

# **RSB Grievance mechanism:**

**ATOBA Energy**

## **RSB Auditing Procedure**

May 2025

Confidential | Version 1.0

## 1. Purpose

This document defines the grievance mechanism implemented by the Participating Operator (PO) to ensure fair, transparent, and accountable handling of any disputes or complaints raised by internal staff, external stakeholders, or other concerned parties regarding the PO's performance. This mechanism aligns with the requirements of the RSB Grievance Procedure.

## 2. Scope

This procedure applies to:

- All staff members of the PO
- Contractors, subcontractors, and suppliers
- Local communities
- Civil society organisations
- Any person or organisation impacted by the PO's activities

## 3. Principles

The grievance mechanism is based on the following core principles:

- Fairness: All complaints are addressed impartially and objectively.
- Transparency: Processes and decisions are communicated clearly.
- Accessibility: The system is open to all stakeholders, without discrimination.
- Confidentiality: Information provided by complainants is treated with discretion.
- Accountability: Management is responsible for ensuring the timely and just resolution of grievances.

## 4. Grievance Submission Process

Grievances may be submitted via:

- Email to: [loic@atoba.energy](mailto:loic@atoba.energy) or [contact@atoba.energy](mailto:contact@atoba.energy)
- A written letter to: ATOBA Energy, 2 rue des Macchabées, 69005 Lyon
- In-person submission to: Compliance department / Loïc POURCENOUX & Gauthier BLANGEZ
- Anonymously, using [www.atoba.energy](http://www.atoba.energy) contact form

All grievances must include:

- Description of the grievance
- Name and contact information of the complainant (if not anonymous)
- Date of the incident (if applicable)
- Any relevant supporting documentation

## 5. Grievance Management Procedure

### Step 1: Acknowledgement

- The PO will acknowledge receipt of the grievance within 5 working days.

### Step 2: Assessment and Classification

- The grievance will be reviewed and classified as:
  - Minor (resolved within 10 working days)
  - Major (requires investigation and resolution within 30 working days)

### Step 3: Investigation

- A designated grievance officer will lead the inquiry, involving all relevant parties and maintaining neutrality.

### Step 4: Resolution

- A decision or corrective action will be determined and communicated in writing to the complainant.

### Step 5: Appeal

- If the complainant is not satisfied with the resolution, an appeal can be filed with [appeals committee or senior management], who will review and decide within 15 working days.

## 6. Documentation and Recordkeeping

The PO shall maintain a Grievance Register, including:

- Date of complaint
- Name of complainant (if available)
- Summary of the issue
- Steps taken to investigate and resolve
- Final outcome and date of closure

Records will be kept for a minimum of 5 years, in accordance with RSB requirements.

## 7. Monitoring and Review

- An annual review of the grievance mechanism and grievance register will be conducted.
- Lessons learned and systemic issues identified will be incorporated into the PO's continuous improvement plan.

## 8. Communication and Training

- All staff will receive training on this procedure.
- The grievance mechanism will be made publicly available through company website