



LANFORCE ENERGY STAKEHOLDER GRIEVANCE HANDLING POLICY

Table of Contents

- PURPOSE..... 2
- INTRODUCTION..... 2
- SCOPE..... 2
- GRIEVANCE REPORTING CHANNELS 3
 - Telephone..... 3
 - Email..... 3
 - Face to face..... 3
- ROLES AND RESPONSIBILITIES..... 4
- GRIEVANCE MECHANISM PROCESS 4
 - Receive Grievance..... 5
 - In Person/ over the phone..... 5
 - Electronic..... 5
 - Record..... 5
 - Screen..... 5
 - Acknowledge..... 6
 - Investigate 6
 - Act..... 6
 - Follow up and close out..... 6
- APPEAL 7
- REPORTING..... 7
- STORING OF GRIEVANCES 7

PURPOSE

Lanforce (together with its subsidiaries, Stakeholders and Partners) is committed to conducting business in accordance with all applicable laws, rules and regulations and to the highest ethical standards, and this commitment is embodied in our Code of Ethics.

The purpose of this Stakeholder Grievance Policy is to reiterate Lanforce (together with its subsidiaries, Stakeholders and Partners) commitment to full compliance by the Company, its subsidiaries and affiliates, and its officers, directors, employees and agents with any Stakeholder Grievance laws that may be applicable within the countries we operate.

Compliance with the policies and procedures set forth in this Policy is mandatory. Violations will result in disciplinary action, which may include termination of employment. Violation of this Policy also can lead to civil and criminal penalties, including fines or imprisonment for the individuals involved. The individuals and entities to whom this Policy applies must therefore familiarise themselves with the Policy, seek guidance where they have any questions about the Policy, and report any suspected violations of this Policy within 48 hours to Lanforce Ethics Alert at SMS: +263788259728 or E-mail: ethics@lanforce.co.zw

INTRODUCTION

The purpose of this document is to formalise the management of grievances from Lanforce Energy's stakeholders to minimise the social risks to the business. The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

SCOPE

The grievance mechanism procedure applies to all external stakeholders of our operations and exploration activities. This procedure does not cover grievances raised by internal stakeholders, such as employees, who are to refer to Lanforce Energy's internal grievance procedures that can be found in the HR Department.

Specific and localised grievance mechanisms may need to be put in place for future development projects, which take into account local language and customs.

Term	Definition
Grievance	An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the company in a formal manner
Grievance Mechanism	A formalised way to accept, assess, and resolve community complaints concerning the performance or behaviour of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts.
Internal Stakeholders	Groups or individuals within a business who work directly within the business, such as employees and contractors.
External Stakeholders	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community, NGOs and the government.

GRIEVANCE REPORTING CHANNELS

Lanforce Energy will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external stakeholders to vocalise their grievances formally include:

Telephone

Stakeholders can call Lanforce Energy's head office on +263788259728 and request to speak to a **Risk Officer**.

Email

Grievances can be sent to ethics@lanforce.co.zw.

Face to face

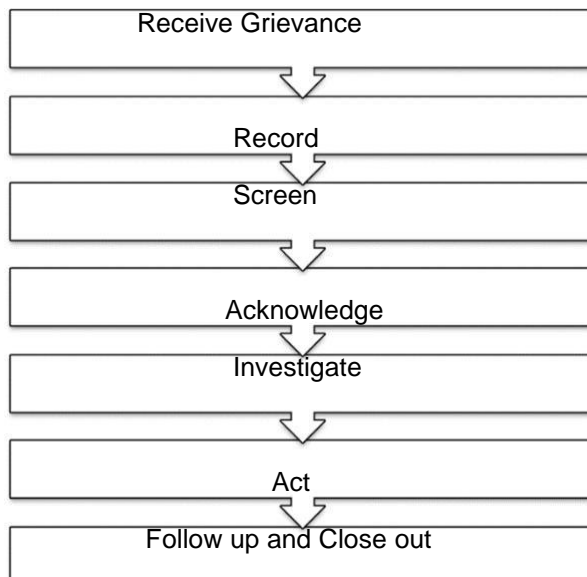
Stakeholders can voice their grievance to any Lanforce Energy employee who will then escalate using the correct process.

ROLES AND RESPONSIBILITIES

Role/ Position Title	Responsibility
Grievance Owner	Employee investigating the grievance and liaising with the external stakeholder/s. Developing resolutions and actions to rectify any issues. Follow up and track progress of grievance. Document any interactions with external stakeholders.
Stakeholder Contact Officer	Receive grievances and assign a grievance owner. Makes sure the grievance mechanism procedure is being adhered to and followed correctly. Maintains grievance register and monitor any correspondence. Monitor grievances/trends over time and report findings to the Audit, Risk and Compliance Committee . Raise internal awareness of the grievance mechanism among employees and contractors.
Employees	Receive grievances in person. Report grievance to the Risk Officer by lodging the Grievance Lodgment Form. May provide information and assistance in developing a response and close out of a grievance.

GRIEVANCE MECHANISM PROCESS

The figure below describes the process that will be used to resolve any grievances:



Receive Grievance

In Person/ over the phone

If a grievance is received face to face or over the phone and the stakeholder wishes to address the grievance formally, it is the responsibility of the employee who receives the grievance to complete a Grievance Lodgement/ Notice Form. Once the form is completed the employee will then pass the form on to the stakeholder contact officer for processing.

Electronic

The **Risk officer** receives all grievances that come through via email or Lanforce Energy's website. The **Risk officer** will review the grievance form and process the grievance in accordance to this procedure.

Record

All formal grievances will be logged in the External Grievance Register and Grievance Lodgement/ Notice Forms will be saved in Lanforce Energy's **database** for record of correspondence.

Screen

The **Risk officer** is responsible for assigning a grievance owner to liaise with the external stakeholder/s and work on a resolution. Grievances will be screened depending the level of severity in order to determine who the grievance owner will be and how the grievance is approached. See below table categorising the different levels:

Category	Description	Grievance Owner
Level 1	When an answer can be provided Immediately and/or Lanforce Energy are already working on a resolution. (Only formal grievances to be lodged in the External Grievance Register)	Risk Officer
Level 2	One off grievance that will not affect the reputation of Lanforce Energy	Supervisor Level or above

Level 3	Repeated, extensive and high profile grievances that may jeopardise the reputation of Lanforce Energy	Executive Level
---------	---	-----------------

Acknowledge

A grievance will be acknowledged, by the grievance owner, within two working days of a grievance being submitted. Communication will be made either verbally or in written form (stakeholders will outline their preferred method of contact on the Grievance Lodgement Form)

The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

Investigate

The grievance owner is responsible for investigating the grievance. The investigation may require the grievance owner to make site visits, consult employees, contact external stakeholders and complete other activities. Records of meetings, discussions and activities all need to be recorded during the investigation. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

Act

Following the investigation, the grievance owner will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The grievance owner is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the grievance owner feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

Follow up and close out

The grievance owner will make contact with the external stakeholder/s not more than three weeks after the grievance is resolved. When contacting the external stakeholder, the grievance owner will verify that the

outcome was satisfied and also gather any feedback on the grievance process. Minutes of the meeting will be recorded and saved in Lanforce Energy's **database**.

If required, the grievance owner may need to follow up with the external stakeholder on numerous occasions to confirm all parties are satisfied.

APPEAL

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the grievance owner needs to escalate the matter to the executive management team. The executive team will review the grievance and all documentation gathered throughout the investigation and determine whether further actions are required to resolve the grievance. Lanforce Energy is fully committed to resolving an external stakeholder's grievance so if Lanforce Energy is unable to resolve a complaint or a stakeholder is unhappy with the outcome, Lanforce Energy may seek advice from other independent parties.

REPORTING

The **Audit, Risk and Compliance Committee committee** will receive quarterly updates on stakeholder grievances. Information outlining the number of grievances, time to resolution and outcomes of grievances will be communicated. Grievances will also be reported in Lanforce Energy's **annual Report** available publicly. Lanforce Energy will evaluate and update the Grievance Mechanism procedure every two years (or when required) to continually improve its stakeholder engagement.

STORING OF GRIEVANCES

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed in Lanforce Energy's **database** to ensure privacy and confidentiality is maintained for all parties involved.