

MONNICKENDAM DIAMOND LTD GRIEVANCE MECHANISM
JANUARY 2022

1. SCOPE AND BACKGROUND

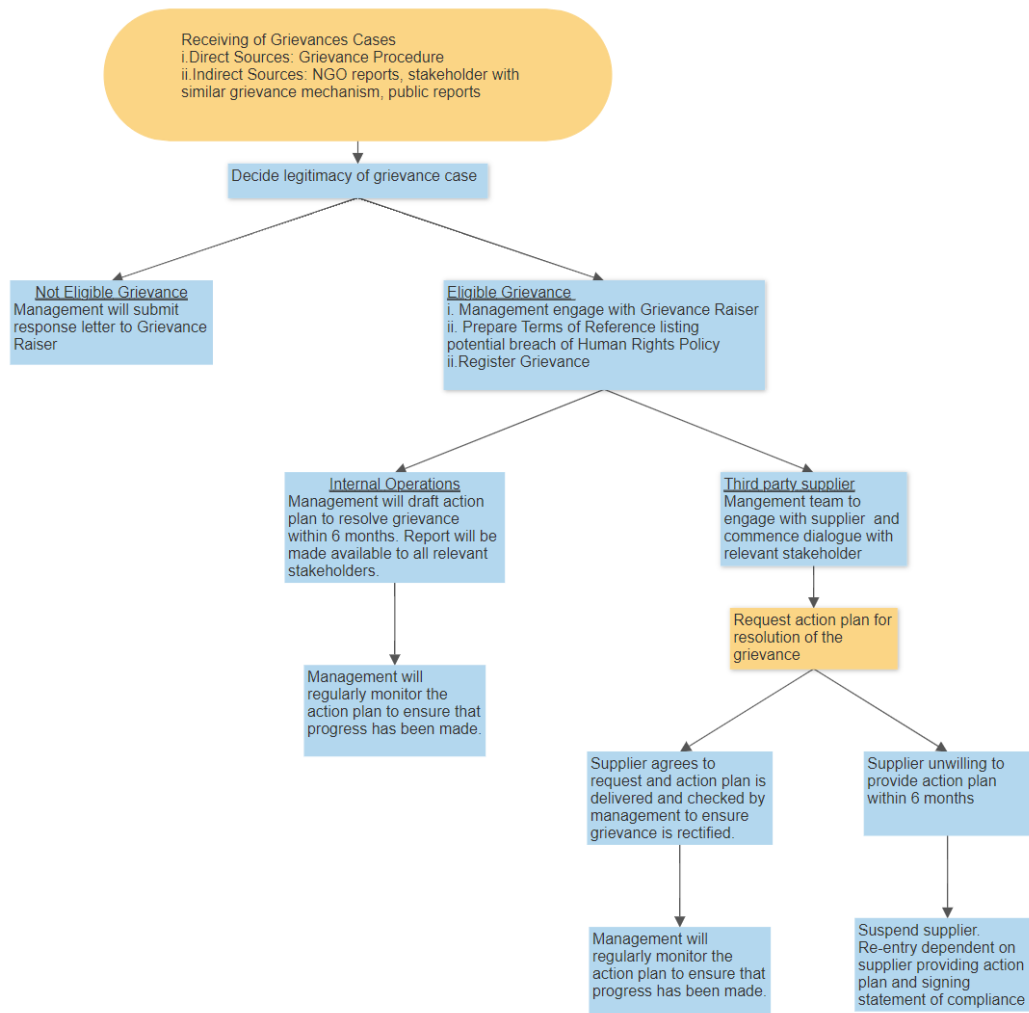
This version of the MONNICKENDAM DIAMONDS LTD Grievance Procedure enables any stakeholder to raise a grievance against any party in MONNICKENDAM DIAMONDS LTD supply chain and / or our own operations. A grievance is a complaint, concern or problem related to the adverse human rights impacts that MONNICKENDAM DIAMONDS LTD has caused, contributed or been linked with which an individual or a group wants MONNICKENDAM DIAMONDS LTD to investigate and address.

MONNICKENDAM's Grievance Procedure shall apply to our own operations and all third-party suppliers within our supply chain.

This procedure covers activities related to the handling of stakeholders' grievances. This includes logging grievances, taking actions to verify claims, rectifying any confirmed issues, reporting the verification results, delivering the response to stakeholders and managing and monitoring any follow-up actions. All grievances logged under the Grievance Procedure shall be dealt with in a timely manner, and all investigations and findings will be reported transparently with full disclosure. To ensure that implementation of our Grievance Procedure is a source of continuous learning, a review is conducted periodically to allow lessons learnt from real case studies to be used to improve the mechanism.

This grievance procedure is open to all stakeholders, though is primarily focused on receiving grievances from internal sources.

2. GRIEVANCE PROCEDURE PROCESS FLOW



3. DUTIES AND RESPONSIBILITIES

a) Management (Arthur Monnickendam, Neil Holness)

- i. Management is responsible for coordinating and performing all tasks necessary for the successful implementation of this updated Grievance Procedure, including:
 - receiving, recording, classifying, and reporting grievances and making recommendations about suspension and / or lifting of suspension(s).
 - engaging with any party who raises a grievance (Grievance Raiser),
 - managing communications, including response letters to Grievance Raisers in the language of the original Grievance.
 - monitoring public sources relating to Monnickendam Diamonds LTD and our suppliers to identify potential grievances.
- ii. Management is responsible for investigating grievances to confirm its validity and collect information to deliberate and address grievance(s). This primarily includes to study and verify the grievance data/information provided by the external party. Management shall develop report(s) outlining the results of its verification and recommended actions, including a timebound action plan.

4. PROCEDURE

4.1 Receiving Grievances Cases

4.1.1. Via the Grievance Procedure

- a) Grievances can be received via any of the following channels:

Via email to: arthur@monnickendam.co.uk

By telephone to : 020 7242 2333

In writing to: Monnickendam Diamonds Ltd, 9 Ely Place, London EC1N 6RY

Attention: Grievance Coordinator

- b) Grievances should include provision of the following information:

- Full Name
- Name of Organisation (if any)
- Address
- Phone No./Fax No./Email Address (at least one contact point)
- Description of the grievance in detail
- Evidence to support the grievance
- Any requests for confidentiality

Contact details are requested to seek further clarification on the grievance. If the Grievance Raiser requests that their identity be kept confidential, Monnickendam Diamonds Ltd will fully respect this request; and will not share the information related to the case outside of the grievance investigation team. In any cases where a grievance raiser requests confidentiality, and where the case is not already in the public domain, the grievance or parts thereof will only be made public through public reporting if the Grievance Raiser agrees in writing. Any party may appoint a third-party to submit their grievances provided that the third-party follows the procedure and has been given clear mandate. Monnickendam Diamonds Ltd also allows for the submission of grievances anonymously.

4.1.2. Via other indirect sources

Noting that many grievances are raised following non-governmental organisation (NGO) investigations, stakeholders (peers or customers) having similar grievance procedures or mechanisms, and monitoring of public reports, the Management may also accept receiving of grievance cases via such indirect source channels.

4.2 Protection of Human Rights Defenders, Whistleblowers, Complainants, and Community Spokespersons

Monnickendam Diamonds Ltd has zero tolerance for threats, intimidation, violence, or reprisals towards any Grievance Raiser or their representative(s).

4.3 Grievance review, investigation, and resolution

Monnickendam Diamonds Ltd is committed to remain in dialogue with Grievance Raisers throughout the process. This Grievance Procedure is intended to be used to address Human rights policy breaches.

4.3.1 Review and register of grievance cases

- a) All potential Human rights policy breaches which come to the attention of the Management via Grievance Procedure will be assessed to determine eligibility to the Grievance Procedure.
- b) Within five working days of receiving the grievance case Management will prepare a grievance dossier and contact the Grievance Raiser. If it is assessed that the grievance is not eligible, the Grievance Unit shall submit a Response Letter to the Grievance Raiser. If the Grievance Unit assesses that the grievance is eligible, the Grievance Unit will formally extend an offer to engage in dialogue with regards to the grievance with the Grievance Raiser. Management shall keep all files and documents that are relevant, including any correspondences managed internally and externally.
- c) Management will prepare a Terms of Reference (TOR) listing each stakeholder concern/ potential breach of the Human Rights policy requiring investigation. Dialogue with the Grievance Raiser will be maintained during this process to maintain accountability for the fair conduct of the grievance procedure.
- d) Management registers eligible grievance(s) in the grievance log. Management shall maintain an up-to-date grievance log detailing all grievances handled in accordance with this procedure.

4.3.2 Verifying grievances

4.3.2.1 For cases related to Monnickendam Diamonds Ltd's own operations:

- a) Management shall complete a verification report providing conclusions on the validity and degree of the grievance, accompanied with recommended time-bound action plans where necessary.
- b) Within three weeks, management will submit a Response Letter to the Grievance Raiser with an update on the case.

4.3.2.2 For cases relating to Monnickendam Diamonds Ltd's third-party suppliers:

- a) Management shall engage directly with the suppliers.
- b) Management may undertake interviews and dialogues with relevant stakeholders; and where necessary collect additional data to substantiate the validity of the grievance.
- c) Where possible and if appropriate, Monnickendam Diamonds Ltd will encourage the supplier to engage directly with the Grievance Raiser and monitor the dialogue between the parties.

4.3.3. Addressing Grievances Through Time-Bound Action Plans

4.3.3.1 For verified cases related to Monnickendam Diamonds Ltd's own operations:

- a) Within six months, management shall prepare a timebound action plan and commence steps/ actions to resolve the grievance and report the result on the Grievance log

2. For verified cases relating to Monnickendam Diamonds Ltd's third-party suppliers:

- a) Within six months of verifying the grievance, the third-party supplier must provide an action plan for the resolution of the grievance. Management will regularly review the time-bound action plans to ensure that progress has been made against the agreed plan.
- b) If the supplier does not demonstrate a willingness to comply or resolve the non-compliance or fails to make progress against the time-bound action plan, management will suspend the supplier.

4.3.3.3. A regular monitoring and evaluation schedule will be developed to check the progress of all Action Plans in relation to the grievances received and will be overseen by the Grievance Unit.

- a) For Monnickendam Diamonds Ltd's own operations, the relevant Operations Manager(s) shall monitor the progress in progressing the action plan(s) related to grievance cases in their respective operations.
- b) For third party suppliers, the monitoring and evaluation schedule will be implemented by the Verification Team for all cases where an action plan is in place.
- c) Once a grievance case involving third party suppliers is resolved, Monnickendam Diamonds Ltd will encourage the third- party supplier and the grievance raiser to continue direct dialogue

4.6 Communications

- a) Monnickendam Diamonds Ltd will report on grievance review and resolution. Unless confidentiality is requested by the Grievance Raiser, the following information will be publicly reported for each grievance: a summary, the date filed, the issue and outcome. Monnickendam Diamonds Ltd will report dates of resolution or if case is under ongoing monitoring.