

Business Procedure

Complaint Handling Procedure Document Number – STM-PROC-16

This document applies to the following sites:

All Sites <input checked="" type="checkbox"/>

Table of Contents

1.0	Purpose.....	1
2.0	Scope	1
3.0	Definitions	2
4.0	Actions	2
4.1	Receiving and Recording complaints	2
4.2	Recording complaints	3
4.3	Responding to complaints	5
4.4	Resolving complaints.....	7
5.0	Review and Consultation	8
6.0	Communication Plan.....	8
7.0	References.....	8
8.0	Revision History	8

1.0 Purpose

The purpose of this procedure is to define the process for receiving, recording, investigating and resolving external complaints.

2.0 Scope

This procedure applies to all external complaints received by Stanwell. This procedure does not apply to:

- media enquiries
- Marketing and Trading related enquiries including agreed contracts
- Enterprise Bargaining Agreement related grievances or disputes
- reportable conduct.

WRITTEN BY: ENDORSED/CHECKED BY: APPROVED BY: DATE:
NAME: Cheryl Ward NAME: Kevin Swanepoel NAME: Jenny Gregg

Doc No: STM-PROC-16 Revision No: 5 Revision Date: 30.04.2018 Page: 1 of 12

THIS DOCUMENT IS UNCONTROLLED IN HARD COPY FORMAT

3.0 Definitions

General Complaint:	An expression of dissatisfaction about one or more of Stanwell's actions and/or performance from a person (anonymous or otherwise) or organisation external to Stanwell requesting or requiring a response.
Environmental complaint	An Environmental complaint occurs when there is an expression of dissatisfaction or concern about the environmental aspects of Stanwell's operations, actions and/or performance from a person (anonymous or otherwise) or organisation external to Stanwell requesting or requiring a response or remedial action.
Level 1 Interaction (L1)	Initial response to a query which can in most cases be resolved over the phone or with the dissemination of information.
Level 2 Interaction (L2)	Face to face follow up required. In cases of environmental complaints, existing data to demonstrate compliance may be required.
Level 3 Interaction (L3)	Data provided to address issue is not acceptable to near neighbour or other external party and further action required. In the case of an environmental complaint this may require monitoring on the property.
Reportable conduct	Reportable conduct includes conduct by Stanwell people, which, in the view of the individual or organisation making the disclosure, is: <ul style="list-style-type: none"> • dishonest • fraudulent • corrupt • unethical • an illegal act, including theft, drug sale or use, violence or threatened violence or criminal damage against property • a repeated breach of Stanwell policy or administrative processes • a breach of Commonwealth or State legislation or local authority by-laws • an unsafe work practice which involves substantial risk to the health and safety of our people or the public • any other conduct which may cause financial or non-financial loss to Stanwell or be otherwise detrimental to the interests of Stanwell • any deliberate concealment relating to any of the above.
Stanwell people	Stanwell Directors, employees and all contractors working for or at a Stanwell site, in their capacity as a Director, employee or contractor of Stanwell.

4.0 Actions

4.1 Receiving and Recording complaints

All Stanwell employees have the potential to receive complaints in the course of their duties.

Complaints

Complaints both general and environmental may be received from members of the public or external organisations in person, the environmental regulator, via telephone, email or through Stanwell's website contact form.

If a complaint or information is received about reportable conduct allegedly committed by a Stanwell person (or people) it should be immediately referred to the Company Secretary.

The complainant should be informed that their details will be referred to the Community Relations team for follow up.

The Stanwell officer who receives a complaint should record the following details during the initial contact:

- Name, address and contact number
- Time, date and nature of complaint
- A short summary of the complaint, including clarification about whether the environmental harm is still occurring. If it is the complaint must be referred immediately.
- Any previous contact the complainant may have had with Stanwell about their issue
- Seek the consent of the complainant to record personal information for the purposes of investigating the complaint
- Advise that a member of Stanwell's' Community Relations team will make contact to further discuss
- The time, date and method the complaint was referred to Community Relations team

As soon as practical, and no later than one day, refer the complaint to the Community Relations team who will coordinate Stanwell's response.

Upon receipt of the complaint the relevant Community Relations team member will make contact with the complainant to:

- inform them who the Stanwell contact person is
- confirm the information provided
- Identify any additional or relevant information
- Confirm consent has been given in accordance with Stanwell's Privacy Act obligations
- advise the timeframes that they can expect a response

Personal information recorded as part of receiving and investigating a complaint must comply with Stanwell's obligations under the *Privacy Act 1988 (Cth)* (Privacy Act).

For complaints requiring a response by Stanwell the receiving officer must seek the complainant's consent for their name, contact details, property location and a short summary about the issue to be recorded in Stanwell's document record system.

If their consent is not forthcoming, the caller should be informed that Stanwell cannot investigate the complaint further.

Seeking Consent -example response:

<i>Stanwell employee</i>	<i>To investigate your complaint is it okay to record your name, contact details, property address and a summary of your complaint in Stanwell's document record system?"</i>
	<i>This information is only used for the purposes of investigating your complaint and will not be shared with any other party".</i>
<i>Caller:</i>	Yes <i>(proceed to investigate complaint)</i>
<i>Caller:</i>	No <i>(advise caller Stanwell is unable to investigate without access to certain specific information)</i>

*Meandu Mine Gatehouse staff receiving environmental complaints after hours complete the Environmental Complaint Record (4868-SE-F1100) and action in line with Environmental Complaint Management Procedure (4868-SE-P1016).

4.2 Recording complaints

The Community Relations team is responsible for ensuring relevant and sufficient details are recorded about a complaint to enable a timely and appropriate investigation to be undertaken.

General complaints –Record in TRIM folder STK3966

Any individual records created e.g. emails or documents to record and resolve a general complaint are stored in TRIM STK3966. Examples of general complaint are from the public (not near neighbours` in relation

They must include a file name that is searchable by: nature of complaint e.g. general complaint (mandatory), complainant/s names (if identifiable), date received and Stanwell site or activity (if applicable)

When a general complaint is received, a summary of the details should also be provided to the General Manager Stakeholder Engagement. Where deemed that the general complaint is of a serious nature, through the appropriate channels inform the Executive Leadership Team and/or Board.

Environmental Complaints - Record in TRIM Folder ENV5890

Note: Due to Privacy Act requirements access to “**Register of Environmental Complaints – All Sites**” is restricted.

Environmental complaints are recorded in the following locations:

1. **Register of Environmental Complaints – All Sites** – *Trim 17/129766 - The Community Relations team enters the appropriate information about the complaint including any relevant EARS or Meandu Mine INX references.

Information recorded includes:

- Contact details, location, description of complaint
- Categorisation (initial) - Level 1, Level 2 or Level 3 Interaction
- Is a regulator involved or likely to be informed
- Assess and record the risk/s to Stanwell's business objectives e.g. reputation, environment, financial, safety, compliance
- Stanwell officers involved in receiving, responding and investigating
- Summary of contacts with the complainant
- Investigation details and actions arising
- Summary of the resolution provided to the complainant and whether ongoing actions, monitoring or community relations interactions are required
- Improvement and learning outcomes identified to ensure Stanwell's right to operate and support of its stakeholders is secured

*17/129766 is a tool for tracking purposes only. It:

- records a summary of the interactions between Stanwell and the complainant
- supports the investigation team monitor the progress of complaints
- builds a knowledge database and historical record for Stanwell
- enables trends and continuous improvements to be identified and implemented
- provides the data source for Stanwell's Property & Spatial Information Advisor to create a GIS layer displaying the location and category of complaints.

Events, Audit Risk and Compliance System (EARS) – All complaints are recorded in EARS as an event under one of the following three event categories:

- Hazard (L1 interaction),
- Near hit (L2 interaction) or
- Incident (L3 interaction).

The event severity level (notably for incidents) is then determined through use of the Stanwell risk evaluation matrix - GOV-STD-11

For information purposes: As soon as practicable following the recording of an environmental complaint in EARS, any additional or other relevant background information known about the complaint should be emailed to the General Manager Stakeholder Engagement, General Manager Environment and Assurance and if appropriate Executive Leadership Team and/or Board for information.

4.3 Responding to complaints

The Community Relations Manager may manage the complaint directly, or they may delegate and assign the complaint to a more specialised officer to investigate. See [Appendix 1 - Community Interaction Responses Guideline](#).

4.3.1. General Complaints

The investigating officer should contact the complainant by phone (if details are available and the complainant would be open to such an approach), email or letter within three working days to acknowledge receipt of the complaint and commit to future contact within the next 10 working days. A communication template is attached as an appendix to this document.

The nature of the complaint will determine the length and complexity of the interaction; however, the following principles will apply in all cases:

- All valid complaints are to be investigated.
- Complainants are to have one primary contact at the level appropriate to the nature of the complaint.
- Complainants are to be contacted at appropriate intervals during the process.
- Relevant internal Stanwell stakeholders should be kept informed at appropriate intervals during the course of investigation and resolution
- If particularly sensitive, or otherwise deemed necessary, the investigating specialist should be accompanied by an appropriate Stanwell representative in all face-to-face contact with a complainant.
- Any file notes or records of interactions must be saved in Trim STK3966

4.3.2. Environmental Complaints

The Community Relations team facilitates the formation of an investigation team, which is usually comprised of relevant site and environment team's subject matter experts to assess and develop the initial response.

The Community Relations team manages the relationship between Stanwell and the complainant and is responsible for coordinating any interactions with them on behalf of the investigation team.

The investigation team when assessing the validity and determining an appropriate response will consider the following:

- The availability of historic and current monitoring data that can be disclosed to the complainant without further interrogation and that demonstrates Stanwell's compliance with a relevant environmental authority
- Using information available at the time undertake an impact assessment in line with Stanwell's Risk Evaluation Matrix GOV-STD-11
- The history the complainant has with Stanwell (if any), other sensitive receptors or recognised opinion leaders in the asset community
- The location of the property in relation to the site
- Whether specialist legal or other advice is required to inform the response

The investigation team is to agree on the level of response to the near neighbour concerns and the next steps Stanwell takes in resolving complaints.

4.3.3. Entry into Events, Audit Risk and Compliance System (EARS)

Once level of response is determined event should be entered in EARS as a hazard (L1), near hit (L2) or event (L3) depending of definition of the interaction.

A guide to assist specific complaint types is included in [Appendix 2 - Dust Concern Response Guide](#) and [Appendix 3 - Water, Noise, Blast and Other Response Guideline](#)

Environmental complaints are categorised according to the event category they currently present to Stanwell.

The following categories apply:

- **Level 1 Interaction** – Initial response to a query which can in most cases be resolved over the phone or with the dissemination of information. Level interactions shall be classified as a **hazard** in EARS.

The Community Relations team is responsible for assessing during the interaction stage the potential for any enquiry to escalate to a higher level.

Examples when a level 1 interaction is required may include:

- Request for information regarding air quality, noise, dust, vibration, feral animals or water quality;
- Request for information regarding a specific project or Stanwell initiative which may have an environmental impact on the individual; and
- The enquiry is resolved through the provision of appropriate information and they confirm they are satisfied with Stanwell's response.

All Level 1 interactions are recorded in the relevant site worksheet in 17/129766 for monitoring and regular assessment by the Community Relations team.

- **Level 2 Interaction** – Face to face follow up required. In cases of environmental complaints the disclosure of existing data to demonstrate Stanwell's compliance may be required. Level 2 interactions shall be classified as a **Near Hit** in EARS.

A Level 2 interaction may involve some form of community intervention. This would typically be when a near neighbour expresses concerns that they may be experiencing environmental impacts from a site's operations. In this case the Community relations team would recommend that Stanwell staff attend the location to further understand their concerns.

When visiting an impacted property, two (2) Stanwell people should attend until such time that a trust based relationship is established. Depending on the level of concern being expressed, usually an environmental or technical advisor will accompany the community relations advisor to provide technical context and thus these two people would support the safety of each other.

Examples when a level 2 interaction is required may include:

- Repeat enquiries or indications from a near neighbour that they believe they are experiencing unreasonable noise, air emission, water quality or vibration impacts and Stanwell is confident it can demonstrate compliance from current monitoring reports and/or data;
- During the response it is identified there is potential for them to escalate their concerns to a formal complaint with Stanwell, or an external agency or regulator; and
- During a community forum or communication e.g. newsletter about an initiative, project or program, near neighbours identify the potential for further impacts upon them or their immediate community

All level 2 interactions are recorded within the relevant site tab in Trim 17/129766 for monitoring and regular analysis by the Community Relations team.

- **Level 3 Interaction** – Following a L2 interaction being unsuccessful as result of, existing data having been provided not been considered adequate to address the issue or is not accepted by the the near neighbour, further action I considered necessary. In the case of an environmental complaint this may require additional monitoring be conducted either at site or near / on the property. Level 3 interactions shall be classified as an incident in EARS.

Examples of complaints where a level 3 interaction may be required include:

- A complaint about noise, vibration, water quality, dust or air emission which is causing a nuisance or impact at the property and a review of monitoring data confirms the complaint can be attributed to the site's operations;
- Escalation of a level 2 interaction where information provided from existing monitoring programs has not satisfactorily addressed the neighbour or community members concerns; and
- Community member has escalated their complaint to a regulator or shareholder representative.

As a minimum, communication about all community complaints is to include the Site Manager, Community Relations Manager, General Manager Stakeholder Engagement, and General Manager Environment & Assurance where the complaint is associated with an environmental impact.

4.4 Resolving complaints

4.4.1. General Complaints:

The outcome of an investigation into a general complaint, including independent reviews or approvals should be developed and communicated to the complainant within 10 days.

4.4.2. Environmental Complaints

The investigation team will assess, develop, make recommendations and seek appropriate approvals in resolving environment complaints in ways that:

- Confirms Stanwell's 'right to operate' and social licence to operate are maintained
- Identified corrective, preventative and improvement actions to procedures and processes are approved at the appropriate levels within Stanwell to be implemented with associated work procedures updated;
- Any budgetary impacts have been fully considered, approved and included in current and future budget cycles;
- Is consistent with Stanwell's Values, Stakeholder Engagement Policy (STM-POL-02) and Environmental Sustainability Policy (ENV-POL-01);
- Demonstrates Stanwell's compliance with the relevant Environmental Authority (EA); and
- If escalated to a regulatory agency such as Qld Department of Environment and Science, whether Stanwell has receipt of correspondence confirming no further action is being taken and / or a suitable action plan has been developed and agreed.

Internal approvals may include one or more of the following:

- Investigating specialist's line manager
- Site Manager
- Chief Operating Officer
- General Manager Stakeholder Engagement
- General Manager- Environment and Assurance
- Community Relations Manager
- Legal Counsel
- Chief Executive Officer

4.4.3. Advising the Complainant (all)

The history between Stanwell and the complainant, the seriousness of the complaint and/or whether the complaint is public knowledge will help to determine whether the outcome of the investigation is communicated to the complainant by phone, email, face-to-face and/or formal written correspondence.

In all cases, the following principles apply:

- The complainant should be thanked for contacting Stanwell and extended due respect.

- The specialist should provide information that is factual and unbiased, and where appropriate and if possible, scientifically-based.
- The communication should convey that Stanwell acted upon the complaint and if possible/appropriate, the complaint has led to an improvement.
- If appropriate, the complainant should be offered a further course of action (i.e. meeting with more senior specialist, tour of facility, remedial work at Stanwell's expense).

5.0 Review and Consultation

This document is required to be reviewed, as a minimum, every two years in consultation with key internal stakeholders, including (but not limited to):

- General Manager Strategy & Engagement, Business Services
- Community Relations Manager
- General Manager Environment and Assurance
- Company Secretary

6.0 Communication Plan

At a minimum, this procedure and any subsequent updates are communicated through My News and identified meetings. This procedure is available electronically on GenNet.

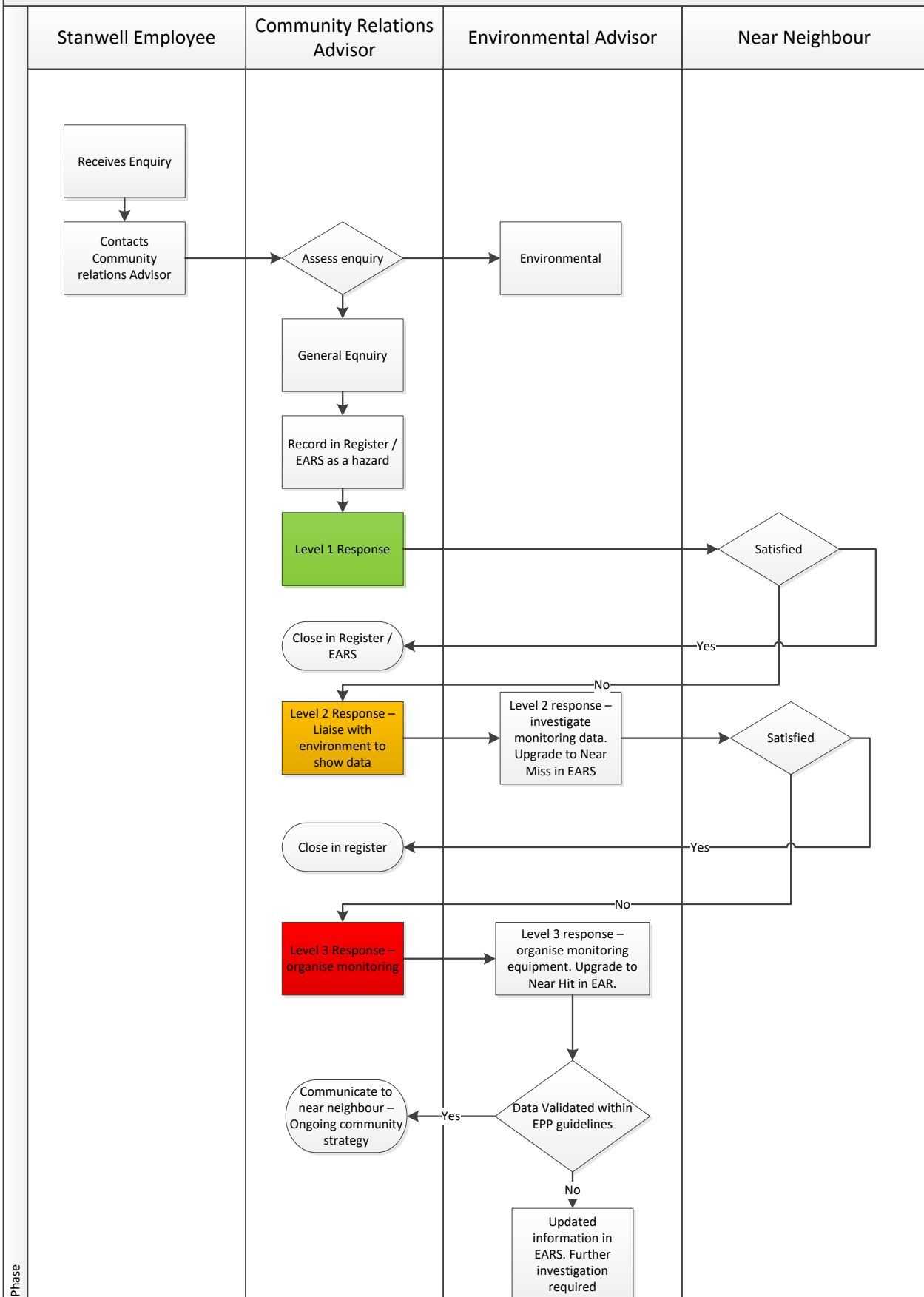
7.0 References

- Corporations Act 2001 part 9 4AAA
- Public Interest Disclosure Act 2010
- Public Interest Disclosure Standard
- Environmental Licences pertaining to site

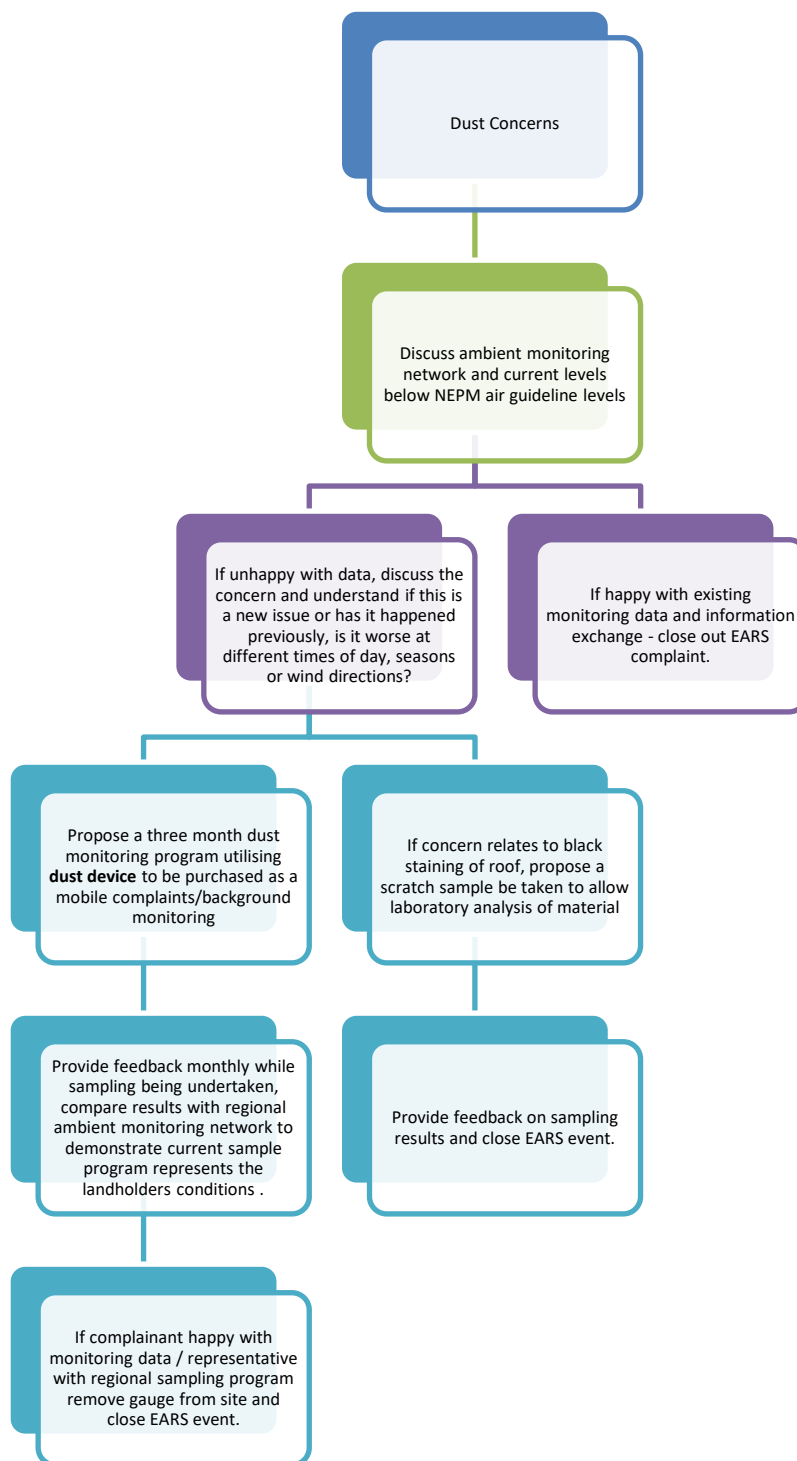
8.0 Revision History

Rev. No.	Rev. Date	Revision Description	Author	Endorsed By	Approved. By
0	02.05.2012	First draft completed in consultation with Environment and Company Secretariat	Natalie Bain		Jenny Gregg
1	12.06.2012	Minor amendments made in relation to Meandu Mine	Natalie Bain		Jenny Gregg
2	03.08.2012	Minor amendments in relation to recording information	Natalie Bain		Jenny Gregg
3	14.07.2014	Minor amendments to reflect organisational structure	Stephanie McMahon		Jenny Gregg
-	21.05.2015	Document References updated to remove reference to HSE-PROC-11 as it has been archived and replaced by GOV-PROC-46. Inclusion of the reference to GOV-PROC-46 is to be done upon the instruction of the document owners to ensure alignment to any process changes. No Signatures required	D.Wilkie		
4	05.04.2016	Amendments to reflect implementation of GOV-PROC-46 for Environmental Events and Complaints to be managed in EARS	John Carey	Stephanie McMahon	Jenny Gregg
5	30.04.2018	Amendments to clarify the processes for defining and handling general and environmental complaints	Cheryl Ward	Kevin Swanepoel	Jenny Gregg

Community Complaint Handling



Appendix 2 - Guide to response to Dust Concerns



Appendix 3 - Guide to response to Water, Noise, Blast and Other Concerns

