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## 1. Purpose

The purpose of the Community & Local Stakeholder Complaints and Grievance Procedure (“Procedure”) is to provide a legitimate, simple, accessible, equitable, rights-compatible and culturally appropriate process for the community and local stakeholders to raise concerns to Resolute Mining Limited and its wholly own subsidiaries (the Company).

This Procedure will ensure matters raised will be addressed in a timely, predictable, fair and transparent manner and will help the Company maintain credible community and local stakeholder relationships, based on trust and mutual benefit.

## 2. Scope

This Procedure will guide the management of all community and local stakeholder complaints at all Company operations.

## 3. Definitions

Term	Definition
ALARA (as low as reasonably achievable)	<ul style="list-style-type: none"> <li>Reduction of risk likelihood and consequence to the point that it is not practicable to reduce any further, given the cost, time and resources involved.</li> </ul>
Complaint	<ul style="list-style-type: none"> <li>A notification by the community and or local stakeholder that they have suffered a real or perceived offence, detriment, impairment or loss due to a business activity and or employee / contractor behaviour.</li> </ul>
Complainant(s)	<ul style="list-style-type: none"> <li>The individual(s) who raise a Complaint.</li> </ul>
Dispute	<ul style="list-style-type: none"> <li>A community Complaint that has not been accepted as valid by one or more parties and has escalated into a disagreement between the parties.</li> </ul>
Grievance	<ul style="list-style-type: none"> <li>A Complaint that has not been resolved and has been escalated to the Chief Operating Office, via the General Manager, for review in accordance with section 5.6.</li> </ul>
Social Impact	<ul style="list-style-type: none"> <li>Impact experienced by community and local stakeholders arising from the Company’s activities.</li> </ul>
Social Risk	<ul style="list-style-type: none"> <li>Risk arising from social, socio-economic and or socio-political interactions that may affect the achievement of Company objectives or otherwise impact the Company.</li> </ul>

## 4. Responsibilities

Role	Responsibilities
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Chief Executive Officer (CEO) / Executive Team (ExCo)	<ul style="list-style-type: none"> <li>• Ensure adequate systems and processes are established for effective risk management across assets.</li> <li>• Ensuring Group compliance with this Procedure</li> <li>• Apply international standards for public reporting on the grievance mechanism</li> </ul>
Chief Operations Officer	<ul style="list-style-type: none"> <li>• Provide grievance resolution support and guidance as deemed necessary.</li> <li>• Escalation of matters to CEO / Executive team.</li> </ul>
General Manager - Operations	<ul style="list-style-type: none"> <li>• Ensure social risks / impacts are identified, assessed and effectively controlled.</li> <li>• Ensure compliance with this Procedure and oversee the management of community and local stakeholder Complaints and Grievances.</li> <li>• Ensuring the process and outcomes respect human rights</li> </ul>
Environment / Community Managers	<ul style="list-style-type: none"> <li>• Act as the focal point with overall responsibility for administering the company complaints and grievance procedure at site level</li> <li>• Ensure that the complaints and grievance procedure is culturally appropriate</li> <li>• Address and resolve community and local stakeholder Complaints and Grievances in accordance with this procedure.</li> <li>• Ensure community complaints and grievances are logged and tracked in the Complaints and Grievance Register</li> <li>• Ensure complaints are escalated appropriately according to their risk rating</li> <li>• Ensure all Personnel under their supervision understand and comply with the requirements of this procedure at all times.</li> <li>• Review and update this procedure on an annual or as required basis.</li> <li>• Identify additional strategies to promote the grievance mechanism within different vulnerable groups.</li> </ul>
Environment & Community Team Members	<ul style="list-style-type: none"> <li>• Comply with this Procedure at all times.</li> <li>• Ensure that complaints and grievances received are acknowledged</li> <li>• Promote the grievance mechanism at the community level and provide access to information</li> </ul>
All employees and contractors	<ul style="list-style-type: none"> <li>• Immediately report any potential / actual complaint to management.</li> </ul>

## 5. Complaints & Grievance Procedure

### 5.1 Step 1: Lodging Complaints

There are multiple ways in which a Complaint may be lodged by the community or local stakeholders with the Company, these include:

- in person;
- by email;
- by telephone;
- by letter;
- during community meetings where Company personnel are present; and
- anonymously or openly through a village leader, community member or other local stakeholder.

Community and local stakeholders will commonly register their Complaints with the Company in person, at community meetings, through community leaders / representatives. Sometimes a Complainant may wish to remain anonymous, in which case they will lodge the Complaint through a trusted representative. It is important to understand that in some situations, if a Complaint is anonymous / confidential this can limit or prevent the Company's ability to effectively investigate the matter or to take appropriate action.

#### **Complaint Registration Form must be completed**

Where possible, the Complainant should record and sign their Complaint in writing on a Complaint Registration Form (Appendix 2), which shall include the date, description of the Complaint, the details of the person who lodged the Complaint (full names and village / community when not anonymous) and other information. If a Complaint is submitted by email or signed letter, this may be attached to a Complaint Registration Form completed by a member of the Community team.

All Complaints are to be recorded in French (provided that is the language of the Complainant).

On occasions where the Complainant lacks the literacy skills to submit a Complaint in writing, a member of the Community team may record this on their behalf. However, in these circumstances, the recording of Complaints shall be witnessed by a representative of the Complainant to ensure accurate, objective and complete information is captured. Where this is not practicable, a Company representative may witness the recording of the Complaint and co-sign the Complaint Registration Form for verification and audit purposes.

Where a Complaint is made verbally, and the Complainant refuses to record or sign the Complaint Registration Form, a member of the Community team must record the details on a Complaint Registration Form noting that the Complainant refused including to sign the form and the reasons why.

#### **Criminal matters**

From time to time, Complaints may be lodged with the Company that involve allegations of a criminal nature.

In these circumstances, the Community team member should encourage the Complainant to report the matter to the competent authorities for investigation. Complainants are not obligated to do so; however, it must be clearly explained to the Complainant that the Company may consider it is necessary or appropriate to report the matter to the competent authorities even if the Complainant chooses not to do so. The Company may also proceed with an internal investigation relating to criminal allegations in accordance with this procedure. All complaints involving alleged criminal matters should be escalated immediately to the site General Manager.

#### **Third Party Complaints**

From time to time, Complaints may be lodged with the Company that involve allegations relating to third parties (other companies including sub-contractors to the Company, organisations, government or other bodies).

While a complaint will still be recorded, in these circumstances, the Community team member must explain to the Complainant that the Company may need to report the matter to the relevant third party if the Complaint:

- a) does not involve the Company; or
- b) is more appropriately directed to a third party, for example if it is a matter that is not within the Company's control and is within the third party's control,

The Community team shall record this advice in writing on the Complaint Registration Form. As relevant, the company will provide support to resolve the complaint or grievance, e.g. grievance with government or contractor with regards to human right violations.

## Next steps

After validating the Complaint with the Complainant using the Complaint Registration Form, the Community team member must ensure the Complaint is recorded in the Complaints and Grievance Register.

The Community team member must advise the Complainant that "the company will investigate and will provide a response to the Complainant in due within a specified timeline".

## 5.2 Step 2: Complaints Assessment

Complaints are social risks that, if not effectively managed, may adversely impact the Company's license to operate. Therefore, a risk-based approach shall be taken on all occasions when assessing the severity of Complaints received, and when deciding on the appropriate process in which they should be managed.

This assessment shall include a review of the Resolute Risk Analysis Tool to accurately identify the risk to the Company if the Complaint is not effectively managed.

The assessment will also consider whether the complaint involves a human right violation.

A risk rating shall be assigned to all Complaints once received by a member of the Community team and this is to be recorded in the Complaints and Grievance Register.

All Complaints are important and shall be treated with care and concern in accordance with this procedure. Complaints shall be prioritised by management according to their level of risk with additional resources assigned as required to ensure a timely, transparent and fair resolution.

## 5.3 Step 3: Complaints Notification

The level of risk assigned to each Complaint will determine the notification protocols required to ensure the matter is effectively addressed.

Complaints assessed as moderate or above in risk consequence shall be reported immediately to the respective General Manager (or delegate). All Complaints involving criminal allegations (other than minor matters such as petty theft) or any legal risk that is assessed as "Significant" must be reported immediately by the General Manager (or delegate) to the Chief Operating Officer.

When reporting the Complaint to the General Manager, the Community team member shall explain the level of risk assigned and the reasons behind this decision. This will help to ensure Management receive sufficient context to determine an appropriate response.

All Complaints shall be reported in accordance with the Community Complaint Escalation Plan (Appendix 3).

## 5.4 Step 4: Complaints Investigation

All Complaints shall be managed with the aim of resolving them, in the shortest timeframes, in a manner that reduces social impact and social risk to as low as reasonably achievable (ALARA).

In the first instance, the Community Manager (or delegate) will initiate a face to face conversation with the Complainant(s) and/or their representative to discuss the Complaint and understand the resolution the Complainant believes would be suitable. In this conversation, the Company representative should:

- explain that in most cases the process is confidential but maintaining strict confidentiality may not be possible if the matter:
  - involves a relevant third party (see section 5.1 above);
  - involves a Company employee;
  - involves alleged breaches of criminal law.
- the Company will take all reasonable steps, when requested, to preserve a Complainant's anonymity, however this may limit the Company's ability to take action;
- provide information about the Complaint process and associated timing;
- confirm the Company representative responsible for managing the Complaint and their contact details;
- take records of the conversation to ensure the allegations and substance of the Complaint are documented and provide copies to the Complainant on request;
- ask the Complainant to provide any evidence that may support the allegations; and
- confirm the next steps in the process.

At times, it may be possible to adequately resolve the Complaint at the initial meeting. In these circumstances, the Complaint resolution details shall be recorded in the Complaints & Grievance Register. Further investigation may be required, and additional meetings may need to be scheduled.

If at the first meeting it is identified that the Complaint does not involve the Company, then the Community team member shall advise the Complainant verbally and in writing via the Complaint Registration Form. The matter will then be closed in the Complaint & Grievance Register.

Once a sound understanding of the Complaint is established, the investigation team and the terms of reference for the investigation will be defined based on the level of risk. It may be necessary to involve a Company professional / technical employee, of at least Superintendent level, to support the resolution of the Complaint.

If necessary, the Company will involve an independent third party to support the complaint resolution process. The third party will be approved by the Company and the affected community.

All Complaints classified as Significant (including potential incidents) involving the community shall be investigated in accordance with Resolute's incident investigation protocols to prevent a reoccurrence.

## 5.5 Complaint and Grievance Resolution Timeframes

Where possible, the Company shall endeavour to resolve all Community and Local Stakeholder Complaints and Grievances as per the below timeframes:

Action	Resolution Timeframe
At least 75% of all Complaints resolved	≤ 14 days
100% of all Complaints resolved	≤ 30 days
All Grievances resolved	≤ 90 days

The Company will communicate regularly with parties about the progress of individual grievances

## 5.6 Escalation of Complaint to a Grievance

A Complaint will escalate to the status of a Grievance if, after all reasonable attempts have been made to investigate / resolve the matter, the Complainant is still not satisfied with the resolution proposed by the Company.

In these situations, the General Manager will assume accountability for the Grievance review process and will inform the Chief Operating Officer who will review the investigation process, all associated information and recommend any additional course of action, including escalation of the matter or approve closure of the matter in the Complaints & Grievance Register.

All information pertaining to the above shall be record in the Complaints & Grievance Register.

## 5.7 Step 5: Complaints and Grievance Resolution

The resolution of Complaints and Grievances shall be undertaken with flexibility on a case-by-case basis however, the below table outlines a non-exhaustive list of community and local stakeholder Complaints and their associated, in-kind, resolution measures:

Complaint Area	Complaint Resolution
Crop damage due to uncontrolled water run-off, dust, vehicle and or equipment interaction	<ul style="list-style-type: none"> <li>• Cash payments calculated on size of area affected with compensation rates aligned with Mali / Senegal regulations if applicable. Oversight to be sought from asset-level Community Consultative Committees if required.</li> <li>• Rehabilitate sites if applicable</li> <li>• Letter of apology</li> </ul>
Damage to individual privately owned asset	<ul style="list-style-type: none"> <li>• Repair / replace affected asset;</li> <li>• Provide cash compensation at market rates.</li> <li>• Letter of apology</li> </ul>

Damage to community asset (e.g. road)	<ul style="list-style-type: none"> <li>• Repair / replace asset;</li> <li>• Provide material and labour cost in cash.</li> <li>• Letter of apology</li> </ul>
Damage to cultural heritage sites	<ul style="list-style-type: none"> <li>• Rehabilitate cultural heritage site or relocate the site and arrange for traditional ceremony once permission has been obtained from local authorities / family where required.</li> <li>• Letter of apology</li> </ul>
Death of livestock	<ul style="list-style-type: none"> <li>• Replace livestock or compensate based on market rates.</li> </ul>
Local Employment	<ul style="list-style-type: none"> <li>• Human Resource representative to explain the Local Employment Process to community and local stakeholder and address potential non-compliance with respective hiring managers.</li> </ul>
Dust / Noise	<ul style="list-style-type: none"> <li>• Community representative to explain suppression / monitoring activities and to discuss issue with respective department Manager to resolve.</li> </ul>
Water Quality	<ul style="list-style-type: none"> <li>• Community representative to explain current monitoring activities;</li> <li>• Undertake analysis of water body in question to confirm quality issues;</li> <li>• Minimise erosion and water run-off impacts;</li> <li>• Drilling of ground water boreholes to improve access to potable water.</li> </ul>
Inappropriate Conduct of Company / Contractor personnel	<ul style="list-style-type: none"> <li>• Confirm Company Code of Conduct expectations with Community;</li> <li>• Reprimand employees once Complaints are substantiated, noting that this must be done in accordance with the Company's Discipline Management Procedure and applicable labour law;</li> <li>• Training / retraining of employees;</li> <li>• Letter of apology;</li> <li>• Notification of Competent Authorities where required.</li> </ul>

Once an acceptable resolution has been reached, the details shall be recorded on the Complaint Registration Form. Where the resolution involves compensation the Complaint Registration Form is to be signed by the complainant acknowledging the receiving of the compensation. All information is to be recorded in the Complaints & Grievance Register.

## 5.8 Step 6: Monitoring and Evaluation

The Community Manager is responsible for monitoring the frequency and nature of Complaints to enable the proactive identification of persistent underlying issues / root causes that may not otherwise be detected. Once identified, these can be addressed to ensure they do not escalate.

For more severe Complaints and Grievances the Community Manager will schedule a follow-up with the Complainant to confirm the resolution of the matter.

All follow-up meetings shall be recorded in the Complaints & Grievance Register.

## 6. Complaints and Grievance Management Process

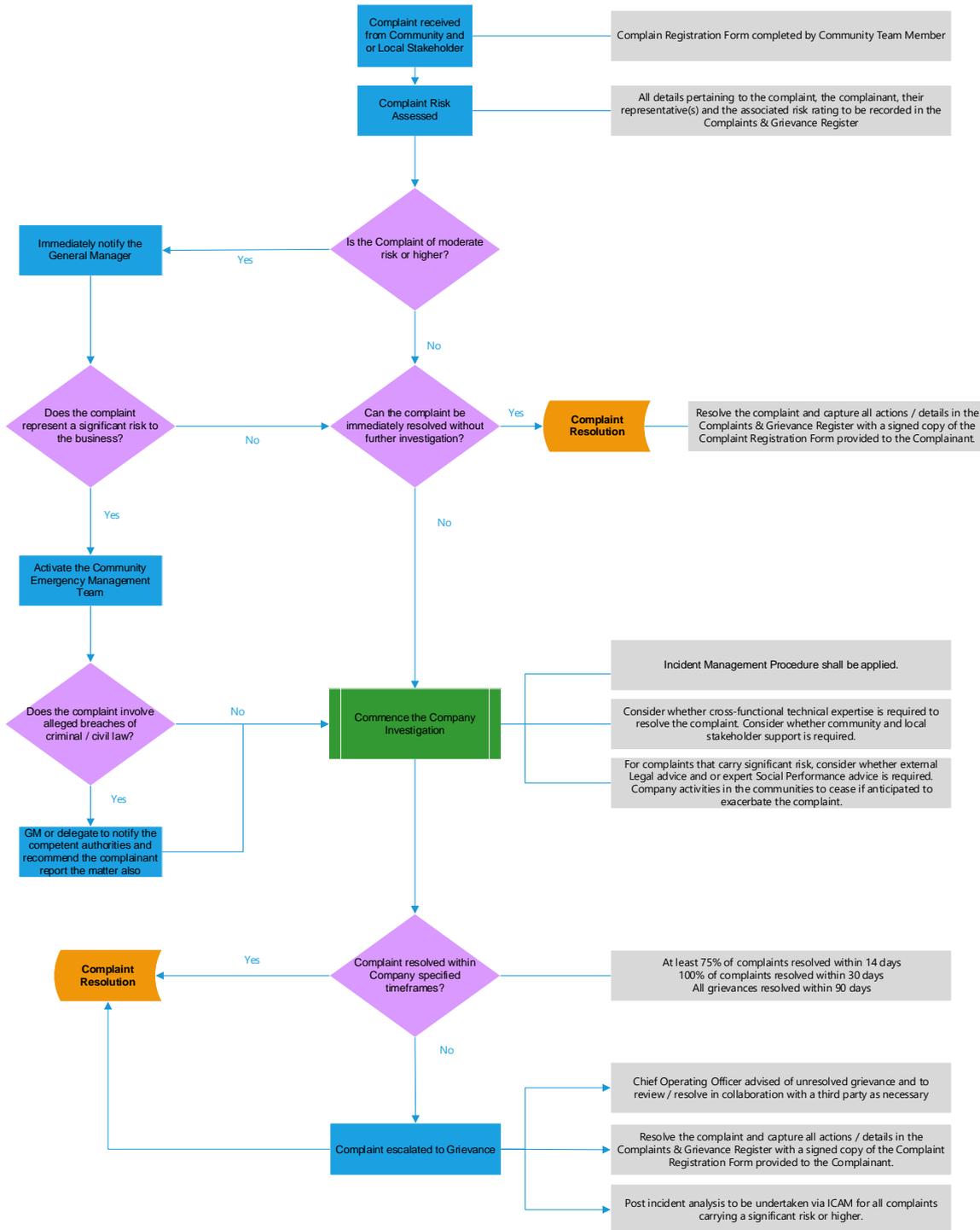
The Complaints and Grievance Management Process chart (Appendix 1) should be used to guide all Complaint and Grievance resolution efforts in the Company.

## 7. Documentation and Records Management

This procedure shall be maintained as a controlled document in the Company's Document Management System and reviewed and amended, if required, at least annually in line with operational requirements.

## 8. Appendix 1 – Complaints & Grievance Management Process

**Complaints & Grievance Management Process**



## 9. Appendix 2 - Complaint Registration Form

<b>Complaint Registration Number:</b> <i>In case of existing complaint, use existing number</i>		Date	DD/MM/YYYY
Name of Complainant: (person / organization / anonymous)			
Name of representative (if complainant wishes anonymity)			
Mobile Phone # / E-mail (if available):			
Location (address, if available)		<i>city/locality/village/community/organisation</i>	
Complaint entry channel		Complaint response channel	
Mobile phone	Media	Mobile phone	Media
Letter	Community /TWG	Letter	Village Leader/TWG
Public meeting	Government	Public meeting	Government
In person	Others	In person	Others
Description of complaint <i>(include date)</i>			
Does the complaint involve human rights violations?			
			Yes No
Notes of other intervention of the complaint or previous record of similar incident <i>(include date)</i>			
What outcome does the complainant expect from Resolute with the complaint? <i>(include date)</i>			
Have there been notifications to third parties? Indicate <i>(include date)</i>			
Number of supporting evidence attached (e.g. statement, photos, additional documentation)			
Name of person registering the complaint			DD/MM/YYYY
Description of Resolution <i>(include date)</i>			

## 10. Appendix 3 – Community Complaints Escalation Plan

Risk Consequence Level	Complaint Level	Plausible Community Related Complaints / Incidents	Resources, Assets and Activities	Notification / Authorisation Protocols		
				COO	MD	Directors
Insignificant	1	<p><b>Can be resolved immediately at the local level with no impact on community / environment / stakeholders:</b></p> <ul style="list-style-type: none"> <li>Isolated complaint regarding local employment;</li> <li>Opportunistic / vexatious complaint without substance;</li> <li>Complaint that, on investigation, does not involve the Company;</li> </ul>	<p><b>Monitor</b></p> <ul style="list-style-type: none"> <li>Standard Community protocols;</li> <li>Regular community and local stakeholder engagement;</li> <li>Local program delivery.</li> </ul>	Not Required	Not Required	Not Required
Minor	2	<p><b>Can be resolved quickly at the local level with no impact on community / environment / stakeholders:</b></p> <ul style="list-style-type: none"> <li>Small number of complaints received regarding minor crop damage associated with heavy rains / water run-off;</li> <li>Small number of confined complaints regarding local employment that are quickly addressed;</li> </ul>	<p><b>Consultation &amp; Engagement</b></p> <ul style="list-style-type: none"> <li>Review and continual improvement of Community protocols;</li> <li>Targeted community and local stakeholder engagement;</li> <li>Community team to address complaint as per Company requirements.</li> </ul>	Not Required	Not Required	Not Required
Moderate	3	<p><b>Moderate impact on community and / or Company reputation and requires Senior Management oversight:</b></p> <ul style="list-style-type: none"> <li>Truck breaks down on the roadside impeding community traffic for eight hours until addressed;</li> <li>Company vehicle injures / kills livestock with the matter resolved via in-kind compensation.</li> <li>Accidental damage to individual property with a low replacement cost (e.g. bicycle repair / replacement);</li> <li>Repeated community complaints from the same area claiming a deterioration in drinking water quality following Company drilling campaign;</li> <li>Repeated concerns raised in relation to a negative perceived impact on the community;</li> <li>Repairable damage to cultural heritage site requiring community and stakeholder engagement to rectify;</li> <li>Moderate damage to community infrastructure (e.g. roads and bridges) due to truck movements during wet season;</li> <li>Complaints received regarding excessive speed of trucks through the host communities;</li> <li>Multiple complaints from the community and local government stating the Company is not meeting its local employment commitments.</li> <li>Allegations of gender bias in local employment practices levelled at Company</li> </ul>	<p><b>Notification &amp; Response</b></p> <ul style="list-style-type: none"> <li>General Manager or delegate (GM) immediately notified;</li> <li>GM inform Chief Operation Officer if imminent escalation of issue is anticipated</li> <li>Technical expert(s) from other Company departments engaged (e.g. Mining);</li> <li>Company activities in the community continue with some restrictions in place;</li> <li>Liaise with community and local stakeholders (e.g. Police, Community Leaders, Community Committee) to assess support options;</li> <li>General Manager to review and approve plan for complaint resolution from the outset and to be kept regularly informed;</li> <li>Community Manager accountable for complaint / grievance resolution with the above support.</li> </ul>	Report updates monthly	Not Required	Not Required
Significant	4	<p><b>Significant impact on community and Company reputation, resulting in direct threat to license to operate:</b></p> <ul style="list-style-type: none"> <li>Serious allegations raised regarding the alleged inappropriate / unlawful conduct of Company employee(s) and/or contractors, including any adverse attention received from the local authorities and media;</li> <li>Community member hit by Company vehicle offsite and sustains significant injuries;</li> <li>Local stakeholder complaint alleging the Company is not meeting its Local Development commitments. Governor / Govt Minister / NGO's request meeting with Company. Media openly critical of Company.</li> <li>Irreparable damage to cultural heritage site requiring community and stakeholder engagement / compensation;</li> <li>Uncontrolled water discharge off the mining lease during heavy rains resulting in multiple complaints of crop damage / erosion, demands for compensation, and adverse media and local government attention;</li> <li>Community protests and blockade at main gate alleging Company is not meeting its local employment commitments, with threats made to Company employees;</li> <li>Consistent and repeated complaints regarding safety concerns with mining activities and along transport routes through the communities, local authorities request meeting to demand action and validate Company safety protocols.</li> <li>Multiple complaints regarding forced / coerced resettlement and/or inadequate compensation / livelihood restoration, including where this may result in adverse media coverage and significant deterioration of community relationships.</li> </ul>	<p><b>Incident Response</b></p> <ul style="list-style-type: none"> <li><b>Consider activation of Emergency Management Team</b></li> <li>Legal implications assessed by internal legal team</li> <li>Engage Social Performance expert- as required;</li> <li>Company activities in the community cease if anticipated to exacerbate the complaint;</li> <li>Planned and considered engagement with Complainant(s) and their representatives;</li> <li>Support requested from District, Provincial &amp; Central authorities and key stakeholders;</li> <li>GM accountable for complaint resolution / grievance with the above support;</li> <li>Internal investigation may run concurrently to external enquiry but shall not impede the process;</li> <li>Company insurer notified, and support obtained as required.</li> <li>Chief Operating Officer advised of unresolved grievance and to review / resolve;</li> <li><b>Post incident analysis to be undertaken via ICAM;</b></li> </ul>	COO notified within 12 hours	MD notified within 12 hours	Ongoing updates
Critical	5	<p><b>Extreme, widespread / permanent impact on the Community. Public or private condemnation for &gt; 12 months:</b></p> <ul style="list-style-type: none"> <li>Catastrophic failure of the Tailings Storage Facility resulting in multiple community fatalities, permanent impact on the environment and suspension of mining activities.</li> <li>Offsite traffic accident (repeat incident) involving a Company vehicle resulting in multiple community fatalities, road closures and community blockade.</li> <li>Child falls into a turkey's nest and drowns resulting in major community complaints and adverse media attention;</li> <li>Multiple repeated complaints claiming inadequate local / national employment resulting in the immediate revocation of all approvals for foreign workers, persistent adverse media attention and damage to Company reputation.</li> <li>Community protests and blockade at main gate alleging Company is not meeting its local employment commitments, national adverse media coverage with multiple Company employees injured in the event.</li> </ul>	<p><b>Crisis Response</b></p> <ul style="list-style-type: none"> <li><b>Activation of Crisis Management Team.</b></li> <li>Operations and Business drawdown.</li> <li>Assessments are made regarding the duration and severity of the event by EMT/CMT.</li> <li><b>Post incident analysis to be undertaken via ICAM;</b></li> </ul>	EMT/CMT	EMT/CMT	Ongoing updates
Extreme	6	<p><b>As above, with license to operate suspended and or permanently revoked.</b></p>	<p><b>Suspension Stage</b></p> <ul style="list-style-type: none"> <li>Operations indefinitely suspended pending the review, reapplication and reissue of key license(s) to operate – e.g. Mining license, Environmental license, Water Extraction license, Mining Agreement, Local Level Agreements etc.</li> <li>License to operate to be repaired over time (&gt; 12 months) following the recommencement of operations and will likely involve a renegotiation of Local Development terms and commitments.</li> </ul>	EMT/CMT	EMT/CMT	Ongoing updates Board approval required