



## **TMAC RESOURCES INC.**

### **Community Complaints Procedure**

#### **Purpose**

1. TMAC Resources Inc. (“**TMAC**”) are committed to treating the members of the communities in which we operate with fairness and respect and it is our goal to maintain the trust and confidence of the community.
2. The purpose of this procedure is to:
  - (a) document, investigate and resolve community concerns promptly and effectively;
  - (b) provide members of the community with an effective and efficient means of reporting concerns related to our activities and operations;
  - (c) provide a clear procedure for dealing with concerns;
  - (d) communicate effectively throughout the complaints procedure with a community member reporting a concern; and
  - (e) monitor complaints about our activities.

#### **Scope**

3. The procedure applies to all:
  - (a) jurisdictions in which we carry on business and in all affected communities; affected communities are communities where we carry out operations or that may be impacted by our operations in some way;
  - (b) members of affected communities or anyone acting on their behalf; and
  - (c) complaints related to the impact of TMAC’s activities and operations on members of affected communities.

#### **Responsibilities**

4. Overall authority for this procedure sits with the President and Chief Technology Officer.
5. Operations Managers have primary responsibility to promote the effective implementation and application of this procedure and to:
  - (a) ensure that anyone working for or on behalf of TMAC on any project or activity understands the importance respecting the concerns of affected communities;
  - (b) communicate this procedure to affected communities in their area of operations; communication should be in the local language and appropriate to the social and cultural context of the operating area; and
  - (c) ensure anyone working for or on behalf of TMAC or any member of the affected communities feels able to raise concerns without fear of reprisals.
6. Anyone working for or acting on behalf of TMAC on a project or activity is responsible for reporting any complaints they may receive from members of affected communities to the appropriate individuals.

## **How to Report a Complaint**

### *Reporting Methods*

7. Any member of an affected community may raise a concern by phone, by email, in writing or in person to the following person in the areas noted below:
  - (a) in Ontario – Julia Micks at 416-628-0216 or [julia.micks@tmacresources.com](mailto:julia.micks@tmacresources.com);
  - (b) in Nunavut - Alex Buchan at 867-983-2385 or [alex.buchan@tmacresources.com](mailto:alex.buchan@tmacresources.com)
8. Any member of an affected community that has a complaint but is not comfortable raising the matter personally with a TMAC representative can appoint someone the complainant trusts to raise the concern on the complainant's behalf.

### *Confidentiality*

9. If requested by the complainant, TMAC will, if appropriate, endeavour to keep the complainant's identity confidential. In some cases, the complainant may be asked to keep the complaint confidential.
10. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose the identity of the complainant.

## **How Complaints Are Handled**

11. TMAC representative receiving the complaint shall complete a Community Complaints Report (see Appendix 1) noting: the time and date of complaint; name, address and contact number (if possible) of the complainant; the means of communication; and the nature of the complaint.
13. The complaint will be forwarded to the appropriate TMAC representative depending on the nature and location of the complaint.
14. The President and Chief Technology Officer shall be informed of community concerns of a significant nature by the TMAC representative who became aware of the complaint. Examples of a significant concern can include:
  - (a) allegations of corruption or fraud;
  - (b) violations of local laws;
  - (c) infringement of human rights;
  - (d) damage to property, environmental or cultural resources; and
  - (e) injury to members of the community.
15. TMAC will assign a Complaints Manager who will investigate the concern and communicate with the complainant.
16. An initial assessment will be conducted to determine whether an investigation is appropriate and, if deemed necessary, the scope and form of investigation that should take place.
17. The primary goal of the investigation will be to ascertain the facts underlying the complaint and recommend a course of action, if deemed appropriate.
18. The complainant may be asked to provide more information during the course of an investigation.

19. The Complaints Manager is responsible for recording details of the complaint and the actions taken by the complainant and TMAC in the Community Complaints Report.
20. Where an investigation identifies wrongdoing by TMAC personnel or anyone acting on behalf of TMAC, action will be taken as deemed appropriate by TMAC.

### **Communications with the Complainant**

21. TMAC will acknowledge the receipt of a complaint and will respond to the complainant if deemed appropriate by TMAC.
22. When TMAC has completed its assessment of the complaint, the Complaints Manager will contact the complainant to relay TMAC's assessment. The Complaints Manager will attempt to provide information that is factual, unbiased and, wherever possible, scientifically based, in an effort to address the concerns to the satisfaction of the complainant.
23. In cases where the complainant continues to be dissatisfied, the complainant will be informed of their right to refer the complaint to the attention of the President and Chief Technology Officer.

### **Monitoring and Reviewing**

24. TMAC will maintain a register of complaints received, the results of investigations and the actions taken to address complaints.
25. The register will be reviewed quarterly at the operations level and annually across the organization.

## **Appendix 1 - Community Complaints Report**

Date of complaint:

Time of complaint:

Name of complainant:

Contact number:

Address of complainant:

Type of communication of complaint:

Nature of the complaint: