GRIEVANCE COLLECTION

From audit programs

From MGP users

Through the MGP's public grievance submission form

From public sources (news articles, reports, blogs, etc.)

GRIEVANCE REVIEW

ANALYST

Initial Assessments
- Summary of grievance information (1-2 pages) including estimated risk tier

TIER 1
HIGH RISK
- Frequent and/or recent
- Clear nexus to high risk activity
- Credible

TIER 2
MEDIUM RISK
- Semi-frequent and/or semi-recent
- Likely nexus to high risk activity
- Credible

TIER 3
LOW RISK
- Infrequent and/or not recent
- Possible nexus to high risk activity
- Somewhat credible

TIER 4
OUT OF SCOPE OR DUPLICATIVE
- Not recent
- No identifiable connection to smelters or refiners
- Not credible or credible but out of scope (e.g. non-OECD risk)

GRIEVANCE ANALYSIS & MITIGATION

Audit Programs

Platform Manager

Investigative Summaries
- Based on grievance assessment, audit programs can request an investigative summary (est. 2 – 5 pages)

AUDIT PROGRAM REVIEW

Investigative Dossiers
- Based on grievance assessment or investigative summary, audit programs can request an investigative dossier (est. 20 pages)

Audit Programs

Industry Review & Mitigation Processes
- Upon completing review of the grievance, relevant audit program(s) request information from the smelter or refiner
- If that response is not sufficient, the audit program(s) request that further steps are taken through the creation of a corrective action plan (CAP)
- The audit program(s) review the CAP and propose further actions if needed
- Once the CAP is complete, the audit program(s) review the CAP results
- Note that the audit program that assesses the grievance will take the lead in communicating with the respondent. Other relevant audit programs will be updated as appropriate in accordance with the cross-recognition agreement

GRIEVANCE CLOSURE

Insufficient action taken

Sufficient action taken

Final Steps
- Audit programs and the Platform Manager review and close Tier 4 grievances on a monthly basis
- The Independent Review Committee (IRC) reviews audit program(s) decision and CAP results

RESOLUTION

Feedback Loop
- Grievances and some associated information are made available to downstream users
- Visible data for each grievance changes depending on user type
- Press releases sent to the Platform Manager are posted publicly on the MGP upon request
- Aggregated results of the MGP grievance process are shared publicly on the MGP as key performance indicators (KPIs)