Grievance Management Procedure

Accessible, confidential and fair grievance mechanism

Company	EBI
Version	1.0
Effective date	April 2026
Prepared by	EBI
Approved by	Executive Management
Owner	Human Resources and Executive Management

This procedure defines the mechanism used by EBI to receive, record, review and resolve complaints or concerns raised by employees, subcontractors, suppliers, local communities and other stakeholders.

1. Purpose

- Receive, record and process complaints and concerns addressed to EBI.
- Resolve stakeholder concerns through a fair, transparent and timely process.
- Maintain a mechanism aligned with international good practice on human rights and social responsibility.

2. Scope

- Employees, consultants, trainers and personnel acting on behalf of EBI.
- Subcontractors, suppliers and business partners.
- Local communities and any stakeholder affected by EBI activities.

3. Guiding principles

- Accessibility, free access, confidentiality and protection against retaliation.
- Transparent and traceable handling, without preventing access to external legal remedies.
- Protection of personal data and respect for the dignity of complainants.

4. Definition of a grievance

A grievance is any complaint, concern or allegation related to actual or perceived impacts of EBI activities, including environmental or social impacts, working conditions, health and safety, staff conduct, human rights issues or any incident affecting a stakeholder.

5. Submission channels

- Email: responsibility@ebi-gn.com or compliance@ebi-gn.com.
- In person: Rue Transversale 1, Residence Concasseur, Grand Immeuble, 4th floor, Dixinn, Conakry, Guinea.
- Suggestion boxes, internal registers or confidential channels made available on client sites.

6. Handling process

- Receipt and registration: acknowledgement within 7 working days, case number assignment and entry in the grievance register.
- Assessment: admissibility review, complaint classification and risk level identification.
- Investigation: information gathering, interviews, fact analysis and evidence documentation.
- Resolution: written proposal, discussion with the complainant, implementation and follow-up of corrective actions.
- Closure: complainant validation where possible, case archiving and register update.
- Escalation: referral to Executive Management or independent external mediation if the matter remains unresolved.

7. Timelines

- Acknowledgement of receipt: 7 working days.
- Full processing target: 30 to 60 days depending on complexity.
- If additional time is required, the complainant is informed regularly of progress.

8. Confidentiality and protection

- Complaints may be submitted confidentially or anonymously.
- Information is shared only with persons involved in case handling.
- Retaliation against a complainant or good-faith witness is strictly prohibited.

9. Operational grievance record

- Place, date and time of receipt.
- Detailed description of facts, period, location, persons involved and expected remedy.
- Available supporting evidence, including documents, statements or photos.
- Follow-up of recommendations, costs, commitments, agreements and corrective actions validated by management.

10. Monitoring and reporting

- Post-resolution monitoring and trend analysis.
- Quarterly reporting to Executive Management.
- Continuous improvement of the grievance management system.

11. Responsibilities

- Human Resources: operational handling and register maintenance.
- Executive Management: supervision, arbitration and approval of sensitive measures.
- Managers: field relay and reporting of relevant information.
- All employees: duty to report and cooperate in good faith.

12. Exclusions

- Commercial contractual disputes handled through the applicable contractual mechanisms.
- Criminal complaints to be referred to the competent authorities.
- Manifestly abusive or bad-faith complaints, without prejudice to legal rights of appeal.

13. Review and approval

This procedure is reviewed every two years or whenever operational, risk or regulatory changes require it. It is approved by EBI Executive Management.

Approval

Name	Robert TOUNKARA
Position	Managing Director
Organization	EBI