

GRIEVANCE MECHANISM PROCEDURE

Concord Strategic Group LLC

Reference: CSG_GOV_005 | Version 1.0 | April 2026

PUBLIC | DECLARED COMPANY PROCEDURE

This procedure is the public-facing companion to CSG's internal Whistleblower Policy (CSG_GOV_003) and operates alongside the Supply Chain Due Diligence Policy (CSG_POL_001). It implements the grievance reporting expectation under Step 1 of the OECD Due Diligence Guidance.

1 Purpose

1.1 Concord Strategic Group LLC (CSG) operates a grievance mechanism so that any person, community, or organisation with a concern about CSG's supply chain, conduct, or operations can raise it directly with the firm.

1.2 This procedure sets out how to submit a grievance, what CSG does with it, and the timelines and protections that apply.

2 Who Can Use This Procedure

This grievance mechanism is open to any person or organisation, including:

2.1 Workers in CSG's supply chain, including artisanal and small-scale producers.

2.2 Communities affected by mining, transport, or processing of minerals connected to CSG's supply chain.

2.3 Civil society organisations, journalists, researchers, and advocacy groups.

2.4 Counterparties, customers, suppliers, and intermediaries.

2.5 Regulatory authorities.

2.6 Any other person with information relevant to CSG's responsible sourcing obligations.

CSG personnel and contractors should also use the internal Whistleblower Policy (CSG_GOV_003), which provides additional protections and an internal escalation path. Internal personnel may use either channel.

3 What Can Be Reported

This procedure covers concerns about, but is not limited to:

3.1 Human rights abuses connected to CSG's supply chain (forced labour, child labour, torture, sexual or gender-based violence, other gross human rights violations).

3.2 Direct or indirect support to non-state armed groups.

3.3 Misconduct by public or private security forces at mining or transit sites.

- 3.4 Bribery, corruption, or fraudulent misrepresentation of mineral origin.
- 3.5 Money laundering or sanctions violations.
- 3.6 Non-payment of taxes, fees, or royalties to host or transit governments.
- 3.7 Environmental harm caused by CSG-linked operations.
- 3.8 Misconduct by CSG personnel, agents, or representatives.

4 How to Submit a Grievance

4.1 Email. Send to compliance@concordstrategicgroup.com. This is the primary and fastest channel. The mailbox is monitored by the Compliance Officer. Anonymous submissions are accepted.

4.2 Postal mail. Concord Strategic Group LLC, Attn: Compliance Officer, 8401 Mayland Drive #8439, Richmond, Virginia 23294, USA. Mark the envelope "Confidential — Grievance."

4.3 Information to include where possible and safe: a description of the concern with dates, locations, and persons or entities involved; supporting documentation, photographs, or other evidence; contact details (optional, anonymous submissions are accepted); and any specific concerns about safety or retaliation.

Incomplete submissions are still accepted. CSG will work with what is provided and will follow up where contact details have been given.

5 Confidentiality and Non-Retaliation

5.1 CSG treats every grievance as confidential. The identity of the person submitting and the substance of the report are shared internally only with personnel who need to know for proper handling of the matter.

5.2 CSG does not disclose the identity of a complainant to the subject of the complaint without the complainant's consent, except where disclosure is required by law or judicial process.

5.3 CSG prohibits retaliation of any kind against any person who submits a grievance in good faith. Retaliation by any CSG personnel, agent, or representative is itself a serious breach of CSG_GOV_001 and will result in disciplinary action up to and including termination of engagement.

5.4 Anonymous submissions are accepted and processed on the same basis as identified submissions.

6 Process and Timeline

Step	Stage	Timeline	What CSG does
1	Acknowledgement	Within 5 business days of receipt	Compliance Officer confirms receipt, assigns a reference number, and provides a point of contact for follow-up.
2	Initial assessment	Within 10 business days of acknowledgement	Compliance Officer reviews the submission to determine seriousness,

Step	Stage	Timeline	What CSG does
			scope, and the appropriate handling pathway. Where the matter falls outside CSG's reasonable control, the complainant is informed and signposted.
3	Investigation	Up to 30 business days from acknowledgement	Compliance Officer investigates with support from the Operations Lead and Managing Director. Investigation may include supplier inquiries, document review, and site visits or third-party verification for material matters.
4	Response	Within 30 business days of acknowledgement	Substantive written response covering findings, actions taken or planned, and timing of further action. Response provided in plain language.
5	Escalation	Within 15 business days of response	If the complainant is not satisfied, the matter may be escalated in writing to the Managing Director. Final written determination within 15 business days of escalation.

Where a matter requires immediate action to prevent harm (for example credible evidence of ongoing forced labour or armed group involvement), CSG suspends relevant commercial engagement during the investigation period regardless of the timeline above.

7 External Recourse

Use of this internal grievance procedure does not limit any complainant's right to raise concerns through other channels at any time, including:

- 7.1** Responsible Minerals Initiative (RMI) grievance mechanism for facilities participating in RMAP.
- 7.2** Relevant National Contact Point (NCP) under the OECD Guidelines for Multinational Enterprises.
- 7.3** Local, national, or international regulatory authorities with jurisdiction over the matter.
- 7.4** Civil society organisations, ombudsperson institutions, or judicial mechanisms.

CSG will not retaliate against any person who chooses to use external channels in place of, or in addition to, this internal procedure.

8 Records and Reporting

8.1 All grievances, regardless of outcome, are logged in the CSG grievance register maintained by the Compliance Officer. Records are retained for a minimum of seven years from the date of final outcome.

8.2 Aggregate, anonymised information about grievances received during a calendar year is included in CSG's Annual Public Due Diligence Report (CSG_CMP_003).

9 Roles and Responsibilities

Role	Responsibility under this procedure
Managing Director	Final escalation authority. Approves any decision to suspend or terminate a supplier relationship arising from a grievance investigation. Reviews the grievance register quarterly.
Compliance Officer	First point of contact. Acknowledgement, initial assessment, investigation coordination, response drafting, register maintenance, annual reporting input.
Operations Lead	Operational support to investigations, including supplier engagement, site verification, and chain-of-custody review.
All Personnel	Cooperate fully with investigations. Refer any grievance received through any channel to the Compliance Officer within 24 hours.

10 Document Control

10.1 This procedure is reviewed annually by the Compliance Officer and approved by the Managing Director. Material changes to applicable law, RMI standards, or CSG's supply chain framework trigger an out-of-cycle review.

10.2 Amendments require written approval from the Managing Director. All versions are retained in CSG's compliance records under CSG_QMS_002.

Approved by the Managing Director of Concord Strategic Group LLC and adopted as the active governing procedure of the company on the effective date stated above.