

**SWISS BETTER GOLD ASSOCIATION
GRIEVANCE MECHANISM****INTRODUCTION**

The Swiss Better Gold Association is a non-profit organisation and a pioneering network of industry, finance and other service providers which supports the creation of responsible gold value chains from mine to market. The main goal of the Swiss Better Gold Association is to provide support to artisanal and small-scale gold mining (ASGM) and to develop effective, sustainable, and responsible supply chains from these producers to its members.

Promoting traceability and ensuring compliance with the Swiss Better Gold sourcing criteria, conformance with the Swiss Better Gold approach is fundamental to us.

The Swiss Better Gold grievance mechanism ensures best practices within the Swiss Better Gold programme and guarantees an effective and timely management of grievances. Incoming grievances will be managed and assessed by the Swiss Better Gold Secretariat and one Board member.

The Swiss Better Gold Association reserves all rights to revise the grievance mechanism according to experience and emerging good practice.

TERMS, DEFINITIONS & RESPONSIBILITIESComplainant

- Concerned stakeholder

Respondent

- Entity / person against whom a grievance is filed

Swiss Better Gold Secretariat

- Works in close collaboration with the Board of Directors and implements strategic and operational decisions of the Swiss Better Gold Association
- Plans and executes the Swiss Better Gold verification programme
- Receives grievances and coordinates the procedures to resolve them

Swiss Better Gold Board of Directors

- Oversees the day-to-day business of the Association in pursuit of its objectives and exercises all powers to this end
- One Board member is involved in the grievance procedures

Swiss Better Gold participating ASGM operation

- ASGM operation that has been accepted to participate in the Swiss Better Gold programme and that finds itself on one of the three steps of the Swiss Better Gold continuous improvement escalator

Swiss Better Gold implementing partner

- Represent Swiss Better Gold on the ground and support participating ASGM operations through technical assistance

Swiss Better Gold independent verifier

- Approved by the Swiss Better Gold Association to carry out verification activities of the participating ASGM operations

Swiss Better Gold Association members

- Members are required to abide by the Swiss Better Gold Association bylaws
- Support the activities of Swiss Better Gold through either purchasing Swiss Better Gold or discretionary monetary and/or in-kind contributions in areas where the Association deems them necessary

PURPOSE OF THE MECHANISM

The purpose of the grievance mechanism is to ensure that:

- The Complainant has an easy, accessible, and straightforward means of formally addressing grievances to the Swiss Better Gold Association which offer prompt actions and speedy resolution.
- The Complainant is confident that his/her grievance is being dealt with effectively and fairly, even if the outcome is not to his/her complete satisfaction.
- Swiss Better Gold considers grievances as a source of continuous learning, conducive to subsequent action to maintain and improve operational quality and responsiveness.

WHO CAN COMPLAIN

Grievances can be made by:

- Swiss Better Gold Association members
- Swiss Better Gold supplying ASGMs and their workers or suppliers
- Third parties, such as non-governmental organisations, retailers, trade unions, etc.

The Swiss Better Gold Association will not disclose the identity of the Complainant. If the Complainant prefers not to mention their identity at all, a code name can be used to facilitate communication.

THE PROCEDURE

Complainants are encouraged to make all possible attempts to resolve the complaint(s) directly with the person/organisation subject to the complaint, giving the Respondent an opportunity to rectify the situation, prior to raising a complaint through the Swiss Better Gold grievance mechanism. However, if not possible, the Complainant can submit a formal complaint to the Swiss Better Gold Association Secretariat.

1. Submission of grievances

How to submit a grievance:

In hard copy: Swiss Better Gold Association, 8B, Chemin des Coulevres, 1295 Tannay, Switzerland

By email to the Swiss Better Gold Association Secretariat:
grievance@sbga.ch

It is important to note that grievance should be submitted in written form and with supporting evidence.

2. Reception of grievance and admissibility check

All grievances will be forwarded to the Swiss Better Gold Association Secretariat who will formally acknowledge their receipt, revise the admissibility, and initiate adequate steps to address these. The Swiss Better Gold grievance mechanism responds to non-compliance with the Swiss Better Gold verification programme or any conduct against the Swiss Better Gold governance and/or policies.

Admissible grievances include:

- Conduct of Swiss Better Gold Association or Initiative in relation to governance and policies
- Status/Conduct of a Swiss Better Gold ASGM operation
- Status/Conduct of Association members related to Swiss Better Gold activities
- Status/Conduct of a Swiss Better Gold independent verifier
- Conduct of a Swiss Better Gold implementing partner

Admissible grievances need to fulfil the following conditions:

- Background, context, and reasons for the grievance
- Within one year of the incident

- Provide supporting evidence which allows the Swiss Better Gold Secretariat to duly address the grievance

Out of scope:

- Private disputes between the Complainant and the Respondent
- Grievances that are filed in order to achieve competitive advantages
- Grievances that do not have a verifiable origin or are not supported by evidence
- Grievances where the incident has happened over one year ago
- Grievances that are not related to Swiss Better Gold activities and/or actors involved in the Swiss Better Gold programme

To all other requests of information or forms of enquiries which do not qualify as grievances according to the above-mentioned admissibility criteria, the Secretariat shall respond to the sender in writing, acknowledging the receipt of the message and providing information or outlining the next steps to address the enquiry.

3. Referral to Respondent

When possible, the Swiss Better Gold Association will seek to resolve grievances through constructive dialogue, enhancing communication between the parties and/or resolution by the Respondent including through remedial or corrective actions.

Where required, resolutions will be monitored by the Swiss Better Gold Association Secretariat in order to assure compliance with agreed timeframes and effective implementation.

4. Further actions (if required)

If the grievance has not been resolved at the dialogue stage, the Complainant can request that their grievance is forwarded to the Swiss Better Gold Board of Directors to determine further actions and responsibilities.

Next steps might include:

- Request for further evidence
- Progress to a formal investigation

5. Formal investigation

If required, a formal investigation is launched, including the following steps:

- The Swiss Better Gold Association Secretariat appoints a grievance panel.
- The panel conducts an investigation (including onsite investigation if necessary).
- The panel produces an investigation report which determines whether the grievance is upheld, and includes clear recommendations for action.

The investigation report and its recommendations will be discussed by the Swiss Better Gold Association Board of Directors.

If the outcome of the discussion is to close the grievance, the Complainant and Respondent will be notified of this decision.

If the outcome of the discussion requires further action, an action plan based on the proposed recommendations will be drafted which will be approved by the Swiss Better Gold Association Board of Directors and shared with the Complainant and Respondent. Failure to comply with the action plan will trigger mitigation measures by the Association and if those do not work, the Association may suspend its relationship with the Respondent.

6. Appeal

If the Complainant is not satisfied with the outcome of the procedure, they can file a formal appeal which leads to a re-assessment by the Swiss Better Gold Association Board of Directors.

Furthermore, members of the Swiss Better Gold Association have the right to appeal a decision taken by the Swiss Better Gold Association Board of Directors.

In these cases, the Board will appoint an independent party to review the facts, the processing of the case and the decided resolution and conclude on the appropriate resolution of the grievance. Such conclusion will be binding for the Association.

Confidentiality and Anti-Trust policies

The Swiss Better Gold Association will keep grievances and their procedures confidential, but reserves the right to publicly report, anonymously and in aggregate, on the grievances received and how they were resolved.

TIMEFRAMES

- Acknowledgement of receipt of a grievance: within 5 working days from date of receipt
- Admissibility check: 15 working days from date of receipt
- Request for additional information: 20 working days from date of receipt
- Re-assessment of admissibility (in case additional information provided): 10 working days from date of receipt of additional information
- Completion of the investigation is dependent on the circumstances

REPORTING

All grievances and their respective investigation procedures will be registered in a Grievances Register.

An annual report will be presented to the Swiss Better Gold Association Board of Directors, listing grievances and the action taken to resolve them.

A summary report will be published by the Swiss Better Gold Association showing grievances statistics, key issues, and resolution as well as key lessons learnt from the process.

COMMUNICATION

The present document will be shared by the Association in all languages used in the regions it is active, both on its website and with the ASGM operations the Association works with.