

# STEELCON GRIEVANCE REPORTING POLICY

## PURPOSE

Steelcon is committed to maintaining the highest standards of integrity and accountability in all its operations. This policy outlines the procedure for reporting and handling complaints to ensure respect for human rights and provide remediation for any adverse impacts caused or contributed to by Steelcon's activities.

## SCOPE

This policy applies to all internal stakeholders (company employees, non-permanent employees, direct suppliers, service providers) and external stakeholders (contractors, indirect suppliers, local communities).

## REPORTING PROCEDURE

### Responsible Persons

- a) Steelcon has designated a Grievance Committee responsible for overseeing the reporting procedure. This committee is impartial, independent, and not bound by external instructions.
- b) Contact details for the Grievance Committee are publicly available on the Steelcon website.

### Reporting Channels

Complaints can be submitted through various channels to ensure accessibility:

- a) Phone: 416-798-3343 Ext 299
- b) Email: [hr@steelcongoc.com](mailto:hr@steelcongoc.com)

### Confidentiality and Non-Retaliation

- a) All grievances are treated with the strictest confidentiality. The identity of the complainant is protected, and complaints can be reported anonymously if desired.
- b) Steelcon is committed to a non-retaliation policy, ensuring that grievances do not face any adverse consequences for reporting issues.

### Grievance Categories

The grievance mechanism allows for the submission of various types of complaints, including but not limited to:

- a) Human rights complaints
- b) Environmental complaints
- c) Unethical business practices

## PROCEDURE STEPS AND TIMELINE

### Receipt Confirmation

Complainants receive an acknowledgment of receipt within 3 business days.

### Initial Review

The Grievance Committee reviews the complaint within 7 business days to determine its validity and the appropriate course of action.



## **Investigation**

If necessary, an investigation is conducted, which may involve consulting the complainant or their representative. This step typically takes 30 business days.

## **Resolution**

The complainant is informed of the resolution and any remedial actions taken. The resolution process aims to be completed within 45 business days from the receipt of the complaint.

## **EVALUATION AND APPEAL**

The effectiveness of the grievance procedure is evaluated at least once every 12 months and on an ad hoc basis.

An appeal procedure is in place for complainants who are dissatisfied with the resolution. Appeals must be submitted within 30 days of receiving the resolution.

## **OPTIMIZING ACCESSIBILITY**

Steelcon ensures the grievance procedure is accessible to all stakeholders through various media and platforms:

- a) Training sessions
- b) Information dissemination through online and offline media
- c) Joint industry complaint procedures when applicable

## **CONTINUOUS IMPROVEMENT:**

Feedback from stakeholders on the grievance procedure is encouraged to continually improve the process and ensure it remains effective and accessible.

## **CONTACT INFORMATION**

For any questions or to report a grievance, please contact the Steelcon Grievance Committee at:

**Email:** [hr@steelcongoc.com](mailto:hr@steelcongoc.com)

**Phone:** 416-798-3343 Ext 299