GRIEVANCE COLLECTION

From audit programs
From MGP users
Through the MGP’s public grievance submission form
From public sources (news articles, reports, blogs, etc.)

GRIEVANCE REVIEW

Initial Assessments
- Summary of grievance information (1-2 pages) including estimated risk tier

ANALYST

TIER 1 HIGH RISK
- Frequent and/or recent
- Clear nexus to high risk activity
- Credible

TIER 2 MEDIUM RISK
- Semi-frequent and/or semi-recent
- Likely nexus to high risk activity
- Credible

TIER 3 LOW RISK
- Infrequent and/or not recent
- Possible nexus to high risk activity
- Somewhat credible

TIER 4 OUT OF SCOPE OR DUPLICATIVE
- Not recent
- No identifiable connection to smelters or refiners
- Not credible or credible but out of scope (e.g. non-OECD risk)

GRIEVANCE ANALYSIS & MITIGATION

Audit Programs
Investigative Summaries
- Based on grievance assessment, audit programs can request an investigative summary (est. 2 – 5 pages)

Platform Manager
Audit Programs
Investigative Dossiers
- Based on grievance assessment or investigative summary, audit programs can request an investigative dossier (est. 20 pages)

Platform Manager
Audit Programs
Industry Review & Mitigation Processes
- Upon completing review of the grievance, relevant audit program(s) request information from the smelter or refiner
- If that response is not sufficient, the audit program(s) request that further steps are taken through the creation of a corrective action plan (CAP)
- The audit program(s) review the CAP and propose further actions if needed
- Once the CAP is complete, the audit program(s) review the CAP results
- Note that the audit program that assesses the grievance will take the lead in communicating with the respondent. Other relevant audit programs will be updated as appropriate in accordance with the cross-recognition agreement

GRIEVANCE CLOSURE

Final Steps
- Audit programs and the Platform Manager review and close Tier 4 grievances on a monthly basis
- The Independent Review Committee (IRC) reviews audit program(s) decision and CAP results

Audit Programs
Insufficient action taken

Platform Manager
Sufficient action taken

RESOLUTION

Feedback Loop
- Grievances and some associated information are made available to downstream users
- Visible data for each grievance changes depending on user type
- Press releases sent to the Platform Manager are posted publicly on the MGP upon request
- Aggregated results of the MGP grievance process are shared publicly on the MGP as key performance indicators (KPIs)