

Platform Manager

# GRIEVANCE COLLECTION

From audit programs

From MGP users

Through the MGP's public grievance submission form

From public sources (news articles, reports, blogs, etc.)

Platform Manager

# GRIEVANCE REVIEW

ANALYST

Grievance Assessments

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

**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**

- Rare and/or not recent
- No nexus to high risk activity
- Not credible

STAGE TRACKER

STAGE TRACKER

Platform Manager Audit Programs

# GRIEVANCE ANALYSIS & MITIGATION

Audit Programs

AUDIT PROGRAM REVIEW

Platform Manager

Investigative Summaries

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

Investigative Dossiers

- Based on grievance assessment or investigative summary, audit programs can request an investigative dossier (est. 20 pages)

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

Platform Manager Audit Programs

# 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

RESOLUTION

Insufficient action taken; appeals

Sufficient action taken

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)

STAGE TRACKER

STAGE TRACKER