

# GRIEVANCE MECHANISM PROCEDURE

## 1. INTRODUCTION

The purpose of this document is to formalise the management of grievances from NMS's clients and employees to minimise the social risks to the business. The grievance process, outlined in the document, provides an avenue for clients and employees to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships.

## 2. SCOPE

The grievance mechanism procedure applies to all external clients of our operations and exploration activities. This procedure also covers grievances raised internally by employees.

Specific and localised grievance mechanisms may need to be put in place for future development projects, which take into account local language and customs.

## 3. DEFINITIONS

Term	Definition
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 formalised way to accept, assess, and resolve community complaints concerning the performance or behaviour of the company, its contractors, or employees. This includes adverse economic, 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, NGOs and the government.

## 4. GRIEVANCE REPORTING CHANNELS

NMS will communicate this procedure to its stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for stakeholders to vocalise their grievances formally include:

- **Telephone**  
Stakeholders can call NMS's head office on +421232115260 and request to speak to a stakeholder contact officer.
- **Email**  
Grievances can be sent to [nms@nms-int.com](mailto:nms@nms-int.com)
- **Face to face**  
Stakeholders can voice their grievance to any NMS employee who will then escalate using the correct process.
- **Online form using Microsoft o365 products**

Stakeholders can complete a grievance form located on our website:

<https://forms.office.com/r/0nE3rffyqg>

<https://forms.office.com/r/0Z6cdUfLfu>

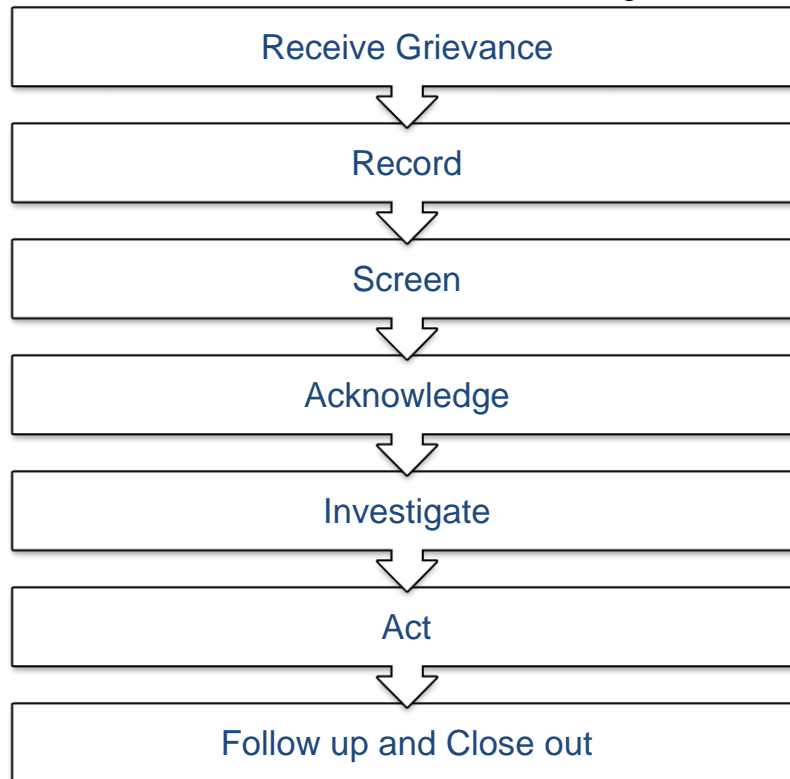
Links are only available to logged-in users. Internal and External users are permitted.

## 5. ROLES AND RESPONSIBILITIES

Role/ Position Title	Responsibility
Grievance Owner	<ul style="list-style-type: none"> <li><input type="checkbox"/> Employee investigating the grievance and liaising with the external stakeholder/s.</li> <li><input type="checkbox"/> Developing resolutions and actions to rectify any issues.</li> <li><input type="checkbox"/> Follow up and track progress of grievance.</li> <li><input type="checkbox"/> Document any interactions with external stakeholders.</li> </ul>
Stakeholder Contact Officer	<ul style="list-style-type: none"> <li><input type="checkbox"/> Receive grievances and assign a grievance owner.</li> <li><input type="checkbox"/> Makes sure the grievance mechanism procedure is being adhered to and followed correctly.</li> <li><input type="checkbox"/> Maintains grievance register and monitor any correspondence.</li> <li><input type="checkbox"/> Monitor grievances/trends over time and report findings to the Sustainability Committee.</li> <li><input type="checkbox"/> Raise internal awareness of the grievance mechanism among employees and contractors.</li> </ul>
Employees	<ul style="list-style-type: none"> <li><input type="checkbox"/> Receive grievances in person.</li> <li><input type="checkbox"/> Report grievance to the Stakeholder Contact Officer by lodging the Grievance Lodgement Form.</li> <li><input type="checkbox"/> May provide information and assistance in developing a response and close out of a grievance.</li> </ul>

## 6. GRIEVANCE MECHANISM PROCESS

The figure below describes the process that will be used to resolve any grievances:



## 7. 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 a Grievance Lodgement Form. Once the form is completed the employee will then pass the form on to the stakeholder contact officer for processing.

### Electronic

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

## 8. RECORD

All formal grievances will be logged in the External Grievance Register and Grievance Lodgement Forms will be saved in NMS's intranet for record of correspondence.

## 9. SCREEN

The stakeholder contact officer is responsible for assigning a grievance owner to liaise with the external stakeholder/s and work on a resolution. Grievances will be screened depending the level of severity in order to determine who the grievance owner will be and how the grievance is approached. See below table categorising the different levels:

Category	Description	Grievance Owner
Level 1	When an answer can be provided immediately and/or NMS are already working on a resolution. (Only formal grievances to be lodged in the External Grievance Register)	Stakeholder Contact Officer
Level 2	One off grievances that will not affect the reputation of NMS.	Supervisor level or above
Level 3	Repeated, extensive and high profile grievances that may jeopardise the reputation of NMS.	Executive level

## 10. ACKNOWLEDGE

A grievance will be acknowledged, by the grievance owner, within two working days of a grievance being submitted. Communication will be made either verbally or in written form (stakeholders will outline their preferred method of contact on the Grievance Lodgement Form).

The acknowledgement of a grievance 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 acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

## 11. INVESTIGATE

The grievance owner is responsible for investigating the grievance. The investigation may require the grievance owner to make site visits, consult employees, contact stakeholders and complete other activities. Records of meetings, discussions and activities all need to be recorded during the investigation. 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.

## 12. ACT

Following the investigation the grievance owner will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The grievance owner is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the grievance owner feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

## 13. FOLLOW UP AND CLOSE OUT

The grievance owner will make contact with the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder the grievance owner will verify that the outcome was satisfied and also gather any feedback on the grievance process. Minutes of the meeting will be recorded and saved in NMS's intranet.

If required the grievance owner may need to follow up with the external stakeholder on numerous occasions to confirm all parties are satisfied.

## 14. APPEAL

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the grievance owner needs to escalate the matter to the executive management team. The executive team will review the grievance and all documentation gathered throughout the investigation and determine whether further actions are required to resolve the grievance.

NMS are fully committed to resolving an external stakeholder's grievance so if NMS are unable to resolve a complaint or a stakeholder is unhappy with the outcome, NMS may seek advice from other independent parties.

Date: 18/01/2022



Dr. Ing. Igor Lengyel  
Company President