



# Chevron Myanmar Grievance Mechanism Procedure

Policy, Government and Public Affairs

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# **1 Introduction**

## **1.1 Overview**

The purpose of this document is to define the procedure for managing stakeholder concerns and complaints (referred to as “grievances”) in a planned, timely, and respectful manner.

This grievance mechanism helps Chevron Myanmar fulfill the requirements of:

- Environmental, Social and Health Impact Assessment (ESHIA) process
- Operational Excellence Management System (OEMS) Element 10: Stakeholder Engagement
- OEMS Element 13: Issues Management / Legislative and Regulatory Advocacy
- Human Rights Policy 520

This grievance mechanism also ensures Chevron Myanmar alignment with international best practices in stakeholder engagement.

A management process to effectively and proactively manage a community’s feedback, grievances or concerns is frequently used to allow communities a chance to have two-way dialogue with a company about its operations. A grievance mechanism can enhance outcomes by giving people satisfaction that their voices are being heard and that their issue was subject to formal consideration within the company.

This grievance mechanism does not replace existing Myanmar legal processes, or Chevron Myanmar administrative processes already in use. In addition, this grievance mechanism does not impede access to other judicial or administrative remedies that might be available under domestic law or through existing arbitration procedures, or substitute for feedback mechanisms provided through collective agreements.

## **1.2 Stakeholders**

### **1.2.1 Internal Stakeholders**

This document is intended to be used by Chevron Myanmar PGPA; with support from the Myanmar Country Manager. All Chevron Myanmar staff members and contractors that interact with external stakeholders should be made familiar with the grievance mechanism on an annual basis. The process requires the support of senior management who should ensure satisfactory performance.

### **1.2.2 External Stakeholders**

Chevron Myanmar needs to be ready to coordinate incoming grievances with a variety of external stakeholders including the local government, contractors or other community members, wherever operations might impact people.

## **2 Objectives and Scope**

### **2.1 Objectives**

The objectives of the grievance mechanism are to:

- Provide accessible avenues for all external stakeholders to contact Chevron Myanmar;
- Provide a mechanism for stakeholder concerns to be addressed effectively, in a timely manner and by the most appropriate department;
- Identify and monitor stakeholder concerns to support effective stakeholder and risk management;
- Enhance Chevron Myanmar's reputation as a transparent company and a leader in Corporate Social Responsibility in Myanmar; and,
- Meet requirements of international best practice.

### **2.2 Scope**

The grievance mechanism will manage grievances from external stakeholders, in Chevron's Block A5 "Project Area of Interest" which is defined as the townships of Thandwe and Gwa in Rakhine State, where Chevron Myanmar operations might have an impact. It applies to all grievances that arise as a consequence of any Chevron Myanmar activity. This Process is designed to provide a system for managing grievance from the general public, and does not replace Myanmar legal processes, existing employee grievance systems, normal business-to-business dialogue, or other management procedures already in place.

There are no restrictions on the type of issue a stakeholder can raise under this procedure. However, when a complaint is received that would be more appropriately handled under a separate company process established for that purpose (such as employment or business integrity related issues), it will be re-directed so as to prevent parallel processes being followed. All complaints received under this procedure shall be tracked until close out, regardless of the process under which they are handled.

Company reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified, and therefore un-actionable dissatisfaction with the company, is otherwise malicious in nature, or concerns a matter for which the company has no formal responsibility (for example, a matter that the government controls).

### **2.3 Confidentiality**

The personal details of Complainants should only be made available to those involved in the resolution of the grievance in question, and PGPA and other groups must follow policies related to protecting personal data when handling the grievance.

Chevron Myanmar will accept, log, and seek to address grievances contained in anonymous grievance forms, but, due to the anonymous source of the grievance, will not be able to respond directly to the Complainant.

## 3 Grievance Mechanism Process

### 3.1 Administration

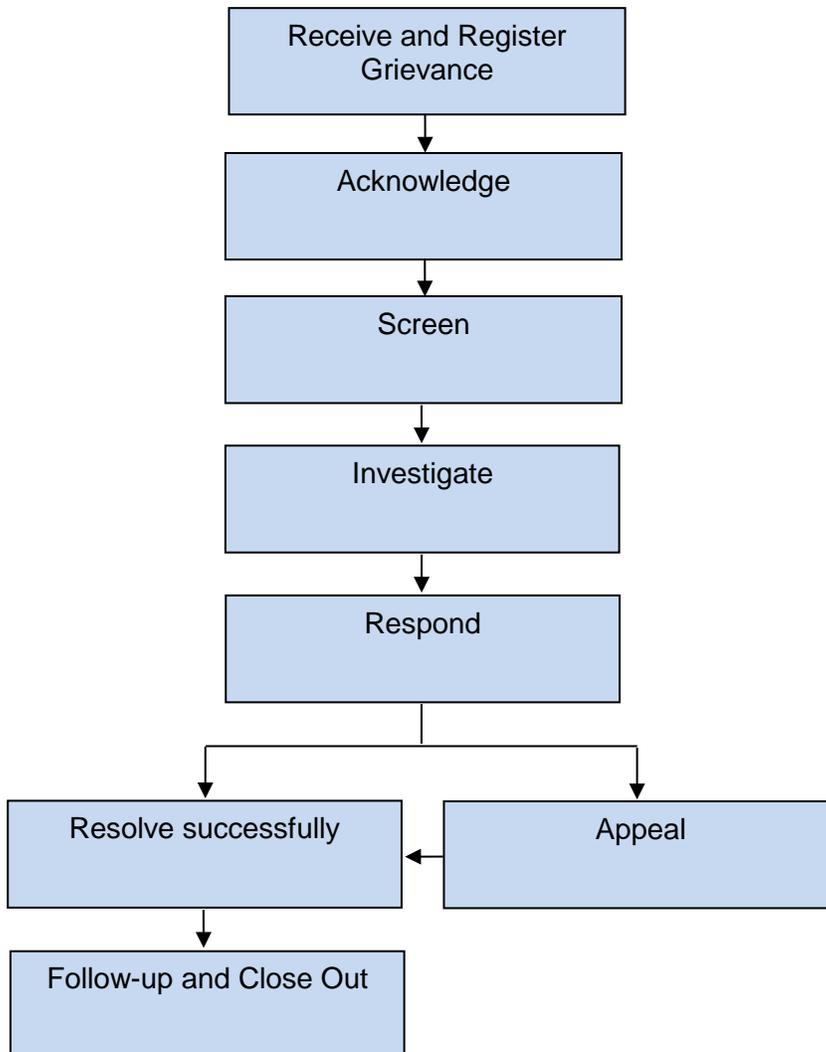
PGPA will administer the grievance mechanism by providing resources to handle correspondence, coordinate internal resolutions, manage a log, and report (both internally and externally). PGPA will need to liaise with, support, and work with other work groups within Chevron Myanmar in order to be able to formulate a solution and response.

The approval process for external correspondence and reporting will be important to ensure that communication is consistent with the *Chevron Way*, Chevron Myanmar's strategies, and approved key messages. This approval process is detailed later in the plan.

### 3.2 Grievance Mechanism Process

The key tasks in implementing the grievance mechanism are summarized in Figure 1 and described below.

**Figure 1: Grievance Mechanism Process**



### 3.2.1 Receive and Register Grievance

#### 3.2.1.1 Methods for Receiving Grievances

Stakeholders can submit grievances through a number of methods, including:

- In Person:
  - To Chevron Grievance Officer or other Chevron Representative
  - Note: As Chevron Myanmar will not always be present in the field to receive grievances, then community members may also submit grievances to Chevron via: MOGE officials; Local Government / Village Administrators; and Fisheries Liaison Officer (during seismic campaign). The Chevron Grievance Officer will collect grievances informally through these stakeholders, however, it will be important for the GO to assess whether grievances are being accurately captured, shared and managed in a timely manner.
- Electronic:
  - Through e-mail address: [blockA5@chevron.com](mailto:blockA5@chevron.com)
- Traditional means of collecting grievance:
  - Dedicated telephone line: 09 78 131 2824
  - Letters: Chevron Myanmar, PO Box 963, Yangon General Post Office, Yangon, 11181, Myanmar
  - Face-to-face: Townhalls and other community meetings (to be determined by the stakeholder engagement plan)

PGPA is responsible to ensure that any personnel and contractors that could potentially receive claims will be knowledgeable about the grievance mechanism process and ready to accept feedback. PGPA will stress that there will be no costs or retribution associated with lodging grievances.

To facilitate tracking, evaluation and response to grievances, standardized information should be collected and recorded on the Grievance Recording Form (Appendix A). As a best practice, practitioners should always carry the Grievance Recording Form and a grievance mechanism brochure or contact information, if available, when they conduct field visits or community meetings.

#### 3.2.1.2 Publicizing the Procedure

The grievance mechanism procedure will be publicized and communicated in a manner appropriate to the scope and nature of the project, and in a manner appropriate to the audience (i.e. method of delivery, language, etc.). In particular, Chevron Myanmar will publicize and communicate the process to those most likely to use/administer it: local communities, authorities, and contractors. Notification will include:

- A summary of the procedure and how it can/should be used;
- Details of the process, such as who is responsible for receiving and responding to grievances, and any external parties that can receive grievances from communities;
- When stakeholders can expect a response, and
- Safeguards in place to ensure confidentiality.

Chevron Myanmar will communicate this grievance mechanism procedure via brochure and during townhall meetings or engagements with Village Administrators, local

government and community members. A handout / brochure will be provided in Myanmar language with information about the grievance mechanism and contact details.

During the notification process, Chevron Myanmar will solicit feedback on how the procedure could be improved. This information will be taken into consideration when revising this procedure.

#### 3.2.1.3 Registering Grievances

Grievances will be logged in the Grievance Register (Appendix B) within two days of receiving the grievance. A grievance owner will be assigned to each grievance when they are logged. The grievance owner may delegate responsibilities to other staff, but is ultimately responsible for:

- Defining and implementing resolution actions.
- Investigating the grievance.
- Consulting relevant departments or persons within the organization.
- Making sure resolution actions are completed.
- Tracking progress of individual grievances.
- Aggregating and forwarding feedback to Complainants.
- Documenting resolution actions.
- Gaining necessary approvals from, and reporting to, management.

While no response is necessary for anonymous grievances, these will be logged and reported with other grievances to facilitate continuous improvement.

### **3.2.2 Acknowledge Grievance**

The Grievance Officer will formally acknowledge grievance within 5 working days of the submission of the grievance, informing the Complainant that Chevron Myanmar's objective is to respond within 20 working days. Verbal and then written feedback will be provided so that a record of correspondence is retained and recorded.

Acknowledgement should include a summary of the grievance, Chevron Myanmar's approach to responding to the grievance, and an estimated timeframe in which the final response will be issued. If needed, use the acknowledgement opportunity to clarify issues from the grievance or request further information if required.

If grievance is considered out-of-scope for the grievance mechanism (see section 3.2.3 on screening), the Grievance Officer should draft a response for signature by the PGPA Manager explaining why it is out-of-scope and providing any guidance of where to go to get the issue addressed (if possible). In cases where another entity (e.g. the government or a contractor) should be responsible for handling the grievance, Grievance Officer will share the grievance with the appropriate government stakeholder (unless the grievance could result in potential reprisal) and inform the Complainant that the grievance has been shared with the appropriate body/person. If appropriate, Grievance Officer may also provide details to the Complainant on any specific follow up that Chevron Myanmar has completed with the relevant entity to share information for them to address the issue.

### **3.2.3 Screen**

Each grievance will be screened from Level 1 to 3, per definitions provided in Table 1, in order to determine the appropriate response.

“Routine” issues will be managed through the grievance mechanism. “Potentially Significant” grievances will be flagged and managed via the Issues Management/Legislative and Regulatory Advocacy Process.

**Table 1: Grievance Screening Categories**

| Category | Issue Description   | Issue Type              | Management Approach   |
|----------|---|-------------------------|---|
| Level 1  | A grievance for which there is already a Chevron Myanmar management-approved response and an answer can be provided immediately. This level also includes grievances that are out of scope.   | Routine                 | Inform PGPA management and then utilize approved answers to handle response.  |
| Level 2  | Grievances characterized by being a one-time situation, local in nature, and that will not impact Chevron Myanmar’s reputation.   |                         | Define grievance response plan and draft a response for PGPA and other management approval.                                 |
| Level 3  | Repeated, widespread or high-profile grievances that may result in a negative impact on Chevron’s business activities and/or reputation. Level 3 grievances indicate a gap in a management plan or procedure, or that a serious breach in Chevron Myanmar policies or Myanmar law has occurred. | Potentially significant | Prioritize through Issues Management/Legislative and Regulatory Advocacy Process and define appropriate management strategy |

### 3.2.4 Investigate

The Grievance Owner will lead grievance investigation, when needed, which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities. Investigation findings will be used to document decision making process and inform proposed remedy.

### 3.2.5 Respond

Before responding to the Complainant, the Grievance Owner will complete the following:

- Level 1 Grievances - Grievance Owner informs PGPA management and then utilizes recently approved answers to respond to Complainant. Response requires approval of PGPA Manager.
- Level 2 Grievances - Grievance Owner defines plan for grievance response and crafts the draft response for PGPA and Country Manager approval.
- Level 3 Grievances – Grievance Owner works directly with PGPA and other management to define plan for grievance response, then drafts response. For grievances relating to physical or economic displacement and resettlement, or damage claims or negotiations, PGPA and Major Capital Projects will develop a strategy in coordination with Negotiations and Legal. Sufficient evidence will be

collected, captured or verified to support damage or monetary claims. In the case of particularly sensitive grievances – particularly grievances related to physical and/or economic displacement and resettlement – Chevron Myanmar may engage an external organization or third party (e.g. a NGO) in a joint investigation, or allow for the participation of a Community Action Council, or other community structure, in order to demonstrate transparency in the process being taken to resolve the issue. Level 3 grievance responses need to be approved by Country Manager.

Once the response has been approved, Grievance Officer will take final, approved language and respond formally using appropriate communication vehicle in the appropriate languages.

The Grievance Owner is responsible for ensuring all information on the grievance is documented and actions tracked in the Grievance Register.

### **3.2.6 Follow-up and Close Out**

If the Complainant accepts the proposed resolution, the agreed actions are implemented.

The Complaint Owner is responsible for assigning action parties, actions, and deadlines to implement the resolution. These are recorded in the Grievance Register with any supporting documentation. If necessary, monitoring arrangements will be put in place to verify implementation.

After resolution, the grievance should be formally closed out. This includes requesting the Complainant sign a completion form to document satisfaction with resolution actions, documenting actions taken, and closing out in the Grievance Register.

### **3.2.7 Appeal**

In cases where a Complainant is unsatisfied with and/or unwilling to accept the resolution actions proposed, the grievance may be escalated to the Appeals Committee for review and final decision.

The Appeals Committee reviews the case and determines if further reasonable action is possible. If options for reasonable, justified corrective actions are exhausted, a written notice should be provided to the Claimant notifying him or her that their grievance is being closed. Supporting documentation of resolution actions and the Grievance Mechanism Procedure may be sent with the notice. Examples include paid invoices, written agreements, photographs, emails, etc. If an address is not available, the Complainant may be notified by telephone or in person.

## **4 Roles and Responsibilities**

Roles and responsibilities of key staff involved in operation and management of grievance mechanisms are shown in Table 2.

**Table 2: Roles and Responsibilities**

| Title/Role   | Responsibilities   |
|--|--|
| <b>Grievance Owner</b>   | <ul style="list-style-type: none"> <li>• Investigating the grievance.</li> <li>• Consulting relevant departments or persons within the organization.</li> <li>• Defining and implementing resolution actions.</li> <li>• Gaining necessary approvals from, and reporting to, management.</li> <li>• Making sure resolution actions are completed.</li> <li>• Tracking progress of individual grievances.</li> <li>• Aggregating and forwarding feedback to Complainants.</li> <li>• Documenting resolution actions.</li> </ul>   |
| <b>Grievance Officer (Grievance Officer)</b>   | <ul style="list-style-type: none"> <li>• Overall responsibility for stewardship of the grievance mechanism process and documentation, from receipt to closeout.</li> <li>• Provide guidance and support to operations.</li> <li>• Collect and receive grievances: (1) in person at community meetings, site visits, etc.; (2) by phone or email from MCP team, contractor, and key stakeholders on site in Area of Interest (e.g. MOGE, Village Administrators, Fisheries Liaison Officer, etc)</li> <li>• Assign Grievance Officer (if appropriate to assign to an SME or different Chevron representative)</li> <li>• Manage database of grievances, responses, and stakeholder information</li> <li>• Track, analyze, and report grievance updates to PGPA management.</li> <li>• Look for trends in grievances and work with PGPA management to manage strategically.</li> </ul> |
| <b>Country Manager</b>   | <ul style="list-style-type: none"> <li>• Review and endorse grievance resolution, as appropriate</li> <li>• Provide oversight of grievance process and monitor consistency of resolutions and responses</li> <li>• Review grievance reports with PGPA on a regular basis and escalate as appropriate</li> <li>• Ensure Grievance Officer has appropriate level of training to handle role and responsibilities.</li> <li>• Support process in a timely fashion through review, leadership, and approvals.</li> <li>• Ensure external and internal reporting is appropriate.</li> <li>• Support appeal process.</li> </ul>  |
| <b>Project Team</b>  | <ul style="list-style-type: none"> <li>• Accept grievances in person at community meetings, site visits, etc.</li> <li>• Log grievances gathered in person or at physical locations</li> <li>• Refer received grievances within 24 hours to the Grievance Officer (PGPA)</li> <li>• Ensure project staff, contractors, and other resources are knowledgeable about the process</li> <li>• Ensure project feedback is integrated into grievance mechanism</li> <li>• Ensure grievance is dealt with at appropriate levels</li> </ul>  |
| <b>Subject Matter Experts (includes Asia South / Asia Pacific / Corporate resources)</b> | <ul style="list-style-type: none"> <li>• Engaged at the discretion of PGPA, as required by the nature of the grievance</li> <li>• Provide information and assistance in order to plan for response, respond and close the grievance</li> <li>• Provide peer review of grievance process</li> </ul>   |

## 5 Monitoring and Evaluation

As part of the OE10 annual process for continuous improvement, Chevron Myanmar PGPA will review process qualitative and quantitative indicators internally with management and externally with the appropriate community stakeholder groups. Additionally, PGPA will conduct a quarterly review on quantitative indicators and report

to a monthly management team meeting. Quarterly and annual indicators are provided in Table 3.

**Table 3: Review Period and Indicators to Review**

|   | Objective   | Suggested Indicators   |
|---|---|--|
| Quarterly review of quantitative indicators | <ul style="list-style-type: none"> <li>Assess whether grievances are correctly classified</li> <li>Identify trends in grievances</li> <li>Ensure grievances are being addressed</li> </ul>                      | <ul style="list-style-type: none"> <li>Total number of grievances received by grievance level and type</li> <li>Number of open grievances by grievance level and type</li> <li>Timeframes for closure by grievance level and type</li> <li>Repeat of grievance from the same stakeholder</li> <li>Repeat grievance from several stakeholders (i.e. trends in grievance)</li> </ul>   |
| Annual review of grievance procedure        | <ul style="list-style-type: none"> <li>Assess compliance with the grievance process</li> <li>Evaluate progress in achieving objectives</li> <li>Identify improvements and update grievance procedure</li> </ul> | <ul style="list-style-type: none"> <li>Compliance with process</li> <li>Completeness of grievance log</li> <li>Total number of grievances received by grievance level and type</li> <li>Number of open grievances by grievance level and type</li> <li>Timeframes for closure by grievance level and type</li> <li>Repeat of grievance from the same stakeholder</li> <li>Repeat grievance from several stakeholders (i.e. trends in grievance)</li> <li>Qualitative assessment of stakeholder awareness of the grievance mechanism through stakeholder engagement process</li> <li>Qualitative assessment of trust in grievance mechanism through stakeholder engagement</li> </ul> |

## 6 Annual Communication and Work Plan

An annual work plan for grievance mechanism related communication and reporting will be developed pending outcomes from the seismic program.

## **Appendix A: Grievance Recording Form**

(To be provided in Myanmar language)

# Chevron Myanmar Grievance Recording Form

Chevron would like to know your concerns related to our work and that of our contractors. You can submit your concern anonymously. However, the more information provided, including contact details, the easier we will be able to follow-up. This process is at no cost to you. Participation in this process does not affect your right to take actions under Myanmar law.

|  |  |           |
|--|--|-----------|
| Date/Time/<br>Location   | Date (dd-mm-yyyy):<br><br>Time (24 hr):  | Location: |
| Name   | <input type="checkbox"/> You can use my name but do not use it in public<br><input type="checkbox"/> You can use my name when talking about this concern in public<br><input type="checkbox"/> I do not want to give my name.  |           |
| Alternative contact:   | <input type="checkbox"/> I would like the following trusted individual to talk with Chevron on my behalf.  |           |
| Method to Contact You:   | <input type="checkbox"/> By mail: Address where you or your trusted contact receive mail:<br><br><input type="checkbox"/> By Telephone:<br><input type="checkbox"/> By E-mail:<br><input type="checkbox"/> I would like to pick up responses at the Chevron [local town] office.<br><input type="checkbox"/> I would like to pick up responses at the [Local organization, if applicable] office |           |
| Location of Residence:   | If we would like to talk with you in person, describe where can you normally be found?   |           |
| Supporting Documents:  | <input type="checkbox"/> Written (email, invoice, title, commitment, contract, etc.) <input type="checkbox"/> Photograph <input type="checkbox"/> Other:<br><input type="checkbox"/> Voice Recording   |           |
| Brief Description:<br>(What happened?<br>Who was involved?<br>Who did it happen to?) | <div style="border: 1px solid black; padding: 5px; display: inline-block;"> <input type="checkbox"/> Compensation Requested           </div>   |           |

|   |  |
|---|--|
| <b>Follow-up:</b><br>(How would you like to see this resolved?) |  |
|---|--|

|                                    |  |
|------------------------------------|--|
| <b>Acknowledgement of Receipt:</b> | <input type="checkbox"/> By checking this box, I acknowledge that my grievance has been received by Chevron and that I am aware of the grievance resolution process. |
|------------------------------------|--|

\_\_\_\_\_

Signature (Claimant)

\_\_\_\_\_

Date (dd-mm-yyyy)

\_\_\_\_\_

Signature (Chevron)

\_\_\_\_\_

Date (dd-mm-yyyy)

| For Official Use Only                                  |  |
|--|--|
| Grievance Involves:                                    |  |
| <input type="checkbox"/> Human Rights                  | <input type="checkbox"/> Property Damage       |
| <input type="checkbox"/> Injury                        | <input type="checkbox"/> Environmental Concern |
| <input type="checkbox"/> Impact to Livelihood / Income | <input type="checkbox"/> Other: _____          |

## Appendix B: Grievance Register



Chevron Myanmar  
GM Register.xlsx

## Appendix C: Definitions

| Term                | Definition  |
|---------------------|---|
| Access Point        | A method for submitting grievances to Chevron   |
| Anonymous Grievance | Grievances where the identity of the complainant is not known to the company.   |
| Community           | A group of people who share a common sense of identify and interact with one another on a sustained basis.  |
| Complaint           | A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as 'concern', 'grievance and 'issue'.   |
| Complainant         | An individual, group or organization who submits a grievance to the company.  |
| Concern             | A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as 'complaint', 'grievance' and 'issue'.  |
| Grievance           | A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as 'concern', 'complaint' and 'issue'.  |
| Grievance Mechanism | A grievance mechanism is a process for receiving, investigating, responding to and closing out complaints or grievances from affected communities in a timely, fair and consistent manner.  |
| Grievance Owner     | The person responsible for ensuring a grievance is resolved, but may bring in others to support the process.  |
| Issue               | A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as 'complaint' and 'grievance'.   |
| Remedy              | Actions taken to resolve a grievance; for example, apologies, restitution, rehabilitation, financial and non-financial compensation and/or punitive sanctions. Same as 'resolution'.  |
| Resolution          | Actions taken to resolve a grievance; for example, apologies, restitution, rehabilitation, financial and non-financial compensation and/or punitive sanctions. Same as 'remedy'   |
| Stakeholder         | Individuals or groups who can affect, or are affected by, or have a legitimate interest in the company's performance. Stakeholders can include, but are not limited to: government officials, communities, NGOs, media, contractors, business organizations and legislative and regulatory authorities. |