

PROCEDURE FOR COMPLAINTS, CLAIMS AND SUGGESTIONS OF THE FAIRMINED CERTIFICATION

Version 1.0

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INTRODUCTION

This procedure has **the objective** of allowing miners, mining communities, allies, mineral buyers, civil society actors, governments, and any other interest group to register their complaints, suggestions, concerns, and comments related to the Fairmined Certification, the compliance with the Fairmined Standard, the rules, protocols, and policies established by the Alliance for Responsible Mining (ARM).

This procedure has **the scope** of the actors involved in the Fairmined Certification, such as certified mining organizations, suppliers, and authorized Fairmined licensed brands. In addition, this procedure also reviews the performance of the auditing companies, allied organizations, and ARM as the creator and administrator of the scheme.

With this protocol, ARM seeks to generate a standardized procedure that allows any challenge to be resolved on time, objectively, and based on the reinforcement of communication and trust.

Any claim received will be perceived as an element of utmost importance to improve the Fairmined assurance scheme, including the actions of the Fairmined certified mining organizations and the companies authorized to buy and manufacture Fairmined metals. Similarly, all claims received about the service provided by the third-party certification auditing firms and the guarantees offered by ARM as the creator of the Fairmined Standard and the Fairmined Certification are taken very seriously. Therefore, it is in the best interest of ARM to rigorously treat any complaint, claim, or suggestion to continue providing the best possible service to all stakeholders and strategic allies that make it possible to achieve the objectives of the Fairmined initiative.

Three general sections are specified below for the proper management of complaints, claims, and suggestions:

1. Principles:

- 1.1. Any claim will be handled by ARM in a responsible, transparent, efficient, and effective manner.

- 1.2. **Complaint:** this is a statement through which inappropriate conduct is brought to ARM's attention by any of the organizations or companies involved in the Fairmined Certification or by the auditing firm, partner, or ARM.
- 1.3. **Claim:** this is a statement through which deficiencies are made known to ARM by any of the organizations or companies involved in the Fairmined Certification or by the auditing firm, partner, or ARM.
- 1.4. **Suggestion:** it is a recommendation or proposal for improving the Fairmined Certification, its operations, procedures, and results.
- 1.5. **ARM** manages complaints, claims, and suggestions by the procedures established in this document following the ISEAL criteria 5.1.12 requirements.

2. Complaints, claims, and suggestions management procedure

- 2.1. Any person or institution that wishes to send ARM complaints, claims, and suggestions about a certified mining organization, a Fairmined authorized company, an auditing firm, or the ARM team must fill out the alert registration form available on the website: <https://fairmined.org/complaints-and-suggestions-mailbox/>
- 2.2. If the person cannot write or has limited access to technology, alerts can be received by telephone at +57 (4) 332 47 11. Individuals can also visit the central office at Calle 32 B SUR # 44 A 61. Envigado, Colombia. Complaints can be communicated directly to a member of the ARM team, preferably someone from the standards and assurance area (cert@responsiblemines.org).
- 2.3. Any complaint, claim, or suggestion must have at least:
 - Name and contact details (unless the communication is submitted anonymously).
 - Description of the complaint, claim, or suggestion.
 - Supporting evidence (optional).
 - Description of the steps already taken to resolve the matter at an informal or indirect level.
- 2.4. All members of the MRA team must be trained on this procedure and be able to ensure that they guide people through it.
- 2.5. All complaints, claims, and suggestions are reviewed in advance to ensure that they are not unjustified or that essential information is missing.
- 2.6. The person in charge of the Assurance and Quality area will be the person designated to receive and treat the complaint, claims, and suggestions.

- 2.7. In the event that the Quality Assurance Manager receives a claim, which by its nature constitutes a serious claim, the leader of the area will investigate and analyze the problem or the claim raised and will initiate the procedure if necessary or, if warranted, call a committee of three people to analyze the case.
- 2.8. Each complaint, claim, or suggestion case will be recorded in the file **"Registry of complaints, claims, and suggestions."**
- 2.9. The person responsible for the management of complaints, claims, and suggestions will confirm in writing the receipt of the claim to the claimant within 15 days, providing a summary of the procedure to be followed and the expected periods by moments or stages.
- The complaint must be in scope as stated in the introduction: a lower-level solution has been sought through an appropriate channel, and the correct information has been submitted.
- 2.10. Any eligible complaint, claim, or suggestion will be notified in writing to the complainant and the subject of the complaint.
- 2.10.1. The person responsible for managing complaints, claims, and suggestions will inform the subject of the complaint in writing that a complaint has been received and will invite the individual to send a written reaction and supporting evidence within the following 15 business days. ARM may decide to extend this period by an additional ten business days to allow the individual responsible for the complaint to submit a reaction and evidence supporting the request if a valid reason is provided.
- 2.10.2. The person in charge will request more information from the claimant if he sees it necessary to have a broader picture of the situation. Any parties asked for more details will be given ten business days to present them.
- 2.11. ARM will respond to anonymous complaints as long as the complainant is acting in good faith in submitting the alert and has sufficient evidence to believe that a violation of the Fairmined Standard may occur.
- 2.12. The standards and assurance area will maintain the anonymity of the person who made the complaint, claim, or suggestion only if the person expressly requested this.
- 2.13. The complaint, claim, or suggestion will be duly investigated, considering the facts and data provided in the case record. Additional relevant information from the personnel involved and third-party experts will also be deemed.
- 2.14. Within 30 days of receiving the information, ARM will inform the parties of the understanding of the situation and proposed solution. When a mutually agreeable solution is possible, it will proceed. If not, ARM will decide and define the follow-up measures. ARM reserves the right to extend the period to determine if the case's complexity requires it. ARM will inform the parties in writing about it.

- 2.15. The ARM Directorate, the Management of the Assurance and Quality area, and the Evaluation Monitoring and Learning area will be informed of the case and its resolution. The status of the claim will be reported as process supervision areas.

3. Documentation

3.1 The documentation of the management of complaints, claims, or suggestions include:

- The complaint, claim, or suggestion (with dates and original registration information as received on the website or via email)
- The ARM response (partial notification).
- A complete description of the management of the claim/suggestion, including the documentation of all the people involved.
- The resolution of the case with the respective documentation of the actions taken and their effect.
- Recommendations.

3.2 All complaints, claims or suggestions systematized in the file "**Registry of complaints, claims, suggestions and alerts**", as well as their respective supports during the management of the case as a result of the investigation; will be documented and saved:

- In the path of the corresponding ARM server for the management of complaints, claims and suggestions:
/2. ESTANDARES Y CERTIFICACION/FM CERT SYSTEM/4. Fairmined Complaints mechanism
- In the folder created with the name of the mining organization, the supplier or the Fairmined license mark, auditing firm, who is affected by the claim.