

# COMPLAINTS MANAGEMENT PROCEDURE

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## VERSION HISTORY

Author	Version	Approved by	Issue Date	Review Date
C. McHugh	Draft V1.4	To be Approved		
GH, RS, JT	Draft V1.5	To be approved		

## 1. INTRODUCTION

The following additional Conditions of the Mineral Lease 6438 conditions 45-49, Extractive Mineral Lease 6439 conditions 10-14, and Miscellaneous Purpose Licence 146 18-22 require Rex Minerals (Rex or the company) to develop a complaints register. The conditions state:

### Complaints Register

45. The Tenement Holder must operate a 24 hour per day, 7 day per week, free-call telephone complaints line for the purpose of receiving complaints from members of the public in relation to mining operations.
46. The Tenement Holder must take reasonable measures to notify the public of the complaints line telephone number and the fact that it is a complaints line.
47. The Tenement Holder must establish and maintain a public complaints register. The public complaints register must, as a minimum, record the following detail in relation to each complaint received in which it is alleged that environmental harm (including an environmental nuisance) has been caused by the mining operations:
  - 47.1. the time at which the complaint was received;
  - 47.2. all personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
  - 47.3. the subject-matter of the complaint;
  - 47.4. the action taken by the tenement holder in relation to the complaint, including any follow-up contact with the complainant; and
  - 47.5. if no action was taken by the tenement holder, the reasons why no action was taken.
48. All records in respect of the public complaints must be maintained for a period of at least 7 years.
49. The Tenement Holder must make the public complaints register publicly available except for the name and contact details of each complainant.

Rex has developed a comprehensive Complaints Management Procedure (this document) that satisfies the requirements for a complaints register, set out above, as well as providing guidance on the management of feedback, issues, complaints and disputes that arise as a result of the company's activities.

## 2. PURPOSE AND SCOPE

To establish a process for receiving, classifying, responding to, and recording feedback, issues, complaints and disputes (as defined in Section 3) that arise as a result of the company's activities.

### 3. DEFINITIONS

Complaint	A statement that something is unsatisfactory or unacceptable.
Complainant	The person or party making the statement that something is unsatisfactory or unacceptable.
Dispute	A disagreement or argument. A dispute may result from a complaint that has not been resolved to the satisfaction of the complainant.
Feedback	Information that is used as a basis for improvement. This is not a complaint, but rather information that has been provided for consideration. However, feedback may escalate into an issue or even a complaint if the provider feels it has not been considered adequately.
High priority matter	A matter that presents an immediate threat to persons health, safety or property, has the potential to disrupt day-to-day landholder activity or that may result in an environmental incident causing contamination or hazard
Issue	An important topic or problem for debate or discussions. This is not a complaint, but rather a matter that has been identified as requiring discussion. A discussion may resolve the issue, or it may escalate into a complaint requiring a course of resolution to be put into place.
Landholder	The owner or holder of land adjoining or on the mine lease (including residents on that land)
Matters	A collective term used herein for feedback, complaints, issues and disputes
Public	All persons, whether landowners, residents, local community, tourists or other
Resolution action	Action proposed or taken to resolve a matter
Vexatious	An action or the bringer of an action that is brought without sufficient grounds but rather to cause annoyance to the party against which the action is brought.

### 4. PRINCIPLES

This document outlines Rex's approach to identifying, classifying and addressing feedback, issues, complaints and disputes ("matters") that are raised by landholders and the communities in which it operates. Rex requires that all matters are addressed following the steps outlined in this procedure and that records are kept and feedback provided to stakeholders in the manner outlined herein.

All complaints, disputes or issues ("matters") will be investigated to identify corrective actions aimed at eliminating the risk of recurrence and/or escalation of the matter.

Rex acknowledges that the people or party that raise matters with Rex about its activities expect:

- Timely acknowledgment of their matter
- An honest and timely response to the matter they raise about company activities
- An action to address their matter, if required
- The action is dealt with in a timely fashion and at the appropriate level within Rex
- A fair and reasonable outcome.

## 5. PROCESS OVERVIEW

The complaints, disputes and issues management process flow is summarised in

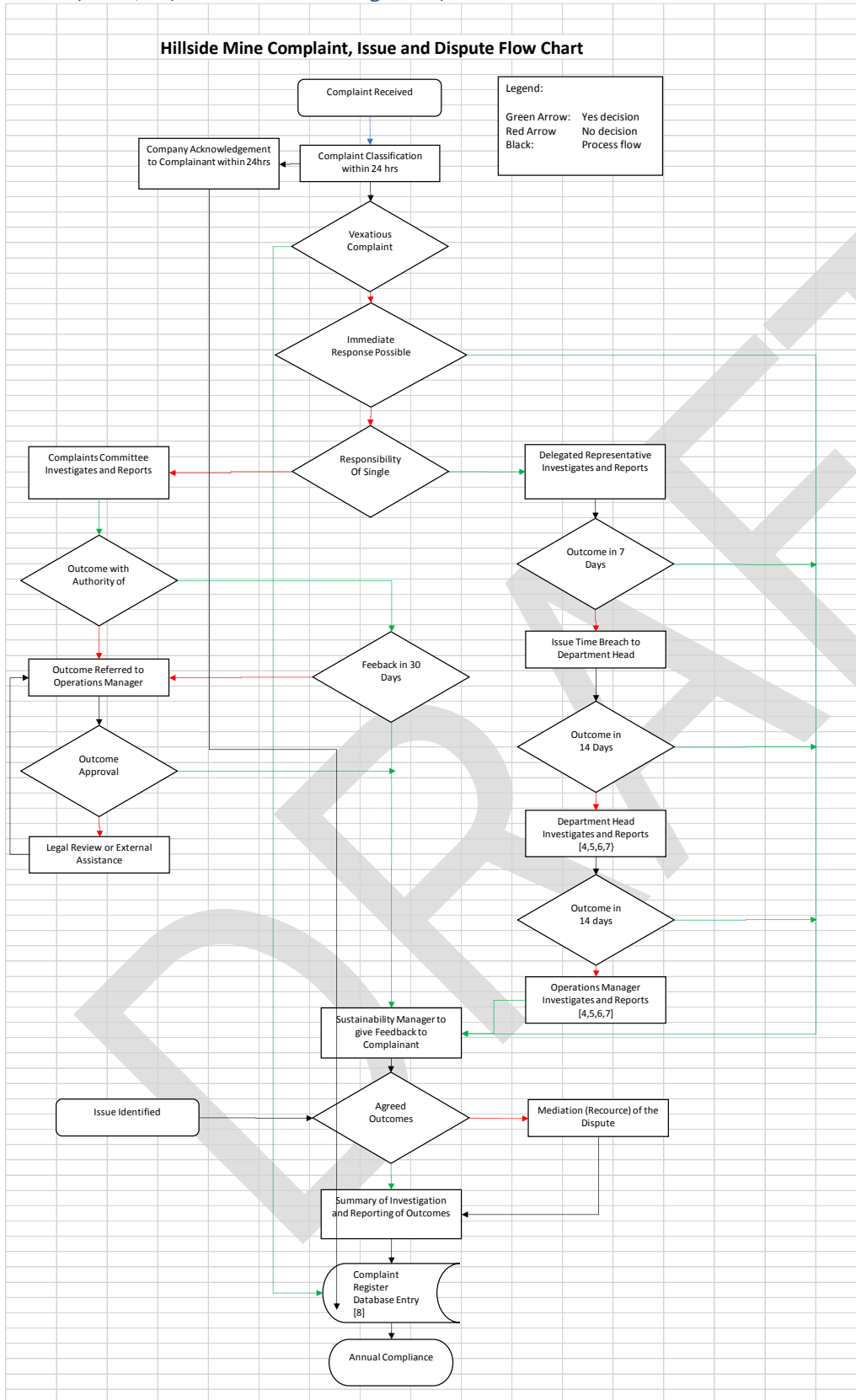


Figure 1 Process for managing feedback, issues, complaints and disputes.

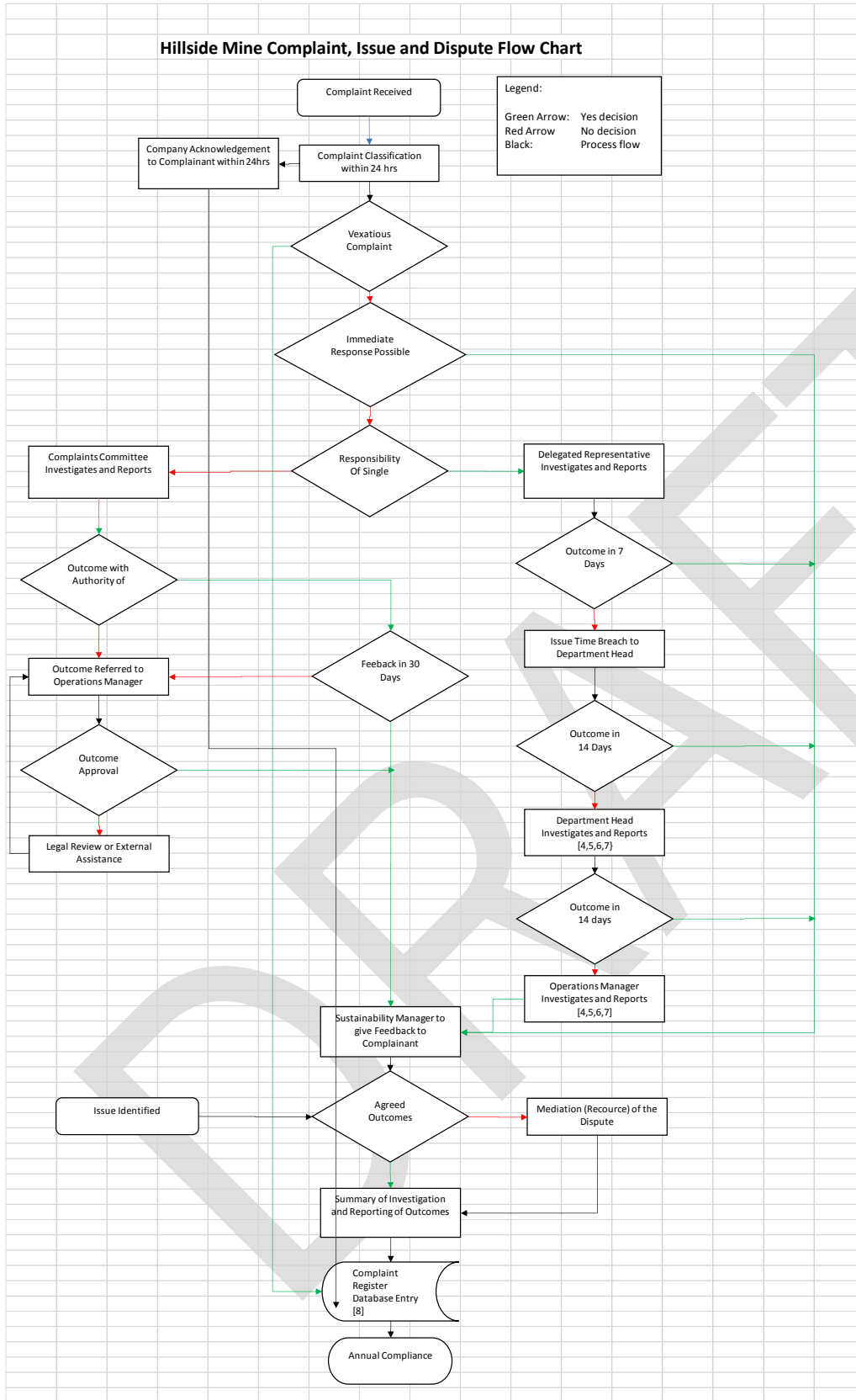


Figure 1 Process for managing feedback, issues, complaints and disputes (matters)

## 6. PROCEDURE DETAIL

### 6.1 Receive and register

Feedback and advice of an issue, complaint or a dispute may be received verbally (on the phone, via the complaints line, in person or at a meeting) or via email or a letter. On receipt of such, the matter will be advised to the Sustainability Manager or nominated representative who will record it in the complaints register with the following details:

- the time at which the matter was received;
- all personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- the subject-matter of the complaint;
- any immediate action taken by the company in relation to the matter, eg a relocation or change to parts of the operation;
- the action taken by the Company in relation to the matter , including any follow-up contact with the complainant; and
- if no action was taken by the Company, the reasons why no action was taken.

### 6.2 Classify and Allocate

Within 24 hours of receipt, the Sustainability Manager or nominated representative will determine:

- a) whether the matter relates to the company's activities thus is eligible for the complaints procedure,
- b) whether the matter is feedback, an issue, a complaint or a dispute and
- c) to where internally the matter will be allocated.

### 6.3 Eligibility

Matters that are outside the company's control are not eligible to be investigated and will not progress through the complaints management procedure and the person or party that raised the matter will be informed accordingly. For example, if the matter related to a traffic incident that occurred in the vicinity of the mine site, but that was in the control of the local council or State roads department (that is, was an issue of speed or road condition and not related to the company's activities), it would not progress through the complaints procedure and the person or party that raised the matter would be referred to the relevant controlling party for resolution. Only matters that relate to the company's activities (ie. in the company's control) will progress through the complaints procedure.

### 6.4 Type of matter

Once eligibility is confirmed, the Sustainability Manager or nominated representative will determine whether the matter is feedback, an issue, a complaint or a dispute, using the definitions provided in Section 3. Examples of each are provided below.

#### Examples of feedback, issues, complaints, disputes

Feedback	It would be useful if company vehicles avoided parking in Main Street when they attend the event
Issue	I am concerned that company vehicles will occupy all the parking in Main Street during the event, reducing the availability of parking for residents
Complaint	A company vehicle parked across my driveway during the event and I was unable to take my car out

Dispute	A company vehicle was driven onto my front yard and caused damage to my garden (refuted by the company personnel and/or with no evidence identified in investigation)
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### Vexatious complaints

In some instances, persons or party will raise matters:

- a) that have already been dealt with in accordance with this complaints procedure (that is, avenues contained herein have been exhausted) or
- b) that do not relate to company activities or
- c) that have both been dealt with in accordance with this procedure and/or as a result are no longer considered to relate to company activities.

In some instances, these repeatedly raised matters may be considered vexatious (raised for the purpose of causing nuisance where a resolution is not sought or not possible). If a matter has been previously dealt with in accordance with this procedure and is repeatedly raised with no additional or new aspects, it may be considered vexatious and will be registered but progress no further through the complaints procedure. The person or party that raised the matter will be advised that it has been dealt with in accordance with this procedure, referred to the original outcome and advised that it will not progress further through the complaints procedure. If the person or party that raised the matter continues to raise the same matter, Rex will discontinue any further correspondence and simply file the matter with no acknowledgement sent.

### 6.5 Allocate Resources

The Sustainability Manager or nominated representative will allocate matters to the Department Manager to which the matter relates or the Complaints Committee who will have the appropriate resources at their disposal. All matters will be allocated within 24 hours of receipt, except where they are of high priority. High priority matters are defined as matters that present an immediate threat to persons health, safety or property, have the potential to disrupt day-to-day landholder activity or that may result in an environmental incident causing contamination or hazard.

### 6.6 Acknowledgement

Once the matter has been classified and allocated, the Sustainability Manager or nominated representative will acknowledge receipt of the matter to the person or party that raised the matter. If the matter is rejected (i.e., it is not within the company's control or is vexatious), the person or party that raised the matter will be advised. If the matter is accepted, the person or party that raised the matter will be advised of the process that their matter will progress through to resolution. Acknowledgement is expected to occur within 24 hours of receipt.

If the above process of classification, etc is extended, the matter will still be acknowledged within 24 hours.

## 7. DECIDE APPROACH

### 7.1 Address immediately

The Sustainability Manager or nominated representative will determine the initial approach to resolving the matter. If it can be addressed immediately, the Sustainability Manager or nominated representative will communicate the proposed resolution action to the person or party that raised the matter and attempt to carry out the resolution action either immediately or within seven business days. There may be many complaints which can be resolved very quickly through this process and this would be the company's preference.

If the resolution action cannot be completed within seven business days, the Sustainability Manager or nominated representative will agree a timeframe for completion with the person or party that raised the matter. If the resolution action and timeframe is not agreed, the Sustainability Manager or nominated representative will refer to the Mediation process.

Once the matter is resolved, the Sustainability Manager or nominated representative will record the resolution details in the complaints register and the matter will be closed in accordance with Section 8.

## 7.2 Investigate

If the matter requires investigation, the relevant Department Manager or Complaints Committee will be responsible for investigating the matter and reporting the outcome including any resolution action to the Sustainability Manager or nominated representative. Investigation into matters will be conducted in accordance with the company's Incident Report and Investigation procedure (OHS PRO 821).

With the approval of the Operations Manager, the Sustainability Manager will communicate the proposed resolution action and timeframe for completion to the person or party that raised the matter. If the resolution action is ongoing, the responsible department will report its progress to the Operations Manager on a monthly basis until the matter is resolved. The Sustainability Manager or nominated representative will provide a monthly update to the person or party that raised the matter, until the matter is resolved.

If the matter is not resolved in the agreed manner or timeframe to the satisfaction of the person or party that raised the matter the Mediation procedure will be followed.

## 7.3 Complaints Committee

The Complaints Committee will investigate complaints of a complex nature that fall across the responsibility of more than one department manager. The committee will convene for the duration of the investigation process. Each committee will comprise:

- A member of the department to which the matter relates with the appropriate technical knowledge to investigate the cause of the matter
- The Sustainability Manager
- A member of the finance department to provide advice on cost implications.

The complaints committee will also be responsible for reporting the outcomes of its investigation to all relevant departments within the company in order that the cause is understood and a repeat of the matter can be avoided.

## 7.4 Mediation

Failure to resolve the matter in the manner agreed and/or timeframe to the satisfaction of the person or party that raised it may result in it escalating to a dispute. The Company will attempt to negotiate through a third party mediator (where agreed to by both parties) or the dispute may be escalated to legal action (although this is not the preferred option). When the resolution or ruling is reached the matter will be closed.

## 7.5 Closing the matter

Once the matter is resolved, the Sustainability Manager or nominated representative will record the resolution details in the complaints register and the matter will be closed. The Sustainability Manager or nominated representative will communicate with the person or party that raised the matter to advise them of:

- The successful completion of the matter in the manner agreed
- The findings/outcome of any investigation into the cause of the matter
- The actions taken by the company to avoid recurrence of the matter.



## 8. REPORTING

All matters must be recorded directly into the complaints register and include the information as presented in Section 6.1. This information will be maintained for at least seven years. The status of all matters entered into the complaints register will be reported to the Operations Manager on a monthly basis and in published in the Annual Compliance Report (which is publicly available except for the name and contact details of each complainant). The HMCV will also be regularly updated with information on reported matters.

## 9. COMMUNICATION

The details and the advertisement of Rex Mineral's free-call telephone number will be developed in consultation with stakeholders and will be available for the life of Hillside. For example, communications to the community will include the number, and it will be circulated to local landowners, residents and community groups, and be visible on the Rex Minerals website.

## 10. RESPONSIBILITIES

**Operation Manager** is responsible for overall mine site operation including authorising any resolution actions up to their financial authority level set by the Board of Directors.

**Sustainability Manager** is the first point of contact for complaints management, responsible for classifying complaints, providing feedback to the public and maintaining the complaints register.

**Department Managers** are responsible for reviewing all reports on matters originating in their departments to ensure reports are complete, that any investigation has identified causal factors and root causes and that corrective actions are appropriate to prevent a recurrence.

Managers must be directly involved in investigations of high priority matters (refer Section 2.3).

**Supervisors** are responsible for ensuring that all matters allocated to their departments are properly reported, classified and investigated. They are responsible for ensuring the requirements of this procedure are met. They are responsible for initiating an immediate investigation (if required) and that actions are completed.

**Employees** are required to report matters raised to them by landholders and/or members of host communities.

**Contractors** must report any matters in accordance with this procedure.

**Rex Contract Manager** must ensure all contractor matters are reported and investigated.

## 11. INVESTIGATION

Investigation into matters will be conducted in accordance with the Company's Incident Report and Investigation procedure (OHS PRO 821).



**12. ATTACHMENTS / APPENDICES**

**13. RELATED DOCUMENTS**

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