



## 1. Introduction

The purpose of this document is to formalize the grievance mechanism of Masan Tungsten Limited Liability Company (MTC). MTC encourages open and honest communication among the company and its stakeholders to resolve issues or disputes that may arise in connection with problems at work or business. It is essential to maintain constructive stakeholder relations to support MTC's stakeholder wellbeing and enable the proper functioning of MTC.

This procedure enables stakeholders to raise and address any concerns, problems or complaints they may have so MTC can resolve any issues promptly, fairly and in the interest of everyone involved.

## 2. Scope

This grievance mechanism procedure applies to all stakeholders of MTC's operations and business activities.

## 3. Definition

| Term                  | Definition  |
|-----------------------|---|
| Grievance             | An issue, concern, problem, or claim (perceived or actual) that an individual or community group addressed to the company in a formal manner.   |
| Grievance Mechanism   | A formalized way to receive, assess, and resolve complaints concerning the performance or behavior of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts. |
| Internal Stakeholders | Groups or individuals who work directly within the company, such as employees and contractors.  |
| External Stakeholders | Groups or individuals who are not directly employed or contracted by the company but are affected in some way from the decisions of the company, such as customers, suppliers, community, NGOs, and the government. |

## 4. Grievance Reporting Channel

Masan Tungsten Company will communicate this procedure to its stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external and internal stakeholders to vocalize their grievance formally include:



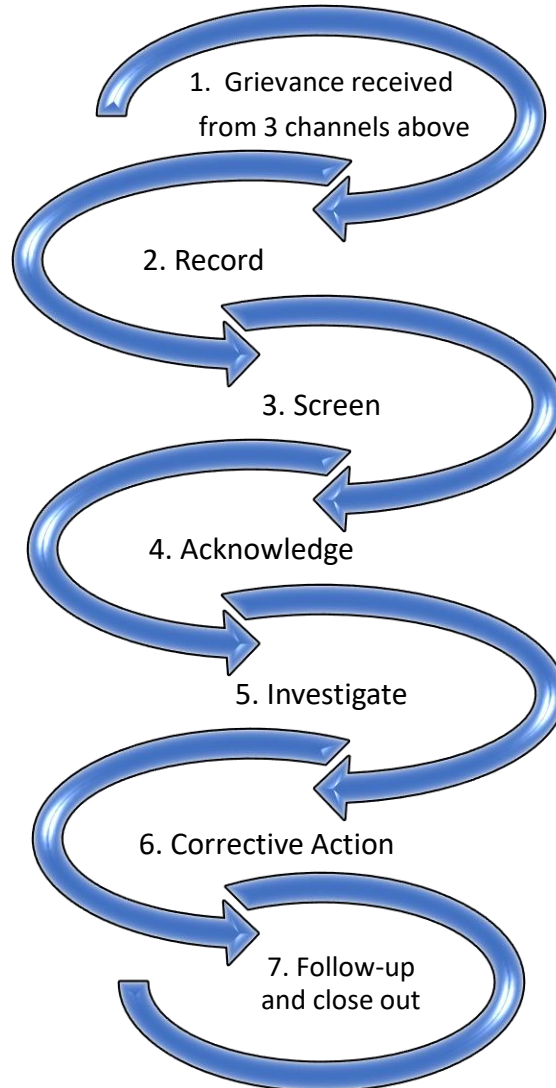
| Reporting channel   | Detail   |
|---------------------|--|
| Online Platform     | Link to access to the Grievance Platform - Your Voice Matters:<br><a href="https://deloitte-halo.com">YOUR VOICE MATTERS (deloitte-halo.com)</a>   |
| Telephone and Email | Official company contact:<br>Telephone: (84-24) 3718 2490<br>Email: <a href="mailto:info@mht.masangroup.com">info@mht.masangroup.com</a><br><br><i>(Using forms described in Appendix 1 &amp; 2.)</i><br><br>For MTC's products:<br>POC: Mr. William ParryJones – Head of Sales & Marketing Department<br>Email: <a href="mailto:William.ParryJones@mht.masangroup.com">William.ParryJones@mht.masangroup.com</a><br>Mobile: +84 901 753 255 |
| Face to Face        | Stakeholders can voice their grievance to any MTC employee who will then escalate using the correct process.<br><br><i>(Using forms described in Appendix 1 &amp; 2.)</i>  |

## 5. Roles and Responsibilities

| Role/Position Title         | Responsibility  |
|-----------------------------|---|
| Grievance Owner             | <ul style="list-style-type: none"> <li>Employee investigating the grievance and liaising with the stakeholder (s).</li> <li>Developing resolution and actions to rectify any issues.</li> <li>Follow up and track progress of grievance.</li> <li>Document any interactions with stakeholders.</li> </ul>   |
| Stakeholder Contact Officer | <ul style="list-style-type: none"> <li>Receive grievances and assign a grievance owner.</li> <li>Make sure the grievance mechanism procedure is being adhered to and followed correctly.</li> <li>Maintain grievance register and monitor any correspondence. Monitor grievances/trends over time and report findings as required.</li> </ul>       |
| Employees                   | <p>In case of grievances from external stakeholders:</p> <ul style="list-style-type: none"> <li>Receive grievance in person.</li> <li>Report grievance to the Stakeholder Contact Officer by lodging the Grievance Lodgment Form.</li> <li>May provide information and assistance in developing a response and close out of a grievance.</li> </ul> |



## 6. Grievance Mechanism Process



### 6.1. Grievance received:

#### a. 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 Lodgment Form (see Appendix 1). Once the form is completed the employee will then pass the form to the stakeholder contact officer for processing.

#### b. Electronic



The stakeholder-contact-officer receives all grievances that come through via email or online system Your Voice Matters. The stakeholder contact officer will review the grievance and process the grievance in accordance with this procedure.

**6.2. Record**

All formal grievance will be logged in the Grievance Forms (see Appendix 1&2) and Online Grievance platform – Your Voice Matters will be saved on the Company’s intranet for record of correspondence.

**6.3. Screen**

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

| Category | Description   | Grievance owner             |
|----------|---|-----------------------------|
| Level 1  | When an answer can be provided immediately and/or MTC is already working on a resolution. | Stakeholder Contact Officer |
| Level 2  | One off grievance that will not affect the reputation of MTC                              | Supervisor level or above   |
| Level 3  | Repeated, extensive and high-profile grievance that may jeopardize the reputation of MTC  | Executive level             |

**6.4. Acknowledge**

A grievance will be acknowledged by the grievance owner, within three 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 Lodgment Form, see Appendix 1). 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 acknowledgement provides an opportunity to ask for any additional information or to clarify any issues.

**6.5. 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 analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

**6.6. Corrective action**

Following the investigation, the grievance owner will use the findings to create an action plan/ corrective action 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 stakeholder via their preferred method of contact.

#### **6.7. Follow up and Close-out.**

The grievance owner will contact the stakeholder(s) three weeks after the grievance is resolved. When contacting the 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 on the Company's intranet. If required, the grievance owner may need to follow up with the stakeholder on numerous occasions to confirm all parties are satisfied.

### **7. Appeal**

If the 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. MTC is fully committed to resolving all stakeholder's grievances so if MTC is unable to resolve a complaint or a stakeholder is unhappy with the outcome, MTC may seek advice from other independent parties.

### **8. Reporting**

MTC will receive quarterly updates on stakeholder grievances. Information outlining the number of grievances, time to resolution and outcomes of grievances will be communicated. MTC will evaluate and update the Grievance Mechanism Procedure every two years (or when required) to continually improve its stakeholder's engagement.

### **9. Storing of Grievances**

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely saved on the Company's intranet to ensure privacy and confidentiality is maintained for all parties involved.

### **10. Reference Documents**

Responsible Minerals Assurance Process – Tungsten Smelter Grievance Standard,

The UN Principles on Business and Human Rights 2009 (the 'Ruggie Principle'),

The new EU Whistleblower Directive 2019/1937.



**APPENDIX 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:<br>(if applicable)    |  |  |  |
| Date:                          |  | Time:  |  |
| Preferred Contact Method       | <input type="checkbox"/> Telephone<br><input type="checkbox"/> Email<br><input type="checkbox"/> Face to face<br>Please provide contact details: _____ |  |  |
| Supporting Documents Attached? | <input type="checkbox"/> Yes<br><input type="checkbox"/> No  |  |  |

|   |  |
|---|--|
| <b>Please provide details of your grievance</b> |  |
|---|--|



|                                      |  |
|--------------------------------------|--|
| <b>What outcome are you seeking?</b> |  |
| <b>Additional Information</b>        |  |

Claimant Signature:..... Date:.....

MTC signature: ..... Date:.....

**Office use only**

|                               |  |  |
|-------------------------------|--|--|
| <b>Stakeholder Reference:</b> | NGO <input type="checkbox"/>               | Government - Commonwealth <input type="checkbox"/> |
|                               | Neighbour <input type="checkbox"/>         | Government - Province <input type="checkbox"/>     |
|                               | Neighbour - Other <input type="checkbox"/> | Government - Local <input type="checkbox"/>        |
|                               | Indigenous <input type="checkbox"/>        | Contractor <input type="checkbox"/>                |
|                               | Other <input type="checkbox"/>             | Consultant <input type="checkbox"/>                |
|                               | Comment:                                   |  |





**APPENDIX 2 EXTERNAL GRIEVANCE REGISTER**

