



**Pilbara
Minerals**

Stakeholder Grievance

Procedure

October 2020

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1. Introduction and Purpose	3
2. Objectives	3
3. Definitions.....	3
4. Reporting channels	4
5. Confidentiality.....	4
6. Roles and Responsibilities.....	5
7. Grievance process.....	5
7.1 Administration	6
7.2 Methods for receiving grievances	6
7.2.1 Face to face or via telephone	6
7.2.2 Electronic or written.....	7
7.3 Record.....	7
7.4 Acknowledgement.....	7
7.5 Screen	7
7.6 Investigate and act.....	7
7.7 Follow up and close out	8
7.8 Appeal.....	8
7.9 Reporting and monitoring.....	8
7.10 Information and document management	8
7.11 Review	8
7.12 References	8
8. Other Avenues.....	8

1. INTRODUCTION AND PURPOSE

The purpose of this document is to outline and formalise the grievance management process for Pilbara Minerals Limited's (Pilbara Minerals or the Company) and its stakeholders.

This grievance procedure provides a process for Pilbara Minerals' stakeholders to have their concerns heard, investigated and responded to by the Company within an appropriate timeframe.

This procedure has been developed by Pilbara Minerals with the intent of managing any stakeholder complaints in a transparent, fair and credible manner for all parties. While also supporting Pilbara Minerals to deliver on its commitment to 'Valuing our Partners' under 'What we Stand for' by creating a foundation for dialogue between Pilbara Minerals and its stakeholder, both positive and negative, to build open and respectful relationships.

This procedure applies to all external stakeholders who are involved with or impacted by Pilbara Minerals' business, mining and exploration activities. It does not apply to internal stakeholder grievances which is covered by an internal process.

2. OBJECTIVES

The objective of this grievance procedure is to:

- Provide avenues for stakeholders to lodge formal complaints with the Company.
- Provide a framework for stakeholders' issues or concerns to be addressed in a timely and effective manner by Pilbara Minerals.
- Investigate, record and monitor stakeholders' concerns.
- Provide transparency as to how Pilbara Minerals' manages and responds to stakeholder concerns and issues.
- Support Pilbara Minerals' reputation as an organisation that values its partners (stakeholders) and a responsible Australian mining company.

3. DEFINITIONS

Table 1: Definitions

TERM	DEFINITION
Grievance (same as complaint, issue or concern)	A perceived or actual injustice, issue or concern pertaining to Pilbara Minerals or its contractors that an individual or group and would like appropriately addressed by the Company.
Grievance process	Formalised process to listen, understand, assess and resolve a stakeholder's or stakeholder group's grievance about the Company's activities and/or its employees or contractors.
Employee	An individual that is employed under a contract with Pilbara Minerals.

Contractors	A third party that has been contractually engaged to deliver work for the Company.
External Stakeholder	An individual or group that has an interest in or is affected by the Company and/or its operations. In respect of this policy, this definition does not include employees or contractors of the Company.
INX InControl system	Pilbara Minerals' workplace health and safety management system.
Resolution	Actions taken by Pilbara Minerals to resolve a grievance.

4. REPORTING CHANNELS

A combination of face to face and electronic communication channels have been established to support stakeholders in lodging a formal grievance with the Company (see Table 2). Different channels enable stakeholders to choose the option most appropriate to their circumstance to communicate their grievance with Pilbara Minerals. The Company will communicate this procedure via the website and directly to key stakeholders to ensure they understand how they can lodge a grievance and to provide transparency as to how grievances will be reported and addressed by Pilbara Minerals.

Table 2: Grievance reporting channels

CHANNEL	CONTACT
By phone	Telephoning Pilbara Minerals' Perth office on (08) 6266 6266 and speaking with Pilbara Minerals' Corporate Affairs Manager or Health and Safety Manager.
Written correspondence	Via email to admin@pilbaraminerals.com.au or Via post to PO Box 884, WEST PERTH, WA, 6872
Face to face	To any Pilbara Minerals' employee.
Via website	Using the online submission form at pilbaraminerals.com.au/site/contact/contact-us

5. CONFIDENTIALITY

Personal details of stakeholders will not be released to any third party. These details will only be used internally by the Company to support the investigation and subsequent resolution of the grievance. In the instance that a grievance involves a specific employee or contractor, personal details of the stakeholder lodging the grievance will not be released to these parties without prior permission. For transparency, grievances will be reported in the Company's Annual Sustainability Report as a total number and aggregated into categories that will not identify individual stakeholders.

6. ROLES AND RESPONSIBILITIES

Roles and responsibilities of Pilbara Minerals' employees that will be involved in the investigation and resolution of the grievance is outlined in table 3.

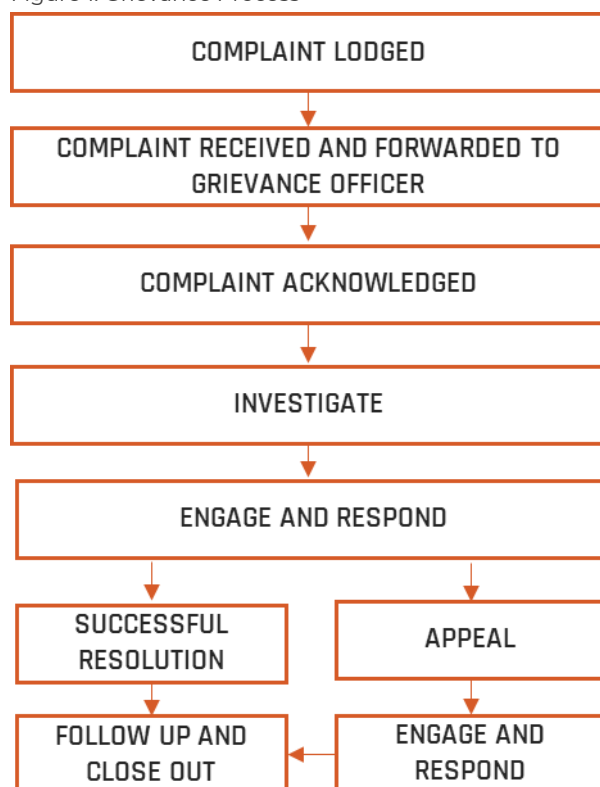
Table 3: Roles and responsibilities

ROLE	RESPONSIBILITY
<p>Grievance Officer</p> <p>The following positions within Pilbara Minerals have the added responsibility of performing the role of the Grievance Officer when required:</p> <ul style="list-style-type: none"> • Manager Corporate Affairs • HSET and Approvals Manager • Risk and Compliance Manager 	<p>Investigates and coordinates the resolution of the grievance, key responsibilities include:</p> <ul style="list-style-type: none"> • Investigating the grievance by engaging with relevant employees, contractors and operational areas. • Liaising with the stakeholder in the absence of a relationship manager. • Developing actions and a resolution to resolve issue. • Monitoring and recording correspondence and interactions with stakeholders in INX InControl. • Ensuring grievance process is followed. • Tracking progress and following up where needed. • Managing appeal and negotiation to a successful resolution. • Supporting the executive leadership team, if needed, to resolve the grievance.
<p>Stakeholder Relationship Manager</p>	<ul style="list-style-type: none"> • A Pilbara Minerals' employee that manages the day to day relationship with the stakeholder (if applicable). • Manages all touch points with the stakeholder and is responsible for keeping the stakeholder informed during the process.
<p>Employee</p>	<ul style="list-style-type: none"> • Receives grievance from stakeholder and collects details outlined in 7.21 • Refers to the Grievance Officer • Provides additional information to support the investigation and close out of grievance where needed.

7. GRIEVANCE PROCESS

The process for receiving, assessing, and resolving a stakeholder grievance is outlined in figure 1 below.

Figure 1: Grievance Process



7.1 ADMINISTRATION

The Grievance Officer is responsible for the administration of the grievance including all correspondence, coordination of the internal investigation, development of a resolution, maintaining a log in INX InControl (internal and external actions and interactions) and engaging with the stakeholder concerned. The employee who receives the grievance is responsible for obtaining as many of the details outlined in 7.2.1 and emailing the details of the grievance to the Grievance Officer.

7.2 METHODS FOR RECEIVING GRIEVANCES

7.2.1 FACE TO FACE OR VIA TELEPHONE

If a grievance is lodged by phone or face to face it is the responsibility of the employee receiving the grievance to:

- Record details of the grievance including:
 - date, time, who it involved, a summary of the grievance.
- Ask the stakeholder to provide their details:
 - full name and contact details including preferred contact method.
- Advise the stakeholder that the Grievance Officer will be in contact shortly.
- Employee then provides all these details in an email to the Grievance Officer.

7.2.2 ELECTRONIC OR WRITTEN

Employees who receive a grievance via email or the website contact form should forward this immediately to the Grievance Officer who will review and manage the process in accordance with this procedure.

7.3 RECORD

The Grievance Officer is responsible for logging and maintaining an accurate and detailed record of the investigation and interaction with external and internal stakeholders in the INX InControl system.

7.4 ACKNOWLEDGEMENT

Stakeholders will receive a formal acknowledgement of their grievance, a summary and an outline of the process to resolve the grievance including an expected timeline for investigation and response from the allocated Grievance Officer within five (5) business days. This acknowledgement will be made in writing via email to the stakeholders' nominated email address. In a case where an email address is not available, this contact will be made via phone. At this point of contact there may be a requirement for the stakeholder to provide additional information to assist in investigation of the grievance.

7.5 SCREEN

CATEGORY	GRIEVANCE DESCRIPTION	MANAGEMENT APPROACH
Level 1	Where the issue that resulted in the grievance is already being addressed internally and an answer can be provided without escalation.	To be managed and responded to by the Grievance Officer.
Level 2	Grievance categorised as a once off situation, localised, can be resolved at an operational level and unlikely to escalate and impact Pilbara Minerals' reputation.	To be managed by the Grievance Officer. The operational area lead should be notified and involved in the investigation, mediation and response.
Level 3	Repeated, widespread or high-profile grievance that may impact negatively on Pilbara Minerals' business, operations or reputation. It may be a serious breach of compliance or an incident that has had significant impact.	Prioritised with organisation and led by a member of the executive leadership team e.g. the Chief Operating Officer. These level grievances may require notifying the appropriate government regulatory authority.

7.6 INVESTIGATE AND ACT

In line with the categories above, a Level 1 grievance will be managed and responded to directly by the Grievance Officer.

The investigation of a Level 2 grievance will be led by the Grievance Officer, activities could include document gathering, site visits, interviews internally and engagement with stakeholders. As well as developing a plan on how the grievance will be resolved. A Level 3 grievance will be led at the executive leadership level of the organisation and may involve engagement with regulatory authorities dependent on the nature of the grievance.

All investigative findings will be used to assess the grievance. The Grievance Officer is responsible for ensuring all information is documented in INX InControl system. As well as assigning and monitoring actions to ensure all actions are completed within the nominated timeframe. Where needed, the Grievance Officer may escalate the grievance to the Executive Leadership team. Once all actions are completed and the

Grievance Officer is satisfied the grievance has been resolved, then the Grievance Officer will develop a response and respond to the stakeholder via their preferred contact method. Where a Stakeholder Relationship Manager is involved, the Grievance Officer should discuss with the Stakeholder Relationship Manager who is the best person to provide the response. Responses should be provided by phone and then followed up in writing (where possible).

7.7 FOLLOW UP AND CLOSE OUT

Within two weeks of the formal response, the Grievance Officer or stakeholder relationship manager will contact the stakeholder to understand whether the stakeholder is still satisfied with the response and the process to which the grievance was resolved. A detailed file note will be created to ensure this feedback is documented internally. If the stakeholder identifies any issues with the process or grievance, then it is the responsibility of the Grievance Officer to ensure these are addressed and resolved and where appropriate changes made to the process to improve it. If needed, the Grievance Officer will continue to engage with the stakeholder until a satisfactory outcome is achieved for both parties.

7.8 APPEAL

In the case that the stakeholder is not satisfied with the resolution and the proposed actions to rectify the grievance, the Grievance Officer will escalate the grievance to the executive leadership team. All documentation will be provided to the executive leadership team for review and the determination of whether further action is required to resolve the grievance. To support Pilbara Minerals' commitment to ensuring all stakeholders' grievances are addressed and resolved, it may at times call on advice and/or mediation from an independent party to ensure parties can reach a satisfactory outcome.

7.9 REPORTING AND MONITORING

Stakeholder grievances will be reported quarterly to the Sustainability Working Group which will review grievances to understand any trends and ensure grievances are being assessed and addressed appropriately in line with this procedure.

To support Pilbara Minerals' commitment to transparency, grievances will be publicly disclosed, as aggregated data to maintain stakeholder confidentiality, in Pilbara Minerals' Annual Sustainability Report.

7.10 INFORMATION AND DOCUMENT MANAGEMENT

All information, including meeting notes, and any documents pertaining to the grievance will be stored within INX InControl system to ensure a detailed record is kept, where needed restrictions to access internally will be implemented to maintain stakeholder confidentiality.

7.11 REVIEW

This procedure will be reviewed by the Company annually.

7.12 REFERENCES

The UN Guiding Principles on Business and Human Rights and conflict-affected areas: state obligations and business responsibilities.

8. OTHER AVENUES

Stakeholders can also lodge reports of misconduct via the Pilbara Minerals' Whistleblower Policy located here pilbaraminerals.com.au/site/About-Us/corporate-governance/corporate-governance-policies on the Company's website.