



# Andromeda

**Great White Kaolin Project**  
Inquiries, Complaints and  
Feedback Management Procedure

**Andromeda Metals Ltd**  
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## Glossary of Terms

Abbreviation	Meaning
AIM	Andromeda Industrial Minerals Pty Ltd, a wholly owned subsidiary of Andromeda Metals Ltd
Community Engagement Officer	The member of the Company responsible for Community interactions or person acting in that capacity
Company CEO	Andromeda Metals Ltd Chief Executive Officer, and/or Managing Director (as appointed)
Company	Andromeda Industrial Minerals Pty Ltd and Great Southern Kaolin Pty Ltd collectively
Complaint	An approach to the Company from a stakeholder or wider community member relating to an incident or practice that causes concern. Examples may include community concerns about environmental issues like noise or dust or the behaviour of staff or contractors.
Complainant	The person or party who approaches to the Company regarding an incident or practice that causes concern
DEM	Department for Energy and Mining
Dispute	A disagreement or argument. A dispute may result from a complaint that has not been resolved to the satisfaction of the complainant.
EL	Exploration Licence
Feedback	An approach to the Company from a stakeholder or wider community member with information regarding the community, Project or processes either in a positive nature or with a suggestion for improvement. Feedback received by the company is reflected on, learnt from and if applicable a means for improving processes or decision.
General Manager - Operations	The mine site manager or authorised person acting in that capacity
GSK	Great Southern Kaolin Pty Ltd, a wholly owned subsidiary of Andromeda Metals Ltd
ICF	Abbreviation to encompass Inquiry, Complaint and Feedback
Inquiry	An approach to the Company from a stakeholder or wider community member seeking or requesting clarification, information or knowledge in relation to the Project and its activities or protocols
Landowner	The owner of land in the vicinity of the Project
Mining Tenements	The ML and MPLs in relation to the Great White Project
ML	Mining Lease
MPL	Miscellaneous Purposes Licence

<b>Abbreviation</b>	<b>Meaning</b>
Procedure	Inquiries, Complaints and Feedback Management Procedure
Project	Great White Kaolin Project
Public	All persons, whether landowners, residents, local community, tourists or other
Register	Inquiries, Complaints and Feedback Register; ICF Register
Resolution action	Action proposed or taken to resolve an ICF
Responsible Department	The person or department delegated the management of a complaint by the Relevant Company Representative
SA	South Australia
Tenement Holder	The registered holder or holders of the ELs, ML and MPLs
Vexatious	An action or the bringer of an action that is brought without sufficient grounds but rather to cause annoyance to the party against which the action is brought

# 1 Introduction

Andromeda Industrial Minerals Pty Ltd (AIM) and Great Southern Kaolin Pty Ltd (GSK), both wholly owned subsidiaries of Andromeda Metals Ltd (Andromeda) propose to develop the Great White Kaolin Project (the Project), located on the Eyre Peninsula of South Australia (SA) (collectively 'the Company' or 'the Tenement Holder').

The Project includes Mining Lease (ML) 6532 and Miscellaneous Purposes Licences (MPLs) 163 and 164 (collectively 'Mining Tenements'), all granted by the Minister for Energy and Mining on 17 December 2021. The Project also includes four Exploration Licences (ELs 6096, 6202, 6426 and 6588) between Streaky Bay and Poochera on the western Eyre Peninsula (Figure 1).

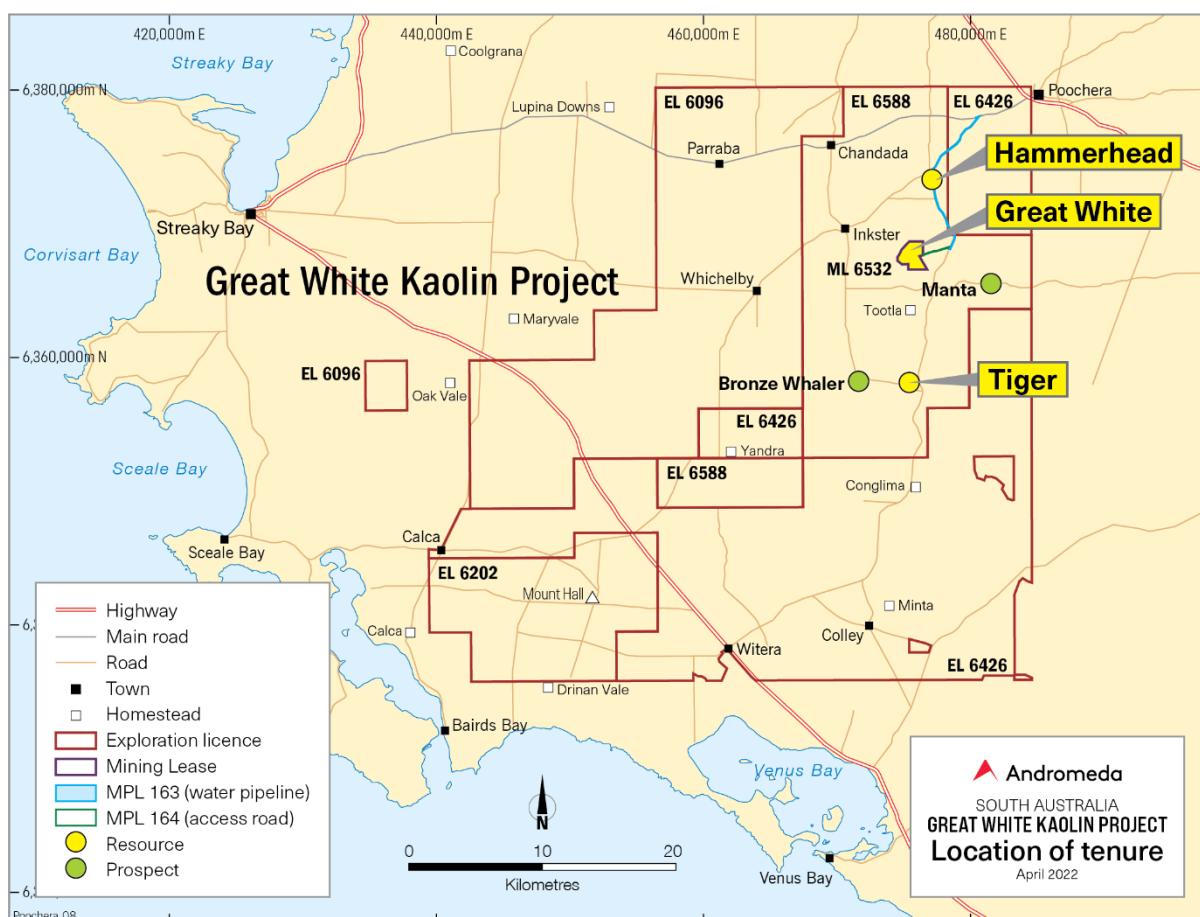


Figure 1. Great White Kaolin Project, location of tenure.

While the development of the Inquiries, Complaints or Feedback Management Procedure (the Procedure) or the corresponding Inquiries, Complaints and Feedback Register (the Register), is not a requirement of the ML or the MPLs, the Company is committed to hearing and resolving any Inquiries, Complaints or Feedback (ICF) its stakeholders, landowners and community members may have.

## **1.1 Purpose**

The Company recognises the importance of an effective mechanism for the management, and where appropriate, remedy of individual and community inquiries, complaints and feedback (ICFs). The purpose of the Procedure is to establish a process for receiving, classifying, responding to, and recording ICFs that may arise as a result of the Company's activities within and associated with the Mining Tenements. The Procedure does not include operations within the Exploration Licences held by the Company. The Procedure aims to ensure staff and contractors respond to ICFs within specified timeframes as part of the Company's commitment to its stakeholders and the community in which it operates.

## **1.2 Principles**

The Company's approach is informed by internationally recognised principles such as those identified by John Ruggie (2008)<sup>1</sup> who has reported on good practice in the resources sector in relation to complaints management.

Those principles are that complaint handling should be:

- Legitimate
- Accessible
- Predictable
- Equitable
- Rights-compatible and
- Transparent

In addition, at an operational level, it should be based on engagement and dialogue, be culturally appropriate, proportional, and foster continuous improvement. As such, the Company will ensure that all inquiries, complaints and feedback received are handled with respect and responded to in a timely manner.

## **1.3 Review**

As part of the Company's commitment to continual improvement, the Procedure will be a live document and reviewed periodically to ensure it continues to be fit for purpose.

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<sup>1</sup> Ruggie, J.: 2008, 'Protect, Respect, Remedy: A Framework for Business and Human Rights', Human Rights Council of the United Nations, A/HRC/8/5.

## 2 Inquiries, Complaints and Feedback Management

The avenues available for individuals and community members to submit an ICF to the Company are:

- Phone call – via the dedicated phone line
- Email – via a dedicated email address for public correspondence
- Via post – to a nominated Australian postal address
- In person – at community events or during scheduled meetings.

The Company will ensure these contact details are accessible on the Andromeda website prior to commencement of construction.

All ICFs will be recorded within the Register.

The definition of an 'Inquiry', 'Complaint' or 'Feedback' is as follows:

<b>Inquiry</b>	An approach to the Company from a stakeholder or community member seeking or requesting clarification, information or knowledge in relation to the Project and its activities or protocols.
<b>Complaint</b>	An approach to the Company from a stakeholder or community member relating to an incident or practice that causes concern. Examples may include community concerns about environmental issues like noise or dust or the behaviour of staff or contractors.
<b>Feedback</b>	An approach to the Company from a stakeholder or community member with information regarding the community, Project or processes either in a positive nature or with a suggestion for improvement. Feedback received by the Company is reflected on, learnt from and if applicable, a means for improving processes or decision.

The high-level steps taken when the Company receives an ICF include:

<b>Step 1</b>	Receive, acknowledge, assess and record
<b>Step 2</b>	Prioritise and delegate
<b>Step 3</b>	Resolution and/or closure

## 2.1 Receive, Acknowledge, Assess and Record

An ICF may be received verbally (via phone call, in person or at a meeting), via email or a letter. On receipt of such, the ICF will be acknowledged by the Community Engagement Officer who will assess the ICF and record it in the Register with the following details:

- the time and date at which the ICF was received
- contact details of the submitter, as provided by the submitter or, if no such details were provided, a note to that effect
- the subject-matter and
- assessment of the type of ICF

Where the ICF has been made verbally, the staff member who receives the ICF will reflect their understanding of the issue back to the submitter to ensure the ICF is well understood. The staff member who receives the ICF will then provide the details of the ICF to the Community Engagement Officer for entry into the Register.

The process for resolving an ICF, where it is unable to be resolved immediately, includes providing the submitter with a record of the interaction in writing for confirmation of the issue and:

- any immediate action taken by the Company in relation to the ICF, e.g., a relocation or change to parts of the operation
- the action taken by the Company in relation to the ICF, including any follow-up contact with the complainant and
- if no action was taken by the Company, the reasons why no action was taken.

Within 24 hours of receipt of the ICF, the Community Engagement Officer will:

- determine whether the ICF relates to the Company's activities and is therefore eligible for the Procedure and
- determine the type of ICF received (inquiry, complaint or feedback)

## 2.2 Prioritise and Delegate

Once the ICF has been determined as in inquiry, complaint or feedback, the ICF will be prioritised according to Table 1. The Company will respond to the ICF in the timeframe specified.

**Table 1: Priority ranking of ICF**

Nature of ICF	Description	Priority Assessment	Delegate and Action
Emergency	Traffic accident, smoke or fire report, public involved injury or potential injury	High	Immediately
Significant Disruption	Disturbance to adjacent landowner activities or lifestyle,	High	Immediately



Significant Environmental Hazard/Incident	Environmental incident causing contamination or hazard.	High	Immediately
Non-urgent Concerns	Noise from equipment	Moderate	Within 48 hours
General inquiries and feedback	All other inquiries and feedback.	Low	If it cannot be resolved at the time of receipt of the ICF, follow up within 72 hours

## 2.2.1 Inquiries and Feedback

Inquiries and feedback are classified as low priority. The Community Engagement Officer will follow up within 72 hours of receiving the inquiry or feedback and will record the date at which the inquiry or feedback has been resolved.

## 2.2.2 Complaints

The process for managing complaints differs from that for inquiries and feedback. Once prioritised, the General Manager - Operations will allocate and approve the appropriate resources to manage or resolve the complaint, and the proposed resolution action and timeframe for completion will be communicated to the submitter of the complaint (the Complainant). The management of the complaint will be delegated to the Responsible Department by the General Manager - Operations.

If the resolution action is ongoing, the Responsible Department will report its progress to the General Manager - Operations and to the Complainant directly or via the Community Engagement Officer on a monthly basis until the complaint is resolved.

If the complaint is not resolved in the agreed manner or timeframe to the satisfaction of the Complainant, the dispute resolution procedure will be followed.

### Dispute resolution

The Company is committed to working directly with the Complainant to resolve any concerns or issues relating to the complaint, noting that there may be times when direct communication and negotiation is not successful, and a solution cannot be reached.

If a complaint cannot be resolved by the General Manager – Operations, the matter will be escalated to the Company CEO for resolution.

If the complaint cannot be resolved by the General Manager – Operations or Company CEO, either party may at any time, by giving 21 days written notice, advise the other party that an independent mediator to assist in resolving the complaint is required. Should this occur, a mediator approved by both the Complainant and the Company, with the cost borne by the Company, will be appointed to assist. However, the Company will not partake in mediation for complaints that the General Manager - Operations considers to be vexatious in nature (refer Unfounded or Vexatious ICFs).

In the unlikely event that direct negotiation, followed by mediation, is not successful, either party may choose to refer the complaint to the relevant Court for a solution.

## **2.3 Resolution and/or Closure**

### **2.3.1 Inquiries and Feedback**

Feedback is considered resolved on written acknowledgement. An inquiry is considered resolved on the supply of information to the submitter relating to the inquiry.

Once the inquiry or feedback is resolved, the Community Engagement Officer will record the resolution details in the Register and the inquiry or feedback will be closed.

### **2.3.2 Complaints**

The Community Engagement Officer will communicate in writing (unless able to be verbally resolved when the complaint was raised) with the Complainant to advise them of:

- the successful completion of the complaint in the manner agreed
- the findings/outcome of any investigation into the cause of the complaint and
- the actions taken by the Company to avoid recurrence of the complaint.

Once the complaint is resolved, the Community Engagement Officer will record the resolution details in the Register and the complaint will be closed. This information will be maintained for at least seven years.

## **2.4 Unfounded or Vexatious ICFs**

If an ICF is judged to be vexatious in nature, the General Manager – Operations may, having given due consideration, including appropriate engagement with the Complainant, declare the ICF to be resolved and closed on these grounds. The General Manager – Operations shall give written notice to the submitter that the Company considers the ICF to be unfounded or vexatious and that no further action will be taken with respect to the ICF.

The dispute resolution procedure will not apply to ICFs determined to be unfounded or vexatious in nature. The unfounded or vexatious ICF will be recorded in the Register.

## **2.5 Reporting**

The status of all ICFs entered into the Register will be reported to the General Manager - Operations on a monthly basis and summarised in the Annual Compliance Report for the Mining Tenements (which is publicly available except for the name and contact details of each submitter).