

Document Title: Stakeholder Grievance Mechanism

Document Number: ZRR-SGM-

Project: Rogozna Project

Document Owner: Community Relations Manager, Zlatna Reka Resources d.o.o.

Confidentiality: Internal Use – Controlled Document

Version No.	Date Issued	Prepared By	Reviewed By	Approved By	Description of Change
1.0	24 Aug 2025	Ben Pearson E&S Manager	Sarai Tautari Community Relations Manager	Sarai Tautari Community Relations Manager	Initial issue

Purpose & Scope

Zlatna Reka Resources d.o.o. is committed to providing an accessible, transparent and culturally appropriate grievance mechanism for all stakeholders, including employees, contractors, suppliers, community members and other affected parties. This mechanism supports the Company's Human Rights Policy, Community Relations & Indigenous Peoples Policy, Code of Conduct, and Environmental Policy.

Guiding Principles

The mechanism is based on international best practice (IFC PS1, ICM, UN Guiding Principles on Business and Human Rights) and will be:

- Legitimate: governed by Strickland Metals (Zlatna Reka Resources) with clear responsibilities.
- Accessible: multiple safe channels, free of charge, local language support.
- Predictable: clear procedure with timelines.
- Equitable – fair process, support for vulnerable groups.
- Transparent: regular updates to complainants.
- Rights-compatible: aligned with the Strickland Metal's [Policy](#) framework including Human Rights and Suppliers Policy.
- Protective: complainants safeguarded from retaliation.
- Continuous learning: analysis of grievances to improve performance.

Access Points

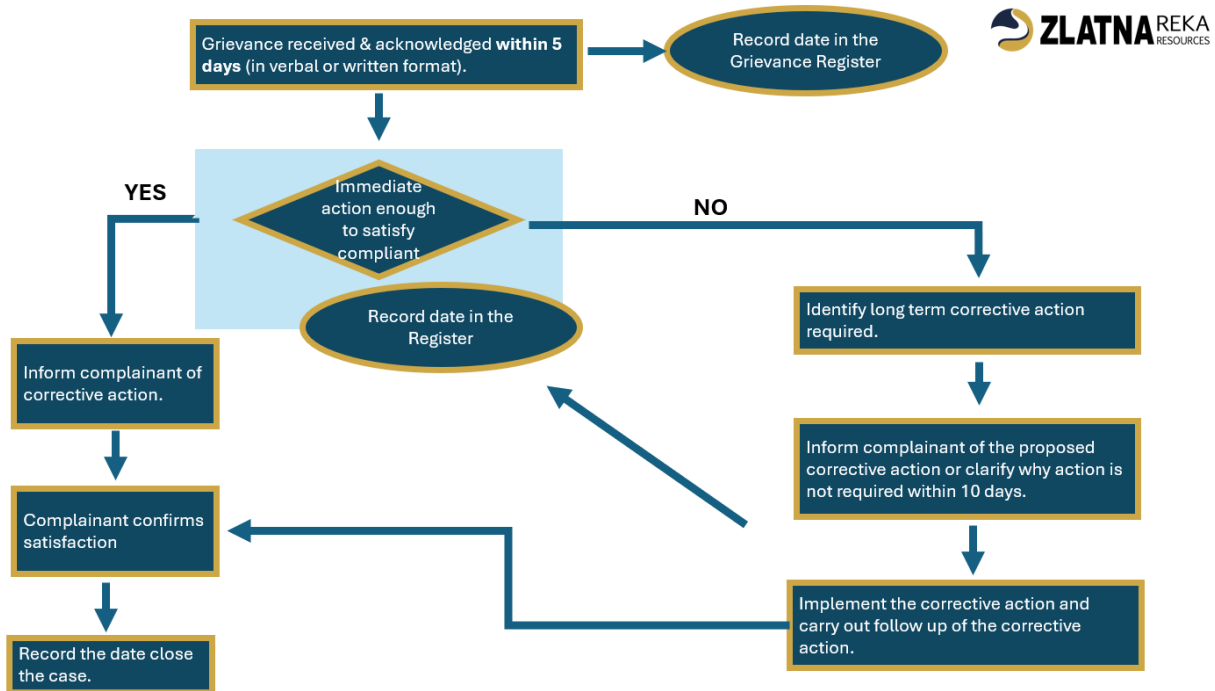
Stakeholders may lodge grievances through:

- Local Community Offices (Novi Pazar), Corporate and Regional Headquarters (Belgrade & Raska).
- Community Relations team or Field Officers (including Geologists, Field Techs, etc)
- Dedicated email address: info@zlatnareka.com
- Postal address: Bulevar Kralja Aleksandra 24, 11167 Belgrade, Serbia
- Telephone hotline: +381 66 8120 875

Process Steps & Timelines

- **Receipt & Acknowledgement**-Within 5 working days.
- **Assessment & Assignment**-Within 10 working days, Senior Community Relations Officer assigns responsibility (with escalation to Community Relations Manager where relevant).

- **Resolution Proposal**-Within 30 working days, proposed resolution shared with complainant.
- **Implementation & Feedback**-Actions implemented; complainant confirms satisfaction.
- **Appeal**-If unresolved, escalated to Country Manager/independent mediation.
- **Closure & Record** – Resolution logged in grievance register.



Special Provisions

- Anonymous complaints will be accepted through all grievance channels. Complainants may choose not to disclose their name or contact details. Anonymous submissions can be made via:
 - A drop box at the community office in Novi Pazar.
 - Postal mail without return address.
 - Telephone hotline without caller identification.
 - Web-based or email submission with 'anonymous' selected as the identification option.

All anonymous grievances will be logged, assessed, and addressed in the same way as identified grievances. Where a response to the complainant is not possible, actions taken and resolutions will be recorded internally in the Grievance Register.

- Non-retaliation guaranteed (aligned with Strickland's/ZRR's Human Rights Policy).
- Sensitive issues (e.g. corruption, discrimination, safety risks) can be referred directly to the Managing Director or Board.

Roles & Responsibilities

- Community Relations Officers and Field Staff: day-to-day management.
- Senior Community Relations Officer/Community Relations Manager: field-level intake and tracking.
- Community Relations Manager/Environment & Permitting Manager: oversight and integration with the Environmental and Social Management System (ESMS).
- Country Manager: escalation point for unresolved cases.
- Board Audit & Risk Committee: annual oversight, trend review.

Monitoring, Reporting & Learning

- Grievance Register is maintained by the Zlatna Reka Community Relations Team and will be updated monthly.
- Quarterly reporting to management and annual disclosure in ESG/Annual Reports.
- Lessons learned integrated into risk management and community investment frameworks.

Communication & Training

- Mechanism explained to communities through meetings, posters, and radio announcements.
- All employees, contractors, and suppliers trained, consistent with Suppliers Policy expectations.