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Policy on the Management of the Complaints and Grievance Mechanism

Identification number POL.000.027
In force from 18.05.2026





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Short description

The complaints and grievance mechanism of DPTU “Bucim” DOOEL Radovish is a structured and accessible system through which stakeholders can submit complaints, grievances, and other concerns related to the Company's activities.

The mechanism is established and applied in accordance with Group requirements and standards and is adapted to the local context, with the aim of ensuring consistent, timely, and transparent handling, while respecting confidentiality, protection from retaliation, and the possibility of anonymous submission.



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1 | POLICY STATEMENT

DPTU “Bucim” DOOEL Radovich, guided by Group policies and values, establishes a complaints and grievance mechanism as a structured and accessible process through which stakeholders can submit complaints, grievances, and other concerns related to the Company’s activities.

The mechanism is established in accordance with applicable international standards and good practices and is adapted to the local context, with the aim of ensuring fair, timely, and transparent handling.

The Company ensures the confidentiality of data, the possibility of anonymous submission, and guarantees that submitters will not be subject to retaliation or unfavorable treatment. The mechanism does not restrict the right of submitters to address competent institutions or other legal mechanisms.

2 | Цел

The objectives of the grievance mechanism are:

- To provide a timely, transparent, reliable, and predictable process for identifying and resolving the concerns of stakeholders;
- To ensure that all grievances and complaints are properly understood and appropriately addressed, in accordance with international human rights standards;
- To provide an accessible mechanism through which stakeholders can submit grievances and seek an appropriate resolution or remedy;
- To contribute to the prevention and mitigation of negative impacts through the timely and constructive resolution of issues.

3 | Scope of Application

The complaints and grievance mechanism is available to all stakeholders and their authorized representatives, for submitting complaints and grievances related to the activities of DPTU “Bucim” DOOEL Radovich, with a view to their review and appropriate resolution.

The following matters are not addressed through this mechanism and are referred through other appropriate channels:

- matters related to employees and labour relations;

- reports of breaches of the Code of Conduct and reports of wrongdoing;
- matters not related to the Company's activities.

If a submitted complaint or grievance does not fall within the scope of this mechanism, the submitter is informed and, where appropriate, referred to a relevant internal or external channel, in accordance with applicable regulations.

The mechanism applies at the level of the Company and its operations and is regularly reviewed and updated to ensure alignment with legal requirements and operational needs.

In cases where the Company is not the direct cause of a given impact but the impact is linked to its business relationships, the Company may take appropriate and proportionate measures within its sphere of influence, with the aim of encouraging the appropriate resolution of the situation.

4 | Additional Applicable Documents

- Code of Conduct;
- POL.000.025 Policy on Sustainable Development Management Standards;
- POL.000.001 Human Rights Policy;
- PRA.705.000.013 Rulebook on Internal Reporting of Critical Incidents;
- POL.000.026 Terms and Definitions – Sustainable Development Reporting.

5 | Applicable Criteria

The grievance mechanism of DPTU “Bucim” DOOEL Radovich is established in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and their effectiveness criteria. These criteria form the basis for its functioning, governance, and continuous improvement.

The mechanism is implemented in a manner that is:

- **Legitimate** – builds trust among stakeholders and ensures fair conduct of the procedure;
- **Accessible** – available and understandable to all stakeholders, overcoming possible barriers (language, access, fear of retaliation, etc.);
- **Predictable** – provides a clear procedure with defined stages, deadlines, and possible outcomes;
- **Equitable** – enables equal and reasonable access to information and support for all parties;
- **Transparent** – ensures timely information on the progress of the procedure

and the overall effectiveness of the mechanism;

- **Rights-compatible** – ensures that outcomes are in line with internationally recognized standards;
- **A source of continuous learning** – enables the identification of weaknesses and the prevention of future negative impacts;
- **Based on engagement and dialogue** – encourages constructive communication and the involvement of stakeholders in the process.

6 | Grievance Mechanism

The complaints and grievance mechanism is implemented within predetermined deadlines, with the aim of ensuring timely and efficient handling.

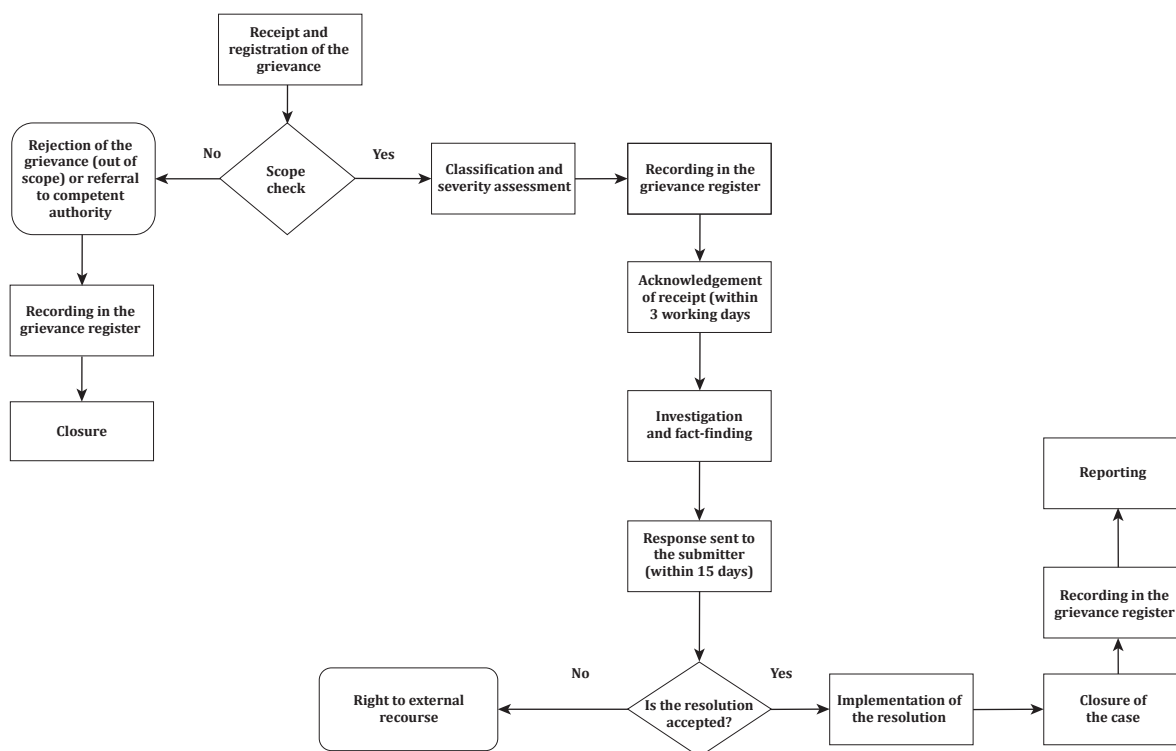
In cases of increased complexity, sensitivity, or the need for additional verification, the handling deadline may be extended. In such cases, the submitter of the complaint or grievance is informed in a timely manner of the reasons for the delay and the expected timeframe for completion of the procedure.

All relevant employees and engaged persons (including personnel engaged in the field, security, and contractors) are required, without delay, to forward all received complaints and grievances to the person responsible for receipt and handling, and, where necessary, to provide support to stakeholders in using the mechanism.

Deadlines for handling:

- Acknowledgement of receipt of the complaint / grievance: within 3 working days of receipt;
- Initial response to the submitter: within 15 working days;
- In complex cases: the procedure may take longer, but not longer than 8 weeks, except in exceptional situations, in which case the submitter is additionally informed.

6.1. Procedure and Timeframes for the Grievance Mechanism – Flowchart



6.2. Receiving Complaints and Grievances, Channels and Forms

DPTU “Bucim” DOOEL Radovich provides an accessible mechanism through which stakeholders can submit complaints and grievances, orally or in writing.

- Complaints and grievances may be submitted:
- directly to the Company, through the person responsible for receipt and handling;
- by email, web form, or telephone;
- in writing, at the Company's business premises;
- through complaint and grievance boxes placed at accessible locations within the Company, as well as at the premises of the municipalities in which the Company operates;
- through direct communication with an authorized representative of the Company.

The mechanism is publicly available, understandable, and free of charge to use. The Company ensures confidentiality, the possibility of anonymous submission, and protection from retaliation.

Complaint and grievance forms are available through all channels, in understandable languages, and in a simple format.

All complaints and grievances are recorded in the Complaints and Grievances Register. Orally submitted complaints must be formalized, after which the procedure begins. The Company provides support to persons who face difficulties in submitting a complaint or grievance (for example: illiteracy, disability, language barriers, or limited access to means of communication). In justified cases, a complaint or grievance may also be submitted on behalf of an affected person.

6.3. Initial Assessment

Upon receipt of a complaint or grievance, the Company conducts an initial assessment to determine whether it falls within the scope of this mechanism.

The assessment is based on:

- whether the matter is related to the Company's activities;
- whether the Company has control or influence over the situation;
- whether there is actual or potential harm or concern.

If the complaint or grievance does not fall within the scope, it is recorded together with a rationale, and the submitter (if not anonymous) is informed and, where necessary, referred to an appropriate internal or external channel.

In cases of complex, sensitive, or unclear complaints, the Company may conduct additional consultations with competent internal structures before reaching a decision.

The procedure is carried out in a fair, impartial, and confidential manner, respecting the submitter's right to address competent institutions.

6.4. Classification and Severity Assessment

If the complaint or grievance falls within the scope of this mechanism, the Company carries out its classification and severity assessment.

Classification of complaints and grievances (aligned with the legal framework of the Republic of North Macedonia)

Category	Description
Human Rights and Labour Relations	Matters related to respect for human rights and employment rights, equal treatment, non-discrimination, and dignity in the workplace, in accordance with the applicable legal framework in the Republic of North Macedonia
Environment	Impacts related to pollution, waste management, air, water, and soil quality, as well as pollution prevention and control, in accordance with environmental regulations
Occupational Health and Safety	Matters related to the safety and health of employees and other persons, in accordance with occupational

	health and safety regulations
Land, Property, and Livelihood Resources	Matters related to the use, access, or potential infringement of property rights and livelihood resources, in accordance with regulations on ownership and other property rights
Local Community and Social Impacts	Matters related to the impact on the quality of life, infrastructure, and well-being of the local community, in accordance with the principles of sustainable development and public interest
Suppliers and Contractors	Matters related to the conduct of third parties engaged by the Company, in accordance with contractual obligations and applicable regulations
Ethics, Integrity, and Compliance	Matters related to corruption, conflict of interest, abuse of position, and unethical conduct, in accordance with the applicable legal framework
Cultural Heritage and Local Values	Matters related to the protection of cultural property and local values, in accordance with regulations on the protection of cultural heritage
Други релевантни прашања	All other complaints and grievances that do not fall within the listed categories but are of relevance to stakeholders, in accordance with applicable regulations

The severity of the complaint or grievance is assessed in order to determine the priority of handling and the required deadlines. The assessment takes into account:

- the scope and nature of the actual or potential harm;
- whether the impact is ongoing or a one-off occurrence;
- the complexity of the case;
- the stakeholders involved and their vulnerability;
- potential legal, financial, or reputational risks.

Regardless of the initial assessment, certain cases are escalated without delay to management and, where necessary, to relevant corporate structures, particularly when they involve:

- serious or ongoing human rights violations;
- significant legal, financial, or reputational risks;
- sensitive or complex cases (including corruption, the involvement of management personnel, or impacts on vulnerable groups, health, safety, or the environment).

6.5. Complaints and Grievances Register

The Complaints and Grievances Register is a central and secure system for recording, monitoring, and managing all complaints and grievances, from their receipt to their closure.

Each complaint or grievance is recorded and assigned to a competent person or organizational unit, with the aim of ensuring timely and responsible handling.

The severity of complaints and grievances is classified as: low, medium, high, or critical. Complaints and grievances of medium and high severity are reviewed with priority, while in cases of high or critical severity, the person responsible for receipt and handling must, without delay and no later than within 2 hours of recording, notify the Company's management.

The Register is used for monitoring, analysis, reporting, and the continuous improvement of the complaints and grievance mechanism.

The person responsible for the receipt and handling of complaints and grievances is responsible for maintaining and updating the Register, ensuring the entry of relevant data, such as:

- submitter details (where available);
- the location and date of the event;
- the organizational unit to which the case relates;
- classification and severity;
- the status of the procedure;
- actions taken and communication with the submitter.

The Register is maintained in accordance with personal data protection regulations. Only authorized persons have access to the data, ensuring confidentiality and, where necessary, the anonymity of submitters.

Anonymous complaints and grievances are accepted and recorded in the same manner as others, marked as “anonymous” and assigned a unique identification number.

6.6. Acknowledgement of Receipt of a Complaint / Grievance

Following recording in the Complaints and Grievances Register, the Company provides an acknowledgement of receipt to the submitter.

The acknowledgement is issued by the person responsible for receipt and handling, no later than within 3 working days of receipt.

The acknowledgement contains:

- confirmation that the complaint or grievance has been received and recorded;
- a brief explanation of the further procedure;
- information on the expected handling deadlines;
- the unique reference number of the case.

The acknowledgement is issued in the Macedonian language, as the official language of the Republic of North Macedonia, and in an appropriate format. The reference number is used for tracking the case and for further communication.

6.7. Investigation and Review

The purpose of the investigation is to ensure the objective and impartial establishment of the facts related to the complaint or grievance.

The Company conducts the investigation in a timely manner and in accordance with the complexity and severity of the case. The investigation is coordinated by the person responsible for receipt and handling, in cooperation with the competent organizational units.

As part of the investigation, where necessary, the following is carried out:

- collection and analysis of relevant information and evidence;
- determination of the causes;
- involvement of stakeholders;
- field verifications.

Persons to whom the complaint or grievance relates, as well as persons with a personal interest, do not participate in the investigation or decision-making. In such cases, another person is designated or an independent third party is engaged.

Based on the investigation, the complaint or grievance is assessed as:

Substantiated – when the allegations are confirmed on the basis of facts and evidence, establishing that a negative impact or violation exists, and appropriate corrective and/or preventive measures are taken;

Partially substantiated – when part of the allegations are confirmed while the remainder are not, in which case measures are taken with respect to the confirmed aspects;

Unsubstantiated – when the allegations are not confirmed on the basis of the available information and evidence;

Conclusions are based on objective, verifiable, and relevant evidence, such as documents, statements, expert opinions, or field findings.

For complex or sensitive cases, the Company may engage independent experts or mediators.

The findings of the investigation are documented in a report covering the established facts, the causes, and the proposed or implemented measures.

If the Company is not able to resolve the complaint or grievance on its own, it may involve relevant external parties (e.g., competent institutions or independent mediators).

If it is determined that the matter is beyond the Company's authority or control, the submitter (unless anonymous) is informed and, where necessary, referred to other appropriate mechanisms.

6.8. Identifying and Developing Resolution and Response Options

Based on the findings of the investigation, the Company determines appropriate measures for resolving the complaint or grievance, depending on its nature and severity.

If the complaint or grievance is substantiated, the Company takes measures to remedy

the identified deficiencies and prevent their recurrence. Where necessary, the submitter may be involved in the process.

If the complaint or grievance is partially substantiated, the confirmed elements are resolved, while an appropriate explanation is provided for the rest.

If the complaint or grievance is unsubstantiated, the Company documents the conclusion and informs the submitter (unless anonymous). In sensitive or complex cases, the conclusion is reviewed by management prior to its communication.

In cases where the evidence is incomplete but there is an indication of potential impact, the Company may take appropriate precautionary measures.

Resolution measures may include:

- corrective and preventive actions;
- organizational or technical measures;
- an apology or other non-material measures;
- compensation, where applicable.

Measures with legal or financial effect are approved by management, with the involvement of the competent functions.

Following the decision, the Company sends the submitter written notification containing:

- the key findings and conclusions;
- the agreed measures and deadlines;
- follow-up activities;
- information on further options, should the submitter not be satisfied.

If the Company is unable to provide a resolution on its own, it may involve external parties or relevant institutions.

6.9. Right to External Recourse

The Company seeks to have complaints and grievances resolved amicably through the established mechanism.

If the submitter is not satisfied with the outcome, or of their own choice, they have the right at any time to address competent state institutions or other relevant external mechanisms, in accordance with applicable regulations.

This mechanism constitutes an internal procedure of the Company and does not restrict, condition, or delay the submitter's right to seek protection or remedy through judicial, administrative, or other proceedings.

The Company may, where necessary, provide information on available external institutions or mechanisms, without affecting the submitter's right to independently choose how to proceed further.

6.10. Implementation and Monitoring of the Resolution

In cases where a complaint or grievance has been determined to be substantiated and resolution measures have been defined, the Company ensures coordination with the competent organizational units with a view to the timely, complete, and effective

implementation of the agreed corrective and preventive measures.

The implementation of measures is subject to approval by senior management, including:

- the findings of the investigation;
- the proposed resolution measures;
- the process for their implementation.

The Company continuously monitors the progress of implementation and ensures appropriate documentation of the activities carried out. All relevant data, including evidence of implementation (e.g., written records, photographs, or other relevant materials), are recorded in the Complaints and Grievances Register.

Where applicable, the submitter is informed of the progress of implementation and may be involved in confirming the effectiveness of the measures taken.

In cases involving significant impacts on the community or a potential impact on human rights, the Company may engage independent third parties or relevant expert bodies with a view to providing additional monitoring and verification of implementation.

Upon confirmation of the full implementation and effectiveness of the measures, the case is closed in accordance with the established procedure.

6.11. Closure of the Grievance

A complaint or grievance is considered closed after the implementation and verification of all agreed resolution measures, in accordance with the established procedure.

The Company ensures the updating of all relevant data in the Complaints and Grievances Register, including:

- the status of the case;
- the resolution reached;
- the actions taken;
- the results of implementation;
- follow-up activities;
- the timeframe.

Where applicable and reasonably practicable, the submitter is informed of the outcome of the procedure and given the opportunity to provide feedback.

The case is closed upon confirmation that:

- the agreed measures have been fully implemented;
- their effectiveness has been verified;
- the procedure has been carried out in accordance with this Rulebook.

The final record of the case contains appropriate documentation, including:

- the findings of the investigation;
- the corrective and preventive measures taken;
- relevant communication;
- internal approvals, where applicable.

If the submitter is not satisfied with the outcome, they are referred to the possibility of addressing competent external institutions, in accordance with Section 6.9.

6.12. Reporting

The Company ensures regular, accurate, and timely reporting on complaints and grievances, in accordance with the established procedures for sustainability reporting and internal governance.

The report is prepared by the competent organizational unit for sustainability and, where applicable, submitted to senior management and Group structures.

The complaints and grievances report contains at least:

- the total number of complaints and grievances received during the reporting period, classified by type, severity, and stakeholders involved;
- the number and percentage of resolved complaints and grievances;
- corrective and preventive measures taken;
- the percentage of complaints and grievances acknowledged within 3 working days;
- the average handling and response time;
- the number of appeals submitted;
- the number of cases involving allegations of retaliation.

Data from the Complaints and Grievances Register is analyzed on an ongoing basis with the aim of identifying trends, recurring issues, and root causes that may indicate systemic risks.

Where applicable, the analysis also incorporates feedback from stakeholders, collected through appropriate mechanisms (e.g., surveys, interviews, focus groups, or other tools).

The results and lessons learned are reviewed by management at least once a year, with the aim of assessing the effectiveness of the mechanism and defining measures for its improvement.

Aggregated data, trends, and measures taken are included in sustainability reports or other relevant public disclosures, with the aim of ensuring transparency and accountability toward stakeholders.

7 | Review and Update of the Grievance Mechanism

The complaints and grievance mechanism is regularly reviewed by the Sustainable Development Committee, with the aim of determining whether it is functioning effectively and whether improvements are needed.

The review takes into account:

- data from the Complaints and Grievances Register;
- experience gained from the handling of complaints and grievances to date;
- feedback from stakeholders;
- changes in laws and regulations;
- organizational changes and needs;
- changes in operational risks;
- initiatives from management or the person responsible for the process.

The Company continuously monitors the functioning of the mechanism, with the aim of improving it and ensuring alignment with legal requirements and human rights principles.

Any necessary amendments and additions to this procedure are made in a timely manner, in accordance with the changes that have occurred and the needs identified.

8 | Roles and Responsibilities

The Company establishes and maintains a complaints and grievance mechanism, adapted to its operations, size, and organizational context, with the aim of ensuring efficient, timely, and impartial handling of all complaints and grievances received.

To this end, the Company establishes an appropriate organizational structure that ensures a clear allocation of roles and responsibilities, including a person responsible for the receipt and handling of complaints and grievances, management, relevant organizational units, and the Sustainable Development Committee.

This structure is intended to ensure:

- the accessibility and transparency of the mechanism;
- timely and effective handling;
- impartiality and the avoidance of conflicts of interest;
- the coordinated implementation of resolution measures;
- compliance with applicable regulations and human rights principles.

In order to ensure the effective functioning of the mechanism, the following roles and responsibilities are established:

Role	Responsibilities
Person responsible for the receipt and handling of complaints and grievances	• receiving and recording complaints and grievances; • informing stakeholders about submission channels; • maintaining and updating the Complaints and Grievances Register; • classification and initial assessment; • coordinating investigations with the competent departments; • monitoring the implementation of measures; • communicating with submitters; • preparing reports.
Company Management	• providing conditions and resources for the functioning of the mechanism; • approving resolution measures, particularly in higher-risk cases; • making decisions on sensitive and complex cases; • monitoring the effectiveness of the mechanism.
Sustainable Development Committee	• oversight of the implementation of the mechanism; • periodic review and proposing improvements; • analysis of trends, recurring issues, and causes; • review of complex or sensitive cases; • ensuring transparency, impartiality, and alignment with ESG principles.
Department Heads	• handling complaints within their area of responsibility; • participating in investigations and providing relevant information; • implementing agreed corrective and preventive measures; • integrating measures into the department's operations; • providing feedback on status and results.
Legal / Compliance Department	• providing legal support; • assessing compliance with legal requirements; • participating in complex or high-risk cases; • advising on measures with legal or financial implications.

9 | Definitions

Term	Definition
Grievance submitter	A person or group (stakeholder) who submits a complaint or grievance to the Company.
Grievance / complaint	An expressed dissatisfaction or concern related to the Company's activities, which the person or group believes has a negative impact on their rights, interests, or well-being.
Anonymous grievance	A complaint or grievance submitted without disclosing the submitter's identity. To be considered, it must contain sufficient information about the matter. Anonymity may make the investigation and communication process more difficult.
Confidential submission	A submission in which the submitter's identity is kept confidential and is not disclosed without their consent, except where necessary for legal or procedural reasons.
Stakeholders	Persons or groups who are or may be directly or indirectly affected by the Company's activities, or who may influence its operations. This includes, among others: employees, contractors, local communities, suppliers, institutions, and organizations.

9.1. Categorization of Grievances

Category	Type of complaint / grievance	Примери
1. Community and Environment	Environmental impacts	Excessive dust, water pollution, habitat destruction
	Land rights violations	Unauthorized use of land, inadequate compensation
	Impacts on livelihoods	Restricted access to resources, disruption of local activities
	Impacts on cultural heritage	Damage to cultural/religious sites

	Community health and safety	Exposure to risks, inadequate measures
	Community consultation	Insufficient information, exclusion of groups
	Resettlement and compensation	Poor conditions, inadequate compensation
	Impacts on vulnerable groups	Negative impact on women, the elderly
2. Governance and Transparency	Inadequate grievance mechanism	Inaccessible or inefficient process
	Lack of transparency	Failure to disclose information, weak oversight
	Unfair business practices	Non-transparent procurement or hiring
3. Ethics and Compliance (Code of Conduct)	Corruption	Bribery, misuse of funds
	Conflict of interest Измама и лажно претставување	Undisclosed business relationships
	Fraud and misrepresentation	Falsification of data
	Nepotism and favouritism	Decisions based on personal relationships
	Breach of confidentiality	Disclosure of sensitive data
	Bribery in procurement/HR	Personal benefits for decisions Принудна работа, детски труд
4. Human Rights and Social Issues	Human rights abuses	Forced labour, child labour

5. Employees and Labour Relations

Retaliation against
whistleblowers

Pressure or punishment
following a report

Discrimination

Unfair treatment based on sex,
age

Mistreatment and
harassment

Verbal, physical, or sexual

Unfair dismissal

Without due process or as
retaliation

Pay and working hours

Unpaid work, overtime hours

Benefits and compensation

Insufficient entitlements or
insurance

Occupational safety

Lack of PPE, unsafe conditions

Working conditions and
well-being

Poor food, accommodation,
conditions

Work-life balance

Excessive workload, no
flexibility

Career development

Lack of training and promotion

9.2. Appendix No. 1 Complaint / Grievance Submission Form

Complaint / Grievance Submission Form	
Submitter details (optional)	
Name and surname	
Contact telephone	
Email / address	
Would you like to remain anonymous?	☐ Yes ☐ No
Complaint / grievance details	
Title (short description of the issue)	
Detailed description of the event (what happened, how, and why)	
Location (exact place)	
Date and time of the event	
Is the issue ongoing?	☐ Yes ☐ No
Who/what is affected (people, property, environment)	
Is there a risk to health/safety?	☐ Yes ☐ No
Have you reported this before?	☐ Yes ☐ No (if yes – when?)
Evidence and witnesses (if any)	
Does evidence exist?	☐ Yes ☐ No
Type of evidence	☐ photographs ☐ documents ☐ other
Witness name and surname	
Witness contact	
Acknowledgement (optional)	
Submitter's signature	
Date	
Official section (for internal completion)	
Received by (name and position)	
Method of receipt	☐ in person ☐ telephone ☐ email ☐ box ☐ other
Date and place of receipt	
Case reference number	

9.3. Appendix No. 2 Acknowledgement of Receipt of a Complaint / Grievance

ПОДАТОК	ОПИС / ПОПОЛНУВАЊЕ
Референтен број на жалбата	
Датум на прием	
Локација на прием	
Начин на поднесување (на рака / е-пошта / кутија)	
Име на подносител на жалба (опционално)	
Контакт адреса / е-пошта (опционално)	
Град / Село (опционално)	
Телефонски број (опционално)	
Краток опис / наслов на жалбата	
Име и презиме на вработен кој ја примил жалбата	
Потпис на вработениот во ДПТУ Бучим ДООЕЛ	
Датум на издавање на потврдата	

*This form serves as an acknowledgement of receipt of your grievance. The Company undertakes to notify you of the status of the procedure within fifteen (15) days of the date the grievance was registered.

9.4. Appendix No. 3 Notification of the Outcome of the Grievance Procedure

Catedory	Data	Information/To be completed
GENERAL DATA	Grievance reference number	
	Short title/description of the grievance	
	Date of receipt	
	Location of receipt	
	Name of submitter (optional)	
	Contact (address/email) (optional)	
	Town/community (optional)	
	Telephone (optional)	
OUTCOME OF THE GRIEVANCE PROCEDURE	Status of the grievance	☐ Substantiated ☐ Unsubstantiated ☐ Partially substantiated
	Date of completion	
NOTIFICATION	Method of notification	☐ In person ☐ Email ☐ Telephone
	Date of notification	
ACKNOWLEDGEMENT COMPANY	Name and surname of responsible person	
	Signature	
	Date	
ACKNOWLEDGEMENT SUBMITTER (if applicable)	Name and surname	
	Signature	
	Date	
SUBMITTER'S DECLARATION	I confirm that I have been informed of the outcome	☐

9.5. Appendix No. 4 – Example Monthly Complaints and Grievances Report

Category / Indicator	Subcategory / Description	Total	Resolved	Unresolved	% Value
TOTAL NUMBER OF GRIEVANCES	All grievances	60	42	18	100%
BY TYPE	Environment	12	8	4	20%
	Community	10	7	3	17%
	Health and safety	8	6	2	13%
	Governance and transparency	6	4	2	10%
	Ethics and compliance	9	7	2	15%
	Employees and labour relations	15	10	5	25%

10. Change History

Date	Version	Description of Change
18.05.2026	1.0	Creation

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**Policy on the
Management of
the Complaints and
Grievance Mechanism**

Identification number POL.000.027
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