



# Grievance Redress Mechanism and Review Guideline

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## 1.0 Introduction

### 1.1. Purpose

This document is designed to allow expression of and response to grievances related to AIMS Group of Companies in the implementation of its projects and activities under its Environmental and Social Management System. This Mechanism addresses concerns raised by potentially affected peoples and potentially affected communities or groups, regarding the consequences of the activities carried out by the Company. However, this mechanism is not a substitute for proactive outreach for stakeholders to inform, seek their input, and respond to their suggestions and concerns regarding social and environmental benefits, risks and impacts.

These guidelines are designed to help the Company receive, addresses, and resolves grievances promptly and effectively.

As each jurisdiction will have local practices, opportunities and challenges in redress of a community related case, when it is necessary, a specific country's regulations will be referred for each country where AIMS Group of Companies operates.

### 1.2. Scope

This guideline applies to employees of AIMS Group of Companies and all its subsidiaries regardless of locations and its stakeholders, which covers the necessary aspects as measured by IFC Performance Standard 4.

### 1.3. Normative References

- IFC Performance Standards on Environmental and Social Sustainability
- AIMS Stakeholder Engagement Guidance Handbook
- Other relevant regulatory provisions in which AIMS operates.

### 1.4. Guiding Principles

The mechanism is based on the following principles:

- Provide an accessible and transparent procedure for receiving and responding to grievances.
- The process of addressing grievances shall be impartial and unbiased. Reviews of grievances will be conducted by individuals who have no personal connection to the parties.
- Confidentiality, if requested, is honored and is maintained to a practical extent whenever possible and reasonable.
- Freedom from reprisal from all involved parties.
- Fairness and reasonableness of the remedy and/or transparency.

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## 1.5. Roles and Responsibilities

Role	Responsibilities
ESMS Working Committee	<ul style="list-style-type: none"><li>• Preliminary review and facilitate dialogue with involved parties</li><li>• Discuss and plan appropriate action plan with relevant internal stakeholders</li><li>• Monitor and provide support where needed</li></ul>
Communication & Marketing	<ul style="list-style-type: none"><li>• Develop communication strategies and materials</li></ul>
Legal	<ul style="list-style-type: none"><li>• Ensure compliance of local regulatory of action plan to be taken</li></ul>
Other relevant internal business owner / stakeholder	<ul style="list-style-type: none"><li>• Take charge and plan for appropriate action plan</li></ul>
Grievance raiser	<ul style="list-style-type: none"><li>• Identify issues or incidents relating to AIMS Group of Companies</li><li>• Has the right to appoint representative during discussion</li></ul>

## 1.6. Definition of Terms

Term	Definition
Company	AIMS Group of Companies
Mechanism	Grievance Redress Mechanism
External Stakeholder	Individuals, groups, or entities that are not directly part of the Company but have an interest or stake in its activities, operations, or outcomes.

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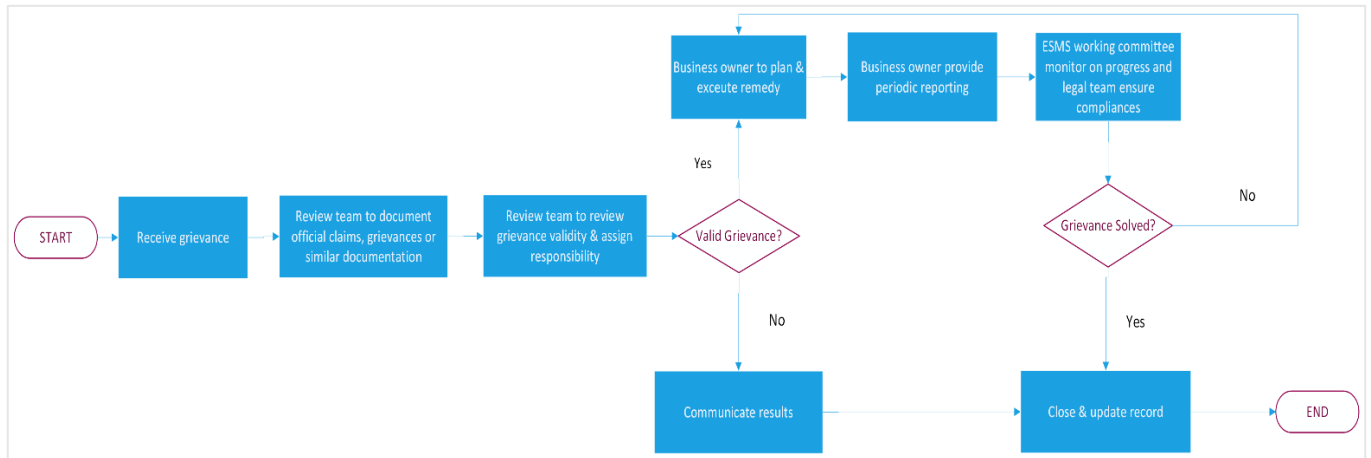
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## 2.0 Grievance Procedure

The following outline the overview of grievance resolution.



### 3.1. Log and Receive Grievance

Grievance can be submitted in writing through email or by post mail using the following details:

**Email:** [grievance@aims.com.my](mailto:grievance@aims.com.my)

**Mailing address:**

Level 18, Menara AIMS,  
Changkat Raja Chulan,  
50200 Kuala Lumpur,  
Malaysia.

Submission of grievance should include the following information:

- Complainant's name and contact information;
- The details of person involved in the complaint;
- The specific operation / project of concern;
- The harm that is or may be resulting from the operation;
- Any other relevant information or documents;
- Any actions taken so far to resolve the problem;
- Proposed solutions; and
- Whether confidentiality is requested (stating reasons).

Failure to include information as above may affect review team's ability to address the issue and the concern may be deemed ineligible for this process. Again, for the grievance to be eligible for review under this process, the grievance must be:

- Connected to the Company's operations and/or involved Company's personnel.

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- If a representative is filling a grievance on behalf of the affected party, a letter of authorization must be presented.
- The date of incident shouldn't be more than 6 months from the date of logging the grievance, but it is advisable to log the grievance as soon as possible.

## 3.2. Grievance Receipt Acknowledgement

Regardless of where the grievance is submitted, all grievances will be recorded, and acknowledgement of receipt will be within 5 working days. All potentially eligible grievances will be received by the review team to assess the eligibility of the grievance.

Grievance Review Team

- Legal Department
- ESMS Committee

## 3.3. Assess and Investigate Grievance

Once the grievance is received, the following shall be performed in a timely manner:

- Contact the person who submitted the grievance and obtain as much information as possible to gain understanding of the grievance.
- Gather view from other stakeholders, including but not limited to witnesses and project managers.
- Determine whether the grievance is eligible. If the grievance is deemed to be eligible, a further investigation and relevant parties will be identified to work on the resolution. If it is deemed to be ineligible, the review team will refer the issue to another party that may be more appropriate to address the issue.
- The grievance will be categorized according to below:

Level of Grievance	Issue Description	Issue Type	Management Approach	Timeline	
				Response	Resolution
Level 1	Grievance where a management-approved responses can be provided immediately	Routine	<ul style="list-style-type: none"> <li>• Report to management</li> <li>• Utilize approved answers to handle grievances</li> </ul>	5 working days	
Level 2	One time situation, that will not impact the project's reputation	Routine	<ul style="list-style-type: none"> <li>• Formulate response plan for approval</li> </ul>	5 working days	Varies according to agreement with
Level 3	Repeated or high-profile grievances that may result in a negative impact on the	Potentially Significant	<ul style="list-style-type: none"> <li>• Urgent escalation to management to define new solutions</li> </ul>		

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Level of Grievance	Issue Description	Issue Type	Management Approach	Timeline	
				Response	Resolution
	Company's project / reputation. It indicates a gap in a management plan or procedure.				complaint

### 3.4. Grievance Resolution and Closing

- i. All grievances will be addressed individually, following a case-by-case approach. For grievances categorized under Level 2 and Level 3, a joint discussion involving both the complainant and the affected parties (grievance committee) will be conducted to ensure accountability and fairness. Following the discussion, a corrective action plan will be formulated.
- ii. Should the complainant remain unsatisfied with the proposed corrective action plan, the grievance will be escalated to senior management or third-party entities for further consultation.
- iii. The Company aims to address grievances in a timely manner depending on the gravity of the case. For cases that are criminal in nature will be dealt directly with local law enforcement authority.
- iv. Once the grievance has been resolved, all parties shall sign off the grievance report / any relevant resolution documents.

### 3.5. Reporting, Monitoring and Corrective Action

- i. A periodic reporting shall be prepared by the relevant business owner. The report shall summarize all the types and status for each remedy. The report shall be approved by the relevant Management according to the existing Discretionary Authority Limits of AIMS.
- ii. A periodic compliance audit will be performed to ensure the operationalization of this policy and/or other relevant policies. Each relevant business owner is responsible to provide all the necessary supporting documents and support the audit process.
- iii. Any (potential) non-compliance activities or areas are required to implement immediate corrective actions. The corrective actions would be determined and agreed by the relevant business owner, Compliance and the relevant Management of AIMS Group of Companies.
- iv. All periodic reporting, and audit in relation to community cases filed by employees regarding illegal or unethical practices shall be subject to a non-disclosure and confidential treatment.

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## APPENDICES

### APPENDIX 1 REVISION HISTORY

Version No.	Description of Change	Revised By	Effective Date	Change Ref. No.
1	Document published	Swit Yee	1 April 2024	ESMS24-01

### APPENDIX 2 FORMS AND TEMPLATE

Not Applicable