

Orano Canada Inc.

**Orano Mining CSR Procedure for
Managing Complaints/Grievances**

Summary for Stakeholders

August 2020

Approval for Use

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1 Overview

Orano Mining, a business unit of Orano Group, respects international best practices for the extractive industries sector, and as a subsidiary of Orano Group, Orano Canada Inc. (Orano Canada) values transparency and dialogue with stakeholders. Orano Canada provides numerous opportunities for engagement including access to effective mechanisms to resolve grievances. Through the implementation of this process to manage complaints or grievances we wish to reinforce relationships with the stakeholders and communities near our operations and activities that are based on trust and transparency.

It is our aim to resolve problems at the operational level before they lead to legal disputes.

2 Scope

While signatories to northern Saskatchewan Collaboration Agreements have grievance mechanisms already in place, this procedure is intended for any concerns outside of those agreements, or with third parties that are not included in Collaboration Agreements.

Complaints or grievances could include requests for information related to a specific fact or issue, or the request to make remarks or express concerns about an activity of the company. For example, if an individual or organization has a concern with Orano's exploration activity in their area they can enter their concern through this grievance mechanism. This grievance mechanism will be managed by Orano Canada's Corporate Social Responsibility (CSR) team but may include input from other departments of Orano Canada. The process does not cover the management of complaints when they are referred to or dealt with at the judicial level.

3 Criteria

To ensure the effectiveness of the grievance mechanism, Orano will be guided by eight criteria identified in the United Nations Guidelines on Business and Human Rights:

1. **Legitimacy:** build trust with the stakeholder groups for which the mechanism is intended, and be accountable for the fair conduct of grievance processes.
2. **Accessibility:** ensure the mechanism is known to all stakeholder groups for which it is intended, and provide adequate assistance for those who may face particular barriers to access.
3. **Predictability:** provide a clear and known procedure with a time frame for each stage, and clarity on the types of processes and outcomes available and means of monitoring implementation.
4. **Equitability:** ensure aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms.
5. **Transparency:** keep parties to a grievance informed about its progress and provide sufficient information to build trust and respond to public interest.
6. **Rights-compatible:** ensure that outcomes and remedies are in accordance with internationally recognised human rights.

7. **Source of continuous learning:** identify lessons for improving the mechanism and preventing future grievances and harms.
8. **Based on engagement and dialogue:** consult stakeholder groups for which it is intended and focus on dialogue as the means to address and resolve grievances.

4 Process for receiving and processing a complaint/grievance

For the grievance mechanism to be effective, relevant information must be recorded, tracked and managed. Orano Canada will use the Stakeholder Issues and Information Management System (SIIMS) tool to manage the process. This includes details of the complaint, identity of the complainant, company actions requested and information about the resolution. The following predictable and transparent process will be followed:



1. **Identify and acknowledge receipt:** To be heard, a claim must be based on fact and brought forward to Orano through a phone call, email, visit to the office, letter or other means. We will record the information to open a file and give a copy to the complainant. Processing time for receiving the complaint and sending a copy to the complainant is one week.
2. **Evaluate and assign:** A CSR team member will conduct an initial review and assign the file to the most appropriate department to process and resolve/respond. Processing time for evaluation and assigning is three weeks.
3. **Investigate and respond:** The complaint is examined and possible solutions developed and proposed. If the complainant accepts the solution, the file is closed. If the complainant does not accept the solution, other authorities may be asked to participate or other solutions may be proposed. Time to investigate and respond should not exceed one month.
4. **Close the file:** When a solution has been accepted, the CSR representative closes the relevant section of the complaint form and the file in the grievance system. The complainant will be kept informed. Any actions arising from the closing of the file should be complete within one month.

5 Contact information

To file a complaint or grievance, or to get more information, please contact your CSR local representative or email: OC-solutions@orano.group or see our website at: <http://www.oranocanada.com>