



## Group Grievance Procedure for External Stakeholders



# Mission Statement

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The Company's Group External Grievance Procedure (GP) provides external stakeholders with a procedure to express grievances or concerns without fear of reprisal and is designed to ensure that all matters are appropriately addressed in a timely manner. The grievance procedure offers a set of approaches whereby the grievant and the company can find effective solutions together.

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# Intent and Purpose



- An effective formal grievance procedure is an important channel for feeding information from communities and other external stakeholders or concerned parties into the company
- A formal grievance procedure creates an important channel for receiving information about community and other stakeholder grievances with the company or concerns about its operations and can provide an early warning of potential problems before they have the chance to escalate, this can mitigate many other social risks (fires, strikes, riots etc.)
- This version of the grievance procedure is aimed at external stakeholders such as community members, farmers, landowners, local government or traditional authorities. For employees, the company provides a Workers Grievance Procedure (WGP) for employees to raise workplace concerns. This WGP is contained in a separate document.
- The grievance procedure is provided for all community members to voice concerns about the company, operations and/or its employees. Grievances or concerns can be captured through a variety of channels provided to maximise accessibility to all stakeholders including vulnerable groups through appropriate means. The procedure involves an appropriate level of management and emphasises acknowledging and addressing concerns within a specified period (dependent on the severity of the concern/grievance), using an understandable and transparent process that provides timely feedback to those concerned, without any retribution
- The procedure allows for identified or anonymous complaints to be raised and addressed. Identified grievances can be made through a direct approach to company employees, telephone, text message or email or by using the suggestion boxes or via the company website. The company will promote 'informal discussion groups' where communities may feel more comfortable to raise concerns that can be captured and resolved. Grievances can be made anonymously through the suggestion boxes or the company's website. The procedure will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance management processes provided through collective agreements
- Types of grievances will be recorded on a monthly basis, this record (appendix xx) will be used as a tool to monitor the types of grievances received by the company, the outcomes and company success, all serious grievances will be reported to company Directors straight away
- There will be a quarterly review of grievances to consider any trends, if a recurring trend is obvious a root cause analysis will be conducted
- The Environmental, Social and Governance (ESG) committee will be updated on any received grievances on a quarterly basis
- This document has been designed so that it can be used as an internal training tool. Any comments regarding this document should be sent to [sd@miroforestry.com](mailto:sd@miroforestry.com).



## Group Grievance Procedure



# External Grievance Procedure Flowchart



**1. Receive Grievance :** Directly to community liaison officers, management, company employee, text, telephone or email [comments@miroforestry.com](mailto:comments@miroforestry.com) or suggestion box. Informal reporting through conversations with employees is extremely valuable – any grievance identified this way should be recorded by the employee.

**2. Acknowledge, Assess and Record :** Confirm to aggrieved party that grievance has been received, enter to grievance database using grievance entry form and notify relevant management. All grievances or concerns must be recorded whether received through formal or informal means. Assess the severity of the grievance and categorise for the response

**3. Investigate :** Appropriate investigation to be decided during assessment stage, if deemed necessary the investigation should include a risk assessment and root cause analysis. The investigation stage may include follow up meetings between the stakeholder(s) and company, in this case a neutral party should be present. Minutes of all meetings must be recorded and added to the grievance database

**4a. Determine Resolution:** Depending on severity of the grievance and findings during the investigation stage, the resolution can often be decided immediately. If the resolution does not follow predetermined criteria, present to management for review. The resolution should also try to include actions that will reduce or mitigate the risk of re-occurrence.

**4b. Present Resolution to Management**  
If the case has not been closed and the resolution needs further input, the resolution will be presented to management who can advise on a resolution

**FAST TRACK**  
**Present Grievance to ESG Committee**

If the grievance has large risk or consequences associated to it the fast track process ensures that senior management (in this case the ESG committee) will be consulted at this early stage in the process to allow for input into investigation process

## 5. Complaint Satisfied?

Yes- Process concludes with written agreement signed by complainant and management

No- If the issue has not been reviewed by senior management it must be presented to them for resolution. If it cannot be resolved by senior management, it must be presented to the ESG committee for advice on a resolution. If there is still no resolution the issue is taken up with an impartial mediator as appropriate and if still not resolved legal action may be taken as appropriate.

## 6. Documentation Management

Throughout the grievance procedure it is of highest importance that documentation is kept updated and retained in the company data room which is currently controlled by the EHSS Manager

# 1. Receive Grievance

- **Receiving grievances-** The following channels are open for receiving grievances from external stakeholders:

## COMMUNITY GRIEVANCES

In order to cover vulnerable and minority parts of the community, there must be multiple, accessible routes to access the grievance procedure. Grievances will be received through the following channels:

- Presented by village, traditional councils or chief
- Raised in formal or informal community gatherings/meetings (all concerns of informal gatherings are recorded in the informal meeting register but serious grievances are dealt with using the GP)
- Received by telephone, text or email - [comments@miroforestry.com](mailto:comments@miroforestry.com) email address specifically for grievances
- Received through suggestion box
- Open door for CLO's – informal discussion
  
- The company should promote the use of the Grievance procedure with community members to remove the associated stigma using a variety of culturally appropriate means including positive story telling through theatre, radio, cartoons, examples and discussion groups to positively enforce the changes that can come from reporting concerns.

## 2. Acknowledge/ Assess/ Record

- Grievance assessment has four aims:
  - Determine at what level the grievance can be dealt with and whether it is in fact within the company's remit
  - Decide whether the grievance is a **complaint**, a **suggestion** or a **request** and assign it the appropriate process- grievance and complaints can be dealt with through the system, suggestions do not generally require a resolution but should be responded to, requests need to be managed through a separate mechanisms by the CLO's and Social Manager
  - Determine the severity of the grievance:
    - High Risk - a grievance that could cause harm, affect the health or livelihood of the aggrieved, impact on operations of the company.
    - Medium Risk - a grievance that has the potential to escalate and cause harm to health or livelihoods and impact operations.
    - Low risk - a grievance or complaint that has limited or no impact on health or livelihoods and low risk of escalation or impact on operations.
  - Determine whether the grievance is **urgent**. The timelines are articulated in slide 12. Any urgent grievance will be classified as High Risk
  - Determine **which team** needs to deal with the grievance. Community grievances will be managed by the social/community development team unless they are severe/high risk when they will be referred to the Group Compliance Director .
- Once a grievance has been received it is essential the receiver acknowledges receipt to the grievant, including a time frame of the resolution process. All grievances received should be acknowledged in writing. Where verbal grievances were received a response letter can be hand delivered.
- The grievance is recorded on the company grievance form and filed in the grievance database, which contains all further grievance documentation. External grievances should be given a grievance reference of Country followed by External and number – i.e. GH-E-001 or SL-E-001.

## 3. Investigate

- Once the correct team has been appointed to the grievance, investigation can begin
- Grievances are often founded on perception, or in some cases may be opportunistic or misplaced, the investigation process must ascertain the facts of the case and use these facts and a neutral platform to propose suitable resolutions
- NB- the extent of investigation for anonymous grievances is limited and it may be impossible to resolve these grievances, although an investigation should be attempted and documented
- Investigations will be conducted by local management except for; severe/high risk grievances that will be referred to the Compliance Director and may be fast tracked to the ESG committee for advice; or grievances involving senior management which will be referred to the Group EHSS or other Directors.
- The expected outcome of an investigation is a **process establishing the facts of the situation and a suggested resolution**, the facts should all be logged along with the identities of those involved in the investigation and the resolution, where possible, should be developed with the aggrieved party.
- In some cases the data will be confidential and may relate to management in this case it will be referred to the Group EHSS Director.

## 4. Determine Resolution

- The grievance resolution process must be consistent across the group, it is worthwhile formulating examples of acceptable solutions to specific or common cases that can be shared with management
- The grievance resolution process should seek to:
  - **Understand the grievance and its root cause** before a grievance can be remedied it is important that the company understands its source so that it can avoid re-occurrence.
  - **Remedy problems** (e.g. the best resolution for damage to property caused by the company is to restore the damage, rather than to pay compensation for the damage)
  - **Remedies should address root causes rather than addressing symptoms** (e.g., complaints about lack of Personal Protective Equipment (PPE) should include a process for distributing and keeping PPE rather than simply replacing or buying more PPE)
  - **Remedies should be based on company standards, policies and criteria** this ensures consistency and a fair pre-determined resolution process
  - Where possible, standard remedies should be defined through **participatory engagement** with communities.
- Once a proposed grievance resolution is agreed internally, it should be documented and the proposed resolution included in the grievance log

## 5. Complaint Satisfied?

- If the grievant agrees with the proposed remedy to the grievance, then the grievance can be closed
- If not, then the grievant has options regarding an appeals process
- Anonymous grievances will usually be regarded as closed once a resolution is proposed. In some cases it may be appropriate to post a notice to community or workers' notice boards about follow-up measures that are being taken for an anonymous grievance
- If the grievance is resolved then the signed (or thumb-printed) grievance form should be attached to the grievance database, preferably with a photograph of the signing.
- The grievance is not fully closed until the resolution is signed and the remedy has been applied. The status of the grievance will be 'agreed' prior to closure and only on application of the remedy will it change to 'closed', all of which must be included in the database
- If the aggrieved party does not accept the proposed resolution, they can register an appeal, which may include external stakeholders to reach closure (e.g. some community grievances can sometimes be resolved more easily with the intervention of community or religious leaders). The external stakeholders will be decided upon by the company and the grievant – they must be trusted by both parties.
- The appeal committee should comprise of a majority of independent parties (less than 50% of the committee should have been involved in the initial grievance process.)
- In a situation whereby the complainant is not contactable for a period of six months the grievance will be deemed closed.

The fact that a grievance has passed into the appeals process should be documented in the grievance log and be noted in the quarterly ESG committee update

# Suggested Timelines



Severity/Risk Rating	Acknowledgment	Investigation	Closure
High Risk	3 working days	1 week	1 week
Medium Risk	3 working days	2 – 4 weeks	No more than 30 working day
Low Risk	3 working days	4 – 6 weeks	No more than 60 working days

# Next Steps

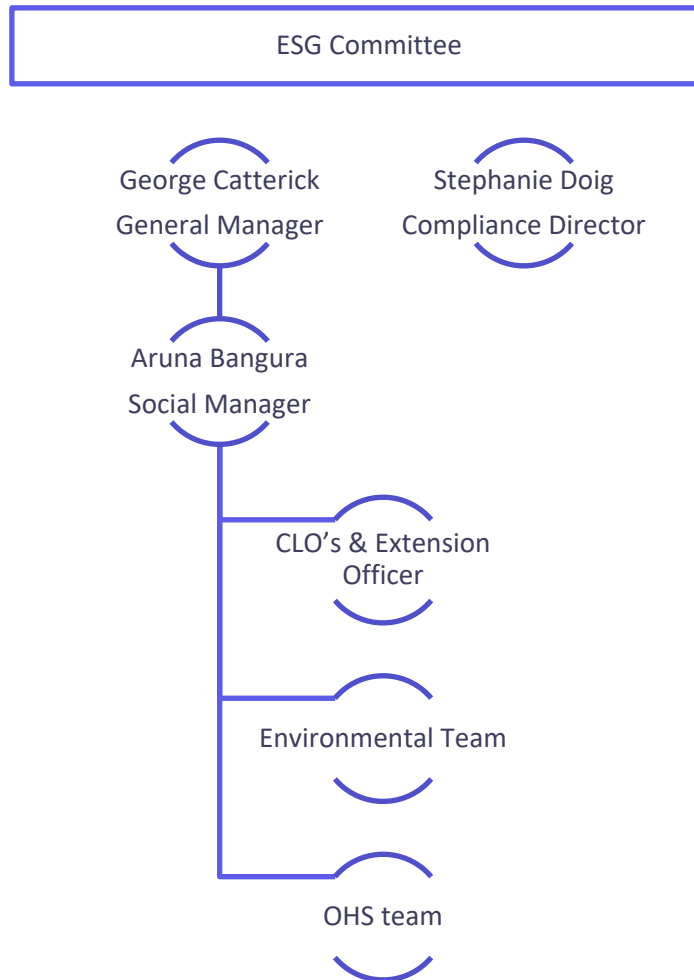


## Oct/Nov 2020

- Develop new visual messaging and communication program (KM & SD with 3Stickmen.com)
- Training of Social Teams in use of visual messaging (KM & SD with 3Stickmen)
- Trial new messaging (KM & SD)

## Nov/Dec 2020

- Group Training on GP based on the roles and responsibilities (KM & SD)
  - Reiterate the importance and benefits of the GP
  - Introduce positive stories of change / risk mitigation / community buy-in
  - Get people to think about how the GP has helped us
  - Training on implementation / process – importance of record keeping etc.
- Community engagement to raise awareness of the GP (Social team)
  - Focus on changing perception of the GP and building trust
  - Introduce positive stories of change / risk mitigation / community buy-in
  - Re-enforce GP as a means of communication and helping Miro
  - Introduce new opportunities for different community members to engage such as women's chats/transect walks/informal forums
  - Request input from communities on means of reporting and suggested resolutions for common issues or other ways to improve it



## Receiving Grievances:

- CLO's
- OHS Manager
- General Manager
- Planning Manager
- Any Miro employee

## Acknowledge , Assess and Record:

- Social Manager
- CLO's

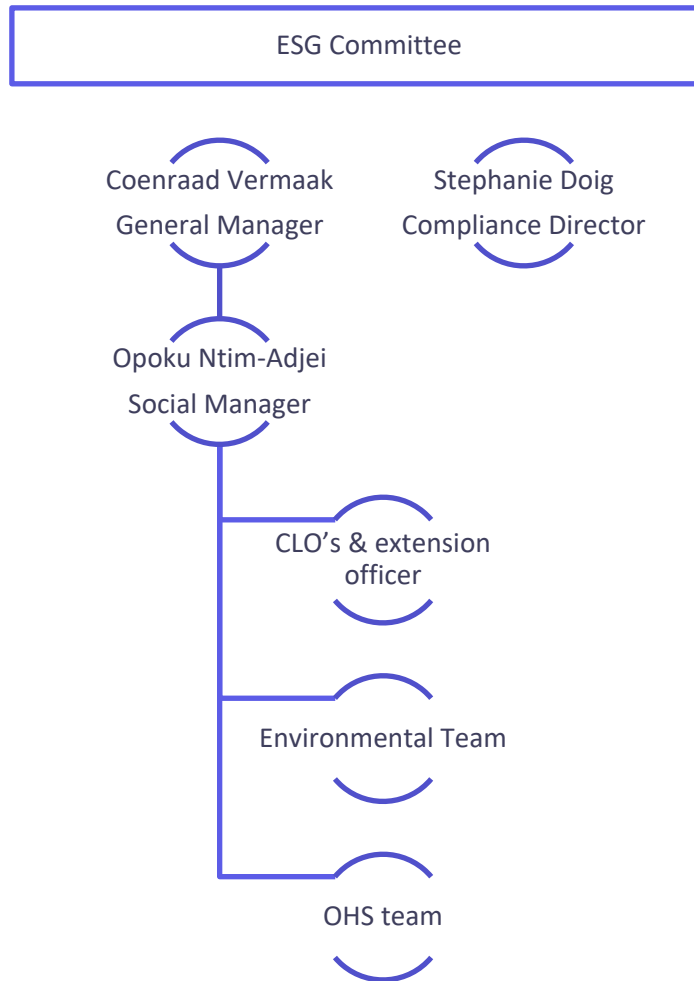
## Investigate and Determine Resolution (depending on topic)

- CLO's
- OHS Manager
- General Manager
- Environmental Manager
- EHSS Manager
- Senior Management (if necessary)

## Complaint not satisfied

- Senior Management (General Manager or Compliance Director)

# Roles and Responsibilities Ghana



## Receiving Grievances:

- CLO's
- OHS Manager
- General Manager
- Business Manager
- Any Miro employee

## Acknowledge , Assess and Record:

- Social Manager
- CLO's

## Investigate and Determine Resolution (depending on topic)

- CLO's
- OHS Manager
- General Manager
- Environmental Manager
- EHSS Manager
- Senior Management (if necessary)

## Complaint not satisfied

- Senior Management (General Manager or Compliance Director)

- **Grievance Registry form**
  - Made available to all CLOs, extension officer and community managers. Community Manager to give workshops in grievance registry and handling
  
- **Grievance Acknowledgment Letter**
  - Once registered the grievance is designated to an employee who is then responsible for closing out that grievance, this person (generally a CLO) will be responsible for ongoing communication regarding the grievance and will keep the General Manager and EHSS manager updated
  
- **Grievance Follow Up Form**
  - Designated employee responsible
  
- **Grievance Closure Letter**
  - Signed by grievant and witness
  
- **Grievance Record**
  - Managed by Community Officer, overseen by EHSS Manager
  
- **All documentation is kept on the Company database which is accessible by senior management only**
  
- **When possible all documents should have photographs attached**



## Appendix



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# External Stakeholder Notice - GH

If you have a concern, problem or complaint about Miro Forestry Company or one of its employees, we would like to hear from you.

You can contact us in the following ways:

- Bring it up directly with a company employee
- Leave a comment in the secure suggestion box attached to this notice board, this will be checked weekly
- Contact one of Miro’s Community Liaison Officers or the Social Manager. Alternatively you can see the CLO when they are visiting your community on the last Thursday of every month between 10:00-12:00
- Send a letter to Miro Forestry (Ghana) Ltd, P.O. Box 3, Agogo Asante-Akyem North, Ashanti
- Send an email to [comments@miroforestry.com](mailto:comments@miroforestry.com)

Once your grievance has been received the company will follow a documented grievance procedure , You will be updated on the progress of your grievance and can expect a suggested resolution within 30 days of registering it. Miro management will oversee the handling of all grievances.

**All comments and complaints will be treated with complete confidentiality.**

**Your Social Manager is: Opoku Ntim-Adjei, contact him on: [ona@miroforestry.com](mailto:ona@miroforestry.com) or 0244488637**

# External Stakeholder Notice - SL

If you have a concern, problem or complaint about Miro Forestry Company or one of its employees, we would like to hear from you.

You can contact us in the following ways:

- Bring it up directly with a company employee
- Leave a comment in the secure suggestion box attached to this notice board, this will be checked weekly
- Contact one of Miro’s Community Liaison Officers or the Social Manager. Alternatively you can see the CLO when they are visiting your community on the last Thursday of every month between 10:00-12:00
- Send a letter to Miro Forestry (SL) Ltd, Royanka Estate, Yoni.
- Send an email to [comments@miroforestry.com](mailto:comments@miroforestry.com)

Once your grievance has been received the company will follow a documented grievance procedure, You will be updated on the progress of your grievance and can expect a suggested resolution within 30 days of registering it. Miro management will oversee the handling of all grievances.

**All comments and complaints will be treated with complete confidentiality.**

**Your Social Manager is: Aruna Bangura, contact him on: [ab@miroforestry.com](mailto:ab@miroforestry.com) or 099437043**



# Grievance Registry Form

Grievance Record Number (e.g. GH – C- 001, SL-C-001):			
Report Date & Time:		<input type="checkbox"/> Verbal	<input type="checkbox"/> Written
Complaint Received by: <i>Include telephone number</i>			
Complainant Full Name:		Telephone Number:	
Community Area:		Alternative Contact Name:	
Complaint Category: <i>Please tick category below</i>	Complaint Details: <i>Please give full details, add another sheet if necessary</i>		
Livelihood	<input type="checkbox"/>		
Land	<input type="checkbox"/>		
Compensation	<input type="checkbox"/>		
Environmental	<input type="checkbox"/>		
Staff	<input type="checkbox"/>		
Other (specify)	<input type="checkbox"/>		
Suggestion	<input type="checkbox"/>		
Request	<input type="checkbox"/>		
Assigned Resolving Officer:		Date:	
Resolving Officer Acknowledgment (sig):		Date:	
Acknowledgment letter sent to grievant:	<input type="checkbox"/> Yes <input type="checkbox"/> No	Expected Resolution Date:	
<i>If resolved straight away Grievant Signature:</i>		Date Signed:	

# GP DOCUMENTATION

## Grievance Registry Form



Co Address

Date

Grievant Address

Re. Grievance number #####

Dear [Grievant Name],

Thank you for submitting your grievance to the Miro through [employee name/submitting method]. Miro is committed to maintaining strong relationships with the communities and stakeholders that enable it to operate peacefully and productively and strives to address grievances in a responsible and timely manner.

Because we wish to give due weight to your grievance it is currently in an investigation process where relevant people will be contacted to understand more about the grievance. If we need more information about your grievance from you, we will contact you during this process.

We will investigate your grievance to ascertain the facts of your case and once this is complete, Miro will propose a resolution to the grievance based on these facts. Our aim is to reach a resolution that is fair to you and also fair to the company.

We aim to provide you with this initial proposed resolution within one month of receiving your grievance. In your case we aim to provide you with this information by [Insert Due Date here]. An appropriate member of the management team [insert employee name] will bring you a written version of the proposed grievance and will explain anything in the resolution that is not clear to you. You will then have the choice of:

- a) Accepting the resolution
- b) Rejecting the resolution and asking for an appeal
- c) Asking for some time to consider the resolution
- d) Continuing your grievance through other means

If you choose to accept the resolution, then you will be asked to acknowledge the resolution. If further action is required to complete the grievance, then the timing of this action will be included in the proposal. We will ask you to acknowledge the completion of the action when it is done, so that the grievance can be closed.

We value your support of our operations and trust that a mutually agreeable and fair solution can be reached to your concern.

Kind Regards,

[Name and position of suitably qualified person] Page 22



# Grievance Follow-up Form

Grievance Record Number:		Date Received:	
Acknowledgment Date:		Required Resolution Date:	
Grievant Name and contact details:			
Assigned Resolving Officer:			
Investigation Team:	Investigation Summary:		
1.			
2.			
3.			
Proposed Resolution:			
Resolution Approved by: name and signature			
Resolution presented to grievant: date		Grievance Resolved:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Grievant Signature and Date:			
If No- Next Steps: <i>if mediator is being enlisted/ legal action pursued include details and dates</i>			

# Grievance Closure Letter



Dear **[Grievant Name]**,

Thank you for submitting your grievance to Miro Forestry, through **[use appropriate name/method]**. We are pleased to present our findings and proposed resolution to your issue. This letter provides a description of the issue raised, the results of the investigation of the issue and a proposal for resolution.

Summary of Issue:

Remedy Sought by Grievant:

Investigation Findings:

Proposed Resolution:

**Once this letter has been explained to you, you have four choices:**

- a) Accept the resolution
- b) Reject the resolution and asking for an appeal
- c) Request for some time to consider the resolution
- d) Continue your grievance through other means.

I have read / had this form read to me and agree with the content \_\_\_\_\_  signed

Witness signed:

**[Name and position of suitably qualified person]**

Attached: Photograph of resolution acceptance, and remedy proof etc



