



A GLENCORE COMPANY

# Communication Plan WDL 174

**In an emergency phone 08 8975 8222**

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### Acknowledgement

McArthur River Mine acknowledges the Gudanji and Yanyuwa people of the Gulf Region of the Northern Territory, the Traditional Owners of the land on which our mine site and Bing Bong Loading Facility operate. We pay our respects to elders past, present and emerging and thank elders for the knowledge and wisdom they share with our people. We also pay our respects to Garrwa and Marra elders and acknowledge their connection to the country on which we operate.

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# 1 Introduction

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## 1.1 Purpose and Objectives

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The purpose of this Communication Plan is to provide clear guidance for communicating with stakeholders about Waste Discharge Licence WDL 174.

It outlines the key stakeholders impacted by waste discharge from our operations and the steps to communicate with them about the licence on an ongoing basis and in the event of either planned or unplanned discharges of water.

The key objectives of this plan are to:

- Ensure the community and stakeholders are aware of and understand the protocols of the Waste Discharge Licence;
- Clearly communicate actions being undertaken by MRM to protect the environment; and
- Build relationships with stakeholders through appropriate levels of engagement.

## 1.2 Regulatory requirements

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McArthur River Mining Pty Ltd is the Licensee and the Northern Territory Department of Lands, Planning and Environment (DLPE) is the Administering Authority, for Waste Discharge Licence (WDL) 174.

The WDL licences the discharge of mine-affected wastewater from Mineral Lease Northern (MLN) 1121, 1122, 1123 and 1124 into the McArthur River and from MLN 1126 into marine waters at the Bing Bong Loading Facility. The licence specifies the need for a Communication Plan, which outlines a “strategy for communicating with members of the public who are likely to have a real interest in or be affected by” discharge from the site.

## 1.3 Responsibilities

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Responsibilities under this communication plan are as follows:

The Communities and Social Performance Superintendent is responsible for implementing this plan and for ensuring appropriate community stakeholders are notified of any relevant environmental incidents.

The Health, Safety and Environment Manager is responsible for ensuring the DLPE are notified of any relevant environmental incidents. The Health, Safety and Environment Manager is also responsible for providing emergency response training, including the site Emergency Response Plan (stipulated in WDL 174).

The Water Superintendent is responsible for ensuring the positions above are advised of any potential environmental incidents or non-compliances with conditions of the WDL.

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## 1.4 Review

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This communication plan is reviewed on an annual basis before the start of each wet season and updated as necessary. Actions are cascaded into the MRM Stakeholder Engagement Plan.

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## 2 Business Overview

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### 2.1 Glencore

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Glencore is one of the world's largest global diversified natural resource companies and is one of the ten biggest companies within the FTSE 100 Index. The Group's industrial and marketing activities are supported by a global network of more than 150 assets located in over 35 countries.

Our diversified operations comprise mining and metallurgical sites, offshore oil production assets, farms and agricultural facilities. We employ approximately 160,000 people, including contractors, producing more than 60 commodities.

### 2.2 McArthur River Mining

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Situated in the remote Gulf of Carpentaria region 970 km southeast of Darwin by road, McArthur River Mining Pty Ltd (MRM) (ABN 90 008 167 815) is a wholly owned subsidiary of Glencore. See *Figure 1: Map of Operations*.

Operating since 1995, MRM is one of the world's largest zinc resources and a key operation in Glencore's global portfolio. We produce zinc, lead and silver from our open cut mine which is then processed and stored onsite before being transported to Bing Bong Loading Facility and shipped to our customers all over the world.

We are proud of our 30-year history in the Territory and remain committed to running a safe, responsible, sustainable and competitive mining operation.

Our vision is to be cash-flow positive through mining cycles, which will enable us to responsibly deliver on our commitments to our people and our communities.

**Figure 1: Map of Operations**



## Mine Site

The mine site covers 112.04km<sup>2</sup> within five contiguous mineral leases (MLN1121, MLN1122, MLN1123, MLN1124 and MLN1125) located on McArthur River Station in the Gulf Region of the Northern Territory.

The site comprises:

- Open pit
- Overburden emplacement facilities
- Tailings storage facility
- Concentrator
- Concentrate storage shed
- 54MW gas-fired power station fed by a gas pipeline
- Warehouse
- Offices
- Workshops
- Associated infrastructure including dams, electricity distribution infrastructure and roads.

The mine site is supported by village infrastructure, comprising:

- 700 bedrooms in motel-style demountable rooms and houses
- Dry and wet messes
- Gym and other recreational facilities
- Airport and 2,500m sealed airstrip
- Associated infrastructure including wastewater systems, laundries and offices.

The mine site is a 24/7 operation utilising a fly-in, fly-out (FIFO) and drive-in, drive-out (DIDO) workforce. The mine site is located on Gudanji land.

## Bing Bong Loading Facility

Bing Bong Loading Facility is situated on MLN1126, located on the Bing Bong Pastoral Lease. Adjacent to the Bing Bong Mineral Lease is the Bing Bong dredge spoil emplacement facility area, located on the previously approved Non-Pastoral Land Use Approval NP035. The site comprises:

- Port facilities with a dredged channel leading to an offshore transfer zone
- Concentrate storage shed
- Dredge spoils
- Offices
- Village facilities including 66 bedrooms in motel-style rooms, dry and wet messes
- Associated infrastructure including dams, generator, wastewater system and laundries.

Bing Bong Loading Facility is a 24/7 operation utilising a fly-in, fly-out (FIFO) and drive-in, drive out (DIDO) workforce. Shipping Services are provided by Carpentaria Shipping Services, a joint venture between P&O Shipping and Mawurli and Wirriwangkuma Aboriginal Corporation

(MAWA) representing the four language groups of the region, Garrwa, Yanyuwa, Marra and Gudanji. The Loading Facility is located on Yanyuwa land.

### Borrooloola Community Office

The Borrooloola Community Office is located within the Malandari Store Complex, Robinson Rd, Borrooloola. It includes a public display area, office, boardroom, storeroom, kitchen and ablution facilities. It operates weekdays and is a key engagement hub for local community contact. The office has teleconference facilities and is available for use by community groups. The office is located on Yanyuwa land.

### Darwin Office

The Darwin office is located in Bishop Street Stuart Park and is staffed on a permanent basis by employees not working on site. Site-based staff also use the office when working from Darwin. It comprises five offices, an open plan work area, boardroom, storage, kitchen and ablution facilities.

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### 3 Water Management

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Water is managed through the MRM Water Management Plan (WMP), which is a component of the overarching Adaptive Management Plan (AMP). It provides detailed technical information with regard to surface water and groundwater management on-site.

The purpose of the WMP is to:

- provide transparency for operational water management at the Mine, including key objectives and strategy;
- outline the surface water and groundwater related monitoring programs and performance criteria; and
- fulfil the requirements of key approval and licence conditions.

Community values are particular values or uses of the environment that are important for a healthy ecosystem or for public benefit, health, safety or welfare, and requires protection from the effects of stressors.

In accordance with the Australian and New Zealand Water Quality Guidelines (2018), MRM has identified the following community values for the McArthur River receiving waters downstream of the Mine:

- aquatic ecosystems (slightly to moderately disturbed);
- primary industries including stock drinking water, irrigation and general water uses;
- recreation and aesthetics; and
- cultural and spiritual values.

Typically, the most stringent water quality objectives are associated with the protection of aquatic ecosystems. Where more stringent water quality guidelines have been identified for other McArthur River community values (e.g. primary industry), these have been adopted in preference to those related to the protection of aquatic ecosystem values.

#### Water Management Plan Objectives

The key environmental and operational objectives supported by the WMP and strategy are:

1. Protect the McArthur River beneficial uses and community values from mining impacts.
2. Facilitate development of the ecosystems and their functions along the McArthur River Diversion Channel for terrestrial and aquatic flora and fauna.
3. Achieve a recovering trend in the water quality and ecosystem function in creeks on the Mine site within 20 years of cessation of mining.
4. Manage water resources to ensure continuous water supply for mining and ore processing operations whilst minimising water abstraction and maximising water recycling.
5. Manage the operational risk of Open Pit inundation to ensure continuous mining operations and protection of the Mine's assets.
6. Ensure water management is conducted in accordance with MRM's regulatory obligations.

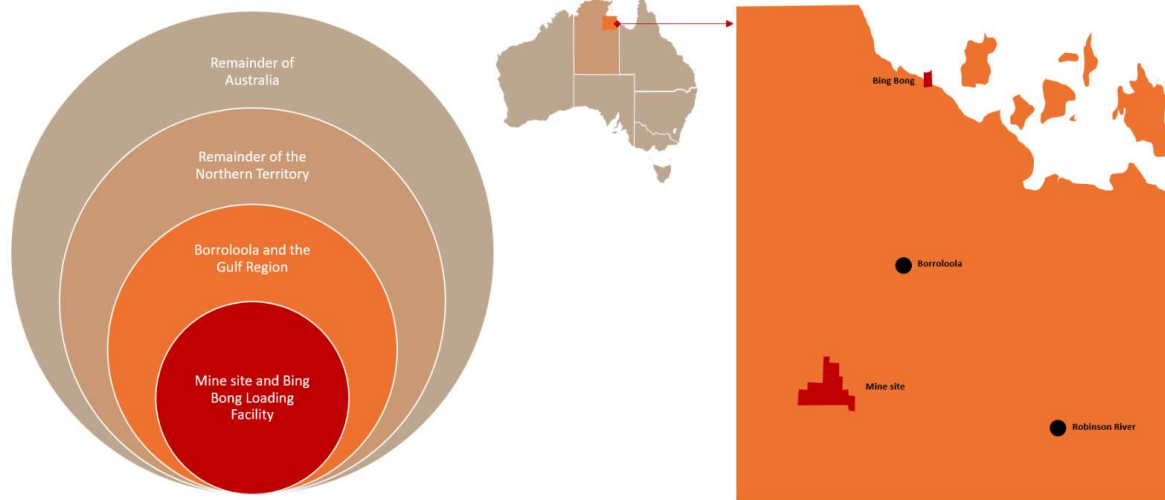
The operational strategies that support these objectives are aligned with the wastewater management hierarchy which aims to preferentially apply strategies in the order of avoidance, reuse and reduction of waste. The hierarchy aims, where practical, to reduce the requirement to dispose of wastewater through discharge to the receiving environment.

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## 4 Context and Knowledge Base

McArthur River Mine defines four key areas that the mine has influence on, as shown in *Figure 2: MRM areas of influence*.

*Figure 2: MRM areas of influence*



While this plan addresses the communication needs of stakeholders in all four areas, the local region is discussed in more detail below as the stakeholders most impacted by any discharges from MRM operations.

### 4.1 Borroloola and the Gulf Region

McArthur River Mining’s operations are located in the Roper Gulf Regional Council (RGRC) which is defined by the Australian Bureau of Statistics (ABS) as the Roper Gulf Statistical Local Area (SLA). Two of the 14 towns in the RGRC region are significant to our operations – Borroloola and Robinson River.

The region also includes 26 outstations located at varying distances from Borroloola. An outstation (or homeland) provides the opportunity for Indigenous people in the NT to live on their traditional land, maintaining their cultural heritage. Residents of these outstations travel to Borroloola to access services and have therefore been captured as being a part of Borroloola.

The other community considered significant in the region is King Ash Bay, a fishing village to the north of Borroloola.

The McArthur River runs directly through Borroloola, King Ash Bay and a number of outstations in the region and is central to life and culture throughout the region.

## Borrooloola

Borrooloola is located approximately 65km north of the mine site, 972 km southeast of Darwin, 655 km southeast of Katherine and 940 km northwest of Mount Isa in Queensland. Borrooloola can be accessed via the Carpentaria Highway (single sealed, all-weather road) which is seven hours drive from Katherine, via air charter (Borrooloola airstrip is 1.5 km out of town) or via a barge, 40 km from Borrooloola (only accessible in suitable weather conditions). Access is also possible via the east from the Queensland border on the Savanna Way Highway, although this route is not sealed.

Borrooloola is an important service centre for the local community, surrounding agricultural properties and tourists. With a population of 752 (ABS Census, 2021) in the town has five discrete living areas, locally known as: the Suburb, Garawa One Camp, Garawa Two Camp, Yanyuwa Camp and Mara Camp. The camps accommodate three of the four main Indigenous language groups: Yanyuwa, Garawa and Mara. Gudanji people live in the suburb or with family in the other camps. There are an additional 26 outstation/ homeland residential areas, ranging up to 260 km from Borrooloola, that rely on services provided from the township.

## King Ash Bay

The King Ash Bay fishing centre, located approximately 52 km northeast of Borrooloola on the McArthur River, is a popular tourist destination. In the off-season, it is a small centre, consisting of a caravan park, camping grounds and a shop, with a few permanent residents maintaining it year-round. In the Dry season from May to October, it has a population of up to 1,000 residents, including a significant number of tourists.

## Robinson River

Robinson River is a small Aboriginal community comprising of 180 people, located approximately 150 km east of Borrooloola. Formerly known as Robinson River Station, the land was handed back to Traditional Owners in 1992.

## 4.2 Engagement considerations for Indigenous stakeholders

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Engagement in the local context is strongly influenced by the high percentage of Indigenous people living in the region.

According to 2021 Australian Census, Aboriginal and Torres Strait Islander people make up 76% of the population in the local region, compared to 26.3% average across the Northern Territory and 3.2% across Australia. 19.2% of the population speaks an Aboriginal language at home.

Specific considerations that need to be taken into account for Indigenous stakeholders are summarised in *Table 1: Engagement considerations for Indigenous stakeholders*.

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**Table 1: Engagement considerations for Indigenous stakeholders**

<b>Topic</b>	<b>Detail</b>
Borrooloola office engagement	The Borrooloola Community Office gives Indigenous people in the local region the opportunity to interact with MRM community engagement staff face to face at a time of their own choosing. The office also facilitates informal general engagements, with many elders “popping in” to escape hot weather or have a cup of tea. This helps build relationships at a personal level.
Meet through culturally appropriate forums	We follow the lead of Traditional Owners about the most culturally appropriate forum to discuss issues of importance. We seek advice through Gudanji Yanyuwa Garra Marra Aboriginal Corporation, Northern Land Council, Mabunji Aboriginal Resource Centre and other organisations as appropriate.
Understand cultural activities	We continue to work with community leaders to understand the local community’s calendar of cultural activities to schedule meetings at times that suit Traditional Owners. We respect important cultural ceremonies, including Sorry business, and do not integrate ourselves into cultural activities that are not appropriate for us to attend.
Individual meetings	We provide community members with the opportunity to have individual meetings with MRM staff and leaders so they can raise concerns that would otherwise not be heard. Such meetings are a forum for hearing concerns from community members who may not feel comfortable raising their voice in more public settings.
Senior Leadership Team participation	We ensure our senior leaders are available meet with Elders to demonstrate our respect for their cultural standing in community.
Informal gatherings	We organise informal community gatherings as appropriate to engage with the local community in a relaxed atmosphere. We attend community events to engage in a comfortable, community-led setting.
Engagement fatigue	<i>Many local Elders and other community members sit on multiple boards and committees and are subject to numerous consultations by Governments, NGOs and other organisations. People suffer from engagement fatigue and some Elders need to take personal leave days from work to participate in MRM engagements. We respect that their time and knowledge are valuable and should be respected.</i>

## 5 Key stakeholders

### 5.1 Stakeholder interest in Waste Discharge Licence

Stakeholders with an interest in the Waste Discharge Licence have been identified in *Table 2: Key stakeholders*.

**Table 2: Key stakeholders**

<b>Stakeholder</b>	<b>Description and interest</b>
Traditional Owners	<i>Members of the Gudanji, Yanyuwa, Garrwa and Marra language groups. The McArthur River traverses their country and they are concerned for the health of the river, environment and cultural heritage.</i>
Gudanji Yanyuwa Garrwa Marra (GYGM) Aboriginal Corporation	<i>Representative of the four local language groups, as outlined above.</i>
Department of Lands, Planning and Environment	<i>Regulator for the Waste Discharge Licence and mine activities. Interested in potential impacts on river health and environment.</i>
NTG Ministers	<i>Interested in potential impacts on river health, environment and reputation (social licence to operate).</i>
Federal Government	<i>Regulator for endangered species and environment. Interested in potential impacts on environment, endangered species and reputation (social licence to operate).</i>
MRM Community Reference Group	<i>Independently appointed body to facilitate communication between the mine and community. Interested in all potential impacts on the local community and beneficial uses of the river.</i>
McArthur River Station	<i>Adjoining landholder. Interested in impacts on country and water.</i>
Independent Monitor	<i>Conducts annual audit of MRM compliance with regulatory conditions.</i>
Local residents	<i>Interested in potential impacts on river health and ability to use the McArthur River for a variety of activities.</i>
Northern Land Council	<i>Represents the interests of native title holders and potential impacts on the river, broader environment and cultural heritage.</i>
Local community organisations	<i>Interested in potential impacts on river health and ability to use the McArthur River for a variety of activities.</i>
Borrooloola Police	<i>An important conduit of information to the local community in the event of an emergency situation. May also be a first responder in specific circumstances.</i>
Employees	<i>Includes employees and contractors working on site.</i>
NGOs	<i>Includes Environment Centre of the NT, Environmental Defenders Office, SEED and Territory Natural Resource Management. Interested in environmental health.</i>
Industry groups	<i>Includes Minerals Council of Australia, NT Cattlemen's Association and Amateur Fishermen's Association of the NT,</i>

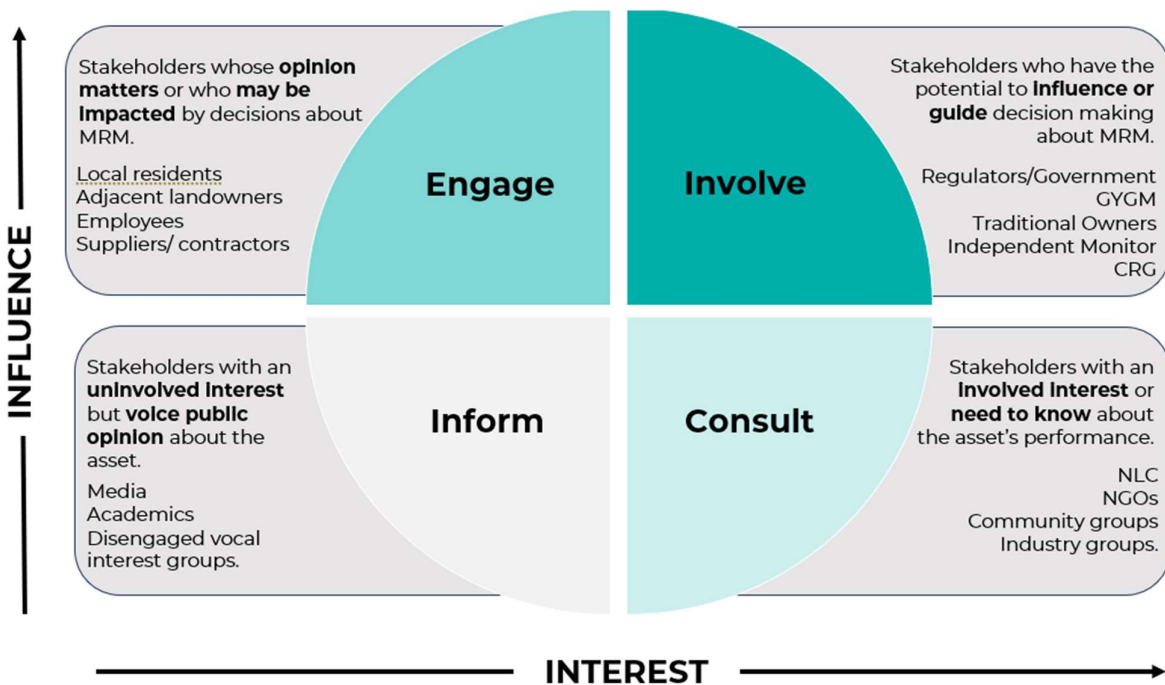
Academia	<i>Academics with an interest in the environment, Indigenous issues and cultural identity.</i>
Suppliers and contractors	<i>Includes all suppliers and contractors with a connection to MRM</i>
Media	<i>Media in and outside of the NT.</i>

## 5.2 Stakeholder matrix

A high-level assessment is undertaken of stakeholder groups to determine how MRM should engage with each group. This assessment, shown in Figure 3: Stakeholder matrix, is carried out based on:

- **Influence:** the stakeholder's capacity to influence MRM's operations; and
- **Interest:** the stakeholder's interest in the operation, including impacts that may be felt by that stakeholder group.

Figure 3: Stakeholder matrix



## 6 Communication Plan and Activities

### 6.1 Objectives and Priorities

Our overarching objective is to *build trusted relationships with stakeholders who may be affected by, or have an interest in, waste discharge from MRM operations.*

We will do this by:

- Providing timely advice in the event of planned or unplanned discharges from MRM operations
- Maintain regulator confidence in MRM compliance with Waste Discharge Licence obligations
- Build trust in MRM's commitment and strategies to protect the McArthur River from harm.

**Table 3: Communication Activities Overview**

Purpose	Build trusted relationships with stakeholders who may be affected by, or have an interest in, waste discharge from MRM operations		
	1	2	3
Focus areas	Discharge events	Compliance	Environmental trust
Priorities	Provide timely advice in the event of planned or unplanned waste discharges from MRM operations	Maintain regulator confidence in MRM compliance with Waste Discharge Licence obligations	Build trust in MRM commitment and strategies to protect the McArthur River from harm
Outcomes	<ul style="list-style-type: none"> <li>• Water discharge does not create unwarranted concern in community</li> <li>• Greater understanding of why water discharge is sometimes necessary to protect the environment</li> <li>• Community members know what to do in the unlikely event of environmental pollution</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder trust that MRM is meeting its obligations</li> <li>• Compliance with licence conditions</li> <li>• Positive findings in annual Independent Monitor Report</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholders trust that the environment is healthy</li> <li>• Continued beneficial uses of the McArthur River, including for cultural purposes</li> <li>• Balanced public narrative</li> <li>• Community members access mechanisms to ask questions and provide feedback</li> </ul>
Stakeholders	<ul style="list-style-type: none"> <li>• Traditional Owners</li> <li>• Gudanji Yanyuwa Garra Marra (GYGM) Aboriginal Corporation</li> <li>• MRM Community Reference Group</li> <li>• Community members</li> <li>• Local community organisations</li> <li>• Employees</li> <li>• Borroloola Police</li> <li>• Media</li> </ul>	<ul style="list-style-type: none"> <li>• Dept Lands, Planning and Environment</li> <li>• NTG Ministers</li> <li>• Federal Government</li> <li>• Independent Monitor</li> </ul>	All stakeholders from Priorities 1 and 2, plus: <ul style="list-style-type: none"> <li>• Northern Land Council</li> <li>• Environment NGOs</li> <li>• Industry Groups</li> <li>• Suppliers and contractors</li> <li>• Academia</li> </ul>
Actions	<ol style="list-style-type: none"> <li>1.1 Maintain database of stakeholders to ensure timely dissemination of information as needed</li> <li>1.2 Inform stakeholders of MRM's readiness ahead of each Wet season</li> <li>1.3 Inform stakeholders of discharge events in a timeframe appropriate for the discharge type</li> <li>1.4 Maintain emergency phone number for community to report incidents and emergencies</li> </ol>	<ol style="list-style-type: none"> <li>2.1 Maintain accurate records of stakeholder engagements and actions</li> <li>2.2 Participate in reviews and audits of WDL compliance</li> <li>2.3 Advise stakeholders of potential, emerging or actual material issues in a timely manner</li> </ol>	<ol style="list-style-type: none"> <li>3.1 Implement MRM Stakeholder Engagement Plan</li> <li>3.2 Ongoing stakeholder engagement through GYGM and CRG meetings</li> <li>3.3 Generate proactive and positive stories about MRM environmental initiatives</li> <li>3.4 Provide opportunities for community to ask questions, provide feedback and make complaints</li> <li>3.5 Maintain emergency phone number for community contact</li> </ol>
Responsibility	<ul style="list-style-type: none"> <li>• <b>Communities and Social Performance Superintendent</b></li> <li>• MRM Senior Leadership Team</li> <li>• Community engagement team</li> <li>• Corporate Affairs team</li> <li>• Environment Superintendent</li> <li>• Water Superintendent</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Health Safety and Environment Manager</b></li> <li>• Environment Superintendent</li> <li>• Water Superintendent</li> <li>• Communities and Social Performance Superintendent</li> <li>• Senior Leadership Team</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Communities and Social Performance Superintendent</b></li> <li>• MRM Senior Leadership Team</li> <li>• Community engagement team</li> <li>• Corporate Affairs team</li> <li>• Environment Superintendent</li> <li>• Water Superintendent</li> </ul>
Channels	<ul style="list-style-type: none"> <li>• Group and one-on-one meetings and briefings</li> <li>• Borroloola office engagement</li> <li>• Emails</li> <li>• Phone calls</li> <li>• Q&amp;As</li> <li>• Facebook</li> <li>• Website</li> <li>• Police briefings in a potential pollution event</li> <li>• Media release</li> <li>• Emergency hotline (08) 8975 8222</li> </ul>	<ul style="list-style-type: none"> <li>• Reporting</li> <li>• Audits and reviews</li> <li>• Group and one-on-one briefings</li> <li>• Emails</li> <li>• Phone calls</li> <li>• Site visits</li> </ul>	<ul style="list-style-type: none"> <li>• Group and one-on-one meetings and briefings</li> <li>• Borroloola office engagement</li> <li>• Emails</li> <li>• Phone calls</li> <li>• Q&amp;As</li> <li>• Facebook</li> <li>• Website</li> <li>• Proactive media (owned and earned)</li> <li>• Access to complaints and grievances mechanism</li> <li>• Emergency hotline (08) 8975 8222</li> </ul>

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## 7 Feedback, Complaints and Grievances

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Ensuring local communities have a voice and can raise any concerns about activities taking place at the mine sites near to where they live is a core part of a mining company's responsibility to respect human rights. Complaints and grievances give MRM the opportunity to improve its performance to meet community needs, protect the environment and show respect for people and culture.

MRM's Complaints and Grievances Procedure has been established to support adherence to Glencore standards, Code of Conduct, policies and procedures. It is aligned with the United Nations Guiding Principles on Business and Human Rights to ensure it is accessible, predictable, equitable, transparent and a source for continuous learning.

The external complaints and grievances mechanism is managed by the Communities and Social Performance department.

### Access to the mechanism

The Complaints and Grievances mechanism shall be communicated through various public communication channels including newsletters, Borrooloola office noticeboard, a dedicated fact sheet, MRM website and community meetings. The MRM Community Reference Group is also a forum for communication of the mechanism and collection of complaints and grievances.

The following mechanisms exist to allow complaints or grievances to be made directly to MRM:

- MRM information line, 1800 211 573;
- MRM Emergency hotline (08) 8975 8222;
- Face-to-face communication via meetings and personal contact;
- Visit to the MRM Borrooloola Community Office;
- Fill out the Complaint Form and submit to one of MRM's Community Team members, or via the complaints box at the MRM Borrooloola Community Office;
- Phone or personal contact with Community team members, or other employees;
- Email contact, as advertised on the MRM website; and
- Postal contact, as advertised on the MRM website.

Where requested, MRM can facilitate an education and training session/materials for community members on how to effectively utilise the mechanism. This will include how the process works, who to talk to and what evidence to bring in support of the complaint.

Where a stakeholder wishes to raise a complaint or grievance anonymously, Glencore has provided a mechanism through its Raising Concerns Program. A confidential service is provided through the Raising Concerns website at <https://glencore.raisingconcerns.org> or telephone (02) 5104 9820.

## Support for complainants

MRM recognises that complainants may require support throughout the Complaints and Grievances Process. This can be provided in a number of ways:

- All complainants have the right to be supported by a family member, friend, elder or other support person throughout the Complaints and Grievances Process;
- All complainants have access to dedicated support from the mine's Cultural Advisors;
- All complainants have the right to select a particular member of the Community Engagement Team to support them in making their complaint;
- All verbal complaints will be recorded by MRM personnel and followed up with the complainant to ensure it is documented correctly;
- All complainants have the right to be supported by another member of the community, legal service or support group; and
- Interpreters will be provided through the Northern Territory Government Aboriginal Interpreter Service when required at the cost of MRM.

## Response

Complaints are to be responded to as soon as practicable and within a maximum period of 48 hours, depending on the nature of the complaint. Wherever possible, a face-to-face meeting should be held with the complainant to obtain further details and discuss possible mitigation measures, where appropriate.

The following minimum information shall be collected in relation to each complaint:

- the person to whom the complaint was made;
- the person responsible for managing the complaint;
- the date and time the complaint was reported;
- the date and time of the event(s) that led to the complaint;
- the contact details of the complainant if known, or where no details are provided a note to that effect;
- the nature of the complaint;
- the nature of event(s) giving rise to the complaint;
- prevailing weather conditions at the time (where relevant to the complaint);
- the action taken in relation to the complaint, including any follow-up contact with the complainant; and
- if no action was taken, why no action was taken.

## Investigation

All complaints and grievances are subject to investigation through to determine the veracity of the complaint, root causes, resolution, mitigation or disciplinary measures required as per the MRM *Incident Management Procedure*.

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### Report to complainant

Once an investigation is complete, feedback will be provided to the complainant as to the outcomes of the investigation and corrective actions implemented.

### Reporting and Review

Complaints are reported to the MRM Community Reference Group at quarterly meetings, with information identifying the complainant and other persons involved removed.

The MRM Senior Leadership Team reviews trends in complaints and grievances to identify emerging systemic issues that require attention.

The Independent Monitor reviews the Complaints and Grievances register on an annual basis to ensure compliance with the requirements of the Waste Discharge Licence.

# GLENCORE

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