

Business Procedure

Community and Environmental Complaint Handling Procedure

Document Number – STM-PROC-16

This document applies to the following sites:

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

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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 complaints received by Stanwell in relation to activities/community impacts at our sites. This procedure does not apply to:

- media enquiries;
- Energy Trading or Stanwell Retail related enquiries including agreed contracts;
- Enterprise Agreement related grievances or disputes; or
- reportable conduct (see Definition).

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3.0 Definitions

General complaint:	An expression of dissatisfaction about one or more of Stanwell's actions and/or performance at its sites, from a person (anonymous or otherwise) or organisation external to Stanwell requesting or requiring a response.
Environmental complaint	An expression of dissatisfaction towards an environmental aspect 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. Environmental complaints or concerns are categorised according to the level of interaction required to resolve (refer to 4.3.3).
Reportable conduct	<p>Reportable conduct is outlined in Stanwell's Whistleblower Protection Policy (Refer GOV-POL-30) as including conduct which, in the objectively reasonable view of the individual or organisation making the disclosure, is:</p> <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; or • any deliberate concealment relating to any of the above. (see 4.1 for further direction)
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 actioning complaints

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

General and/or environmental complaints may be received from members of the public, external organisations or an environmental regulator. A complaint can be made to Stanwell via telephone, letter, email, social media platform, in person or via the Stanwell website 'contact us' function.

If a complaint or information is received regarding alleged reportable conduct committed by a Stanwell employee (or employees), it needs to be immediately referred to the Company Secretary.

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

- Name, address and contact number of complainant;
- Time, date and nature of complaint;
- A short summary of the complaint;
- If the complaint is made regarding an environmental concern, clarify whether the environmental concern is still occurring. If so, the complaint must be referred immediately to the Community Relations team;

- Confirm if the complainant has previously had contact with Stanwell regarding their complaint;
- Seek consent of the complainant to record personal information for the purposes of investigating the complaint;
- Advise the complainant a member of the Community Relations team will make contact to further discuss; and
- The time, date and method the complaint was referred to Community Relations team.

The Stanwell employee or contractor who receives the complaint 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. The person making the complaint should be reassured that their details will only be used for the purposes of investigation and will not be shared with any other party.

If the complainant does not agree to provide their details, they should be informed that Stanwell will undertake an investigation based on information provided, however it will not be able to respond to the complainant with the outcome. The direct phone number for the Community Relations Manager should be provided to the complainant for any follow up enquiries they may choose to action.

Within one day, or as soon as practicable, complaints must be referred to the Community Relations team to coordinate Stanwell's response. Anonymous complaints should also be forwarded to the Community Relations team for assessment and investigation.

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

Actioning the complaint

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

- introduce themselves, their role and the role they will play during the course of the investigation;
- confirm the information initially provided;
- identify any additional or relevant information;
- confirm consent has been given in accordance with Stanwell's Privacy Policy (Refer GOV-POL-02)
- advise the timeframes in which the complainant 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) and Stanwell's Privacy Policy GOV-POL-02.

Anonymous complaints and/or complaints lodged by parties who do not consent to their contact details being recorded will be actioned as appropriate, and in line with Stanwell's values and risk management framework.

4.2 Recording complaints

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

General complaints – Record in Content Manager Folder STK3966 and Consultation Manager

Any records created e.g. emails or documents to record and resolve a general complaint are stored in Content Manager Folder STK3966 and/or an appropriate entry is created in Consultation Manager.

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 is provided in an email to the General Manager Strategy and Engagement. If the complaint is of a serious nature, the Executive Leadership Team must be informed.

Environmental Complaints - Record in Content Manager Folder ENV5890 and Consultation Manager

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

Environmental complaints are recorded in the **Register of Environmental Complaints – All Sites** – *Content Manager 17/129766 - The Community Relations team enters the appropriate information about the complaint, including any relevant EARS and/or Meandu Mine INX references.

Information recorded includes:

- contact details, location, reason for the complaint and the relevant Stanwell site
- categorisation (initial assessment) - Level 1, Level 2 or Level 3 Interaction (see 4.3.3)
- is a regulator involved or likely to be informed
- identification of any risk/s to Stanwell’s business objectives (refer GOV-STD-11) e.g. reputation, environment, financial, safety, compliance
- names of Stanwell employees involved in receiving, responding and investigating the complaint
- details of any follow up contact with the complainant to progress the investigation
- a summary of the investigation undertaken, conclusions formed and actions taken, including any abatement measures
- a summary of the resolution provided to the complainant and whether ongoing actions, monitoring or interactions are required
- improvement and learning outcomes identified to ensure Stanwell’s right to operate and support of its stakeholders is maintained.

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

- records a summary of the interactions between Stanwell and the complainant;
- does not replace the role of EARS in recording, monitoring and tracking environmental concerns and/or complaints
- supports the investigation team to monitor the progress of complaints;
- builds a knowledge database and historical record for Stanwell;
- enables trends and continuous improvements to be identified and implemented; and
- provides the data source for Stanwell’s Property & Spatial Information Advisor to create a GIS layer displaying the location and category of complaints.

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 Strategy and Engagement, relevant site manager, General Manager Health, Safety and Environment and if appropriate, the Executive Leadership Team.

4.3 Responding to complaints

The Community Relations Manager may manage a complaint directly or assign the complaint to a more specialised employee to investigate. Appendix 1 provides an overview for handling environmental complaints.

4.3.1. General Complaints

The investigating employee should contact the complainant by phone (if details are available and the complainant is open to this approach) or email within one working day, or as soon as practicable, to acknowledge receipt of the complaint and commit to future contact within the next ten working days. A communication template is attached as an appendix to this document. See Appendix 4.

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

- all 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 investigation and resolution;
- if sensitive, or otherwise deemed necessary, the investigating specialist and/or subject matter expert should be accompanied by an appropriate Stanwell representative in all face-to-face contact with a complainant; and
- any file notes or records of interactions must be saved in Content Manager STK3966 and a stakeholder record created in Consultation Manager.

4.3.2. Environmental Complaints

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

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

When assessing the validity and determining an appropriate response, the investigation team must consider the following:

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

The investigation team must agree on the level of response and the next steps Stanwell takes in resolving the complaint/s.

A guide to assist investigation team members respond to environmental complaint types is included in Appendix 2 and Appendix 3.

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

The following categories apply:

- **Level 1 Interaction** – When a query or concern about an environmental aspect of Stanwell's operations can be resolved at the initial point of contact with the dissemination of existing information.

Examples where 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 the complainant confirms they are satisfied with Stanwell's response.

Level 1 interactions are classified as a **Hazard** in EARS.

- **Level 2 Interaction** – When an expressed concern requires some form of community interaction e.g. face-to-face meeting to better understand or it can be resolved by

communicating existing information or monitoring data that demonstrates Stanwell's compliance with a relevant environmental authority.

Examples where 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 the complainant to escalate their concerns to a formal complaint with Stanwell, an external agency or regulator; or
- during a community forum or in response to another communication (e.g. newsletter) near neighbours or other stakeholders express concern about the potential for environmental impacts upon them or their immediate community.

When visiting an impacted property, two Stanwell people should attend until a trust-based relationship is established with the complainant. Depending on the level of concern being expressed, usually an environment team member or technical advisor will accompany the Community Relations team member to provide technical context, record information exchanged and provide the appropriate safety support.

Level 2 interactions are classified as a Near Hit in EARS.

- **Level 3 Interaction** – When a complainant expresses dissatisfaction towards an environmental aspect of Stanwell's operations. Alternatively, following a level 2 interaction, Stanwell is informed that the data or information provided to address an issue or concern is not accepted, and further action is required. In the case of an environmental complaint, monitoring may be required at the location for a period.

Examples where a level 3 interaction is required may include:

- complaint about noise, vibration, water quality, dust or air emission which is causing a nuisance or impact at a 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 satisfied the complainant's concerns; or
- complainant has escalated their complaint to a regulator or shareholder representative.

Level 3 interactions are classified as an **Incident** in EARS.

As a minimum, the following Stanwell employees should be provided with an initial summary and then kept informed about the progress of environmental complaints and any agreed follow-up actions:

- Site Manager;
- Community Relations Manager;
- General Manager Strategy and Engagement; and
- General Manager Health, Safety and Environment (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 environmental complaints in ways that:

- maintain Stanwell's 'right to operate' and social licence to operate;
- identify corrective, preventative and improvement actions, which are subsequently added to procedures and processes (these must be approved internally prior to being implemented or communicated to the complainant).
- ensure any budgetary impacts from abatement measures have been fully considered, approved and included in current and future budget cycles;
- are consistent with Stanwell's values, Stakeholder Engagement Policy (STM-POL-02) and Environmental Sustainability Policy (ENV-POL-01);
- demonstrate Stanwell's compliance with the relevant Environmental Authority (EA); and

In some cases, a complaint may be escalated to a regulatory agency such as the Queensland Department of Environment and Science. If this has occurred, Stanwell must have receipt of correspondence confirming no further action is being taken and/or a suitable action plan has been developed and agreed upon in order to resolve the investigation.

Internal approvals may include one or more of the following:

- investigating specialist's line manager;
- Site Manager
- Chief Operating Officer
- General Manager - Strategy and Engagement
- General Manager - Healthy, Safety & Environment
- Community Relations Manager
- Legal Counsel
- Chief Executive Officer

4.4.3. Advising the Complainant (all)

Previous relations 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 is thanked for contacting Stanwell and extended due respect;
- the specialist who has been involved in the investigation should provide information that is factual and unbiased, and where appropriate and if possible, scientifically based;
- the communication should convey Stanwell acted upon the complaint and if possible/appropriate, the complaint has led to an improvement; and
- if appropriate, the complainant should be offered a further course of action (e.g. 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
- Community Relations Manager
- General Manager Health, Safety and Environment
- Company Secretary

6.0 Communication Plan

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

7.0 References

- GOV-POL-29 Whistleblower Protection Policy
- GOV-PRCO-36 – Protected Disclosure Procedure
- GOV-POL – 02 Privacy Policy

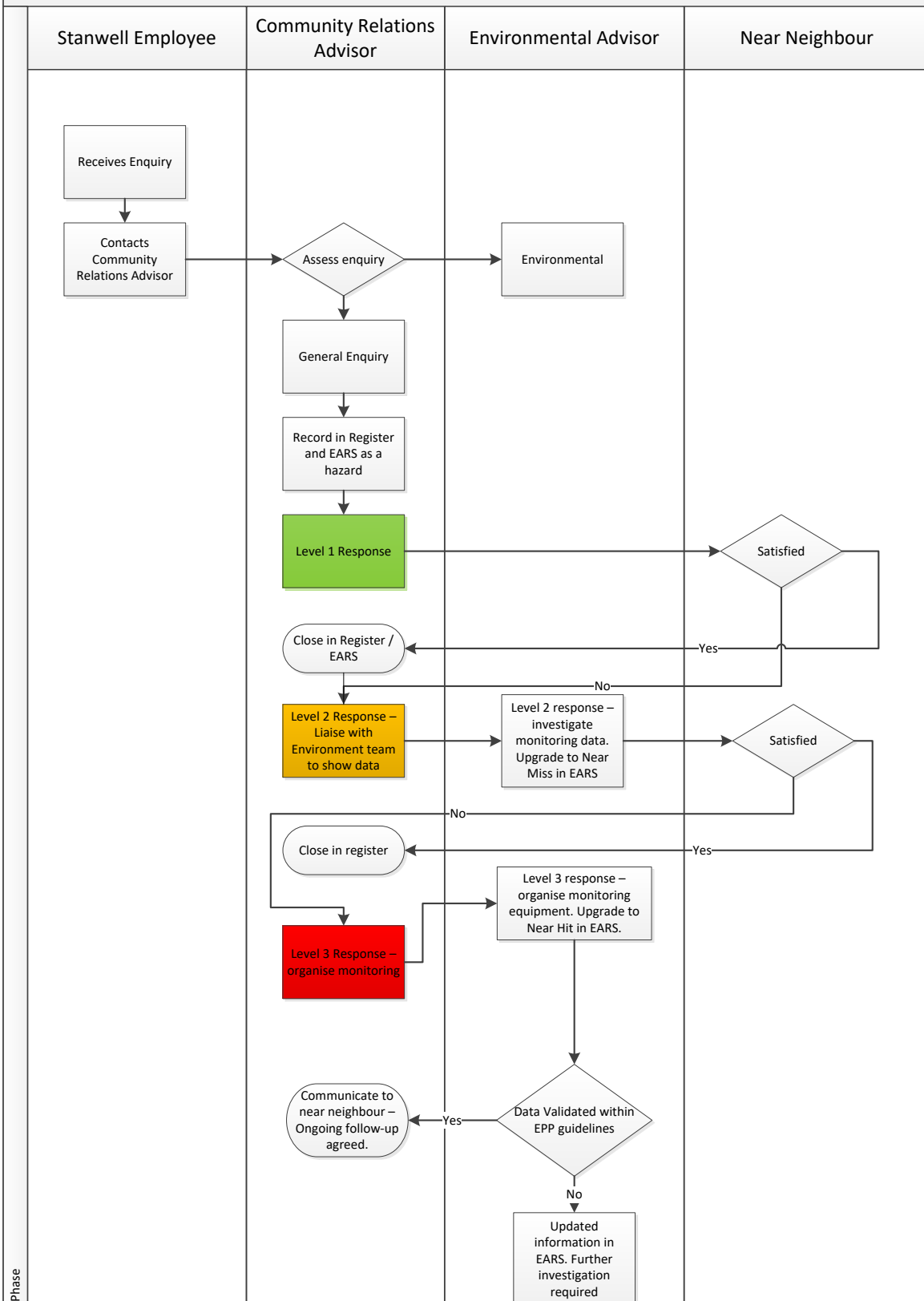
- GOV-PROC – 41 Privacy
- Environmental Licences pertaining to site
- Privacy Act 1988 (Cth)

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
6	18.08.2020	Amendments to wording to reflect the implementation of the Interaction levels approved in 2018	John Carey	Stephanie McMahon	Sophie Naughton

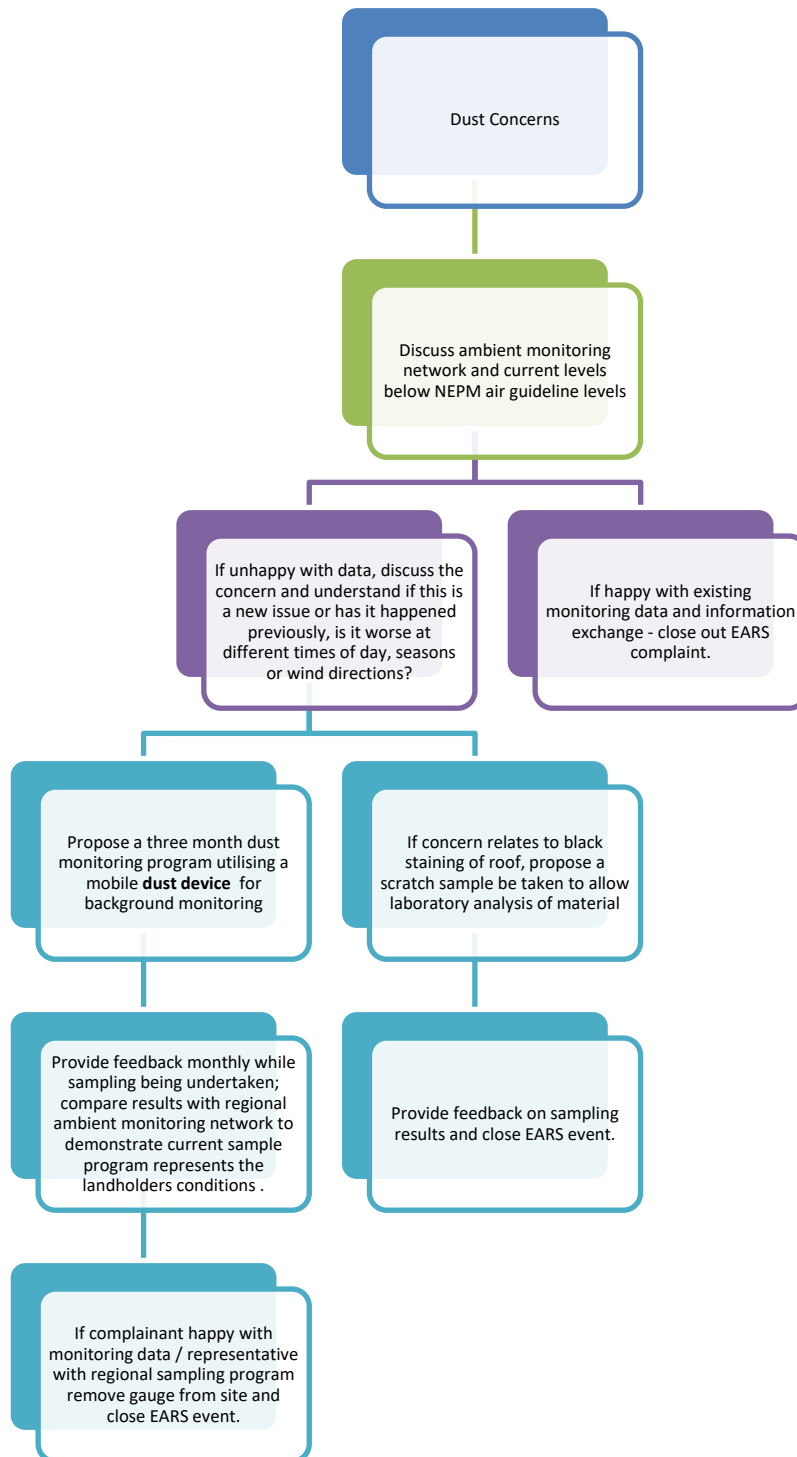
Appendix 1 – Flow Chart – Environmental Complaint Handling

Environmental Complaint Handling

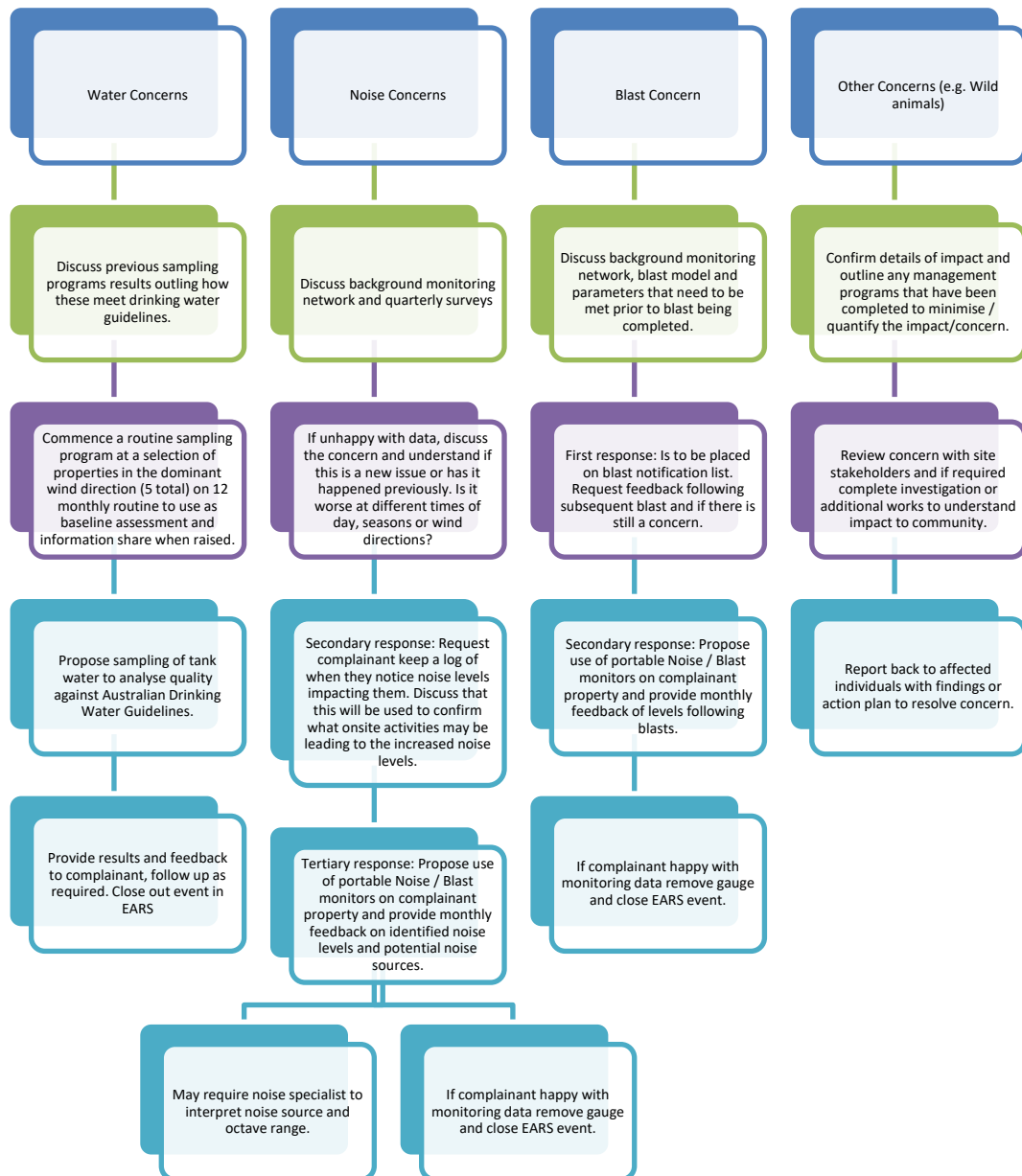


Phase

Appendix 2 - Guide to respond to Dust Concerns



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



Appendix 4 – Communication template - Acknowledging a Complaint

Note – adapt for email/phone call as appropriate

Thank you for your letter of [date] addressed to [position and name]. Your letter was forwarded to me for action and I will be personally supervising an investigation into the matter you have raised.

At Stanwell, we always welcome feedback on the way we conduct our operations. I will contact you again within 10 working days to update you on the status of the investigation and we will provide a final response once our investigation is complete.

If you have any questions in the meantime, please do not hesitate to contact me on the details below.

Yours sincerely