

Scope

This procedure is applicable to all Jamalco managed facilities including Railroad Transportation, the Refinery (and RSAs), Rocky Point Port and all Land and Mining Areas. All Jamalco employees, Contractors, Sub- Contractors, and Contracted Services, including Individual Contractors shall comply with the requirements of this procedure.

Purpose

- To ensure compliance with all legal and other regulatory requirements related to community and the public in general process communication and interactions with Jamalco.
- To provide guidelines to all workers including Contractors in reporting and documenting complaints at Jamalco;
- To coordinate and ensure recording of all complaints received from neighbouring communities, employees, contractors and others;
- To ensure reporting of accurate and reliable information.
- To ensure feedback to the complainant(s) on the decision of the company.

Definitions

Complaint: A formal or informal charge of negative impacts and damages (dust nuisance, noise, noxious odour, soot emission, spills, leaks, illegal waste disposal, abnormal or adverse environmental impact), property loss from fire, blasting, mobile equipment accident, construction activities and other Jamalco related incidents and issues brought to the company's attention by employees, contractors, communities or the public in general.

HSE: Environment Health and Safety

NEPA: Natural Environment and Planning Agency

JBI: Jamaica Bauxite Institute

MOHW: Ministry of Health and Wellness

CRC: Complaints Review Committee

CIT: Complaints Investigation Team

CGC: Complaints Grievance Committee

GOJ: Government of Jamaica

JBI: Jamaica Bauxite Institute

PMC: Parish Municipal Corporation

Affected departments

All Jamalco locations - including the Lands, Mining, Alumina Refinery, Port and Residue Storage Areas.

Forms/Documents Referenced

- Jamalco Complaints Notification Form
- Jamalco Environmental Incident Reporting and Investigation Procedure
- Jamalco Legal Registry
- Applicable GOJ Laws and Regulations
- Permits and licences

General Requirements of the Process

Complaints are managed in accordance with Jamalco's Complaints Management System and Government of Jamaica laws and regulations requirements.

Public notices shall be posted at operating mining sites as required by environmental permits.

All complaints whether formal or informal shall be documented by the person who receives the complaint using the Complaints Report Form and submitted within 8 hours of receipt of the complaint to the HSE Department.

These complaints are generally associated with Jamalco operations, its risks and impacts on communities and public.

The HSE department shall enter the complaint into the Jamalco Complaints Log and an investigation should be initiated within 24 hours of receipt of the complaint.

All complaints investigation reports will be reviewed, and decisions documented in the Complaints Review Committee (CRC) meetings.

Compensation shall be defined as per legal requirements, best practices and/or impacts assessment reports.

Jamalco Financial director shall approval all compensation rates and other related expenses.

The established complaints grievance process shall be communicated to all affected community councils as required by the environmental permits.

Jamalco Community Relations Officers and Manager are the company approved representatives to interact with the communities and the public. The department is responsible for sharing the complaints management procedure with affected communities.

There is a formal community grievance process for complainant as necessary. This process exist to ensure complainant received an independent hearing after the decision of the CRC.

Community council meetings, complaints reports, community complaints review community meetings and grievance committee meetings are to be documented and records maintained for a minimum of 7 years.

Complaints /Grievances associated with work issues are managed in accordance with the Human Resources & Industrial Relations procedures and labour agreements.

Complaints/Grievances associated with contractual agreements are managed through the procurement department.

Complaints closure is targeted to be closed within 90 days from the date received. There will be external factors that may delay actions closure beyond 90 days, and these exceptions shall be documented during the CRC meetings.

Complaint Investigation Team (CIT)

The Complaint Investigation Team shall comprise the HSE Resource, Corporate Services and Security Personnel. For complaints originating in the Mines a representative from the Mining Department and /or the Survey Team shall be a part of the CIT. Other personnel with specialized skills and knowledge may be incorporated into the CIT as required by the HSE Director.

The CIT shall be led by the HSE Resource.

Complaints Review Committee (CRC)

The CRC shall comprise the HSE Director, Lands and Mines Director, Corporate Services Manager, Associate Council, the Refinery Production Manager, HSE Resources (Mines and Refinery), HSE Administrator, and Accounting. Other personnel with specialized skills may be incorporated into the CRC as required. The CRC should meet at least once per month to review complaints and to follow up on actions from previous meetings.

A complaint is closed when the recommendations from the CRC are completed, and the issue is resolved satisfactorily.

The Corporate Services Department shall advise the complainant of the final decision on the complaint within one week of the decision.

For complaints where it has been determined by the CRC that the complaint is not supported by evidence gathered by the CIT, a letter shall be written to the complainant informing them of the decision. The complaint should then be closed.

Recommendations coming from the CRC reviews are communicated to the relevant departments for action via meeting minutes.

The CRC is led by the Lands and Mines Director.

Complaints Grievance Committee (CGC)

The CGC shall comprise of the HR, Corporate Services and Security Director, General Council, and the Strategic Development and IT Director. An external representative on the committee to include Community Council President or a JBI Officer. The HR, Corporate Services and Security Director shall lead the CGC.

Grievances shall be submitted to the Jamalco Community Relations Officer.

The Community Relations Officer in receipt of the grievance shall submit same to the HR, Corporate Services and Security Director.

The committee is responsible for the review and assessment of all grievances associated with the complaints management process. The CGC will meet on a as needed basis and may request further investigation and documents from the CRC. The decision from the CGC is to be considered the final internal decision in the complaints management process. The CGC final decision shall be documented and communicated to the CRC Leader and Corporate Services manager.

The Corporate Services manager is responsible for communicating the decision of the CGC to complainant.

The CGC will not be responsible for any legal actions and issues that may arise during and after the complaints management process. All legal actions will be managed by the Jamalco Legal department.

Complaints Management – HSE Department

1. Ensure Jamalco complaints management procedure is in full compliance with all applicable legal requirements including environmental permits and licences conditions.
2. Conduct training and awareness for affected department personnel to include lands, mines, security, community relations, refinery, port and contractors of all legal requirements and the procedure for effective management of all complaints.
3. Deployment of the complaints management procedure and notifications form to all affected department personnel.

4. Maintain in a current state the Jamalco Complaints Log as per legal requirements.
5. The HSE Professional shall enter the complaint into the Jamalco IHS within 72 hours of receipt of the complaint form. The HSE Professional shall prepare a letter notifying the complainant of receipt of complaint and arrange for letter to be submitted.
6. Coordinate and conduct complaints investigation as soon as possible, after receiving of complaint.
7. Prepare and distribute complaint investigation report to HSE and Corporate Services for review.
8. Make presentation of the complaint investigation findings at CRC.
9. Documentation of CRC meetings.
10. Submit quarterly community council meetings records to NEPA and JBI as per requirements.
11. Tracking complaints closures within 45 days and closure rate of 80%.

Complaints Management – Corporate Services Department

1. Sensitize communities of the Jamalco operations and complaints management process and the procedure for reporting complaints.
2. Complete complaint notification and submit to the HSE department immediately upon receipt of complaints. Where necessary call the HSE director and Corporate Services manager.
3. Active participant in complaints investigation.
4. Active participant in CRC meetings.
5. Coordinate and facilitate actions and follow-up from the CRC meetings.
6. Jamalco representatives at all community council meetings.
7. Documentation and recordkeeping of community council meetings.
6. Management of the organization social programmes and plans within affected communities.

Complaints Management – Security Department

1. Complete complaint notification and submit to the HSE department immediately upon receipt of complaints. Where necessary call the HSE and Corporate Services manager. applicable legal requirements including environmental permits and licences conditions.
2. Active participant in complaints investigation.

Complaints Management – Lands, Mines, Refinery & Departments

1. Notify immediately the Corporate Services and HSE departments of any incidents or issues with potential impact to the community and /or the public.

2. Participate in complaints investigation as requested by the HSE Director.
Complaints investigation associated with the Railroad operations shall include the Rail Haulage and Railroad Maintenance department supervisor and superintendent.
3. The Lands Department shall conduct assessments and valuations of properties and possessions, where necessary, according to the recommendations of the CRC. The assessment process should take no more than four weeks to be completed and communicated to the HSE Department
4. The Lands Department shall prepare and submit a final report of the assessments to the HSE, Corporate Services and Legal Departments.
5. Ensure the site is in full compliance with the requirements of environmental permits and licences including but not limited to posting of public notices, operation signs, and permit signs.
6. Sponsorship/support for Jamalco social programmes within affected communities.

Complaint Investigation Process

WHO

ACTIONS

**Person receiving complaint
(Security/Corporate Services/
HSE Resource)**

Communicates immediately to the HSE department.
Documents all complaints or allegations using the Complaints Report form and submit to the HSE Department as soon as possible (within 8 hrs).

Complaints Investigation Team (CIT)

Conducts the investigation into the incident within 24 hrs of receipt of the complaint and submit the report to the HSE Department within five days.

HSE Resource

Lead complaints incident investigation.
Document all interviews, collect evidence (samples, photographs) and not conditions.

Note weather condition during the investigation.

Record timelines, names and telephone contacts of persons interviewed.

Communicates decision of CRC to the respective departments for action

Draft initial letter of receipt for submission to complainant.

Draft letters for signage by the CRC leader/HR & Corporate Services Director.

Convene the CRC meeting and circulate the meeting minutes.

Lands Department

Conducts assessments and valuations in a case where it is warranted. The request is to be sent to the Mines Manager and Lands Supervisor who shall then delegate to other respective members as required.

Prepares final report to be submitted to Legal Counsel and HSE Department where complainant will be compensated.

Corporate Services Department

Liaise with complainant on a periodic basis during the investigation process and provide update to complainant where necessary. Document all conversations with community/public and file.

Lands and Mines Director

Define the compensation process for nuisance complaints as per the mining lease requirements and Jamalco compensation rates.

Establish the formal process for land clearance compensation.

Approval of expenses associated with compensated for crop assessment loss and other related property damages.

Accounting department

Tracking and management of all expenses associated compensation.

Maintaining expense records associated with compensation.

Legal department

Coordinate all complaints that may have legal implications and/or for which the complainant is represented by an attorney-at-law.

Prepares release documents for complainants receiving compensation.

Prepares letters for as required for complaints (that may be of a sensitive legal nature) where liability has not been

Environment Health and Safety Management System

Complaints Management Procedure



accepted by Jamalco.

Attachments

- Jamalco Complaints notification form.
- Complaints Grievance Process
- Lands department compensation rates
- Complaints Log

DOCUMENT CHANGE HISTORY

DATE	NATURE OF REVISION	DOCUMENT REVIEW PARTICIPANTS
February 10, 1997	Developed and implemented	A. Spence
March 1997	Review and approve	George Morgan, Donald Beal, Blossom Laidlaw
October 1998	Review Develop report form.	Andrea Spence
September 2003	Review. Adopt SOP to ISO 14001 standard requirements. Remove Breadnut Valley Mines facility.	Andrea Spence
August 2007	Review, revise and approve.	Sharmila Maharaj; Shamar Wright; Tegra Morgan, Lindley Jarrett
October 05, 2009	Revised to include roles of CIT & CRC	Joseph McCarthy Shamar Wright
January 10, 2011	Reviewed without changes	Stephen Brown
January 20, 2012	Revised to include role of Legal Counsel and integration of Legal Unit's participation in the investigation process	Stacian Bennett Stephen Brown Elaine Ormsby
April 04, 2013	Reviewed without changes	Ronald Campbell
April 26, 2014	Reviewed without changes	Tiffany Martin
August 20, 2014	Revised to include role of the Lands Department in the process. Reporting time for IHS added. RDA changed to RSA.. Time for completion of investigation added.	Tiffany Martin
December 19, 2014	Reviewed to include Jamalco's Environmental Management System requirements; roles and responsibilities were reviewed.	Andrea Spence, Joseph McCarthy, Christine Lewis, Tiffany Martin, Denise Dawkins,

Environment Health and Safety Management System

Complaints Management Procedure



		Shacola Green, Kedion Kelly
June 2015	Reviewed the composition of the CRC	Denise Dawkins
October 2015	Revised. Reporting of complaint through the use of the Complaint Notification form changed from 24hours to 8 hours. Completion of the investigation by the CIT changed from 48 hours to 24 hours.	Tifany Martin
October 2016	Revised to include a member of the Survey team for complaints received in the Mines; removed the requirement for complaints to be closed with the CEO's approval; removed section stating that this procedure is valid for 30 days after printing; included the HSE professional's responsibility for drafting a letter to the complainant where liability is not accepted	Tifany Martin
July 2017	Revised to include the preparation and submission of letter of receipt by HSE Personnel	Tifany Martin
October 2020	Included a scope into the procedure.	Rhondale Williams
September 28, 2022	Added new requirements in the environmental permits for bauxite mining. Including the documentation of community council meetings, posting of public notices of mining operations signs and grievance process for complaints.	Andrea Spence.
January 2023	Added the Complaints grievance process and members of the Complaints Grievance Committee.	Andrea Spence
November 28, 2025	Changed all EHS references HSE	Kadian Pitter
December 2025	Added tracking of performance metrics such as closures, meetings	Andrea Spence

Approved For Use