



## GRIEVANCE MECHANISM PROCEDURE

The purpose of this document is to formalize the management of grievances from stakeholders of Promise Gold to minimize the social risks to the business. The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

**Scope:** The grievance mechanism procedure applies to all external stakeholders of our operations and exploration activities. This procedure covers grievances raised by internal stakeholders, such as employees, who are to refer to the company's internal grievance standard.

Specific and localized grievance mechanisms may need to be put in place for future development projects, which consider local language and customs.

### Definitions

Term	Definition
<b>Grievance</b>	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the company in a formal manner.
<b>Grievance mechanism</b>	A formalized way to accept, assess and resolve community complaints concerning the performance or behaviour of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts.
<b>Internal Stakeholders</b>	Groups or Individuals within a business who work directly within the business, such as employees and contractors.
<b>External Stakeholders</b>	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community and the government.

### Grievance Reporting Channels

The company will communicate this procedure to its stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external stakeholders to raise their grievances formally include.

1. Telephone Stakeholders can call Promise Gold on +97165288027 and speak to its compliance department.
2. Fact to face Stakeholders can voice their grievance to any employee who will then escalate using the correct process.

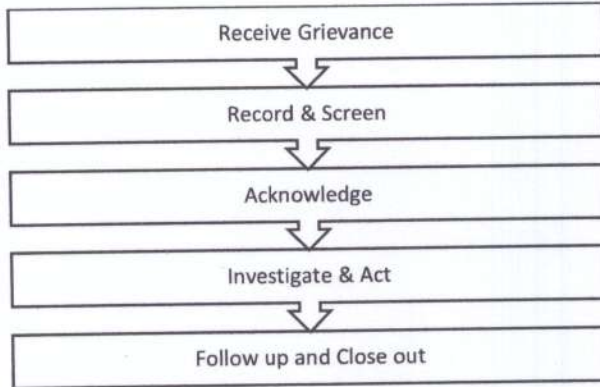
### ROLES AND RESPONSIBILITIES

Roles/Position Title	Responsibility
<b>Grievance Owner</b>	Employee investigating the grievance and liaising with the external stakeholders. Developing resolutions and actions to rectify any issues. Follow up and track progress of grievance. Document any interactions with external stakeholders.
<b>Stakeholder Contact Officer</b>	Receive grievances and assign a grievance owner Make sure the grievance mechanism procedure is being adhered to and followed correctly. Maintains grievance register and monitor any correspondence. Raise internal awareness of the grievance mechanism among employees and contractors.
<b>Employees</b>	Receive grievances in person. Report grievance to the Stakeholder Contact Officer by lodging the Grievance letter



### GRIEVANCE MECHANISM PROCESS

The figure below describes the process that will be used to resolve any grievances:



**Actions:** The Grievance mechanism policy shall be revised as per requirement from time to time to establish the procedure to its fullest effect.





## Complaint Policy

### Introduction

Promise Gold seeks to maintain and enhance its reputation of providing its customers with high quality services.

Promise Gold values complaints as they assist in improving its services levels and relationships with customers, suppliers and stakeholders.

Promise Gold has established a Customer Complaint Policy that covers all stakeholders that are impacted by Promise Gold operations including customers, suppliers, intermediaries and all other relevant entities or individuals that participate in the supply chain.

### Objective

To develop a Customers Complaint Policy that includes reassuring clients that **Promise Gold** values their feedback and is committed to resolving any issues in a fair, timely and efficient manner; the main objective of this policy is to ensure that:

- ✓ All Promise Gold staff members and stakeholders are aware of the complaint lodgement and handling process
- ✓ Customers and staff members understand the complaint handling policy
- ✓ Complaints are investigated with a balanced view of all information and/or evidence.
- ✓ Promise Gold takes all reasonable steps to actively protect customers' information in a highly confidential manner
- ✓ Customers' complaints are considered on its merits considering individual circumstances and needs.

### Scope

Promise Gold customer's complaint policy covers customer, suppliers and any participant in the supply chain, it enables external stakeholders to voice concerns relating to Promise Gold supply chain and related risk management processes.

### Moreover it covers

- ✓ How customers can make a formal complaint
- ✓ Identify steps in discussing, escalating and resolving complaints
- ✓ Indicate some of the solutions and root cause of addressed complaints
- ✓ Inform customers with solutions and reassure our commitment to continuous improvement

### Definition of a complaint

In this policy a complaint means an expression of dissatisfaction that may be raised by the customers, suppliers, intermediaries and all other relevant entities/individuals participate in the supply chain.

### How a complaint be made?

If any of the concerned parties are dissatisfied with any of the services rendered at any stage of the supply chain, the customer should in the first instance consider speaking directly with the staff member/s it has been dealing with. If the Client is uncomfortable with this or considers that the relevant staff member is unable to address its concerns, the customer can lodge a complaint with Promise Gold in the following ways:

- ✓ By completing a feedback form on the Promise Gold website
- ✓ By calling any of Promise Gold senior management by telephone
- ✓ By writing an email to:

Note: the recipients of this email are the senior heads that represent different areas in Promise Gold

### Nature of customer's complaint

Promise Gold encourages its customers, suppliers and all participants involved in the supply chain to officially document and submit their dissatisfaction at any point of time through the authorized means mentioned above. Promise Gold management treats all customer's complaints with confidentiality, fairness and objectivity, and depending on the nature of the submitted complaint, the below process is mandated:



#### **A. Day to Day related customer's complaint**

A Day-to-Day related customer complaint is any complaint received through any of the above-mentioned means, related to daily functions at any stage of the supply chain. Below is a non-exhaustive, indicative list of example complaints:

- ✓ Scrap weight mismatching
- ✓ Refinery results, mismatch between Assay reports
- ✓ Arguments over melting loss
- ✓ Delay in receipt/delivery

#### **Day to Day related customer's complaint escalation process**

In case the complaint relates to any of the day to day functions the respective head in the related area should:

- ✓ Contact the customer to collect more information if required
- ✓ Evaluate the complaint and exert best efforts to resolve it at first instance
- ✓ In the event that the respective Head is unable to resolve the complaint within one working day, the complaint is to be escalated by the respective Head to senior management for objective discussion and decision.
- ✓ Day to day complaints to be resolved in accordance to Turn Around Time of 48 to 72 working Hours from the time it has been officially received.
- ✓ After a decision has been made by the Promise Gold senior management the respective Head will contact the customer to provide feedback and details of the proposed rectification process.
- ✓ All Complaints must be forwarded to Promise Gold compliance for lodgement in the customers' complaint Log

#### **Promise Gold Compliance Officer role**

- ✓ Collect all required information related to the addressed complaint
- ✓ Execute fair and unbiased investigation to the complaint based on details given and supporting documents
- ✓ Inspect all documents/ reports that are related to the complaint
- ✓ Prepare an official investigation report along with recommendations proposing target dates within the set time frame
- ✓ The recommendations to be discussed and agreed upon with the concerned parties mentioned above
- ✓ Ensure that the customer has been contacted and updated with the proposed rectification process and/or decision based on case by case
- ✓ Log the complaints in the LOG that includes:
  - a. Customer name
  - b. Date & Time of complaint
  - c. Method of complaint receipt
  - d. Involved area and/or staff
  - e. Action taken along with dates and evidence (if any)
  - f. Status along with date
  - g. Customer feedback

#### **B - Procedures related customer's complaint**

**Procedures related customer complaint - In case the complaint is related to Promise Gold procedures or any of Promise Gold involved staff.**

Once the procedure complaint has been officially received through any of the authorized methods, the respective Head in related area must:

- ✓ Contact the respective customer and collect more information (if required)
- ✓ Escalate the complaint to the Promise Gold senior management and Promise Gold Compliance Officer and any other parties involved in the complain



## **PROMISE GOLD COMPLIANCE OFFICER ROLE**

- ✓ Collect all required information related to the addressed complaint.
- ✓ Execute fair and unbiased investigation to the complaint based on details given and supporting documents
- ✓ Inspect all documents/reports that are related to the complaint
- ✓ Communicate with all Promise Gold involved staff.
- ✓ Prepare an official investigation report along with recommendations proposing target dates within the set time frame.
- ✓ The recommendations to be discussed and agreed with all concerned parties
- ✓ Ensure that the rectification process is communicated officially to the customer by the respective Promise Gold head
- ✓ In case the complaint is related to any of Promise Gold staff, the same process is to be followed whereby disciplinary action is to be decided by senior management as per their consent (based on case by case)
- ✓ When the complaint is about one of Promise Gold staff members, Promise Gold management exerts best efforts to maintain objectivity by:
  - ✓ Informing the staff member of any complaint about their performance and/or attitude
  - ✓ Providing them with an opportunity for appropriate support
  - ✓ Updating them on the complaint investigation and the result
- ✓ Log the complaints in the LOG that includes:
  - ✓ Customer name
  - ✓ Date & Time of complaint
  - ✓ Method of complaint receipt
  - ✓ Involved area and / or staff
  - ✓ Action taken along with dates and evidence (if any)
  - ✓ Status along with date
  - ✓ Customer feedback

### **Promise Gold Customer complaint LOG to be maintained, monitored by the Promise Gold Compliance Officer who must:**

- ✓ Ensure prompt update to the mentioned LOG, identifying status of complaint
- ✓ Follow up with concerned parties until final rectification
- ✓ Conduct an unbiased investigation when and as required and as stipulated above
- ✓ Communicate with all Promise Gold concerned parties to reach a fair conclusion to the addressed complaint
- ✓ Ensure that the investigation is handled with confidentiality and disclosure is based on "Need to Know" rule
- ✓ Review the Complaint LOG on a monthly basis to ensure that all complaints are properly and promptly handled within the set time frame
- ✓ Identify and escalate long pending complaints to Promise Gold senior management for prompt action
- ✓ In case of any long pending items the Promise Gold Compliance Officer must escalate directly to Promise Gold senior management

### **Turnaround Time (TAT) for complaints resolution**

- ✓ To ensure prompt handling and resolution of any customer's complaint, Promise Gold management has set a time frame to close all customer complaints based on their nature as above:
- ✓ Due to the sensitive and fast nature of the bullion business, all day to day related complaints are to be resolved within TAT 48 to 72 working Hours since it has been officially received.
- ✓ Procedures related complaints are to be resolved within 12 working days since it has been officially received.
- ✓ TAT must be strictly followed at all times any exception is approved by the Promise Gold president .



**Customer's complaint record retention**

Promise Gold must retain of all records and documentation related to customer complaints for a period of 5 years after the closure of such complaint.

**Where to get Help – For any queries or assistance please refer the respective Promise Gold Manager or Promise Gold Compliance Officer**



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