



GRIEVANCE MECHANISM PROCEDURE

1. Introduction

The purpose of this document is to formalize the grievance management of Masan Tungsten Limited Liability Company's stakeholders, to minimize the social 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 mineral extraction, trade, handling and export and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

2. Scope

The grievance mechanism procedure applies to all external stakeholders of our operations and exploration activities. This procedure does not cover grievances raised by internal stakeholders, such as employee, who are to refer to internal grievance standard of human resources of Company. It also does not cover suppliers who supply reagents, spares part and consumables.

3. Definitions

Term	Definition
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group addressed by the company in a formal manner.
Grievance Mechanism	A formalized way to accept, assess, and resolve community complaints concerning the performance or behavior of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts.
Internal Stakeholders	Group or individuals within a business who work directly within the business, such as employees and contractors
External Stakeholders	Group 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

Masan Tungsten 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 vocalize their grievance formally include:



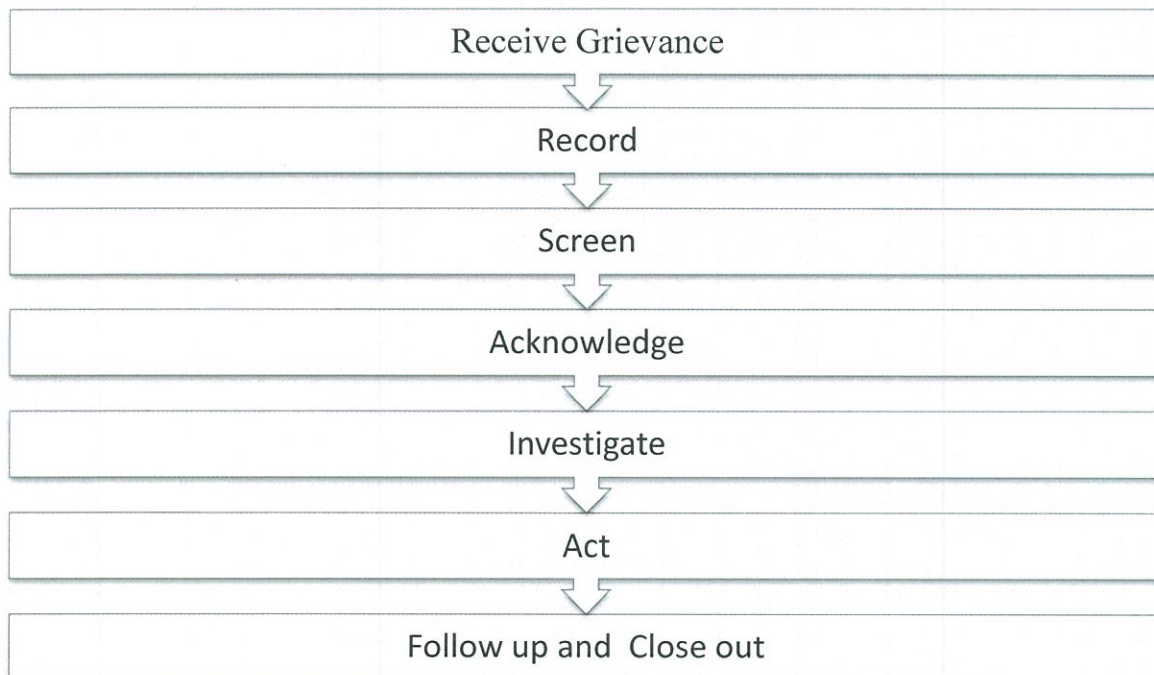
- Telephone
Stakeholders can call Masan Tungsten Company's on (84-24) 3718 2490
- Email
For conflict-free materials:
 - Mr. Rajul Bagrodia – Deputy CFO
 - Email: Rajul.bagrodia@mr.masangroup.com
 - Mobile: +84 902 247 698
 For Masan Tungsten Company's products:
 - Mr. Tony Fitzgerald – Sales & Marketing Director
 - Email: tony.fitzgerald@mr.masangroup.com
 - 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.

5. Roles and Responsibilities

Role/Position Title	Responsibility
Grievance Owner	<ul style="list-style-type: none"> • Employee investigating the grievance and liaising with the external stakeholder (s). • Developing resolution and actions to rectify any issues. • Follow up and track progress of grievance. • Document any interactions with external stakeholders
Stakeholder Contact Officer	<ul style="list-style-type: none"> • Receive grievances and assign a grievance owner. • Make sure the grievance mechanism procedure is being adhered to and follow correctly. • Maintain grievance register and monitor any correspondence. • Monitor grievances/trends over time and report findings Deputy CFO or Sales & Marketing Director. • Raise internal awareness of the grievance mechanism among employees and contractors.
Employees	<ul style="list-style-type: none"> • Receive grievance in person. • Report grievance to the Stakeholder Contact Officer by lodging the Grievance Lodgement Form. • May provide information and assistance in developing a response and close out of a grievance.

6. Grievance Mechanism Process

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



6.1 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 a 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.

6.2 Record

All formal grievance will be logged in the External Grievance Register (see Appendix 2) and Grievance Lodgement Forms will be saved for record of correspondence.

6.3 Screen

This stakeholder contact officer is responsible for assigning a grievance owner to liaise with 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 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. (Only formal grievance to be lodged in the External Grievance Register)	Stakeholder Contact Officer
Level 2	One off grievances that will not affect the reputation of MTC	Supervisor level or above
Level 3	Repeated, extensive and high profile grievance that may jeopardise 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 Lodgement 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 external 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.

6.6 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.



6.7 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 record and saved in Company's database system.

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

7. 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 determines whether further actions are required to resolve the grievance. MTC is fully committed to resolving an external stakeholder's grievance 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 stakeholders engagement.

9. Storing of Grievances

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filled in Company's database system to ensure privacy and confidentiality is maintained for all parties involved.

10. Reference Documents

Responsible Minerals Assurance Process – Tungsten Smelter Standard
Grievance Standard

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



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

Please provide details of your grievance	
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What outcome are you seeking?	
Additional Information	

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

MTC Recipient name and signature: Date:.....

Office use only

Stakeholder Reference:	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



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'	Actions/Notes