



IAMGOLD Corporation – Côté Gold Project				
Document Title	Management of Community Grievances			
Document No.	IMG-ENV-GCP-300	Revision	1.0	

## IAMGOLD Corporation

### Côté Gold Project

### Management of Community Grievances

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Document Owner	Côté Gold Project Community Relations Department
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## 1.0 Purpose

This document describes the protocol which will be followed by the Côté Gold Project (Project) Community Relations Department to ensure appropriate documentation and management of grievances identified by stakeholders, members of the public, Indigenous groups and individuals. This is done to strengthen the communication and appropriate engagement with Project management. This protocol has been developed in accordance with IAMGOLD’s stakeholder engagement best practices, policies and procedures.

This protocol is intended to support the IAMGOLD values:

- We are driven to EXCELLENCE in everything we do.
- We are ACCOUNTABLE and operate with TRANSPARENCY.
- We conduct ourselves with RESPECT and embrace DIVERSITY.
- We grow with TEAMWORK, LEARNING and INNOVATION.

Other plans that relate to this document include:

- Indigenous Consultation Plan; and
- Community Communication Plan.

## 2.0 Scope

This document outlines the protocol for how the Project will address external grievances received from stakeholders, Indigenous groups and individuals during the Project Construction, Operations and Closure phases. Employee grievances will be addressed through a specified process determined and communicated by the Human Resources Department. This document outlines:

- Project-specific obligations, approvals and agreements;
- Roles and responsibilities for the application and management of this protocol; and
- The frequency for review and revision.

This document is not intended to:


- Supersede regulatory compliance and other requirements; and
- Be followed as a substitute for legal advice.

## 3.0 Regulatory Compliance and Other Requirements

This protocol is intended to comply with the relevant Provincial environmental assessment (EA) condition and guided by Towards Sustainable Mining (TSM) guidelines for addressing complaints received from external stakeholders, Indigenous groups and individuals.

### 3.1 EA Conditions and Commitments

The Project underwent both Federal (*Canadian Environmental Assessment Act, 2012*) and Provincial (*Environmental Assessment Act*) environmental assessment (EA) processes beginning in 2013. The Federal process was successfully completed in 2016 and the Provincial process successfully completed in 2017. Following the receipt of the EA approvals, IAMGOLD identified various opportunities to optimize the Project and undertook an environmental effects review (EER) to evaluate the potential effects of changes resulting from the optimization of the Project compared to the EA. The EER was accepted by Federal and Provincial regulators, and amended EA

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conditions were issued to IAMGOLD. As part of the Provincial approval for the Project, IAMGOLD is subject to the following condition pertaining to developing and implementing a complaint protocol for the Project:

*Table 1: Summary of EA Complaint Protocol Conditions*

Topic	Description / Commitment	Source Reference
Planning and Implementation	The Proponent shall prepare and implement a Complaint Protocol that sets out how it will deal with and respond to inquiries and complaints received during the Design, Construction, Operation, and Closure of the Undertaking.	Provincial EA Condition 7.1
Submission	The Proponent shall submit the Complaint Protocol to the District Manager and Director for the public record, 60 days before the start of Construction or such other date as may be agreed to in writing by the District Manager / Director.	Provincial EA Condition 7.2
Amendment of Protocol	The District Manager or Director may require the Proponent to amend the Complaint Protocol at any time. If an amendment is required, the District Manager / Director will notify the Proponent in writing if the required amendment and the date by which the Proponent must complete the amendment and submit to the District Manager / Director.	Provincial EA Condition 7.3
Implementation of Amended Protocol	The Proponent shall carry out the Complaint protocol, as it may be amended by the District Manager / Director.	Provincial EA Condition 7.4

This document is intended to satisfy the Provincial EA condition requiring the Project to prepare and implement a Complaint Protocol.


## 4.0 Roles and Responsibilities

### 4.1 IAMGOLD Community Relations Department

IAMGOLD's Community Relations Department holds the primary responsibility for documenting and managing any external grievances registered with the Project. The Community Relations Department will:

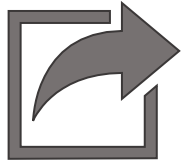


- Maintain records of external communications with stakeholders, Indigenous groups and individuals on general matters and issues related to, and of interest to, the Project including environmental matters;
- Identify the appropriate department within the Project or IAMGOLD needed to address the grievance;
- Provide written reports, as required, to appropriate Project management documenting grievances received and the status of resolution of open grievances.

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## 4.2 Contractors and Sub-contractors

Contractors (including sub-contractors) working for the Project will have a responsibility to ensure compliance with this protocol. Any questions about this protocol should be directed to the Project’s Community Relations Department. Contractors are not expected to resolve grievances received; however, they are expected to:



- Share information with the complainant about how to register a grievance with the Project (see Section 5.1). If a complainant does not wish to follow the suggested process, the contractor will be asked to complete a Grievance Report (Appendix B) and submit it to the Community Relations Department by emailing it to [cotegold@iamgold.com](mailto:cotegold@iamgold.com) or verbally at 705-269-0203.
- Notify the Project’s Community Relations Department within 24 hours of receipt of any grievance.
- Be available to participate in any required follow-up discussions with the relevant Project department to satisfy information gathering that may be required to resolve or respond to a grievance.

This protocol will be shared with contractors at the outset of a contract to ensure understanding and compliance with the established grievance process.

## 5.0 Implementation

Six key steps have been identified to manage the receipt and response of grievances. Refer to Figure 1 for an overview of implementation.

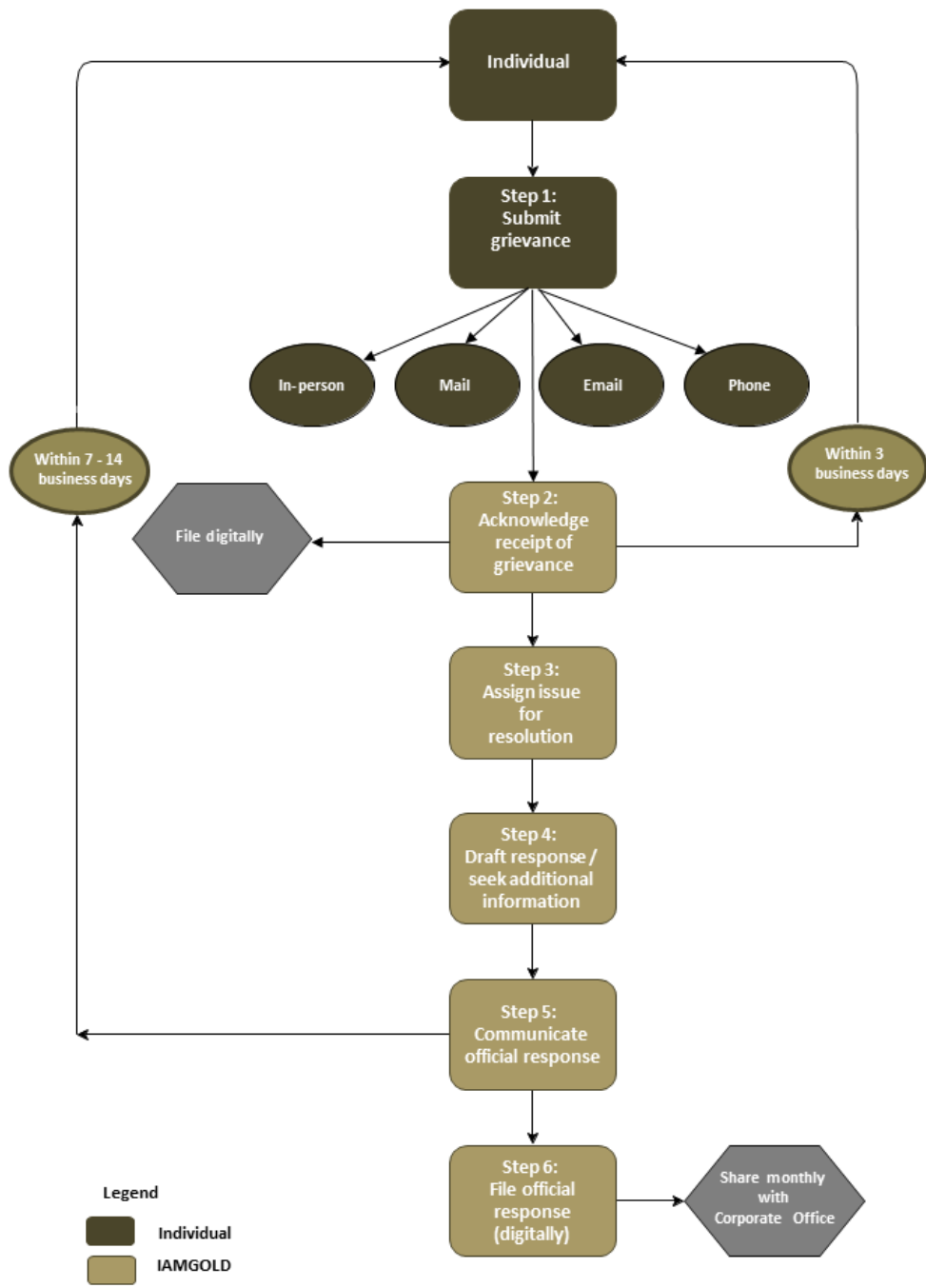



Figure 1: Grievance Protocol Procedure

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### 5.1 Step 1 – Receipt of a Grievance

Grievances can be submitted to IAMGOLD in-person, by telephone, email or regular mail.



Telephone: 705-269-0203  
1-888-IMG-9999 (1-888-464-9999)

Email: cotegold@iamgold.com

Mail / In-person: IAMGOLD Côté Gold Project  
Attention: Community Relations Department  
2140 Regent St., Unit 9  
Sudbury, ON P3E 5S8

Persons sharing grievances to IAMGOLD employees or representatives will be encouraged to submit through the formal mechanisms listed above to facilitate appropriate documentation, tracking and follow-up response.

If the grievance is received by telephone, in-person or is not submitted on a Project Grievance Report form (Appendix B), the Community Relations Department will work with the employee, representative or contractor that received the grievance to complete the form on behalf of the individual.

### 5.2 Step 2 – Acknowledge Receipt of Grievance

Within three business days of receipt, the Community Relations Department will acknowledge receipt by email or letter and/or provide a response if able / applicable. If the issue cannot be resolved through providing available information at this step, the acknowledgement will outline the steps and, if known, identify the timeline for the expected response. If the grievance was submitted anonymously, it will be recorded and Steps 3 to 6 will be followed as applicable.


In the case of an actual or potential environmental incident, the Environmental Department or designate must be notified immediately. This individual will submit a report of the environmental communication within 48 hours to the person who submitted the grievance and will submit a copy to the Environmental Department. This report will acknowledge the reported incident and include any information gathered internally (date, time, personnel involved and suggested courses of action and timeline for the response).

For actual or potential environmental incidents, an immediate response is conducted and communicated. Level 4 or 5 environmental incidents (classified according to the IAMGOLD HSS “Significant Incident Reporting & Distribution Procedure”) are reported to IAMGOLD corporate office as required.

The grievance will be filed using IAMGOLD’s record management system. Each grievance will be assessed and assigned an appropriate ID number (e.g., Côté Gold Project [YEAR]-001). The system will track grievances and will include the following information:



- Date and Location;
- Name and contact information of person filing grievance;
- Method of receipt (e.g., phone, email, in-person, mail);
- Description of grievance;
- Date of receipt;
- Person in charge of documentation;
- IAMGOLD’s response and date;

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- Resolution status (complete, incomplete, ongoing); and
- Recommended follow-up action(s).

A master copy of the tracking table will be maintained by the Community Relations Department and shared monthly, or upon request, with IAMGOLD’s corporate office.

### 5.3 Step 3 – Assign Issue for Resolution

Once submitted, the Community Relations Departments will determine who is responsible for addressing the grievance. Depending on the severity (high, medium, low) of the issue, the Community Relations Department will involve various internal or external resources to respond to the grievance. Severity levels are characterized as:

- ‘Low’ – may be handled directly by the Department responsible;
- ‘Medium’ – requires input and/or review; and
- ‘High’ –requires review by IAMGOLD’s CEO or an external / third party.

### 5.4 Step 4 – Draft Responses / Seek Additional Information

The assigned Department will draft a response, including actions taken to resolve or prevent the issue from happening in the future. If additional information is required to inform the response, the assigned Department will engage the Community Relations Department to gather additional information from the complainant. All correspondence / interaction with a complainant will be tracked by the Community Relations Department.

### 5.5 Step 5 – Communicate Official Response

The results of actions taken or investigation into grievances will be dependent on the nature of the issue and communicated to the Community Relations Department for tracking purposes. The official response should be shared with the complainant in writing, if possible. The official response should be delivered within 7 to 14 business days following acknowledgement of the grievance. For issues that cannot be resolved within this timeframe, communication should occur with the complainant to update them on the status of their grievance.

For grievances that are submitted anonymously, IAMGOLD will communicate relevant information about the issue and its resolution, as applicable, using available Project communication tools (e.g., *Let’s Talk* quarterly newsletter).

### 5.6 Step 6 – File Official Response and Documenting Actions Taken

The official response to the grievance will be filed digitally and be accessible to the appropriate staff. Actions proposed to resolve the grievance will be noted, in order to avoid similar incidents and for future improvement.

As mentioned in Step 2, level 4 or 5 environmental incidents are reported to IAMGOLD corporate office as required.


### 5.7 Adaptive Management and Evaluation of the Protocol

IAMGOLD remains committed to establishing frequent, accessible and effective ongoing two-way communication with stakeholders, Indigenous groups and individuals throughout the life of the Project.

As the Project proceeds, this protocol will be revisited on an annual basis, or as required, to reflect any changing communication requirements and preferences of stakeholders, Indigenous groups and individuals, to the extent practicable.

The assessment criteria for response mechanisms included in the Mining Association of Canada’s Towards Sustainable Mining Aboriginal and Community Outreach Protocol will serve as a supporting tool to evaluate the effectiveness of this protocol (Appendix C).



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## 6.0 Reports and Records

IAMGOLD will maintain detailed records of all grievances and the corresponding resolutions. This information will be summarized as appropriate for the annual monitoring and compliance reporting provided to the Canadian Environmental Assessment Agency, Ministry of Environment, Conservation and Parks, and Indigenous groups each year.

This is a stand-alone document that will be reviewed as needed.

## 7.0 Definitions, Acronyms and Abbreviations

Term	Definition
EA	Environmental Assessment
EER	Environmental Effects Review
HSS	Health Safety and Security
The Project	The Côté Gold Project

## 8.0 References and Related Documents


This protocol was developed under the guidance of the following documents at the time of this revision:

- AMEC (2015). Côté Gold Project. Amended EIS / Final Environmental Assessment Report. Prepared for IAMGOLD.
- IAMGOLD (2010). Rosebel Gold Mines N.V. Management of Community Grievances (Version 3).
- IAMGOLD (2018). Côté Gold Project. Environmental Effects Review Report.
- International Council on Mining & Metals (2009). Handling and Resolving Local Level Concerns and Grievances. Available from: <https://www.icmm.com/website/publications/pdfs/social-and-economic-development/691.pdf>
- Mining Association of Canada (2015). Site-level Grievance and Community Response Mechanisms: A Practical Design and Implementation Guide for the Resource Development Industry. Available from: <https://mining.ca/wp-content/uploads/2019/02/Site-Level-Grievance-Guide-English.pdf>
- Mining Association of Canada (2017). Towards Sustainable Mining: Aboriginal and Community Outreach Protocol. Available from: [http://mining.ca/sites/default/files/Aboriginal%20and%20Community%20Outreach-EN%20-%20WITH%20TAILINGS%20CRITERIA\\_0.pdf](http://mining.ca/sites/default/files/Aboriginal%20and%20Community%20Outreach-EN%20-%20WITH%20TAILINGS%20CRITERIA_0.pdf).

As this protocol is reviewed, references and related documents will be updated pending applicability.

## 9.0 Revision History and Approvals


Please refer to Appendix A for sign off sheets describing revisions made to this protocol and respective approvals.

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## Appendix A


### Revision History and Approvals

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[Initial sheet can be added here, with future updates and approvals becoming a separate sheet to be added prior to appendices]


Version and date	[Sequential version number, x.x and date, dd-mm-yyyy]
Revised by	[State name of revision author]
Approver name and signature	[State name, and sign]
Title / Position	[State title / position of approver]
Description of revision	[State what was updated in EMP]
Revision from Consultation	[State Agency]
Consultation period	[Timeframe of consultation]
Summary of Consultation	[State comments received]

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## Appendix B

### Grievance Report


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		<b>Grievance Report</b>			
Location		Date			
Name and contact information					
Other individuals involved					
Description / Details					


Please submit your completed form or contact the Community Relations Department as follows:

<i>In-person or by mail:</i> IAMGOLD Côté Gold Project Community Relations Department 2140 Regent St., Unit 9 Sudbury, ON P3E 5S8	<i>By email:</i> <a href="mailto:cotegold@iamgold.com">cotegold@iamgold.com</a>	<i>Phone:</i> 705-269-0203 1-888-IMG-9999 (1-888-464-9999)
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**For Administrative Purposes Only:**


Date of receipt	
Method of receipt (e.g., phone, email, in-person, mail)	
Person in charge of documentation	
<b>Management Action Proposed</b>	
<b>Comments and Status</b>	
<b>Official Response</b>	
<p>[describe follow-up action(s) taken and indicate if final response provided back to individual.]</p>	

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## Appendix C

Response Mechanism: Assessment Criteria

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### Response Mechanism: Assessment Criteria

Level	Criteria
C	Minimal effort has been made to understand or incorporate COI* concerns or consultation requirements. <ul style="list-style-type: none"> <li>• There are no systems to track or respond to COI concerns.</li> </ul>
B	The facility has an incomplete knowledge of COI concerns or consultation requirements. <ul style="list-style-type: none"> <li>• The facility gives occasional consideration to COI concerns, based mostly on assumptions and sporadic consultations.</li> <li>• An informal complaint system exists.</li> <li>• A complaint and response system is either planned or in development.</li> </ul>
A	The facility has a good understanding of COI concerns and consultation requirements and documented them. <ul style="list-style-type: none"> <li>• A complaint and response system is in place with processes for follow-up and tracking.</li> <li>• COI input is considered in decision making.</li> </ul>
AA	The facility has a thorough, documented knowledge of COI issues, concerns and consultation requirements. <ul style="list-style-type: none"> <li>• The facility analyzes and acts upon the input received from COI.</li> <li>• Senior management considers results of the engagement and dialogue process at least annually to determine if and how to act upon them.</li> <li>• Sufficient time is built into facility processes to consider and respond to COI concerns before specific plans are carried out.</li> </ul>
AAA	Collaboration with COI occurs to establish and achieve common objectives. <ul style="list-style-type: none"> <li>• Collaboration extends to address common community goals.</li> </ul>

\*Note: COI denotes community of interest.

Source: Mining Association of Canada. June 2017. Towards Sustainable Mining: Aboriginal and Community Outreach Protocol. Available at: <https://mining.ca/documents/aboriginal-and-community-outreach-protocol-with-tailings-criteria/>