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Standard Practice Manual

Community Complaint Management

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Process Owner	Health, Safety, Environment and Community Engagement

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Introduction:

This document provides guidance for Banpu and its subsidiaries to handle community feedback and complaints as part of Banpu-operated projects or operations. The manual is intended to assist Banpu performers in dealing with community concerns as well as to support company’s vision to be “The Asian Energy Company at the heart of innovation, technology, and sustainability”.

This manual also aligns with company’s commitment as stated in Community Development Policy and Human Rights Policy as following details:

Community Development Policy

Banpu respects human rights through conducting all community development activities with honor and respectfulness to all related stakeholders. Community Development units will support each other with racial, ethnic and gender equality. Proactive two-way communication with communities and stakeholders where we operate.

Human Rights Policy

We respect on human rights as integral part of our sustainability. In line with the Universal Declaration of Human Rights (UDHR), UN Global Compact, the UN Guiding Principles on Business and Human Rights (UNGPs) and local regulations, we avoid causing or contributing on adverse human rights impacts through our activities and seek to prevent and mitigate such impacts. Our respect implements through the corporate share value “Banpu Heart”.

This guidance of Community Complaint Management is considered as a part of the dispute mechanism or otherwise known as the grievance mechanism with local communities. When we are involved in local concerns, this management standard will be applied to handle and resolve possible disputes or grievances. At Banpu, the Community Complaint Management is a process that enabling people to be heard, including handling complaints, is recognized as a key component of accountability to the communities that we support in development and humanitarian contexts. In addition, it also strengthens our Business Continuity Management (BCM) by reducing possible risks that would interrupt the operation. This document provides practical guidance to assist Banpu practitioners in implementing mechanisms for handling complaints.

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Objective:

This Standard Practice Manual on Community Complaint Management provides performers with a framework for an effective implementation of the community complaint management across Banpu Group.

The objective aims to:

1. Provide a complainant with access to an open and responsive complaint handling process.
2. Enhance the ability of Banpu to resolve complaints in a consistent, systematic and responsive manner to the satisfaction of the complainant and the organization.
3. Enable Banpu to identify trends and eliminate causes of complaints and improve its operations.
4. Assist Banpu to create a community-focused approach to resolving complaints.
5. Provide a foundation for continual review and analysis of the complaint handling process and the resolution of complaints.
6. Strengthen Business Continuity Management (BCM) to prevent possible risks and ensure a smooth operation while building confidence among community's stakeholders.

Scope:

The standard practice manual applies to all business units under its operation of Banpu-owned or -operated facilities under the company's operational control.

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Definitions:

Community complaint

It is a verbal or written expression of dissatisfaction/worry/concern about service or action of Banpu in relation to an aspect of community.

Complainant

Complainant is a community member who makes a complaint about the dissatisfaction/concern of Banpu.

Complaint receiver

Complaint receiver is CDOs / any BU staff / contractor that receive a complaint report

Community Development Officers (CDOs)

CDOs mean representatives of BUs to engage target local community members and local authorities under Banpu’s CD policy and framework. They have the role of improving the quality of life of people in the target community through community development projects and to ensure that CD implementation is leading to social acceptance.

Complaint Management Center

It is a unit to handle community complaints within the company. Its responsibility is to work with the responsible unit to resolve the issue that prompted the community’s criticism and ensure its effectiveness until completion. Note that, in some local context, the complaint management center can be the same person as complaint receiver.

Dispute/Grievance Mechanism

A structured process that addresses disputes or grievances that arise between the community and Banpu. The dispute mechanism is non-judicial in nature which aims to avoid minor issues escalating into more serious issues or conflicts or regulatory authority involvement.

Process / Content:

Under Banpu dispute mechanism, we define community complaint management process as the effective process established in advance for community groups and individuals to be aware that they can safely bring complaints to the company (confidentially if necessary) and that the company will respond respectfully. Please see detail in Figure 1. At Banpu, there are 3 levels of complaints which categorized as minor, moderate and major. Please see below table to understand the definition of each category.

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Level	Minor	Moderate	Major
Definition	<ul style="list-style-type: none"> Complainant expresses concern to the company, however no specific action is required as the complaint is not relevant to the company <i>and/or</i>; The complainant is advised of the fact & information and is accepting of the explanation. 	<ul style="list-style-type: none"> Complainant expresses concern to the company and is not satisfied with the explanation and resolution actions are required by the company <i>and/or</i>; It may attract attention from local media <i>and/or</i> heightened concern by local community <i>and/or</i>; Possible regulatory authority involvement and demand company action to resolve the issue, which can then be resolved within internal authority. 	<ul style="list-style-type: none"> Complaint might shift from moderate stage <i>and/or</i>; Probable public or media attention with national or international coverage <i>and/or</i>; Significant actual or potential damage to reputation <i>and/or</i>; Calls for action <i>and/or</i> overruled by Regulatory Authority.
Example	<ul style="list-style-type: none"> General inquiries Some complaints that have root cause from outside the company with no further action required by the company. Complainants may have some concerns/inquiries about the company. However, after providing information, the complainants accept the explanation, i.e. seeking a job opportunity. 	<ul style="list-style-type: none"> Complaints that relevant to the operations i.e. noise and dust. The company provides and implements mitigation measures with local acceptance then cases closed. 	<ul style="list-style-type: none"> Environmental complaint affecting a diverse range of social communities. The company has to pay a fine of more than USD 30,000, and the story is in attention of international media <i>and/or</i> NGOs.

Remark: For reporting practice, please refer to BP-HSEC-WP-001 Incident Reporting Procedure

Overview of Banpu Community Dispute Mechanism

Community Complaint Management Process

A community complaint may be made in person, by phone, by email or in writing. Upon receiving the complaint, the complaint receiver must report it to the Complaint Management Center for proper management, however, in some local context, the complaint receiver can be the same person as the complaint management center. All complaints should be dealt with promptly, courteously and in accordance with their urgency. The essential steps are as following information in Figure 1.

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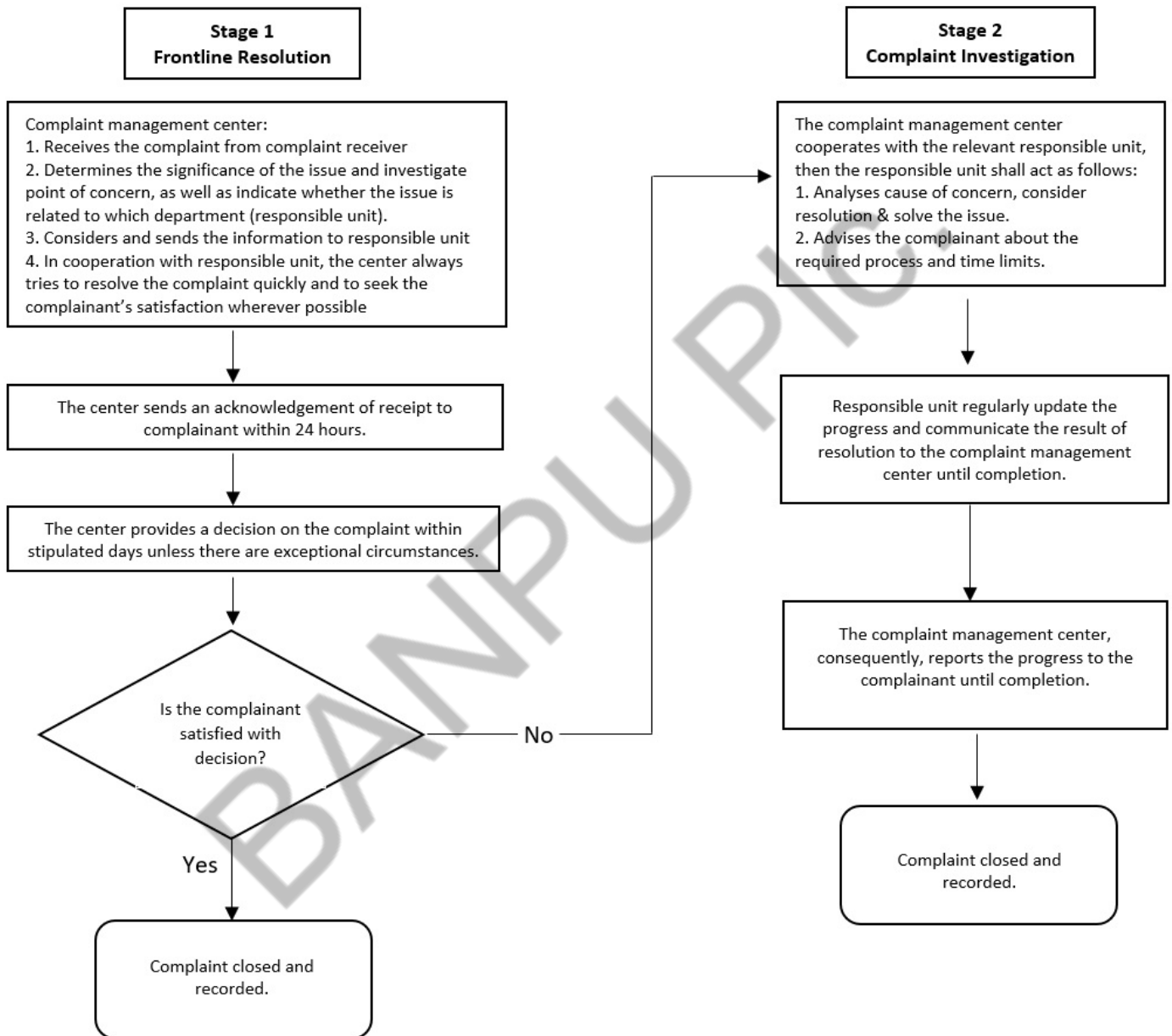


Figure 1: Complaint Handling Flowchart

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Stage one: Frontline resolution

Upon receiving the complaint from the community, complaint receiver must report the case to the Complaint Management Center. The center will be in charge of determining the significance of the issue, examining points of concern, and indicating which department (responsible unit) is involved. In some cases, the complaint receiver and responsible unit will be the same person or maybe not, depending on each country's local context. After that the responsible unit will work in cooperation with the center along the way to solve the problem. Another action that should be taken at this point is to send an acknowledgement of receipt to the complainant within 24 hours.

At the frontline resolution stage, it aims to quickly resolve straightforward complaints that require little or no investigation. Complaint receivers which is including but not limited to CDOs, member of staffs and contractors may deal with complaints at this stage.

The main principle is to seek early resolution, resolving complaints at the earliest opportunity and as close to the point of concern as possible. This may mean a face-to-face discussion with the person concerned, or asking an appropriate member of staff to deal directly with the complaint.

<p style="text-align: center;">FRONTLINE RESOLUTION</p> <p>Complaint Type: Minor</p>	<ul style="list-style-type: none"> • For issues that are straightforward and easily resolved, requiring little or no investigation. 'On the spot' apology, explanation, or other action to resolve the complaint quickly, unless there are exceptional circumstances. • Complaints addressed by any community members. Complaint details, outcome and action taken recorded and used for improvement.
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Stage two: Complaint Investigation

Not all complaints are suitable for frontline resolution. Some may be complex or require a detailed examination before we can state our position. These complaints may already have been considered at the frontline resolution stage, or they may have been identified from the start as it needs immediate investigation.

The complaint will be reviewed by the Complaint Management Center and the responsible unit. The objective of this is to conduct an investigation into the cause of concern and finalize its significance. Both parties will also have an analysis which aims to establish all the facts relevant to the points made in the complaint. At this stage, the responsible unit also considers resolution and solves the complaint. This guideline advises the responsible unit regularly updates the progress and

communicates the result of resolution to the complaint management center. Then the complaint management center will update complainant until completion. Finally, when the case is closed, the complaint management center will record the final action as complete.

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<p>COMPLAINT INVESTIGATION</p> <p>Complaint Type: Moderate & Major</p>	<ul style="list-style-type: none"> • For issues that have not been resolved at the frontline or that are complex, serious or 'high risk' and need immediate investigation. • Responsible unit provides a proportionate response to the complaint management center in order to update the progress and communicate the result on a regular basis until completion. • The complaint management center then provides an update to the complainant until completion.
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Relevant Document

BP-HSEC-WP-001 Incident Reporting Procedure

BANPU PIC.

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Appendix A:

Sample Template for Complaint Registration

Received Date :			
Time :			
Location :			
Complainant			
Contact Detail:	Name-Surname:		
	Tel:	E-mail:	
	Address:		
Complaint Category			
<input type="checkbox"/> Health <input type="checkbox"/> Safety <input type="checkbox"/> Environment <input type="checkbox"/> Others			
Complaint Detail:			
Initial Response:			
Complaint Receiver			
	Name-Surname:		Division / Department:
	Tel:	E-mail:	
Complaint Investigation			
Problem Detail:			
Resolution:			
Resolved by:			
	Name-Surname:		Division / Department:
	E-mail:	Date:	

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Appendix B: Sample Template for Complaint Log

Complaint Log

Location:

No.	Ref	Date	Time	Category				Complaint Detail	Complainant Detail			Initial Resolution	Closing Date	Completed by
				Health & Safety	Environment	Operation	Other		Name	Address	Phone			

