

Number: PD-014/SMI/1123

#### REGULATION OF THE BOARD OF DIRECTORS PT SARANA MULTI INFRASTRUKTUR (PERSERO) NUMBER PD-014/SMI/1123

#### **CONCERNING**

## AFFECTED COMMUNITY AND OBSERVER GROUP GRIEVANCE MECHANISM PROCEDURE REVISION-1

#### BOARD OF DIRECTORS OF PT SARANA MULTI INFRASTRUKTUR (PERSERO)

#### Considering

- a. that as the efforts of PT Sarana Multi Infrastruktur (Persero) (the "Company") to openly accept input, suggestions and grievances from the stakeholders, provisions regarding grievance mechanism have been established which were previously regulated in Regulation of the Board of Directors Number PD-018/SMI/0422 dated 22<sup>nd</sup> April 2022 concerning Affected Community and Observer Group Grievance Mechanism Procedure;
- b. that in order to manage grievances and mitigate the adverse risks for the Company, it is deemed necessary to improve the Company's provisions by adding information regarding the implementation timeline of the environmental and social-related grievance mechanism and ranking as well as other regulatory improvements;
- c. that based on the considerations as intended in letters a and b; it is necessary to establish a Regulation of the Board of Directors regarding Affected Community and Observer Group Grievance Mechanism Procedure Revision 1.

#### Given

- 1. Regulation of the Minister of Environment Number 17 Year 2012 concerning Guidelines for Community Involvement in the Environmental Impact Assessment and Environmental Permit Process (State Gazette of the Republic of Indonesia Year 2012 Number 991);
- 2. Regulation of Financial Services Authority of the Republic of Indonesia Number 46/POJK.05/2020 concerning Infrastructure Financing Companies (State Gazette of the Republic of Indonesia Year 2020 Number 249);
- 3. Regulation of the Financial Services Authority Number 6/POJK.07/2022 concerning Consumer and Community Protection in the Financial Services Sector (State Gazette of the Republic of Indonesia Year 2022 Number 99);



- Regulation of the Financial Services Authority Number 18/POJK.07/2028 concerning Consumer Complaint's Services in the Financial Services Sector (State Gazette of the Republic of Indonesia Year 2018 Number 151)
- 5. The Company's Articles of Association Deed Number 17 dated 26<sup>th</sup> February 2009 was made before Lolani Kurniati Irdham-Idroes, Master of Law, LLM (Lex Legibus Magister), Notary in Jakarta and obtained approval from the Minister of Justice and Human Rights of the Republic of Indonesia based on Decree Number AHU-09067.AH. 01.01 Year 2009 dated 24<sup>th</sup> March 2009, as last amended by Deed Number 16 dated 24<sup>th</sup> January 2023 made before Notary Ashoya Ratam, Master of Law, Master of Notaries and obtained a Letter of Acceptance of Notification of Amendment to the Articles of Association Number AHU-AH.01.03-0014953 dated 27<sup>th</sup> January 2023;
- 6. Regulation of the Board of Directors Number PD-010/SMI/0723 concerning the Eleventh Amendment to Regulation of the Board of Directors Number PD-26/SMI/1217 concerning the Board of Directors' Segregation of Duties and Work Guideline;
- 7. Regulation of the Board of Directors Number PD-035/SMI/0922 concerning Main Duties and Functions of Divisions;
- 8. Joint Regulation of the Board of Commissioners and Directors Number PER-03/SMI/DK/1221 and Number PD-025/SMI/1221 concerning Code of Corporate Governance;
- Joint Regulations of the Board of Commissioners and Directors Number PER-02/SMI/DK/1221 and Number PD-024/SMI/1221 concerning Code of Conduct;
- 10. Regulation of the Board of Directors Number PD-011/SMI/0322 concerning General Risk Management Policy;
- 11. Regulation of the Board of Directors Number PD-002/SMI/0122 concerning Operational Risk Management Procedure;
- Regulation of the Board of Directors Number PD-010/SMI/0720 concerning Handling Legal Issue Handling Guideline Revision –
   1:
- 13. Regulation of the Board of Directors Number PD-028/SMI/0722 concerning Consumer Protection Procedure;
- 14. Regulation of the Board of Directors Number PD-021/SMI/0622 concerning Communication, Outreach, and Information Dissemination Procedure; and
- 15. Regulation of the Board of Directors Number PD-024/SMI/0622 concerning Company Policy Preparation Procedure

**Paying Attention to** 

Approval of General Policy & Procedure Committee Number 08/FPPR/KUP-S/1032 dated 9<sup>th</sup> October 2023 regarding Circular Approval

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of Affected Community and Observer Group Grievance Mechanism Procedure – Revision 1;

#### **HAS DECIDED:**

**Stipulating** 

REGULATION OF THE BOARD OF DIRECTORS OF PT SARANA MULTI INFRASTRUKTUR (PERSERO) CONCERNING AFFECTED COMMUNITY AND OBSERVER GROUP GRIEVANCE MECHANISM PROCEDURE REVISION 1.

#### Article 1

Establishing the Affected Community and Observer Group Grievance Mechanism Procedure, as attached to this Regulation of the Board of Directors.

#### **Article 2**

Once this Regulation of the Board of Directors comes into effect, provisions in Regulation of the Board of Directors Number PD-018/SMI/0422 dated 22<sup>nd</sup> April 2022 concerning Affected Community and Observer Group Grievance Mechanism Procedure shall be revoked and declared no longer valid.

#### Article 3

This Regulation of the Board of Directors shall come into effect as of the date of stipulation

Stipulated in Jakarta,

Dated 9th November 2023

PT SARANA MULTI INFRASTRUKTUR (PERSERO)

#### **Edwin Svahruzad**

President Director

Remark: This document is signed electronically.



PT Sarana Multi Infrastruktur (Persero)

2023

#### ESTABLISHMENT HISTORY

No	Policy Name and Version	Effective Date	Regulation of the Board of Directors	Approval Memo	Information
1	Affected Community and Observer Group Grievance Mechanism Guideline and Procedure	11 <sup>th</sup> October 2017	PD-20/SMI/1017 dated 11 <sup>th</sup> October 2017	Risk Management Sub-Committee Approval Memo Number 12/FPPR/KMR- S/0717 dated 15 <sup>th</sup> August 2017	New Provisions (Not applicable)
2	Affected Community and Observer Group Grievance Mechanism Guideline and Procedure – Revision 1	-	PD-20/SMI/1017 dated 11 <sup>th</sup> October 2017		(Not applicable)
3	Affected Community and Observer Group Grievance Mechanism Procedure	1 <sup>st</sup> March 2022	PD-018/SMI/0422 dated 22 <sup>nd</sup> April 2022	Memo No. FP- 013/SMI/DMR/DM RT/0322 dated 17 <sup>th</sup> March 2022 concerning Approval of Adjustment of Nomenclature and Leveling Structure for Affected Community and Observer Group Grievance Mechanism Procedure	Adjustment of Nomenclature and Leveling Structure Year 2022. (Not applicable)
4	Affected Community and Observer Group Grievance Mechanism Procedure - Revision 1	As per attached memo	As per attached memo	As per attached memo	Addition of information regarding the implementation timeline of the environmental and social-related grievance mechanism and ranking as well as other regulatory improvements.



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INTRODUCTION	CHAPTER-I

#### 1. Background

PT Sarana Multi Infrastruktur (Persero), hereinafter referred to as the "Company", pursues consistently to promote the acceleration of infrastructure development as well as other development financing based on any government assignments. To realize this commitment, the Company openly accepts the environmental and social-related input, suggestions and grievances from its stakeholders.

The stakeholders are specifically the community affected by activities financed by the Company (Affected Communities) and Observer Groups, which consist of various parties such as: academics, experts, Non-Governmental Organizations (NGOs), or observers who have competence in the field.

Effective handling by the Company for the environmental and social-related grievances from the Affected Community and Observer Groups is absolutely necessary to avoid or mitigate the adverse risks for the Company. Therefore, the environmental and social-related grievances in the form of information, responses, criticism, opinions or input from the Affected Communities and Observer Groups must be well managed and resolved quickly and appropriately by the Company.

#### 2. Objective

In the context of policies and implementation of the Company's good and comprehensive governance, this procedure regulates the implementation of Affected Community and Observer Group Grievance Mechanism. The objective is to provide guidance for the Company in managing the Environmental and Social-related Grievances, responses and opinions from the Affected Communities and Observer Groups in accordance with the prudential principle and responsible problem solving to maintain the Company's reputation.

#### 3. Scope

This Affected Community and Observer Group Grievance Mechanism Procedure regulates the mechanism of Grievances from the Affected Community and Observer Groups which are resolved without going through any legal channels. If it is related to legal processes, the handling will be resolved using the Company Policy related to the applicable legal-issue handling.

This procedure regulates the following provisions:

- a. Segregation of duties and authorities in managing the Environmental and Social related-Grievances from the Affected Communities Observer Groups related to the projects/activities financed/supported by the Company.
- b. Principles for managing the Environmental and Social related-Grievances.
- c. General provisions for the Environmental and Social related-Grievances.



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d. Stages of the Environmental and Social related-Grievance Mechanism Process.

#### 4. Legal Basis

- Regulation of the Minister of Environment Number 17 Year 2012 concerning Guidelines for Community Involvement in the Environmental Impact Assessment and Environmental Permit Process;
- b. Regulation of Financial Services Authority of the Republic of Indonesia Number 46/POJK.05/2020 concerning Infrastructure Financing Companies
- c. Regulation of the Financial Services Authority Number 6/POJK.07/2022 concerning Consumer and Community Protection in the Financial Services Sector
- d. Circular Letter of the Financial Services Authority Number 1/SEOJK.07/2014 concerning Education Implementation in the Context of Financial Literacy Improvement for the Consumers and/or Public;
- e. Circular Letter of the Financial Services Authority Number 12/SEOJK.07/2014 concerning Information Dissemination in the Context of Financial Products and/or Services Marketing;
- f. Circular Letter of the Financial Services Authority Number 14/SEOJK.07/2014 concerning Confidentiality and Security of Consumer Personal Data and/or Information;
- g. Circular Letter of the Financial Services Authority Number 17/SEOJK.07/2018 concerning Consumer Complaint's Service Implementation Guideline in the Financial Services Sector;
- h. Company's Articles of Association;
- i. Company policies related to Code of Corporate Governance;
- j. Company policies related to Code of Conduct;
- k. Company policies related to risk management;
- 1. Company policies related to operational risk management;
- m. Company policies related to legal issue handling;
- n. Company policies related to consumer protection;
- o. Company policies related to communication, outreach and information dissemination;
- p. Company policies related to the company policy preparation;
- q. Company policies related to Whistle Blowing System;
- r. Company policies related to the Segretation of Duties and Work Guideline for the Board of Directors;
- s. Company policies related to Main Duties and Functions of Divisions.



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INTRODUCTION CHAPTER-I

#### 5. Special Conditions

In the event there are certain circumstances that lead to any implementation beyond the provisions of this Procedure and/or there are matters that have not been regulated in this Procedure, submission for the special conditions shall be entered for approval on a case-by-case basis and shall have a very selective nature. It is mandatory for the applications for the special conditions to obtain approval from the Board of Directors. If necessary, the Board of Directors may request a review from the relevant work units in advance.

The special conditions referred are intended for operational matters (not related to submitting amendments to to this Procedure) and must be based on the analysis results of the proposal, paying attention to potential risks that may occur, and careful management considerations regarding the Company's interests.

Provisions regarding submission of amendments and/or revisions to this Procedure shall refer to the Company's Policy regarding the establishment of applicable Company policies.

#### 6. Definition

Expert

**Observer Groups** 

			matters or expertise to assess and decide a matter correctly, efficiently and reliably according to their knowledge, education and experience background.
b.	Academics	:	People who specialize in a particular field of expertise and are more oriented towards the world of higher education such as universities or research institutions.
c.	Grievance Panel	:	It is a team in the form of an Ad Hoc organization that can come from internal or external sources which is considered to be able to provide any assistance in the Environmental and Social-related Grievance resolution. This team can be

Groups or individuals who are not directly affected by a business plan and/or activity, but have an interest in the business plan and/or activity. This observer groups can be individuals or groups, non-governmental organizations (NGOs), academics or experts in their field.

mechanism applicable in the Company (if necessary).

formed through the goods and services procurement

A person considered a trusted source for certain technical

Grievance : Information in the form of written complaints; or in the form of negative input, responses, opinions, arguments, or news which is potentially detrimental to the Company from the Affected Communities and Observer Groups addressed,



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#### INTRODUCTION

**CHAPTER-I** 

f. Environmental and Social-related Grievance

: Information in the form of environmental and social-related written complaints; or in the form of environmental and social-related negative input, responses, opinions, arguments, or news which is potentially detrimental to the Company from the Affected Communities and Observer Groups addressed, either directly or indirectly, to the

either directly or indirectly, to the Company.

Company

g. NGOs (Non-Governmental Organizations) : Organizations founded by individuals or groups of people who voluntarily provide services to the public without aiming to gain profit from its activities.

h. Affected Communities

Communities directly affected by projects financed by the

Company.

i. Observers

: People who observe project activities funded by the Company. Observers can be coming from groups of academics, experts, NGOs who master or have expertise that is not possessed by society in general and/or individuals who do not have an expertise background.

j. Environmental and Social Issues

Issues related to the Company's environmental and social commitments which are stated in the Company's policies.



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#### PRINCIPLES, ETHICS AND RISKS

**CHAPTER-II** 

#### 1. Grievance Mechanism Principles

The principles for managing Environmental and Social-related Grievances from the Affected Communities and Observer Groups are as follows:

#### a. Verified

All Environmental and Social-related Grievances must be verifiable based on reliable information sources.

#### b. Accessible

The media used to manage the Environmental and Social-related Grievances must be accessible to Affected Communities and Observer Groups.

#### c. Responsible

The overall Environmental and Social-related Grievance mechanism shall be resolved by considering the Company's ethics, regulations and applicable laws in Indonesia.

#### d. Confidentiality and Security

The entire communication process between the Affected Communities and Observer Groups and the Company related to the mechanism of the Environmental and Social-related Grievances is confidential and cannot be disseminated to the public. At the request of the aggrieved party, a Grievance can be submitted anonymously, with only the receiving party having the contact details. For Grievances related to gender issues and based on requests, the Grievances may only be handled by the Company's personnel of the same gender as the aggrieved party.

#### e. Solutions beyond Legal Channels

The entire Environmental and Social-related Grievance Mechanism process is aimed at finding solutions to problems beyond the legal channels.

#### 2. Grievance Mechanism Ethics

The parties involved in managing the Environmental and Social-related Grievance shall comply with the Company's Policy regarding the Code of Conduct and the Company's Policy regarding Code of Corporate Governance which have been established by the Company.

#### 3. Risk Management and Internal Control

The Environmental and Social-related Grievance Mechanism shall be carried out by paying attention to and considering the potential risks that may occur and mitigation efforts for the following risks:



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#### PRINCIPLES, ETHICS AND RISKS

**CHAPTER-II** 

#### a. Reputational Risk

Reputation risk is a risk associated with a decrease in the level of stakeholder trust originating from negative perceptions of the Company.

Reputation risk mitigation shall be carried out, among other, through both internal and external communication management with the stakeholders through activities that can create a positive corporate image, including with the mass media.

#### b. Compliance Risk

Compliance risk is the risk associated with the Company's non-compliance with and non-execution of applicable laws and regulations.

Compliance risk mitigation shall be carried out, among other, by paying attention to and fulfilling the Company-related laws and regulations.

#### c. Operational Risk

Operational risk is the risk associated with the inadequacy and/or non-functioning of internal processes, human error, system failure, and/or external events that affect the Company's operations.

Operational risk mitigation shall be focused on the adequacy of the Company Policy as well as a structure of main duties and functions, a dual control mechanism, and a clear segregation of duties.

#### d. Legal Risk

Legal risk is the risk associated with any lawsuits and/or weak legal aspects.

Environmental and Social-related Grievance Mechanism is the Mechanism of Grievances that do not have any legal risks or have a very low level of legal risks.

The Mechanism of Grievances having legal risks shall refer to provisions related to the Grievance handling through legal channels.

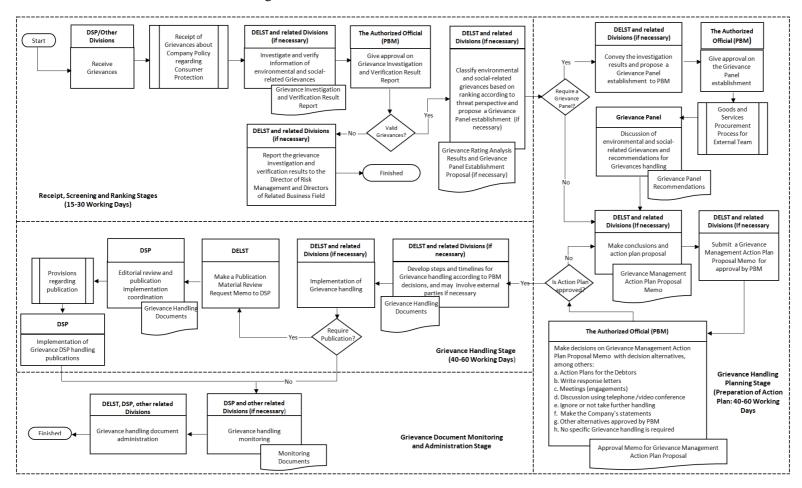


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GRIEVANCE MECHANISM STAGES & PROCEDURES

**CHAPTER-III** 

The flowchart of Grievance Mechanism stages is described as follows:





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## GRIEVANCE MECHANISM STAGES & PROCEDURES

**CHAPTER-III** 

#### 1. Stages of Environmental and Social-related Grievance Receipt, Screening and Rating

The stages of Grievances mechanism which comprise the stages of receiving, screening and rating the Environmental and Social-related Grievances are expected to be completed within a period of 15 to 30 working days.

a. The stage of Environmental and Social-related Grievances receipt is the management of information that has been received/obtained by the Corporate Secretariat Division (DSP), Environmental Social and Technical Evaluation Division (DELST), or other divisions via electronic mail (email), website, reader's letters, suggestion boxes, faxes, official letters, or mass media.

Receipt of Environmental and Social-related Grievances in the form of complaints from the consumers shall be carried out under the provisions and mechanisms which refer to the Company's Policy regarding the applicable consumer protection.

The Environmental and Social-related Grievances received/obtained by DSP or other divisions are later submitted to DELST for further processing.

- b. Screening of Environmental and Social-related Grievances
  - i. First, DELST shall carry out the investigation and verification of information validity against the Environmental and Social-related Grievances. This first step shall be carried out in coordination with other relevant divisions (if necessary). This investigation is carried out to find out whether the information submitted by the Complainant regarding the Environmental and Social Issues is believed to be true. The investigation may involve the Debtor/Client (if necessary).
  - ii. The results of the investigation and verification of Environmental and Social-related Grievances shall be included in the Grievance Investigation and Verification Result Report made by DELST (as in the report format example in Appendix 1) and shall be approved by the Authorized Official (PBM) as regulated in Chapter IV the Authorized Official.
  - iii. If the Grievances are declared valid, the Grievance handling process shall continue. In the event the Environmental and Social-related Grievances are declared invalid, DELST and other related Divisions (if necessary) shall report the Grievances to the Director of Risk Management and Directors of Related Business Sectors.
  - iv. If the Grievances may endanger the Company's reputation and have the potential to diminish the stakeholder's trust due to extensive publication through the media, DELST in coordination with other relevant Divisions (if necessary) is obliged to immediately investigate the validity of the Grievance information within a maximum of 24 (twenty four) hours as of the time the Grievances are received by DELST.



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## GRIEVANCE MECHANISM STAGES & PROCEDURES

**CHAPTER-III** 

c. Rating of Environmental and Social-related Grievances

The verified Environmental and Social-related Grievances are later ranked according to the risk impacts and management/control of those risks. The ranking is divided into three Levels:

#### i. Level 1

The Grievances submitted have the risks of local-scale reputational impacts or the impacts that can only be resolved using local approaches. The Complainants are the local communities or observers, for example, the Grievances about the negative impacts of dust coming from the project activities.

#### ii. Level 2

The Grievances submitted have the risks and potential to impact the national-scale reputation. The Grievances are submitted by observers, institutions or observers on a national scale. If not managed well, it has the potential to become a national issue and even develop into an international issue. In its mechanism, it is necessary to consider involving a Grievance Panel. For example, regarding the Grievances related to the Company's commitments, especially concerning the Environmental and Social Affairs.

#### iii. Level 3

The Grievances submitted have risks and potential to impact the international reputation. The Grievances are submitted by observers, institutions or international observers to the Company. In its mechnism, it is necessary to consider involving a Grievance Panel. For example, Grievances about the Company's commitment to the prevention of climate change impacts.

#### 2. Grievance Handling Planning

Planning for handling the Environmental and Social-related Grievances shall be carried out as follows.

- a. DELST, in coordination with other related divisions (if necessary), shall prepare a Grievance Mechanism Action Plan Proposal Memo which may include action plans and timelines for Grievance handling plans that must be carried out by the Debtors related to the environmental and social issues. The Grievance Mechanism Action Plan Proposal Memo should contain at least:
  - Background (which comprises Grievance delivery/receipt media and Grievance rating).
  - Objectives.
  - Follow-up plans.
- b. If necessary, the preparation of a follow-up plan may involve the Grievance Panel. The establishment of the Grievance Panel shall be approved by the Authorized Official (PBM) as regulated in Chapter IV The Authorized Official. The procurement process for the External



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## GRIEVANCE MECHANISM STAGES & PROCEDURES

**CHAPTER-III** 

Team shall refer to the Company's policy related to the applicable goods/services procurement.

The Grievance Panel Team shall carry out discussions about the Environmental and Social-related Grievances and provide recommendations for handling such Environmental and Social-related Grievances. Recommendations for handling Grievances from the Grievance Panel are part of a Grievance Mechanism Action Plan Proposal Memo.

- c. Based on certain considerations, the preparation of Grievance Mechanism Action Plan Proposal may involve the Debtor/Client/Investee and other related divisions.
- d. DELST shall request an approval for the Grievance Mechanism Action Plan Proposal from the Authorized Official (PBM) as regulated in Chapter IV The Authorized Official.
- e. The Authorized Official (PBM) shall make decisions on the Grievance Mechanism Action Plan Proposal Memo which may encompass one or a combination but is not limited to the following alternatives:
  - i. Proposing action plans to be implemented by the Debtors.
  - ii. Writing response letters.
  - iii. Meetings (engagements).
  - iv. Discussions using telephone and/or video conference media.
  - v. Ignoring or not taking further handling.
  - vi. Making the Company's statements.
  - vii. Other follow-up actions based on the Authorized Official (PBM) considerations.
  - viii. No specific Grievance handling is required.

This stage is expected to be completed within 40 (forty) to 60 (sixty) working days.

#### 3. Handling of Grievance

Handling of Environmental and Social-related Grievances shall be carried out as follows:

- a. Based on the Authorized Official (PBM)'s approval for the Grievance Mechanism Action Plan Proposal Memo, DELST and other related divisions (if necessary) shall prepare a detailed activity plan (timeline) for the Grievance mechanism. The preparation of this activity plan may involve other external parties (if necessary).
- b. In the event the handling of Environmental and Social-related Grievances requires publication, DELST shall make a Publication Material Review Request Memo to DSP to carry out an editorial review and coordinate the publication implementation.
- c. Based on the publication material that has been reviewed, DSP shall carry out out the publication of Grievance Handling in accordance with the applicable regulations. The output from this stage is in the form of a Grievance Handling publication.



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## GRIEVANCE MECHANISM STAGES & PROCEDURES

**CHAPTER-III** 

- d. The Grievance resolution process shall always prioritize dialogue and cooperation to reach an agreement and maintain the Company's reputation.
- e. The Grievance handling is declared complete if the Company has carried out the follow-up actions that must be carried out and has submitted an action plan to the Debtor.

This stage is expected to be completed within 40 (forty) to 60 (sixty) working days.

#### 4. Monitoring and Administration of Grievance Documents

- a. Monitoring of Environmental and Social-related Grievances that have been resolved by the Company shall be carried out in the following 2 manners:
  - i. Monitoring of counter responses by the Grievance complainant.
    - Receipt of counter responses by the Grievance complainant shall be obtained by DSP, DELST, or other divisions under the provisions and mechanisms referred to in Chapter III.1. Receipt, Screening and Rating Stages of Environmental and Social-related Grievances.
  - ii. Monitoring of Grievance handling impacts.
    - The montoring shall be carried out by DELST and the divisions handling the Grievances, in coordination with other related divisions (if necessary).
- b. Monitoring of handling of Environmental and Social-related Grievances that has been carried out shall be properly documented and administered by DELST and DSP. If necessary, other related divisions can participate in carrying out the documentation and administration.
- c. The Company shall upload and update list of Grievances that have been received and/or resolved on the Company's website on a regular basis.
- d. The Company may invite the external independent parties to evaluate the implementation of handling of Environmental and Social-related Grievances on a regular basis.



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THE AUTHORIZED OFFICIAL'S PROVISION

**CHAPTER-IV** 

The Authorized Official's Provisions regarding the activities/transactions related to the mechanism of Environmental and Social-related Grievances are as follows:

No.	Type of Activity / Transaction	Recommended by	Authorized Official (PBM)
1.	Grievance Investigation and	Head of DELST	Director of Risk
	Verification Report	and	Management, and
		Heads of Divisions in charge	Directors in charge of related
		of related business	business.
2.	Approval of a Grievance	Head of DELST	Director of Risk
	Panel establishment (if	and	Management, and
	required).	Heads of Divisions in charge	Directors in charge of related
		of related business	business.
3.	Approval of action plans	Head of DELST	Director of Risk
	for Mechnism of	and	Management,
	Environmental and Social-	Heads of Divisions in charge	Directors in charge of related
	related Grievances	of related business	business,
			and
			President Director.

If the Authorized Official as regulated in the Authorized Official Table above is absent, the approval shall be carried out by the Official receiving the Power of Attorney (SKU) from the Authorized Official.



**CLOSING** 

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This Procedure	e is effective	as of the stipulation	date of its Regulation	of the Board of	Directors.
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Matters that have not been regulated in this Procedure will be further explained in the technical implementation instructions.

At the time this Procedure comes into effect, the Affected Community and Observer Group Grievance Mechanism Procedure Number PD-018/SMI/0422 shall be revoked and declared no longer valid.



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APPENDIX	CHAPTER - VI

**Appendix 1. Grievance Mechanism Example Form** 

#### **GRIEVANCE MECHANISM FORM**

#### I STAGE OF GRIEVANCE RECEIPT

GRIEVANCE SENDER	GRIEVANCE COMPONENTS
GRIEVANCE SENDER CONTACT	ADDRESS

#### II. STAGE OF GRIEVANCE SCREENING AND RATING

SUBMISSION OF GRIEVANCE	PURPOSE OF GRIEVANCE	LEVEL
() Email / Letter	() Projects	() Local
() Telephone	() Corporation	() National
() Publication	() Cooperation	( ) International
( ) Delivered to SMI staff	() Others	() Local
() Others		

TYPE OF GRIEVANCE	VALIDITY OF GRIEVANCE
() Legal	() Valid (clear source)
() Environmental and Social	
() Ethics	( ) Invalid (unclear source)

CONTENTS OF GRIEVANCE		



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APPENDIX CHAPTER - VI

## INITIAL CONCLUSION RESULTS

GRIEVANCE REPORTING OFFICER	DIRECT SUPERVISOR	
Name:	Name :	Name :
Date :	Date:	Date:



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APPENDIX CHAPTER - VI

DIRECTIONS OF THE AUTHORIZED OFFICIAL (PBM)			
GRIEVANCE MECHANISM PLAN	PERSON IN CHARGE		
( ) Making response letters			
() Meetings (engagements)			
( ) Discussions via telephone			
( ) Not requiring further grievance handling			
( ) Making the Company's statements			
( ) Other action plans approved			
( ) Establishing a Grievance Panel			
FOLLOW-UP PLAN			

GRIEVANCE MECHANISM RECOMMENDATIONS



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APPENDIX CHAPTER - VI

#### III. MONITORING AND ADMINISTRATION OF GRIEVANCE DOCUMENTS

IMPLEMENTATION OF RECOMMENDATIONS AND MONITORING	

GRIEVANCE MONITORING RESULTS	Yes	No	Notes
Is there any response from the party who sent the grievances?			