



BASRA MULTIPURPOSE TERMINAL

GRIEVANCE MECHANISM & REDRESS PROCEDURE

<u>DOCUMENT NUMBER:</u> QM-PR-20	<u>REV. NO:</u> 04	<u>REVISION DATE:</u> 23-04-2025
<u>PREPARED BY:</u> Erkan Erkocu (Business Process Manager)	<u>CHECKED BY:</u> Karim Mozan (Branch Manager)	<u>APPROVED BY:</u> Mohammad Damerji (CEO)

Revision History:

20190101 – First Release

Rev01 – 20201120 – Adjusted to be aligned with revised Stakeholder Management Plan, ESMP and IMS to include labour and community grievances.

Rev02 – 20210901 - Revised to be aligned with organizational structure as well as yearly review

Rev03- 20221201 – Revised to be aligned with organizational structure , updated as per ISO 26000, update on the type of grievances.

Rev04- 20250423 – Revised to fit the organizational challenges, name of the document updated, grievance types and the handling process were updated

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

Contents

1. PURPOSE	3
2. PURPOSE AND OBJECTIVES	3
3. DEFINITIONS AND ABBREVIATIONS & ELABORATIONS	4
4. CROSS REFERENCE DOCUMENTS:.....	5
5. RESPONSIBLE PARTIES	6
6. PROCEDURE	7
6.1 NATIONAL LEGAL FRAMEWORK:.....	7
6.2 BMT CODE OF CONDUCT – IFC PERFORMANCE STANDARDS AND GRIEVANCE MECHANISM RELATION:.....	7
6.3 GENERAL PRINCIPLES OF GRIEVANCE MECHANISM:.....	10
6.4 POTENTIAL GRIEVANCE SOURCES ACROSS THE BMT OPERATIONS	12
6.4.1 WORKPLACE & EMPLOYMENT ISSUES (EMPLOYEES).....	12
6.4.2 HEALTH, SAFETY & ENVIRONMENTAL CONCERNS.....	13
6.4.3 COMMUNITY & SOCIAL IMPACT.....	14
6.4.4 COMMUNITY HEALTH & SAFETY	14
6.4.5 4. SECURITY & HUMAN RIGHTS CONCERNS.....	15
6.4.6 GOVERNANCE & ETHICAL CONCERNS	15
6.4.7 ADDITIONAL CONCERNS	16
6.5 MEANS TO FILE/RAISE A GRIEVANCE:.....	17
6.6 LABOUR GRIEVANCE MECHANISM	18
6.7 COMMUNITY GRIEVANCE MECHANISM & PROCEDURE:	24
6.8 CONTRACTOR AND VALUE CHAIN WORKER GRIEVANCE MECHANISMS	31
7. TRAININGS.....	33
8. RELATED RECORDS	33

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

1. Purpose

This Grievance Mechanism & Redress Procedure intends to outline all aspects of the management of Labour, Community & value chain related grievances. It includes provisions and actions starting from receipt of the grievances, communication to the affected communities the channels/means for lodging the concerns and grievances, redress the grievances in a time bound manner, feedback provision to the originator of the concern / grievance, escalation of grievances, documenting grievances and analyze grievance related data to identify patterns and undertake systemic improvements as needed in BMT activities.

This procedure shall also outline the objectives, roles, responsibilities, information and possible impacts on community and similar alongside the applicable measures that Basra Multipurpose Terminal (or its contractors) shall undertake during the activities.

This plan should be read in conjunction with other applicable Integrated Management System policies, procedures. Related documents are provided in Section 4 – Cross Reference Documents. The Plan remains a “live” document as measure are introduced / updated to as necessary, normally shall be reviewed every six months or earlier, as applicable.

This plan shall be in full compliance with applicable legal laws and regulation as well as other commitments and under no circumstance overrides any applicable law.

2. Purpose and Objectives

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

BMT objects to carry out its operation in a safe, environment-friendly and efficient manner based on its own policies, client requirements, industry best practices and applicable legal and other requirements.

In order to establish fundamentals of its procedures and their execution, BMT has implemented an Integrated Management System Comprised of ISO 9001:2015, ISO 14001:2015, ISO 45001:2017 and ISO 26000:2010 in full compliance with applicable laws and regulations alongside relevant and applicable IFC Performance Standards in alignment with its Environmental and Social commitments under its own Environmental and Social Management Plan.

BMT is committed to avoid or minimize the risks and hazards associated with its operations, alongside its commitment that all the environmental adverse impacts are assessed and potential effects are mitigated, where 100% mitigation is not possible, BMT shall undertake the relevant activities to minimize these impacts by its best efforts.

This procedure applies for all BMT related parties such as BMT employees, contractors, visitors and other third parties present or undertaking any activity shall be mandated to act in accordance with this procedure as well as BMT policies. The construction contractors are mandated to adopt this procedure's relevant sections into their grievance management procedures.

3. Definitions and Abbreviations & Elaborations

- Words importing the singular include the plural and vice versa where the context so requires.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- All references to the masculine gender shall be deemed to include the feminine gender and vice versa.
- Unless otherwise is not specified, BMT shall refer to BMT management and employees, its contractors and any party that are present in BMT locations .
- BMT locations shall include all BMT premises at Umm Qasr North Port; BMT Mancamp, BMT Admin Building, BMT Yard 400 (Terminal 1) and BMT Yard 5 (Terminal 2)

- ESIA : Environmental and Social Impact Assessment
- ESMP : Environmental and Social Management Plan
- IMS : Integrated Management System
- QHSE : Quality – Health – Safety – Environment
- SEP : Stakeholder Engagement Plan.
- IFC : International Finance Corporation.

ESMP : Environmental & Social Management Plan :Overarching document to be addressed in this plan

ESIA : Environmental and Social Impact Assessment: Base document to ESMP, outlines and details impacts that are identified to be addressed and their mitigations.

Grievance : Any complaint/dissatisfaction that individual or any third party may have against BMT activities.

Originator : The individual or third party that raises the grievance at first hand.

4. CROSS REFERENCE DOCUMENTS:

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

Internal Documents:

- QHSSE Policy.
- Integrated Management System Handbook
- OHSE System Manual
- OHSE Policy Manual
- Stakeholder Engagement Plan
- Emergency Evacuation Plan.
- Environment and Social Management Plan
- Contractor E&S Management Plan

External Documents:

- IFC Performance Standards
- ISO 9001 Quality Management System
- ISO 14001 Environmental Management System
- ISO 45001 Occupational Health & Safety Management System
- EAMA – Stakeholder Engagement Plan – Doc no: 0171554 Rev01
- IFC Performance Standards
- IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets

5. Responsible Parties

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

All BMT related personnel and BMT contractors shall act in full accordance with the roles and responsibilities that have been assigned to them by this procedure.

6. Procedure

6.1 National Legal Framework:

Iraq does not possess very clear legal requirements in terms of grievances however paragraph 5 of Chapter 14, Article 14 of Law No. 13 of 2006 – The Investment Law states that the investor must:

'.....protect the safety of the environment and to adhere to the valid quality control systems in Iraq and international regulations accredited in this field, also the laws related to security, health, public order and values of the Iraqi society'.

The expectation of public participation and stakeholder engagement is not yet enshrined in federal and national legislation. However, there is, however, clearly an acknowledgement that social issues should be considered and a recognition that International Standards should be applied.

6.2 BMT Code of Conduct – IFC Performance Standards and Grievance Mechanism Relation:

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

Basra Multipurpose Terminal Code of Conduct allows and encourages all personnel to raise their concern to related parties, as being the leading on its sector and valuing its commitment to its own policies and other commitments and applicable laws and regulation, BMT has established its own grievance mechanism.

Addition to this; IFC Performance Standard 1 alongside other PS require that a Community Grievance Mechanism needs to be developed when the possibility exists that communities may be adversely affected by a project and require a safe communications vehicle to express their concerns. IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets document assist the companies to establish and implement a proper grievance mechanism. BMT has reviewed all these guidance and documents and established its own procedure accordingly.

The aim of such a mechanism is to receive and facilitate the resolution of grievances raised by affected communities in a transparent and balanced manner.

PS	Requirement
<i>PS 01- GN 02</i>	this Performance Standard supports the use of an effective grievance mechanism that can facilitate early indication of, and prompt remediation for those who believe that they have been harmed by a client's actions
<i>P01 – GN 29</i>	Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The client shall provide Affected Communities with access to relevant information on the grievance mechanism
<i>Ps01 – GN 35</i>	Where there are Affected Communities, the client shall establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

	about the client's environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project and have Affected Communities as its primary user. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client shall inform the Affected Communities about the mechanism in the course of the stakeholder engagement process
<i>PS01 - GN36</i>	The client shall provide periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities
<i>PS 04 - GN 13</i>	Where national law substantially restricts workers' organizations, the client shall not restrict workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The client should not seek to influence or control these mechanisms
<i>PS 04 - GN 20</i>	The client shall provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The client shall inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed. The mechanism should not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

<i>PS 04</i>	The client shall ensure that contracted workers, have access to a grievance mechanism.
<i>GN 26</i>	In cases where the third party is not able to provide a grievance mechanism the client shall extend its own grievance mechanism to serve workers engaged by the third party.
<i>PS 04</i>	The client shall provide a grievance mechanism for Affected Communities to express
<i>GN 12</i>	concerns about the security arrangements and acts of security personnel

6.3 Fundamental Principles of Grievance Mechanism:

BMT has established a Grievance Mechanism & Redress Procedure in alignment with the principles within Code of Conduct, its overarching QHSSE policy, applicable international standards, and its Stakeholder Engagement Plan. The established mechanism shall always maintain a transparent, fair, accessible notions that shall be applicable to all employees, contractors, value chain workers and stakeholders; that can raise concerns in any way they find fit including being anonymous and using a proxy without fear of retaliation. In this context BMT shall;

- Provide a clear, structured, and time-bound grievance mechanism covering all stages from receipt to resolution and closure, including escalation options for unresolved issues.
- Apply the mechanism equally to all internal and external stakeholders, including BMT employees, contractors, contractor employees, community members, suppliers, workers of its value chain and other interested parties.
- Ensure accessibility, transparency, and cultural appropriateness, using language, formats, and communication methods suited to local stakeholders, including oral communication in areas with low literacy.
- Offer multiple channels for grievance submission, including anonymous and proxy options, via verbal, written, and digital means that are outlined on this document.
- Acknowledge receipt of grievances within 48 hours and provide feedback or resolution within 7 calendar days, unless the issue requires further investigation.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- Prohibit retaliation or victimization against any individual submitting a grievance while maintaining the confidentiality and protection of identity at all times.
- Provide a tiered escalation process, ensuring that unresolved grievances can be raised to higher levels of management or to independent mechanisms.
- Mandate contractors to implement similar grievance systems, aligned with BMT's principles, and regularly monitor their compliance through audits, spot checks, and grievance trend reporting.
- Train BMT and other related personnel on the grievance mechanism, emphasizing respectful handling, non-retaliation, and confidential treatment of concerns. Such training shall be an integral part of the induction and on boarding process periodically throughout employment.
- Record all grievances in a Grievance Tracking Log, including submission date, source, nature, response actions, and resolution outcome. Both verbal and written complaints shall be documented. The log shall maintain the confidentiality as necessary
- Analyse grievances regularly to detect trends or systemic issues, and apply corrective or preventive actions as part of BMT's continuous improvement framework.
- Disclose anonymized summaries of grievances and resolutions in internal reports and sustainability communications, in line with ESRS disclosure obligations.
- Support legal recourse options, and where requested, assist complainants in accessing judicial or non-judicial channels.

Additionally, BMT shall prioritize any grievance that are placed by vulnerable & marginalized groups and its value chain workers to have an inclusive mechanism; within the same context BMT shall;

- Provide additional safeguards for vulnerable, displaced, and marginalized groups, including but not limited to migrant workers, persons with disabilities, ethnic minorities, refugees, women, and youth, ensuring safe, non-discriminatory, and culturally appropriate access.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- Ensure the grievance mechanism is accessible to all individuals affected by its operations, including direct employees, contractor staff, and workers throughout the value chain, such as those in supply, logistics, and outsourced services.
- Ensure that special accommodations are provided to facilitate grievance submissions from individuals with low literacy, limited digital access, or those who may fear retaliation.

6.4 Potential Grievance Sources across the BMT Operations

While Grievances may and can be placed by anyone across BMT related personnel including its contractors and value chain employees or by the communities, below not being an exhaustive list, the list below may be referred as a reference guide to identify any grievance;

6.4.1 Workplace & Employment Issues (Employees including contractors and value chain)

a) Discrimination & Fair Treatment

- Discrimination based on race, gender, age, religion, disability, sexual orientation, etc.
- Bullying, harassment, or victimization by managers, colleagues, or contractors
- Sexual harassment or inappropriate behavior in the workplace
- Disrespectfulness by BMT or BMT contractor personnel to employees
- Retaliation for reporting violations or filing complaints

b) Employment Terms & Conditions

- Unfair dismissal or wrongful termination
- Unreasonable disciplinary actions
- Unfair performance evaluations or disciplinary actions
- Breach of employment contract terms
- Denial of legally mandated benefits or leaves

c) Compensation & Benefits

- Wage disparities or pay inequity between similar roles
- Unpaid wages, salary delays, or incorrect calculations

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- Unlawful deductions from pay
- Denial of legally mandated benefits (healthcare, pensions, leave)
- Misclassification of employees (e.g., contractors vs. full-time)
- Breach of employment contract terms
- Excessive or forced overtime without fair compensation
- d) Career Development
 - Lack of equal opportunity in promotions, training, or career development
 - Unjustified denial of promotions or career advancement opportunities
 - Inadequate training or professional development resources
 - Unfair performance evaluations or disciplinary actions
- e) Privacy & Ethics
 - Poor working conditions (overcrowding, inadequate facilities, extreme temperatures)
 - Workplace privacy violations (monitoring, searches, data misuse)
 - Improper handling of sensitive personal information
 - Unethical behavior by management or staff
- f) Labor Rights
 - Restriction of trade union activities or denial of collective bargaining rights
 - Denial of right of association or information
 - Lack of proper grievance mechanisms or retaliation for raising concerns

6.4.2 Health, Safety & Environmental Concerns

- g) Workplace Safety
 - Lack of proper health and safety arrangements
 - Failure to provide adequate Personal Protective Equipment (PPE)
 - Exposure to hazardous substances without proper safeguards
 - Workplace accidents due to negligence or lack of safety protocols/Procedures
 - Poor emergency response procedures (fire, medical, evacuation)
 - Incidents and accidents to BMT employees
- h) Environmental Impact

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- Disturbance to fauna/flora by project or BMT activities
- Noise, air, or water quality degradation or pollution from BMT activities
- Land degradation or contamination due to project activities
- Lack of proper waste management leading to environmental damage
- Improper waste management or disposal
- Toxic spills or contamination incidents
- Excessive resource consumption (water, energy, etc.)
- Greenhouse gas emissions exceeding allowable limits

6.4.3 Community & Social Impact

- Community Relations
- Disrespectfulness by BMT or BMT contractor personnel to community
- Cultural insensitivity or disrespect toward local traditions
- Unethical behaviors to community by BMT and BMT related parties
- Breach of corporate social responsibility commitments

i) Livelihood & Economic Impact

- Loss of income/property due to BMT activities
- Loss of livelihood (farming, fishing, trade disruption) due to Activities
- Negative impacts on local businesses or economic activities
- Failure to hire locally as promised or expected
- Insufficient compensation for displaced communities

6.4.4 Community Health & Safety

- Lack of proper community health and safety arrangements
- Incidents and accidents to community members caused by BMT or its contractors

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- Negative impact on local water resources or quality
- Air quality degradation or pollution
- Excessive noise or light pollution affecting nearby residents
- Noise, dust, or vibration disturbances affecting daily life

j) Community Access & Infrastructure

- Restricted access to public spaces, water sources, or sacred sites
- Damage to local infrastructure (roads, bridges, etc.)
- Traffic congestion or transportation issues due to operations
- Increased crime or social disruption linked to project presence

6.4.5 4. Security & Human Rights Concerns

k) Security Applications

- Unproportioned security applications
- Excessive use of force by security personnel (private or contracted)
- Intimidation, threats, or violence against employees or community members
- Unlawful surveillance or privacy violations

l) Human Rights

- Human rights allegations
- Restrictions on freedom of movement (blocking roads, barring access to land)
- Forced labour or human trafficking risks in supply chains
- Child labour or exploitation concerns in operations/suppliers

6.4.6 Governance & Ethical Concerns

m) Legal Compliance

- Allegation of crime or unlawful doings
- Non-compliance with environmental permits or regulations
- Tax avoidance or improper financial practices

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- Violation of data protection or privacy regulations
- n) Ethical Conduct
- Unethical behaviors by BMT employees to BMT related parties
 - Corruption, bribery, or fraud involving BMT/contractors
 - Misuse of company resources or funds
 - Conflicts of interest in decision-making or contracts
 - Conflict of interest in procurement or hiring
 - Unfair procurement practices with suppliers(kickbacks, favouritism)
- o) Transparency & Accountability
- Lack of transparency in operations or reporting
 - Misrepresentation of project impacts to stakeholders
 - False or misleading reporting on social/environmental impact
 - Misleading public statements or greenwashing
 - Non-disclosure of known risks to communities or employees
 - Failure to implement whistleblower protections
 - Inadequate grievance mechanisms or failure to address complaints
 - Failure to implement promised environmental mitigation measures

6.4.7 Additional Concerns

- Inadequate housing or living conditions for migrant workers
- Unfair contracting/subcontracting practices (exploitative wages, unsafe conditions)
- Data privacy breaches (leaking employee/community personal information)

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

6.5 Means to File/Raise a Grievance:

BMT shall offer various safe, secure venues to place / raise any concern or grievances, all applications shall be kept confidential while keeping the anonymity of the person(s) with grievances. BMT shall ensure no retaliation to such individuals / groups

The individuals / communities may raise their concerns/grievances via; but not limited to;

Means	Description
Personal application to BMT by communities	Any person shall assist the applicant to the appropriate channels such as CLO or HR Manager or CEO.
Personal application for workers	Labour Relationship Supervisor acts as the first point of contact to raise worker related grievances at BMT
Open Door Policy	BMT has an open door policy where individuals are encouraged to liaise with whichever manager that find fit.
Use of an intermediary/proxy	Using any other party to pass the grievance to the assigned personnel.
Use of Suggestion boxes	Any handwritten notes that is put on HSE Suggestion Boxes next to HSE Boards
Filling out Grievance Form	Completing the forms are available on company website, next to HSE boards, project sites.
By telephone	+964 780 929 9814– CLO (WhatsApp as well)
E-mail*	compliance@bmtiq.com or info@bmtiq.com
Social Media Accounts	Direct messaging, commenting on official social media account of BMT.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

Through Labour Union	BMT encourages and welcomes any grievance / concerned raised by its employees through Labour Union
Others	Any other mean that applicant may find fit

(Note: Both mail addresses are overseen by CLO, and CEO)

BMT shall accept any other means whereby a concern or a grievance is raised. All C/GP shall be logged to Grievance Tracking Log.

6.6 Labour Grievance Mechanism


In relation to the findings and outcome of ESAI, ESMP and Code of Conduct of BMT, Labour Grievance Mechanism shall identify the actions and measures to ensure the outcome is adhered to. The procedure shall be applicable to all BMT employees as well as the employees of BMT's contractors.

BMT contractors shall be obliged to produce their own labour grievance management in full alignment with BMT's;

The purpose of the Grievance Mechanism is foremost to give access to a problem solving procedure to project affected workers, people including internal and external stakeholders.

In accordance with international good practice and specific International Finance Institution Requirements (especially IFC Performance Standards and Good Practice Note) a Complaints/Grievance Procedure (C/GP, often also referred to as a "Grievance Mechanism") has been set up through which any person or organization can report complaints or other problems relating to any aspect of the Project freely, without cost and without any threat of retaliation.

This process may also be used to manage any other contacts with the Project by external parties or stakeholders, for example: comments or queries from local people or NGOs; contacts with regulators; and general enquiries from the public.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

Overall grievance management is performed Labour Relationship Supervisor overseen by HR Manager for the employees and CLO for the community who shall liaise with the relevant parties as necessary. As a transparent and legitimate mechanism the C/GP shall continuously be maintained, updated, and publicized throughout the project as part of the ESMP.

Process:

BMT shall ensure that all employees, contractors, value chain workers, and affected groups can raise grievances freely and receive timely, fair, and confidential resolution, regardless of their position, identity, or method of submission

- All grievances are handled with confidentiality.
- Anonymous grievances are accepted and investigated to the extent possible.
- Employees are protected from retaliation for raising a grievance in good faith.

Stage 1 - Initial Grievance Submission			
Action/Event	Principles/info	Actions by BMT	Further Action

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

<p>Employees can submit grievances through any of the following channels:</p> <ul style="list-style-type: none"> • In person, via a trusted individual of their choice • Email or written statement • Anonymous methods (e.g., grievance boxes, hotline, digital form) 	<ul style="list-style-type: none"> • No obligation to report to a supervisor • Option to submit anonymously • No retaliation shall occur for raising a grievance in good faith 	<ul style="list-style-type: none"> • Grievance is logged by the Labour Relations Supervisor (LRS) in the Grievance Log • Acknowledgement of receipt is provided (within 2 working days if not anonymous) 	<p>Proceed to Stage 2</p>
Stage 2: Initial Review and Early Resolution Attempt			
Action/Event	Principles/info	Actions by BMT	Further Action

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

LRS reviews the grievance and determines if it can be resolved quickly and informally. LRS may involve HR, CLO, and the Compliance Officer if needed.	<ul style="list-style-type: none"> Confidentiality is assured throughout All parties are treated with respect and dignity 	<p>If the grievance is straightforward or minor:</p> <ul style="list-style-type: none"> Discussion is held with the concerned employee (if known) A resolution is proposed within 7 days <p>If the grievance is anonymous:</p> <ul style="list-style-type: none"> HR proceeds with available information to resolve the issue systemically <p>If the grievance is complex or sensitive:</p> <ul style="list-style-type: none"> Escalate to Stage 3 	<p>Close the grievance. If unresolved, escalate to Stage 3 – Formal Investigation, with proper documentation.</p>
---	---	--	---

Stage 3: Formal Investigation & Dialogue

Action/Event	Principles/info	Actions by BMT	Further Action
If a grievance is complex, sensitive, or unresolved at Stage 2, it proceeds to formal investigation. The investigation team may include the LRS, HR, CLO,	<ul style="list-style-type: none"> Fair, impartial, and thorough process Protection of confidentiality and due process Opportunity for all 	<ul style="list-style-type: none"> Investigation begins within 7 working days of escalation Interviews conducted with involved parties (if known) Findings documented clearly and objectively 	If unresolved or the grievance is serious, escalate to Stage 4 –

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

Compliance Officer, and others as appropriate.	relevant parties to be heard	<ul style="list-style-type: none"> Investigation concludes within 14 working days (unless extended with justification) A written summary of findings and proposed resolution is prepared and shared with the employee (if not anonymous). 	Management Panel Review. Otherwise, proceed to closure.
--	------------------------------	---	---

Stage 4: Committee Review & Corrective Actions

Action/Event	Principles/info	Actions by BMT	Further Action
<p>If the grievance remains unresolved, is serious in nature, or the employee is not satisfied with the outcome of Stage 3, it is escalated to the Management Panel. The panel typically includes:</p> <ul style="list-style-type: none"> HR Manager Senior Manager assigned by Executive Management Legal/Compliance rep (if required) 	<ul style="list-style-type: none"> Ensures independence and neutrality Provides a final internal level of appeal Full transparency of prior stages Participation of employee and support person is encouraged 	<p>Committee reviews documentation from previous stages</p> <ul style="list-style-type: none"> Holds meeting with involved parties (if known and willing) Issues a written decision within 7 days of review May recommend specific actions, system improvements, or follow-up 	Proceed to Closure , feedback and learning

Stage 5: Closure, Feedback, and Learning

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

Action/Event	Principles/info	Actions by BMT	Further Action
Once all corrective actions are completed, verified, and agreed upon: • If the grievance is not anonymous, the originator provides written confirmation of closure.	<ul style="list-style-type: none"> Promotes transparency and trust in the process Reinforces accountability and organizational learning Confidentiality still upheld where applicable 	<ul style="list-style-type: none"> Labour Relations Supervisor (LRS) updates and closes the Grievance Log Relevant departments are notified of closure HR/CLO share non-confidential findings or trends internally (e.g., through toolbox talks, internal memos) 	<ul style="list-style-type: none"> Identify root causes and system weaknesses Feed insights into training, policies, or operational adjustments to prevent recurrence
Stage 6: Escalation Beyond BMT			
Action/Event	Principles/info	Actions by BMT	Further Action
If the originator is not satisfied with the final internal outcome (after Stage 4 or 5), they may request escalation to external avenues.	<ul style="list-style-type: none"> Respect for employee rights to independent resolution Promotes accountability beyond internal controls Upholds grievance mechanism alignment with international best practices 	BMT informs the employee (if known) of their right to seek external resolution, including: – Senior management, CEO re-review – Labor arbitration councils or courts – External mediators or ombudsman (if applicable)	BMT assist the external authorities Monitor trends in escalations to identify any

	GRIEVANCE MECHANISM & REDRESS PROCEDURE	Doc. No:	QM-PR-20
		Issue Date:	01-01-2019
		Rev. Date:	23-04-2025
		Rev No.	04

			systemic issues
--	--	--	-----------------

*BMT may assist in referring the grievance to competent authorities or offering information about accessible, legitimate, and culturally appropriate channels

6.7 Community Grievance Mechanism & Procedure:

BMT (and its contractors) shall implement this grievance procedure to provide opportunity for community to raise concerns about the project activities or personnel, BMT shall investigate and resolve such concerns, and the project to document both the grievance process and outcomes of addressing complaints.

BMT shall ensure;

- Mechanisms shall be put in place that allows individuals/stakeholders/stakeholder groups/ affected communities and similar to express grievances about project-related activities and employees.
- The mechanism is shared with the local communities in a format readily understandable and culturally appropriate language.

The grievance system shall include any type grievances including land, infrastructure, health and safety, environment, local recruitment, security, workforce interactions, employment issues, and any others as necessary.

Adhering the same principles of this procedure BMT's Community Grievance Mechanism shall outline and detail;

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

- receive concerns and grievances from members of affected communities;
- communicate to affected communities the channels/means for lodging concerns/grievances;
- redress the grievances in a time bound manner;
- upon redress communicate the decision to the aggrieved person/community;
- provide a mechanism to appeal against a redress decision if the aggrieved persons/community is not satisfied by the redress proposed in the first instance;
- document grievances received and redressed; and
- analyse grievance related data to identify patterns and undertake systemic improvements as needed.

BMT CLO shall

- Communicate the actions taken with the individual, community or organisation that lodged the complaint
- Settle complaints quickly and fairly, and, where appropriate, provide compensation for damage caused by Contractor or Employer.
- Work with BMT CLO's to ensure the process is closely adhered to.
- An acknowledgement of receipt of the complaint shall be provided in 7 days and within a maximum of 30 days a substantiated reply (including a relevant decision or further review or the proposed resolution shall be prepared and the complaint resolved).
- If the complaint is not resolved within this period or the resolution of the issue is not satisfactory to the complaining party, the Employer shall immediately be notified.
- All complaints shall be responded to in written manner, though a verbal response shall be provided as well if this is more appropriate in the circumstances (e.g.: where the complaint cannot be read).
- The resolution of community complaints shall be aligned with Employer's grievance procedures.
- BMT's Grievance Log shall record how the complaint was dealt with and resolved and the time taken to deal with each complaint.

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

Similar to Labour Grievance Management, below steps shall be followed, additionally; for every community grievance, the CLO shall require to complete the Community Grievance Form

The Public Grievance Form specifies the information required to ensure the complaint is dealt with and the resolution is recorded. The form consists of below parts

Section 1 : Details of the Originator/the Person & Group with grievance, including the basic details

Section 2 : Nature of the grievance that details what the underlying issue is with its evolution, the expected outcome from the originator

Section 3 : The information that are required to be captured by BMT including the date of receipt, the venue of receipt and the type of the grievance.

CLO shall require to initiate the investigation and provide feedback to the originator as detailed on the procedure. The corrective actions, time frames of the actions shall be also logged onto the Grievance Log accordingly.

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

Stage 1 - Initial Grievance Submission

Action/Event	Principles/info	Actions by BMT	Further Action
Communities can submit grievances through any of the following channels: <ul style="list-style-type: none"> • In person, via a trusted individual of their choice • Email or written statement • Anonymous methods (e.g., grievance boxes, hotline, digital form) 	<ul style="list-style-type: none"> • Option to submit anonymously • No retaliation shall occur for raising a grievance in good faith 	<ul style="list-style-type: none"> • Grievance is logged by the CLO in the Grievance Log <p>The Community Grievance Form is filled out by CLO , regardless of the means of submittal by community</p> <ul style="list-style-type: none"> • Acknowledgement of receipt is provided (within 2 working days if not anonymous) 	Proceed to Stage 2

Stage 2: Initial Review and Early Resolution Attempt

Action/Event	Principles/info	Actions by BMT	Further Action
CLO reviews the grievance and determines if it can be resolved quickly and informally. CLO may involve HR, and the Compliance Officer or any other personnel if needed.	<ul style="list-style-type: none"> • Confidentiality is assured throughout • All parties are treated with respect and dignity 	<p>If the grievance is straightforward or minor:</p> <ul style="list-style-type: none"> • Discussion is held with the concerned originator (if known) • A resolution is proposed within 7 days <p>If the grievance is</p>	<p>Close the If resolved, close the grievance. If unresolved, escalate to Stage 3 – Formal Investigation,</p>

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

		<p>anonymous:</p> <ul style="list-style-type: none"> CLO proceeds with available information to resolve the issue systemically <p>If the grievance is complex or sensitive:</p> <ul style="list-style-type: none"> Escalate to Stage 3 	with proper documentation.
Stage 3: Formal Investigation & Dialogue			
Action/Event	Principles/info	Actions by BMT	Further Action
If a grievance is complex, sensitive, or unresolved at Stage 2, it proceeds to formal investigation. The investigation team may include the CLO, Compliance Officer, and others as appropriate.	<ul style="list-style-type: none"> Fair, impartial, and thorough process Protection of confidentiality and due process Opportunity for all relevant parties to be heard 	<ul style="list-style-type: none"> Investigation begins within 7 working days of escalation Interviews conducted with involved parties (if known) Findings documented clearly and objectively Investigation concludes within 14 working days (unless extended with justification) <p>A written summary of findings and proposed resolution is prepared and</p>	If unresolved or the grievance is serious, escalate to Stage 4 – Management Panel Review. Otherwise, proceed to closure.

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

		shared with the employee (if not anonymous).	
--	--	---	--

Stage 4: Committee Review & Corrective Actions

Action/Event	Principles/info	Actions by BMT	Further Action
<p>If the grievance remains unresolved, is serious in nature, or the originator from community is not satisfied with the outcome of Stage 3, it is escalated to the Management Panel. The panel typically includes:</p> <ul style="list-style-type: none"> • HR Manager • Senior Manager assigned by Executive Management • Legal/Compliance rep (if required) 	<ul style="list-style-type: none"> • Ensures independence and neutrality • Provides a final internal level of appeal • Full transparency of prior stages • Participation of employee and support person is encouraged 	<p>* Committee reviews documentation from previous stages</p> <ul style="list-style-type: none"> • Holds meeting with involved parties (if known and willing) • Issues a written decision within 7 days of review • May recommend specific actions, system improvements, or follow-up 	<p>Proceed to Closure , feedback and learning</p>

Stage 5: Closure, Feedback, and Learning

Action/Event	Principles/info	Actions by BMT	Further Action
--------------	-----------------	----------------	----------------

GRIEVANCE MECHANISM & REDRESS PROCEDURE

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

<p>Once all corrective actions are completed, verified, and agreed upon:</p> <ul style="list-style-type: none"> If the grievance is not anonymous, the originator provides written confirmation of closure. 	<ul style="list-style-type: none"> Promotes transparency and trust in the process Reinforces accountability and organizational learning Confidentiality still upheld where applicable 	<ul style="list-style-type: none"> CLO updates and closes the Grievance Log Relevant departments are notified of closure HR/CLO share non-confidential findings or trends internally (e.g., through toolbox talks, internal memos) 	<ul style="list-style-type: none"> Identify root causes and system weaknesses Feed insights into training, policies, or operational adjustments to prevent recurrence
--	--	---	---

Stage 6: Escalation Beyond BMT

Action/Event	Principles/info	Actions by BMT	Further Action
<p>If the originator is not satisfied with the final internal outcome (after Stage 4 or 5), they may request escalation to external avenues.</p>	<ul style="list-style-type: none"> Respect for employee rights to independent resolution Promotes accountability beyond internal controls Upholds grievance mechanism alignment with international best practices 	<p>BMT informs the employee (if known) of their right to seek external resolution, including:</p> <ul style="list-style-type: none"> Senior management, CEO re-review Councils or courts External mediators or ombudsman (if applicable) 	<p>BMT assist the external authorities</p> <p>Monitor trends in escalations to identify any systemic issues</p>

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

6.8 Contractor and Value Chain Worker Grievance Mechanisms

To uphold BMT's commitment to fair labour practices, responsible sourcing, and ethical value chain management, all contractors, subcontractors, service providers, and value chain partners are contractually required to establish and maintain grievance mechanisms that are equivalent in accessibility, confidentiality, responsiveness, and protection to BMT's internal system.

These mechanisms must be accessible to all workers, including:

- Temporary, casual, outsourced, and informal workers
- Migrant and seasonal labourers
- Workers engaged through service contracts or in operations
- Vulnerable, displaced, and marginalized groups, with specific attention to barriers related to status, language, or representation

Minimum Requirements for Contractor and Value Chain Grievance Mechanisms

Contractors and value chain partners must ensure their grievance mechanisms:

- Are communicated to all workers during induction or on boarding, in a language and format they understand
- Allow for anonymous complaints and ensure no retaliation or disciplinary action against any worker raising a grievance in good faith
- Provide a timely, transparent, and culturally appropriate resolution process
- Document grievances, actions taken, and outcomes for accountability and review
- Pay special attention to workers at heightened risk of exclusion

	GRIEVANCE MECHANISM & REDRESS PROCEDURE		Doc. No:	QM-PR-20
			Issue Date:	01-01-2019
			Rev. Date:	23-04-2025
			Rev No.	04

Contractors and On-Site Subcontractors

Contractors and on-site service providers shall:

- Operate a grievance system equivalent to BMT's internal mechanism
- Cooperate with BMT's grievance monitoring activities, including audits, worker interviews, and outcome reviews
- Submit regular reports on significant grievances and trends (monthly or as requested)
- Implement corrective actions if grievance handling is found to be inadequate
- Accept that BMT reserves the right to intervene or mandate improvements where workers' rights, dignity, or well-being may be at risk

Value Chain Partners - Off-Site Suppliers and Service Providers:

Value chain partners are expected to:

- Maintain a grievance mechanism appropriate to the scale and nature of their operations
- Ensure accessibility to all workers, particularly disadvantaged and at-risk groups such as migrant labourers, women, or displaced individuals
- Investigate and resolve grievances fairly, in line with international human rights principles
- Report any serious grievances, recurring patterns, or systemic labour issues to BMT
- Support BMT's broader human rights due diligence efforts

Where value chain partners lack sufficient capacity, BMT may:

- Encourage workers to access BMT's own grievance mechanism as a last resort, especially in high-risk cases
- Offer technical support or guidance to improve grievance handling in line with international best practices

Doc. No:	QM-PR-20
Issue Date:	01-01-2019
Rev. Date:	23-04-2025
Rev No.	04

7. Trainings

- BMT's Code of Conduct Training
- Grievance Mechanism & Redress Training

8. Related Records

- QM-LG-19 Grievance Log
- QM-FR-63 Grievance Form