

SMFG's Community Grievance Management Mechanism

The Société des Mines de Fer de Guinée's (SMFG's) community grievance management mechanism (Mechanism) applies to SMFG's Nimba Iron Ore Project and outlines the procedure for the identification, tracking, escalation and resolution of grievances from individuals or groups from communities affected by or interested in the Project. This Mechanism addresses:

- i. Grievances that may be resolved between SMFG and the complainant,
- ii. Grievances that cannot be resolved directly by SMFG and the complainant, and may require referral to or involvement of third parties, and
- iii. Grievances that are not satisfactorily resolved by SMFG's Mechanism and must be referred to official agencies or judicial processes.

The goal of this Mechanism is to ensure resolution of community grievances promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, at no cost to and with no retribution against the individual or group that raised the grievance. This Mechanism is not intended to impede access to judicial or other administrative process.

Through the Mechanism, SMFG aims to ensure that:

- Multiple means are available for lodging community grievances to ensure wide accessibility;
- Information is provided to local people to promote use of this grievance mechanism; and
- Community members know how the company's community grievance mechanism functions so that they can make their grievance known to SMFG with minimal obstacles and without fear of retribution.

The Community and External Relations Superintendent (CER Superintendent) ensures that the following mechanisms for lodging grievances are available to individuals or groups, particularly those from within the Project-Affected Communities (PACs), and are maintained in good working order:

1. Community relations telephone hotline(s),
2. Telephone numbers of contacts in the CCLMs (*Comités de concertation dans les localités minières*) of Lola, N'Zoo and Bossou,
3. Dedicated community relations email address,
4. Locked mailboxes in accessible locations at N'Zoo, Bossou, Lola, and N'Zérékoré and other appropriate villages in PACs, as well as at the Cité 1 and Cité Ouvrière camps,
5. A Community and External Relations staff member based at SMFG's Office in Lola Centre with responsibility for receiving grievances, amongst other duties, during normal business hours,
6. All CER staff members when carrying out their liaison activities in local communities can facilitate receiving a grievance, and
7. Regular meetings between the Director of Operations, the CER Superintendent and representatives of the CCLM's from N'Zoo, Bossou and Lola Sub-Prefectures.

The CER Communications Coordinator ensures that individuals and groups, particularly those from within the PACs, are:

- Encouraged to make SMFG aware of any grievance,
- Aware of the means for lodging a grievance, and
- Reassured that there will be no retribution against any person submitting a grievance.

The following means, at a minimum, are used to promote the avenues for submission of grievances:

- a) Dedicated notices posted on SMFG noticeboards in N'Zoo, Bossou, Lola, N'Zérékoré and other appropriate village locations,
- b) Promotion in SMFG's workforce and community newsletter *NimbalInfo* which is posted on community-based bulletin boards and the bulletin boards at Cité 1 and Cité Ouvrière camps,
- c) Regular inclusion in SMFG's dedicated broadcasts on local radio,
- d) Reasonable and regular support to enable CCLMs to publicise it,
- e) Awareness sessions for SMFG's and contractors' staff,
- f) Officers from the CER Department providing information verbally about the grievance mechanism during their ongoing visits to PACs,
- g) Inclusion in presentations used during stakeholder engagement, and
- h) Inclusion in SMFG's social media communications.

Figure 1 illustrates the steps in SMFG's grievance management mechanism, followed by referral to official judicial processes. A grievance may be communicated to SMFG by any of the formal avenues shown in points 1-7 above. However, grievances may also be communicated on behalf of community members through governmental authorities, local (traditional) authorities, members of the workforce or other means. Irrespective of the ways by which SMFG becomes aware of a grievance, SMFG ensures that all grievances are recorded, acknowledged and managed to their conclusion by the steps shown in Figure 1.

Figure 1. Steps for SMFG’s Grievance Management Mechanism

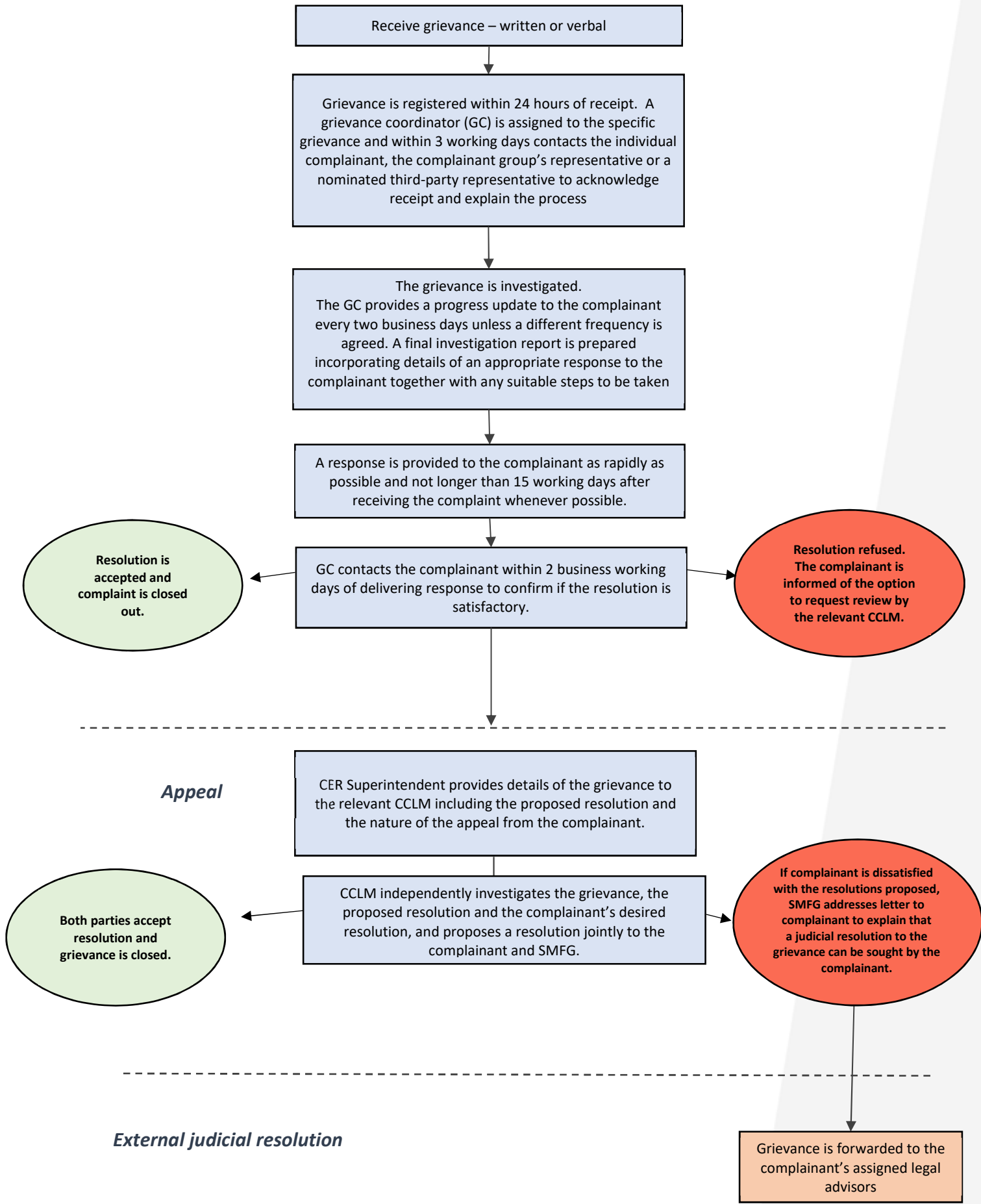


Figure 2. Public Announcement of SMFG's Community Grievance Management Mechanism

Mécanisme de rapportage des Plaintes Communautaires à la SMFG

La Direction de la SMFG reçoit et encourage le rapportage de toutes les plaintes, les inquiétudes et question concernant les actions ou omissions de la SMFG, ou du comportement de ses employés et contractants.

Comment rapporter les plaintes

- Appeler le numéro vert des Relations Communautaires : 628-49-42-36, ou
- Ecrire au Directeur des Opérations, ou
- Mettre la correspondance dans l'une des boites à lettres placées à N'Zérékoré, Lola, N'Zoo, Bossou, et les autres villages, ou
- Envoyer la correspondance à l'adresse suivante : plaintes@nimbairon.com, ou
- Parler directement à l'un des travailleurs des Relations Communautaires, ou encore
- Parler aux membres du CCLM de votre localité aux numéros de téléphone ci-dessous :
 - Lola : 622-03-58-13 / 655-56-33-93
 - N'Zoo : 620-49-34-44
 - Bossou : 669-58-15-63 / 625-68-81-33

Vous pouvez garder l'anonymat en rapportant une plainte, une inquiétude ou en posant une question, mais veuillez fournir les informations précises pour nous permettre de mieux comprendre et résoudre le problème.