lodgement Form, see Annex 1.

The grievance acknowledgement 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 stakeholder contact officer may ask stakeholder/s for any additional information or to clarify any issues.

5.5 Investigate

The grievance owner together with the stakeholder contact officer is responsible for investigating the grievance. The investigation may require the grievance owner to make site visits, consult employees, contact external stakeholders and complete other activities.

Records of meeting, discussion and activities need to be recorded during the investigation. Information gathered during the investigation will be analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

5.6 Act

The grievance owner is responsible for assigning actions, monitoring actions undertaken and meets the deadlines. Once all actions have been completed and the grievance owner feels the grievance has been resolved, the grievance owner will then inform the stakeholder contact officer to further advise the external stakeholder/s via their preferred method of contact.

5.7 Follow up and Close Out

The stakeholder contact officer will contact the external stakeholder/s four weeks after the grievance is resolved to verify that the outcome was satisfied and also gather any feedback on the grievance process. If required, the stakeholder contact officer may need to follow up with the external stakeholder on numerous occasions to confirm all parties are satisfied.

All the results from grievance process will be brought up to the next management system review for management system improvement.

6 RESPONSIBILITIES

Stakeholder Contact Officer

- Receive grievances and assign a grievance owner.

- Ensure the grievance mechanism procedure is being followed correctly.
- Liaise with the external stakeholder(s).
- Maintains grievance register and monitor any correspondence
- Monitor grievances and report findings to Business Manager (Tungsten Vietnam)
- Raise internal awareness of the grievance mechanism among employees and contractors.

Grievance Owner

- Investigating the grievance and liaising with the stakeholder contact officer
- Developing resolutions and actions to rectify any issues.
- Follow up and track progress of grievance
- Document any interactions with external stakeholders

Employees

- Receive grievance in person
- Report grievance to the Stakeholder Contact Officer by lodging the Grievance Lodgements Form
- May provide information and assistance in developing a response and close out of a grievance

7 Appeal

If the external stakeholder(s) are not satisfied with the resolution and/or does not agree with the proposed actions, then the stakeholder contact officer needs to bring the matter to the attention of the Executive Team who will review the grievance and documents gathered throughout the investigation and determine whether further actions are required to resolve the grievance.

If the company is unable to resolve a complaint or a stakeholder is not satisfied with the outcome, the company may seek advice from other independent parties.

8 Reporting

Information outlining the number of grievances, resolution time and outcomes of grievances will be reported to Executive Team on a monthly basis. The company will evaluate and update the Grievance Mechanism procedure every three 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 filled in Company's intranet to ensure privacy and confidentiality is maintained for all parties involved.

Created date: 15th Sep 2022
Effected date: 25th Sep 2022
Updated date: 28th April 2023

Document number: M-03
Version: 1.1

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ANNEX 1: GRIEVANCE LODGEMENT FORM

Grievance Lodgement Form

Name		<input type="checkbox"/> please do not use my name when talking about this concern in public
Company: (if applicable)		
Date:		Time:
Preferred Contact Method:	<input type="checkbox"/> Telephone <input type="checkbox"/> Email <input type="checkbox"/> Mail Please provide contact details: _____	
Supporting Document Attached?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Please provide details of your grievance		
What outcome are you seeking?		
Additional Information		

Claimant Signature:

Date:

TUNGSTEN VIETNAM Signature:

Date:

Stakeholder Contact officer use only:

Stakeholder Reference:	Customer <input type="checkbox"/>	Government – Ministry <input type="checkbox"/>
	Supplier <input type="checkbox"/>	Government – Department <input type="checkbox"/>
	Community <input type="checkbox"/>	Government – Local <input type="checkbox"/>
	Other <input type="checkbox"/>	
	Comment:	

External Grievance Register

Stakeholder	Date Received	Stakeholder Contact Officer	Grievance Owner	Grievance Level (1,2,3)	Grievance Description	Cause of the Grievance	Outcome	If a resolution was offered, please indicate "accepted" or "not accepted"	Action/Notes