

# Hardrock Project

## Complaint Protocol

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# 1 Scope

This Complaint Protocol is a living document that covers the procedure to be followed to manage complaints from external stakeholders for Greenstone Gold Mines’ (GGM) operations for the Hardrock Project (Project) and will be reviewed at a minimum annually and updated as required to reflect the Project development status, priorities and goals.

## 1 Purpose

The purpose of the Complaint Protocol is to outline the process (identification, response tracking and action) to manage complaints from stakeholders (complainant) regarding the Project in a systematic and transparent manner, with the aim of promoting mutual confidence and trust and resolving issues in a timely manner.

The Complaint Protocol has been refined based on Condition 6 of the Provincial Environmental Assessment (EA) Notice of Approval which states:

- 6.1 The Proponent shall prepare and implement a Complaint Protocol that sets out provisions for dealing with and responding to inquiries and complaints during all stages of the Undertaking. The Complaint Protocol shall include a procedure for notifying the District Manager of the complaints or inquiries received and how they have been addressed or responded to.*
- 6.2 The Proponent shall submit the Complaint Protocol to the Director for approval, with a copy to the District Manager, within one year from the Date of Approval or 60 days before the start of Construction, whichever is earlier, or such other time as agreed to in writing by the Director.*
- 6.3 The Director may require the Proponent to amend the Complaint Protocol at any time. Should an amendment be required, the Director shall notify the proponent in writing of the amendment required and when the amendment must be completed.*
- 6.4 The Proponent shall submit the amended Complaint Protocol to the Director within the time period specified by the Director.*
- 6.5 The Proponent shall implement the Complaint Protocol and any amendments that may be made to it.*
- 6.6 The Proponent shall provide a summary of the complaints and inquiries received and how they were addressed or responded to as part of the Annual Compliance Report, as required pursuant to Condition 5 of this Notice of Approval. The Proponent shall post the summary on the Proponent’s Project Website.*

## 2 Roles and Responsibilities

The roles and responsibilities for key GGM staff responsible for implementing the Complaint Protocol is provided in Table 2-1.

**Table 2-1: Roles and Responsibilities for Complaint Protocol**

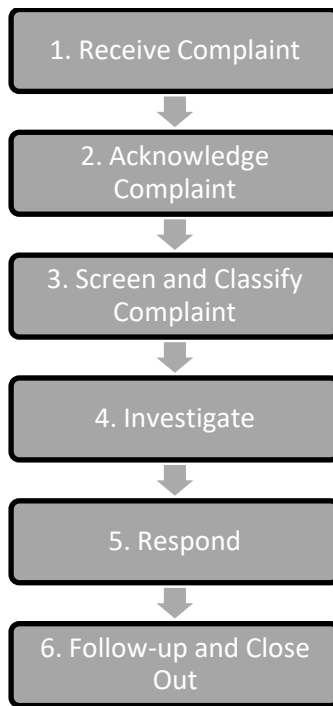
Title or Position	Key Responsibilities
General Manager	<ul style="list-style-type: none"> <li>• Approves responses to Severity Level 3 complaints.</li> </ul>

Title or Position	Key Responsibilities
Director, Environment and Community Relations	<ul style="list-style-type: none"> <li>• Approval of the Complaint Protocol.</li> <li>• Oversee implementation of this protocol to facilitate compliance with this protocol and environmental permits, regulations, commitments and best practices.</li> <li>• Approves responses to Severity Level 2 complaints.</li> </ul>
Manager, Community Relations	<ul style="list-style-type: none"> <li>• Owner of the Complaint Protocol procedure and related processes.</li> <li>• Develop internal training strategy for employees and contractors.</li> <li>• Manage tracking and reporting on complaints including maintaining a Complaint Register.</li> <li>• Identify when legal review is required.</li> <li>• Report monthly on the status of complaints internally.</li> <li>• Assign responsibility for complaint review to a Subject-Matter Specialist as required.</li> </ul>
Subject-Matter Specialist	<ul style="list-style-type: none"> <li>• Upon request of the Manager, Community Relations, conduct the complaint review and investigation in accordance with this protocol</li> <li>• Propose a resolution to complaint to the Manager, Community Relations in a timely manner.</li> <li>• Keep complainants informed of the status of any logged complaints.</li> </ul>
Environmental Superintendent	<ul style="list-style-type: none"> <li>• Notify Ministry of the Environment, Conservation and Parks Thunder Bay District Manager of formal environmental complaints via email within 2 business days of receiving complaint.</li> </ul>
Legal Counsel	<ul style="list-style-type: none"> <li>• Provide timely legal advice and assistance on matters requiring legal implications forwarded by the Manager, Community Relations.</li> <li>• In collaboration with site management, close out cases presented by the Manager, Community Relations as unresolvable.</li> </ul>

### 3 Complaint Response Procedure

Key tasks included in the complaint response procedure are shown in Figure 3-1 and discussed in Sections 3.1 to 3.6.

As the Project proceeds, the Complaint Protocol will be reviewed on an annual basis, and may be revised to reflect any changing communication requirements and preferences of Stakeholders, Indigenous groups and individuals to the extent practicable.



**Figure 3-1: Complaint Response Procedure**

### 3.1 Receive the Complaint

Anyone that wishes to submit a complaint regarding the Project can do so via a number of methods, including:

- In person/telephone: If a complaint is received in person or by telephone and if the complainant wishes to address the complaint formally, GGM will assist the complainant in filling out a *Complaint Notification Form* (Appendix A). GGM will have a 24 hour/day phone line available to accept complaints.
- Electronic: If a complaint is received via the Community Relations email, the Manager, Community Relations will review the complaint and process it in accordance with the procedure.
- Other means of receiving complaint: If a complaint is received via letter or during interactions at GGM led open house events and community meetings, GGM will process it in accordance with the procedure.

In the event that the complainant cannot do so independently, a GGM representative will thoroughly record the complaint onto the *Complaint Notification Form*. Once completed, the GGM representative will read and explain what has been recorded to the complainant to confirm the facts of the complaint are as written.

To facilitate tracking, evaluation and response to complaints, standardized information must be collected and recorded on the *Complaint Notification Form*. The *Complaint Notification Form* will be available at GGM site locations (Operations and Community Relations office), in Company vehicles and will also be made available during community meetings and open house events.

### 3.2 Acknowledge the Complaint

The Community Relations team will formally acknowledge the complaint within two business days of the submission of the complaint, informing the complainant that GGM's objective is to respond within seven business days with an update on actions taken or investigation steps that will be taken. Verbal and written feedback including a letter, will be provided so that a record of correspondence is retained and recorded.

The acknowledgement will include a summary of the complaint, GGM's approach to responding to the complaint, and an estimated timeframe in which the final response will be issued. If needed, the acknowledgement will be utilized to clarify issues from the complaint or request further information if required.

### 3.3 Screen and Classify Complaint

All complaints will be entered into GGM's stakeholder data management system, with the Complaint Notification Form along with any accompanying correspondence. Each complaint will be screened and categorized depending on the level of severity in order to determine the approach as described in

The Environmental Superintendent will notify the Ministry of the Environment, Conservation and Parks (MECP) Thunder Bay Office District Manager via email of all formal environmental complaints (e.g., noise, vibration, dust, air quality, water quality, water level) within two business days of receipt. GGM will also notify the District Manager of how they have been addressed or responded to, either at the same time or will follow-up at a later date if required.

**Table 3-1.**

The Environmental Superintendent will notify the Ministry of the Environment, Conservation and Parks (MECP) Thunder Bay Office District Manager via email of all formal environmental complaints (e.g., noise, vibration, dust, air quality, water quality, water level) within two business days of receipt. GGM will also notify the District Manager of how they have been addressed or responded to, either at the same time or will follow-up at a later date if required.

**Table 3-1: Complaint Screening Categorization**

Screening Category	Issue Description	Severity Level	Approach
Level 1	A complaint for which there is already a GGM management approved response and an answer can be provided immediately.  Complaints that are considered out of scope and when the complainant is referred to another external entity.	Low	<ul style="list-style-type: none"> <li>Respond according to approved responses.</li> <li>Implement approved response actions as required (e.g., water truck for dust complaint).</li> <li>Inform GGM’s Director, Environment and Community Relations via weekly and monthly report mechanisms.</li> </ul>
Level 2	Complaint characterized as being a one-time and/or minor situation.	Medium	Develop response and review with the Director, Environment and Community Relations.
Level 3	Repeated, extensive and/or high profile complaints.	High	To be discussed with the Director, Environment and Community Relations within 24 hours of receipt. Manager of Community Relations to define an appropriate strategy for the General Manager’s review and approval.

### 3.4 Investigate

For a Level 2 or Level 3 complaint, an investigation may be required to determine if additional action or mitigation is required to resolve the complaint. The Manager, Community Relations may undertake the investigation themselves or designate a Subject-Matter Specialist to be responsible for investigating the complaint.

The investigation may require site visits, reviewing monitoring data, consulting employees, contacting external stakeholders and/or completing other activities as required. Records of meetings, discussions and activities will be recorded during the investigation. Information gathered during the investigation will be reviewed and will assist in determining how the complaint will be handled and what steps need to be taken in order to resolve the complaint.

Examples of the type of complaints that may be received include complaints regarding dust, air quality, noise, vibration, and water quality or quantity. Actions that may be taken in order to investigate these types of complaints are described in Sections 3.4.1 to 3.4.3.

#### 3.4.1 Dust / Air Quality Investigation

Steps that may be required during an investigation of a dust or air quality complaint include:

- assessment of relevant weather conditions (wind, precipitation) to determine if there was any atypical weather at the time of the complaint

- investigation of operating conditions to determine if any new or uncommon work procedures were being completed at the time of the complaint
- take photos and GPS location of the area of concern
- interview personnel working or travelling through the area
- review of monitoring data available for area and time of complaint.

### 3.4.2 *Noise and Vibration Investigation*

Steps that may be required during an investigation of a noise or vibration complaint include:

- assessment of relevant weather conditions (wind, precipitation) to determine if there was any atypical weather at the time of the complaint
- investigation of operating conditions to determine if any new or uncommon work procedures were being completed at the time of the complaint
- take photos and GPS location of the area of concern
- interview personnel working or travelling through the area
- review of monitoring data available for area and time of complaint
- if no monitoring data is available for the specific area, install a temporary monitor.

### 3.4.3 *Water Quality/Quantity Investigation*

Steps that may be required during an investigation of a water quality or quantity complaint include:

- assessment of relevant weather conditions (wind, precipitation) to determine if there was any atypical weather at the time of the complaint
- investigation of operating conditions to determine if any new or uncommon work procedures were being completed at the time of the complaint
- take photos and GPS location of the area of concern
- interview personnel working or travelling through the area
- review of monitoring data available for area and time of complaint
- if no monitoring data is available for the specific area, take samples/ water levels.

## 3.5 Respond

Following the investigation, the Subject-Matter Specialist or the Manager, Community Relations will use the findings to create an action plan outlining the steps to be taken in order to resolve the complaint. The action plan will consider the severity of the issues as outlined in Table 3-2.

**Table 3-2: Complaint Response Action based on Severity Level**

Complaint Severity Level	Action	Approvals required
Low	Manager, Community Relations will respond to the complainant using previously approved responses.	N/A



Complaint Severity Level	Action	Approvals required
Medium	Manager, Community Relations or the Subject-Matter Specialist will define plan for addressing the complaint and drafts the response to the complainant.	Response requires approval of the Director, Environment and Community Relations.
High	Subject-Matter Specialist will work directly with the Manager, Community Relations and the Director, Environment and Community Relations to define a plan for the complaint response.	Response requires approval of the General Manager.

Once the response has been approved, the Nominated Person will communicate the approved response to the complainant through the *Complaint Review Outcome Form* (Appendix B), and verbally. GGMs target is to have the Complaint Review Outcome Form issued within 30 days of receiving the complaint. If the complainant accepts the proposed resolution, any outstanding agreed actions will be implemented. The Nominated Person will be responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Upon completion of all actions, the Nominated Person will formally advise the complainant of completion of the actions via their preferred method of contact.

The Nominated Person will be responsible for documenting all information and actions on the complaint.

### 3.6 Follow-up and Close Out

The Nominated Person will make contact with the complainant one week after the complaint is resolved. When contacting the complainant, the Nominated Person will verify that the outcome was satisfactory and also gather any feedback on the complaint response process. Minutes of the meeting or conversation will be documented.

If required, the Nominated Person may need to follow-up with the complainant on numerous occasions to confirm satisfaction. After this step, the complaint will be formally closed out.

If the complainant does not agree with the proposed actions, the Manager, Community Relations will escalate the matter to the Director, Environment and Community Relations and General Manager. They will review the complaint and all documentation gathered throughout the investigation and determine whether further actions are appropriate.

## 4 Monitoring and Record Keeping

All complaints will be documented in GGM’s electronic stakeholder data management system (StakeTracker) along with all relevant communications with the stakeholder who lodged the complaint, and accompanying documentation.

The Manager, Community Relations will provide the Director, Environment and Community Relations with a monthly report on stakeholder complaints. Information outlining the number of complaints, time to resolution and outcomes will be communicated.

As per Condition 6.6 of the Provincial EA Notice of Approval, a summary of the complaints and inquiries will be included in the Annual Compliance Report. The summary will outline the complaint(s) and how they have been addressed or responded to.

## Appendix A – Complaint Notification Form



# COMPLAINT NOTIFICATION FORM

<b>Topics Discussed:</b> <i>(Select one or more, as applicable)</i>	
<input type="checkbox"/> Trees	<input type="checkbox"/> Traffic
<input type="checkbox"/> Water Quantity and Quality	<input type="checkbox"/> Safety
<input type="checkbox"/> Surface Water	<input type="checkbox"/> Soils
<input type="checkbox"/> Noise	<input type="checkbox"/> Tailings
<input type="checkbox"/> Air Quality	<input type="checkbox"/> Property Acquisition
<input type="checkbox"/> Fish and Fish Habitat	<input type="checkbox"/> Archaeology
<input type="checkbox"/> Human Health	<input type="checkbox"/> Wildlife and Wildlife Habitat
<input type="checkbox"/> Education and Training	<input type="checkbox"/> Visual Aesthetics
<input type="checkbox"/> Cultural Heritage	<input type="checkbox"/> Traditional Knowledge
<input type="checkbox"/> Job Opportunities	<input type="checkbox"/> Proposed Sub-Division
<input type="checkbox"/> Other (Please indicate):	<input type="checkbox"/> Other (Please indicate):
<b>Complaints/Issues:</b> <i>(who needs to follow up, and by when)</i> If Communication Classification is a Complaint/Issue enter Issue to be resolved here.	
<b>Is this form being sent with back-up documentation</b> <input type="checkbox"/> YES <input type="checkbox"/> NO <b>If YES, ensure documents are available for scanning/attaching</b>	

## Appendix B – Complaint Resolution Form

<b>Complaint Resolution Form</b>	
Complaint Reference	
Name of Complainant	
Complainant's Contact Information (Address, Phone Number, Email)	
Date Review with Complainant Complete	
Initial Complaint Summary	
Response Summary	
Additional Comments	

*I acknowledge that I have been informed about the outcome of the review and am satisfied with the response.*

Signature of Complainant: \_\_\_\_\_ Date: \_\_\_\_\_

Signature of GGM Representative: \_\_\_\_\_ Date: \_\_\_\_\_