



External Grievance Procedure

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1. Introduction

This document is the External Grievance Management Procedure (GMP) for Liquid Intelligent Technologies (LIT), and forms part of the LIT Environmental and Social Management System (ESMS). The GMP is designed to outline the procedure for accepting, assessing, resolving and monitoring grievances from contractors, suppliers and those affected by the LIT projects. The aim is to identify and manage grievances from contractors, individual stakeholders or stakeholder groups. To timely redress or reach a resolution of such grievances is vital to ensure successful implementation of the LIT projects.

Grievances may encompass minor concerns as well as significant or long-term issues. They might be felt and expressed by a variety of parties including individuals, groups, communities, or other parties affected or likely to be affected by the social or environmental impacts of LIT projects. It is essential to have a robust mechanism to systematically handle and resolve any complaints that might arise to prevent escalation and pose a risk to successful operations. If well-managed, an effective grievance mechanism may develop positive long term mutually beneficial relationships and build trust with contractors and stakeholders.

LIT has placed a high priority on establishing a permanent dialogue and communicating with contractors, suppliers, communities and stakeholders. One of our goals is to respect, inform and respond to people's concerns and queries on a permanent ongoing basis. This GMP provides a simple means for contractors and stakeholders to express their concerns and for LIT to take corrective actions as required to ensure project commitments are effectively implemented while addressing and improving relationships with all partners.

The specific objectives of the GMP include:

- Establishing a mechanism for responding to grievances in an understanding, transparent and culturally suitable manner.
- Developing an accessible, no cost and efficient grievance procedure for project affected peoples and other stakeholders.
- Ensuring effective dialogue and transparent open lines of communication with the contractors, the public and our partners.
- Helping to prevent unrealistic expectations and/or negative perceptions from the local population towards LIT projects.
- Establishing a system of investigation, response and quick grievance resolution.
- Reducing the number of grievances received over time.
- Improving social performance through the analysis of grievances and refinement of work practices.

- Ensuring that non-compliances with project environmental and social commitments are adequately corrected in a timely fashion and are subsequently monitored.

To maximise the effectiveness of the Grievance Procedure, LIT will apply the following factors during implementation and operation of the system:

- Commitment to fairness in both process and outcomes.
- Clear grievance management rules, and accountability.
- Validation of all complaints submitted by actively engaging with the complainant to fully understand and address their concerns and needs.
- Confidentiality as required or where requested.

The GMP is expected to assist improve the LIT's environmental and social performance over time as the number and nature of grievances received is an indicator of the behaviour of our employees, contractors, and the overall effectiveness of ESMS. This GMP has been designed to meet the requirements of the International Finance Corporation (IFC) Performance Standards in relation to grievance management.

2. Procedure Requirements

2.1 Corporate Objectives

The corporate objectives of LIT are set out in the Health, Safety and Environmental (HSE) Policy which states that “LIT undertakes to safeguard its employees, contractors and the communities through providing and maintaining, as far as reasonably practicable, a working environment that is safe and without risk to the health of its employees, contractors and the communities”. We aim to be a proud employer and neighbour with our focus firmly fixed on sustainable development of the organisation through continuous improvement.

2.2 International Guidelines

The main international guidelines applicable to Grievance Management which LIT is basing their GMP against are the Equator Principles and those from the International Finance Corporation (IFC, Performance Standard (PS) 1 and 2).

IFC PS1 require that a grievance mechanism be established “designed to receive and facilitate resolution of concerns and grievances about LIT’s environmental and social performance”. The procedure should be disseminated to the Affected Communities through the stakeholder engagement process. The process should not impede access to any judicial or administrative remedies.

PS2, Labour and Working Condition also requires that LIT provides a grievance mechanism for contractors (and their organisations where they exist) to raise workplace concerns. This procedure should be made available during recruitment / appointment and make it easily accessible to them, with no retribution and should not restrict access to judicial or administrative remedies through legislation, or substitute any grievance mechanism through collective agreements.

3. Roles and Responsibilities

Following best practice, responsibility for the management and resolution of grievances ultimately rests with LIT. For example, with respect to a community grievance related to noise or vibration generated by a contractor traffic within a residential area, LIT would usually delegate resolution to the contractor. However, should the contractor attempt to resolve the complaint and fail to reach an acceptable settlement, it will be required that LIT takes responsibility for the eventual grievance resolution.

LIT and contractors (including subcontractors) must specifically address grievance management, resolution and respective responsibilities.

3.1 LIT Responsibilities

LIT shall ensure that sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of the Grievance Procedure and its monitoring. LIT responsibilities in Grievance Management are:

- Final Approval of the Grievance Procedure.
- Publicising the grievance mechanism.
- Allocation of a dedicated budget for the management of Grievance Mechanism and addressing grievances through financial or in-kind compensation where appropriate.
- Implementing and overseeing the Grievance Procedure.
- Providing accurate and timely information to contractors and stakeholders about the GMP.
- Obtaining, organising and documenting feedback from contractors and other stakeholders regarding perceptions, concerns and requests.
- Taking appropriate actions to address major Non-Conformities by contractors based on audit reports, performance monitoring reports and on proposed approach and actions.
- Coordinating with LIT Project/Construction Management teams in the resolution of a complaint where applicable.
- Evaluating and transmitting feedback obtained from stakeholders' grievances to LIT's management team and contractors if relevant to project decision-making.
- Centralising grievance tracking and monitoring.
- Reviewing and approving contractors' Grievance Management Procedures.
- Reporting Key Performance Indicators (KPIs) applicable to this procedure based on information from contractors and LIT.

Implementation of the LIT Grievance Mechanism will be the ultimate responsibility of LIT Community Relations' team leaders supported by the wider LIT team when required.

LIT Management will:

- Ensure that this Grievance Management procedure is applied through all LIT departments and levels that are undertaking activities related to the LIT projects. The Management will apply necessary controls to minimise risks that could result in stakeholder grievances.
- Contribute to the resolution and sign-off of any grievances which have international repercussions.

3.1.1 Publicising the Grievance Management Procedure

At least 7 days prior to the start of construction works, the LIT Community Relations Team Leader will proactively publicise the grievance mechanisms and inform local communities and the wider stakeholder group of the details of the Grievance Management Procedure. This will include information about where people can go and who they can engage with should they have a grievance. This information shall be widely and regularly publicised (both by LIT and contractors), throughout the duration of the Project.

3.2 Contractors' Responsibilities

LIT's Community Relations' team leader and the contractor personnel responsible for the Grievance Procedure implementation, will liaise regularly to discuss the status of construction activities and any critical grievance issues. If the received grievance was caused by the activities of the contractor, the LIT Community Relations team leader will discuss it with the contractor about appropriate solutions so that both sides agree as to how the corrective action will be carried out. The contractor then will report formally to LIT on the resolution of the grievance and what else might need to be done for the grievance to be closed.

Contractors will also need to provide sufficient and qualified resources allocated on an ongoing basis to achieve effective implementation of their Grievance Procedures. Contractors also need to provide relevant monitoring data/reports to LIT as indicated in their contracts.

Contractors' specific responsibilities for grievance management include:

- Adherence to all LIT policies and plans, including this procedure.
- Developing and executing their own grievance mechanism, in accordance and aligned with this LIT Grievance Management Procedure.
- Receiving grievances directly from the individuals or groups concerned, including community members, employees and workers, or through sub-contractors.

- Handling grievances resolution through their own Community Liaison (CL) teams but in close coordination with the LIT Community Relations team.
- Reporting to LIT Community Relations teams regarding grievances tracking (received, registered, in process and resolved) on a daily and weekly basis.
- Resolving a grievance immediately in the field when practicable.
- Informing LIT Community Relations team in writing of all grievances received, including those immediately resolved in the field.
- Proposing alternative approaches to activities which may result in an impact of concern to stakeholders, in order to avoid and to reduce the number of grievances received.
- Attending all coordination meetings requested by LIT Community Relations team leader on a daily and weekly basis, and as needed.
- Reporting to LIT Community Relations team on a daily and weekly basis and as needed to manage social incidents and other community relations issues.

4. Grievance Procedure

This Grievance Management Procedure is designed to facilitate the lodging, acceptance and closure of grievances coming from contractors, affected communities, but also from other interested stakeholders and project workers.

The GMP is available to any party that wishes to communicate a grievance to LIT whether it be an individual, non-governmental organisation, community-based organisation, other community group, local or national employee.

The GMP is available on a voluntary and non-excluding basis. It does not affect anyone's rights to use the specific country's judiciary systems in any way, nor does it replace the public mechanisms of grievance and conflict resolution. However, LIT believes most grievances can be quickly resolved by openly engaging and discussing the issues in order to achieve mutually acceptable and preferably beneficial solutions in a less official setting.

LIT will ensure the implementation of the contractor's own Grievance Procedures, which are aligned with the LIT Grievance Procedures and are fully enforced. This shall be done by reviewing and approving their Grievance Procedures, ensuring their Community Liaison Officers understand their responsibilities, and by ensuring that grievances are being logged, followed-up and closed-out in a timely manner. LIT retains the right to intervene if a Contractor has not closed-out any genuine grievances after the second attempt or within a reasonable period of time.

Specific grievances in relation to labour or procurement contracts are beyond the scope of the Grievance Procedure and should be reported through the LIT or Contractor Procurement or Human Resource Departments, as applicable.

Grievances will be handled through the Community Relations team within the Project Team. They shall deliver grievances to the appropriate departments in LIT or Contractor organisations, implement systems to organise, track and document all responses and deliver summary reports to management. LIT will aim to resolve all grievances within 14 days from receipt.

The Community Relations team will propose means to resolve grievances, monitor the Procedure, and hold regular meetings to collect grievances in the field and provide feedback to communities. Grievances may also be raised during formal stakeholder meetings which will be handled inline with this procedure.

LIT will inform the local communities, its employees and sub-contractors' employees of the Grievance Mechanism and provide contact details and process of how one may lodge a complaint via:

- The Community Relations team within the Project Team – verbally.
- Telephone.

- Email.
- Digital Grievance Report function.

4.1 Publicising this Procedure

The grievance mechanism procedure will be publicized and communicated in a manner appropriate to the scope and nature of the project, and in a manner appropriate to the audience (i.e. method of delivery, language, etc.). Notification will include:

- A summary of the procedure and how it can/should be used.
- Details of the process, such as who is responsible for receiving and responding to grievances, and any external parties that can receive grievances from communities.
- When stakeholders can expect a response.
- Safeguards in place to ensure confidentiality.

All contact details and means of submitting a complaint will be widely and regularly publicised, throughout the duration of the project. This is to be done through the following channels:

- Including this procedure in contractor specification documents.
- Training of contractor workers on this procedure.
- Including a link to this procedure on OPCO Liquid websites.
- Communicating this procedure during all project-related Stakeholder Engagement Activities.
- Communicating this procedure to all project-related community representatives.
- Placement of posters with contact details at all project sites for the duration of the project.

4.2 Contact Details

All contractors or stakeholders with internet access can report a grievance through LIT's digital Grievance Report function, following the link:

<https://forms.office.com/Pages/ResponsePage.aspx?id=EiZ5aA4Py0axavy4L9qMsQH4N8zGSxxMkHRkSWCD8oRUNTNGNzhYVTZZQUtPUjJYME01R1pDWVpBVy4u>

or



Where a contractor or stakeholder does not have access to the internet, details (name and contact details) of Contractor and LIT representatives will be provided for each LIT project, where grievances can be reported. A grievance can be reported verbally, or in writing using the form in Appendix A.

4.3 Grievance Handling and Resolution

Grievances should be handled according to the following steps:

- For all grievances not reported via the Digital Grievance Report function, the Community Relations team will learn as much as possible about the case, including:
 - Who?
 - What?
 - Where?
 - When?
 - Why?
- LIT shall acknowledge receipt of any grievance as soon as possible, but up to seven days from the date it was submitted and shall inform the complainant about the timeframe in which a response can be expected.
- The findings of all investigations shall be entered into the grievance register and used to determine eligibility (see below Grievances to be Directed Outside of the LIT Grievance Procedure). If the Grievance is considered to be ineligible the Community Relations team will contact the complainant within 3 working days and explain that the complaint was not recognised as eligible.
- For all types of Grievances, the Community Relations team will listen attentively to the person while he/she expresses his/her grievance. In many cases, simply listening with empathy helps to calm the situation.
- During this first meeting if the grievance is resolved, the case is considered closed and shall be recorded as such.

- Should a grievance be more complex, LIT and/or the contractor shall conduct an investigation to verify whether the grievance is genuine as related to project commitments. This is performed in the presence of the individual or the representatives of the local community lodging the grievance. LIT shall fully investigate all grievances received, and will involve other departments, contractors and senior management as required in the process in order to fully understand the circumstances that led to the grievance being raised. This should be performed in a timely manner to avoid delaying the resolution of a grievance. LIT will aim to resolve any grievances within 30 days from the date of receipt of this grievance. This timeframe may be extended to 60 days should it be found that the grievance is more complex in nature.
- The local authorities and/or representatives may be invited to attend the investigation if the grievance warrants their involvement or in the event that they may request to participate.
- The Community Relations team will communicate and explain the grievance to the appropriate person in LIT or in the Contractor organisation.
- The Community Relations team will consult other departments to determine the practical corrective action(s) or mitigation of the grievance:
 - nature of the corrective action;
 - time in which it must be implemented;
 - person responsible for implementation; and,
 - log information in the Grievance Registry.
- LIT and/or the contractor implement this solution.
- If the complainant accepts the corrective actions, they sign a letter of acceptance and the grievance is closed subject to a 15 days monitoring period.
- If the proposed solution or executed solution is not accepted by the complainant, the grievance is elevated to a Grievance Review Committee (Section 4.4).
- LIT and/or the Community Relations team will consider if refinements to procedures or practices could reduce the probability of recurrence. LIT coordinates any changes to plans, procedures and methods with the Contractors within contractual restrictions.

4.4 Grievance Review Committee (GRC)

The GRC will be set up by LIT to address complaints as a result of any project implementation. The GRC will include the Community Relations team leader, representatives from LIT, Contractors and at least two representatives from local communities. A coordination of resolutions within the GRC will be the Community Relations team's responsibility.

All grievances shall be dealt with on a case by case basis. However, all grievances will require further discussions with the complainants and community members to mitigate perceptions that resolutions unfairly benefit LIT.

Documentation pertaining to an unresolved grievance will be given to the Chair of the Committee, who will seek and give opinion about how to resolve the case and who will attempt to resolve the case through conciliation.

As a last resort, aggrieved parties have a right to take legal action. This is a more formal rights-based approach that shall only be taken if all other approaches have failed or when there are serious conflicts about facts and data. The final decision will be taken by the arbitrator or courts based on compliance with laws, policies, standards, rules, regulations, procedures, past agreements or common practice.

4.5 Grievance tracking

Once a verbal or written grievance is received, it will be screened for validity (e.g. to ensure that nothing is blatantly false) and logged into a central grievance mechanism register within 3 business days, scanning the following QR code:



Grievances shall be assigned a case number and records of communication/consultation shall all be attached with the relevant entry and filed. The database shall be monitored regularly for recurring grievances so that appropriate mitigation can be developed.

LIT anticipates that the following direct impact grievances could be categorised as follows:

- Job issues.
- Third party injuries or conflicts.
- Damages to infrastructure.
- Loss of livestock.
- Damage and temporary interruption of access roads.
- Road congestion.
- Nuisance caused by noise or dust.
- Unplanned use / damage to land.

- Environmental issues (soil and water contamination, erosion, damage to wildlife or vegetation, hunting and fishing, improper right of way restoration etc).
- Behaviour of personnel.
- Community health and safety.
- Cultural issues.

The categorisation of grievances will allow LIT to establish trends and adapt its own, and Contractor's management system where needed to improve environmental and social performance and reduce the overall number of grievances resolved.

If a grievance is the result of a non-compliance to project environmental and social project commitments and could result in harm to people or serious environmental impact, the Community Relations team will consult directly with the Construction Management Team and LIT Project Manager and may recommend a temporary suspension of an activity. Any member of staff or contractor has the right to refuse or stop work that is unsafe.

In addition to categorising a grievance, the following information will also be collected in a standards format:

- Name, address, contact number, place or community of residence.
- When and where the grievance was received.
- Name of the Community Relations team members who received the grievance.
- Basic information about the party making the grievance for providing feedback.
- Corrective actions and dates when they were initiated and completed.
- Dates when the required notifications and feedback were given to the affected party.
- Date when all parties agreed the grievance was closed out.

It is voluntary for the individual making the grievance to provide personal information.

4.6 Grievances Outside of the LIT Grievance Procedure

Following best practice, all grievances and claims from contractors and local communities should be accepted and no judgment made prior to investigation, even if complaints are minor. However, several types of grievances deserve special consideration and possible redirection to other grievance resolutions channels, such as:

- Complaints clearly not related to the Project: It is sometimes difficult to determine which issues are related to the project and which are not. If in doubt, employees designated to receive grievances should accept the complaint and assess its legitimacy. Making upfront agreements

with communities as to which types of claims are and are not project-related will help avoid misunderstandings in individual cases.

- Complaints constituting criminal activity and violence: In these cases, complainants should be referred to the formal justice system.
- Commercial disputes (e.g. contractor not paying third parties): Commercial matters should be stipulated for in contractual agreements and issues should be resolved through a variety of commercial dispute resolution mechanisms or civil courts.
- Issues related to Governmental policy and Government institutions: It is not uncommon for communities to use company grievance mechanisms to bring complaints related to aspects of project implementation that are a responsibility of, and implemented by, public institutions and their officials. The private sector is not obliged to address such complaints. Communicating clearly to local communities about the role, responsibilities, and limitations of the LIT Grievance Mechanism is a must, however it is noted that this aspect may pose challenges in implementation. Governments may not have sufficient capacity (either resources or processes) to manage grievances, or they may be inaccessible to any affected communities. At a minimum, such grievances can be captured through the LIT system, and then LIT may choose to pass the grievances to authorities and let the communities know how to follow up.

4.7 Safeguarding Grievances

4.7.1 Background to GBVH

GBVH is an umbrella term that covers a range of behaviours, including sexual, physical, psychological and economic abuse. What sets it apart from other types of violence and harassment is that it is directed at people because of their sex or gender, or disproportionately affects people of a particular sex or gender.

The ILO adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH, in the world of work.²⁵ Convention No. 190 recognises that GBVH can constitute a human rights violation or abuse, that it is a threat to equal opportunities and is incompatible with decent work. Violence and harassment are also explicitly referenced in UN Sustainable Development Goal (SDG) 5 on achieving gender equality.

4.7.1.1 Examples of GBVH

Gender-related complaints include, but are not limited to, those of:

- sexual discrimination, direct or indirect
- sexual harassment
- discrimination or harassment on the basis of sexual orientation or gender identity
- bullying of a nature to ridicule a person's masculine or feminine identity

- sexual abuse
- sexual exploitation.

4.7.2 Background to Modern Slavery

4.7.2.1 Child Labour

Child labour, as defined by the ILO Convention is “work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under of age of 18 that is hazardous to the physical or mental health of the child. In conducting its business, LIT:

- Will not employ children that falls into the definition as stipulated by the ILO Convention, notwithstanding any national law or local regulation.
- Will comply with all other applicable child labour laws, including those related to wages, hours worked, overtime and working conditions.
- Is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities.
- Expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate. Should violation of these Principles become known to LIT and not be remediated, LIT will take action including discontinuation of the business relationship.

4.7.2.2 Forced Labour

LIT expressly prohibits any form of work or service, not voluntarily, obtained under threat of any punishment or that is requested as a way of cancelling a debt. Moreover, it is not required, under any circumstances, that employees leave any kind of deposit during the working relationship maintained.

4.7.3 Principles of GBVH and Modern Slavery Grievance Assessments

The assessment, monitoring and response measures need to be underpinned by these fundamental principles:

- **Survivor-centred:** The rights of GBVH survivors need to be consistently prioritised and used as the starting point for all decisions on efforts to assess, prevent, monitor and respond to GBVH. Maintaining confidentiality and checking with whom survivors want information to be shared are important aspects of a survivor-centred approach. When responding to reports of GBVH, it is important to listen to and respect survivors’ wishes and decisions in order to help their recovery.

- **Safe:** Survivors, witnesses and those who report and seek to address GBVH can be at risk of retaliation, including threatening and violent behaviour, often from those who do not like their position of power being challenged. The threat of retaliation may be used to silence those who speak out about GBVH. This can leave those who report GBVH in a vulnerable position and fear of reprisal can deter people from reporting incidents or raising concerns. It is important to prioritise the safety of those who have experienced, witnessed and/or reported GBVH. Confidentiality and checking with survivors and witnesses about sharing identifiable information are important aspects of ensuring safety.
- **Context-specific:** All measures need to be rooted in a thorough understanding of the local context. As such, it is important to first understand the legal and social context and identify the support mechanisms that are in place.
- **Non-discriminatory:** All survivors need to be listened to and treated equally.

4.7.4 Survivor-centred Approach

The LIT Regional HR Manager will ensure a survivor-centred approach is followed for all GBVH or Modern Slavery grievances reported. Key elements of a survivor-centred approach are to:

- Treat survivors with dignity and respect, taking time to listen to what they have to say rather than rushing to take action.
- Enable survivors to make informed decisions about what they want, providing them with information about support options available.
- Help survivors to be safe, including keeping their information confidential.
- Treat all survivors equally and non-judgementally, making sure their experience is not unfairly dismissed, for example, because they are young, old, disabled, a sexual or gender minority, or work in prostitution.
- A survivor-centred approach is to be used in addressing GBVH. It helps to reduce the potential for further harm to survivors and, the likelihood of further financial and reputational risk to companies. Anchoring decision-making in a survivor-centred approach is, therefore, in the interests of companies and investors.

4.7.5 GBVH and Modern Slavery Grievance Investigator

When a report of GBVH or Modern Slavery is received, the LIT Regional HR Lead will receive the Grievance. The LIT Regional HR Lead will be trained in how to respond to reports of GBVH or Modern Slavery and has the skills and confidence to take a survivor-centred approach.

The lead person's responsibilities are:

- Report all safeguarding grievances to the Head of Environmental and Social within 24 hours of receipt.

- Ensuring the GBVH or Modern Slavery report is appropriately and securely logged in the company's internal system and that confidential records are kept.
- Ongoing monitoring of the support and safety needs of survivors and any witnesses and/or whistleblowers.
- Ongoing communication with survivors to ensure their wishes inform all decisions about the company's response to the report, including initial decisions on how to proceed.

4.7.5.1 Investigator Requirements

The LIT Regional HR Manager will ensure he/she is trained / experienced in:

- Comprehensive training on company grievance mechanisms and investigation procedures, including scenarios and group exercises (such as role playing) to ensure staff are prepared to respond effectively.
- Understanding how GBVH or Modern Slavery risks can be exacerbated by various factors (such as seasonal deadlines or the presence of temporary workers).
- Thorough understanding of a survivor-centred approach and the importance of confidentiality.
- Comprehensive understanding of the local support services available to survivors and witnesses.
- Knowledge of GBVH or Modern Slavery and legal protection expertise available to the company and the qualified third-party providers the company has identified to undertake investigations.
- Basic training on psychological first aid to guide interactions with survivors.

4.7.6 Maintaining Confidentiality

It is crucial that confidentiality is maintained in relation to reports of GBVH or Modern Slavery to protect survivors, witnesses, whistleblowers and alleged perpetrators. It is critical that all details of the report – and any subsequent investigation and associated interviews be kept confidential. The identities of everyone involved, including any investigators, will need to be protected. To do this:

- the number of people with whom information is shared will be limited.
- the timing and location of any investigation activities, including interviews, will be conducted so that they are away from worksites and not observed by others.
- all paper and electronic information in are to be filed in secure locations.
- failure to maintain confidentiality will be linked to disciplinary procedures and communicated to all parties involved.

- Rumours are to be control by ensuring that managers who are informed about the report are aware of what they are/are not allowed to communicate to others.

4.7.7 GBVH or Modern Slavery Grievance Response

When a GBVH or Modern Slavery grievance is reported, the Regional HR Lead will ensure that the immediate priority is to enable survivors to access the professional support they want and to work with survivors, witnesses and whistleblowers to identify safety measures to protect them from further harm.

The Regional HR Lead will need to provide private spaces where support options and potential safety measures can be discussed with survivors (or witnesses and whistleblowers). This is an important aspect of maintaining confidentiality and enabling any concerns to be discussed.

Support options and safety measures offered to survivors, witnesses or whistleblowers ought to be:

- Independent of any other action taken in response to the report of GBVH or Modern Slavery.
- Proactively offered, rather than only made available on request.
- Presented in a way that gives survivors (and witnesses and whistleblowers) choice and control, so they can make informed decisions.
- Provided by trained staff, so as not to cause further harm.

It is important that survivors, witnesses and whistleblowers are able to access support services during working hours so there is no additional cost to them.

4.8 Anonymous Grievances

If an aggrieved wish to report a grievance anonymously, such a grievance can be reported as such using the Liquid ethics hotline: liquidtelecom@tip-offs.com or www.tip-offs.com or via telephone.

Country	Telephone Number
Botswana	BTC 0800 600 644 Orange 1144 Mascom 7111 9602
DRC	+27 31 571 5307
Dubai	8000 3570 3346
Kenya	0800 722 626
Rwanda	+27 31 571 5307
South Africa	0809 339 338
Tanzania	0800 110 025 / 0411 200 082

Country	Telephone Number
Uganda	0800 100 255
United Kingdom	0808 189 1196
Zambia	+260 9712 31250
Zimbabwe	0800 4100 / 0808 5500
South Sudan	+2731 571 5307
Nigeria	+2731 571 5307

5. Consultation and Disclosure

The disclosure of this procedure is done through the Contractor Specifications. A simplified summary procedure will be documented in the Project Offices and the Community Relations team will be well versed and trained in the Grievance Procedure. Contractors should train their personnel on how the LIT grievance procedure must be followed. During Stakeholder Engagement sessions and community engagement meetings, the grievance process will also be explained.

6. Verification and Monitoring

LIT will monitor and ensure that Contractor and subcontractors are adhering to the requirements and commitments contained in the LIT's Management Plans and Contractor Implementation Plans. All monitoring requirements shall be established within the Contractor Plans which detail resources, monitoring, and assurance methods included within the Contractor's ESMS.

This entails effective record keeping of complaints raised throughout the life of the Project. On receipt of grievances, electronic notification to management must be distributed. Grievance records must be made available to management immediately upon request.

Monthly internal reports will be compiled by the Community Relations Team leader, supported by CLOs as required and distributed to the management team. These grievance reports will include:

- The number of grievances logged in the proceeding period by level and type (with further details of the location of the incident/issue).
- The number of stakeholders that have come back after 15 days of monitoring period stating they are not satisfied with the resolution.
- The number of grievances unresolved – by type - after 30 days for relatively straightforward grievances and 60 days for more complex issues.
- The number of grievances resolved after 30 days, without accessing legal or third-party mediators, by level and type.
- The number of grievances of the same or similar issue.
- LIT's responses to the concerns raised by the various stakeholders.
- The measures taken to incorporate these responses into project implementation.

Contractors shall also submit monthly reports aligned to the LIT reports.

An appropriate grievance report should be part of LIT's annual reporting. Annual reports will be made available on request, if not a specific requirement.

7. Procedure owner

The EXCO Sponsor and Owner of this procedure is:

- The Group COO

8. Contact person

Questions and feedback regarding this Procedure should be submitted to:

- Group Head: Environmental and Social

9. Review cycle

This Procedure will be reviewed (and updated, where required) at least every two years or whenever the changes in business environment demand such a review.

10. Version history

Version	Date of Issue	Effective Date	Purpose of the Change
1	October 2020	November 2020	New Procedure
2	November 2020	December 2020	Include GBVH grievance requirements
3	April 2021	April 2021	Rebranding

Appendix A : Grievance Form – Sample

GRIEVANCE ACTION FORM					
PART A					
Location:		Complaint No:		Date Received:	
Name:		Method of Response:			
Address:				Verbal (in person)	
				Verbal (telephone)	
				Written /Email	
Contact Details:					
PART B					
Description of Grievance:					
PART C					
Liquid Telecom Response					
PART D					
Verification of Response and Corrective Action:					