
	GENERAL PROCEDURE CLAIMS MANAGEMENT FROM EXTERNAL STAKEHOLDERS		CODE: PG-HSEC-12		
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Date: June 2022		Date: June 2022		Date: June 2022	
Signature:		Signature:		Signature:	
		Signature:			

GENERAL PROCEDURE

CLAIMS MANAGEMENT FROM EXTERNAL STAKEHOLDERS



**GENERAL PROCEDURE
CLAIMS MANAGEMENT
FROM EXTERNAL STAKEHOLDERS**

CODE: PG-HSEC-01

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1.0 OBJECTIVE

Establish mechanisms for the entry, treatment and closure of complaints from external stakeholders; which allow preventing and/or mitigating consequences to people, the environment, facilities and their surroundings.

2.0 SCOPE

This procedure is applicable to all individuals who interact with external stakeholders, whether Solek workers or collaborators who participate in our operations.

3.0 RESPONSIBILITIES

3.1 General Manager

- Approve this procedure
- Authorize the allocation of resources for the correct application of the procedure.

3.2 Area Manager

- Ensure the communication, understanding and application of this procedure.

3.3 Compliance Officer

- Ensure compliance with internal processes.

3.4 Local Compliance Officer

- Advice on the communication, understanding and application of this procedure.
- Safeguard compliance with internal processes.

3.5 Social Responsibility and Communities Coordinator

- Receive, classify and refer the claim for internal management
- Convene the Complaint Committee responsible or expanded
- Carry out the response management of the external complaint.
- Carry out the reportability of External Claims management.

3.6 Management Team

- Participate or designate the person responsible for the treatment of claims directly related to the activities of their area.

3.7 Area Leaders

- Inform workers in a timely and convenient manner about the risks associated with the operation and prevention and control measures to avoid social, environmental, reputational and financial risks.
- Ensure that the personnel are suitable, trained and competent regarding the management of External Claims.
- Record any deviation that affects health, safety, the environment or the communities.

3.8 HSEC Specialist

- Communicate and ensure correct compliance with the provisions of this procedure.
- Train and guide people for the correct application of the instructions in this document.

3.9 Solek workers

- Apply the guidelines of this external stakeholder complaints procedure.



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3.10 Contributors

- Formally adopt the guidelines of this external stakeholder complaints procedure.

3.11 On-Call Personnel

- Document the entry and exit of interested parties of the facilities.
- Receive records of complaints from external stakeholders.

4.0 DEFINITIONS

4.1 Income Channels

It corresponds to the support through which interested parties enter their claims, queries, requests and suggestions to the company and can be through more than one channel, in order to facilitate access for all segments of the population.

4.2 External Claims

Refers to a complaint or claim raised by external stakeholders related to the projects in their development, construction or operation and/or maintenance phase; policies, activities, real or perceived impact, the behaviour of its employees or collaborators.

4.3 External Stakeholders

It corresponds to any person or organization that may affect, be affected or be perceived as affected by a decision or activity developed by Solek and/or its collaborators.

4.4 External Complaints Committee

It is responsible for receiving, registering and settle complaints or grievances from external stakeholders. This committee will be composed of HSEC Manager, representative of the Local Compliance Officer, Coordinator of Social Responsibility, communities and representative of the area involved.

4.5 External Complaints Committee extended

It is the responsibility of the committee convened to settle complaints and claims from interested parties that requires external advice or request for information from public services or entities external to Solek. It will be formed by members of the Complaints Committee, in addition to representatives of Legal Management and General Management.

5.0 EQUIPMENT AND TOOLS

Not applicable

6.0 DESCRIPTION OF THE ACTIVITY

6.1 General criteria and conditions for the management of External Claims

The company has defined several criteria for the management of External Claims, which are listed below:

- Individualize claimant and response from the Company
- Carry out data protection.
- Ensure anonymity.
- The non-disclosure of sensitive information.
- Promote alternatives for conflict resolution.
- Encourage permanent relationship and fluid communication with stakeholders,
- Include the gender approach in claims management
- Cultural relevance in the application of this procedure.

Claims will be addressed on an individual, case-by-case basis as a matter of priority. However, in the event that the community requires it, counterparts will be established that can carry out the channelling of claims and controversies, defining a representative of the community and a community liaison of the company for the spokespersons and streamlining the dialogue in case of addressing issues that require explanatory and personalized responses. The incorporation of a community representative lies in the timely and agile management of communications within the territory.

6.2 Communication channels for the entry of External Claims

The company has defined the entry of claims from external stakeholders through the numbered record (Annex 1) which can be requested through the following channels.

- **Telephone:** The official contact telephone number for entry of claims from external stakeholders is +56 9 34541407 available Monday to Friday from 9:00 am to 6:00 pm.

- **On-line channels:** Electronic form via QR code (Annex No. 3), email comunidades@solek.com or whatsapp +56 9 34541407.

- **Admission to projects:** Where on-call service exists, external stakeholder complaint entry records will be available.

- **Corporate address:** Calle Badajoz 45 Oficina 15b, Las Condes, Región Metropolitana

In addition to the above, complaints will also be received in the company's field activities, official social networks, interviews or meetings with Solek representatives, who should send them to the email comunidades@solek.com

6.3 Types of External Claims

In order to manage External Claims in a timely manner, a stratification criterion has been established that defines the type of External Claims. This classification requires differentiated organization of treatment and level of care.

The classification of External Claims is defined as follows:

- *Types of External Claims A*
- *Types of External Claims B*
- *Types of External Claims C*

6.3.1 Types of External Claims A

- **Description:** This classification of External Claims is related to possible incidents that require an immediate response or a short period of time: they contemplate situations that require immediate response and

attention or extreme urgency given their severity, risk or need for attention to reduce impacts and that require damage control.

- **Response Time:** Requires a response no later than 24 hours.
- **Example Scenarios:** Assaults or exercise of gender violence by contractor personnel with people residing in the area of influence; cases of sexual violence; criminal acts resulting from work or operation personnel that compromise the well-being and tranquillity of the community; physical violence; damage to the physical infrastructure of the community that exposes the health of the population to an obvious risk and unwanted annoying noises during rest times.

6.3.2 Types of External Claims B

- **Description:** This classification of External Claims is related to possible incident Claims, and complaints related to procedures that affect or potentially may affect the well-being of the communities or adversely affect the collective interest of the community: it considers situations that require the review of procedures or management plans designed specifically for the areas of influence (environmental, traffic, waste) that are specifically addressed for response and immediate or urgent attention given their severity, risk or need for attention to reduce impacts and that require damage control. This review involves the convening of a Complaints Committee for the referral of the procedures.
- **Response Time:** It requires a response within a period that requires an estimated time between 5 and 7 working days for the correct elaboration of responses.
- **Example Scenarios:** Spills of non-polluting liquids that affect with odours or that affect neighbouring areas with housing infrastructure for community use; alterations in the traffic of contractor and subcontractors vehicles participating in the stages of pre-construction, construction, operation and closure of the projects. Uses and occupations of spaces not designed for activities related to the project: placement of trucks in common areas; emission of gases and bad odours by vehicles for the transport of people and loading of materials in areas of homes or recreational spaces.

6.3.3 Types of External Claims C

- **Description:** This classification of External Claims is related to possible incident Claims, and complaints relating to situations involving internal audits, requests for evaluation of processes and management plans involving external agents: they consider situations that require the review of procedures resulting from accidents or incidents in judicial proceedings, mediations between parties in conflict, negotiations for compensatory measures.
- **Response Time:** It requires a response within a period that requires an estimated time between 7 and 30 working days for the correct elaboration of responses.
- **Example Scenarios:** Fires, life-threatening accidents or accidents with fatal results; severe and total damage to infrastructure of use or community interest involving appropriate compensation measures for the satisfaction of individuals and groups exposed to risks or affected by actions resulting from the operational operating processes of Solek or its subcontracted personnel. This review involves the convening of the expanded committee for the referral of procedures, external advice or the request for information to public services or entities external to Solek.

6.4 Individuals involved in the management and supervision of the entry of cases of External Claims

For the proper management of complaints, there are 6 agents in charge, in their different stages and levels committed to this procedure:

- a) Person Responsible for the Management of External Claims, to the email comunidades@solek.com
- b) Blinded Notified #1 at compliance@solek.cl
- c) Blinded Notified #2 at compliance@solek.com
- d) Committee in charge of External Complaints
- e) External Complaints Extended Committee
- f) Management Committee

In addition, three bodies have been established for monitoring and management:

Follow-up period	Person Responsible	Description	Product
Weekly	External Complaints Committee	Follow-up of External Claims Type A, Type B and Type C. if applicable	Weekly Report
Monthly	External Complaints Extended Committee	Monitoring of Claims Type B and Type C, alternative resolution of External Claims and prosecution	Monthly Report
Semi-annual	Management Committee	Monitoring of Claims Type A, B and C, alternative resolution of External Claims and prosecution	Semi-Annual and Annual Report

6.5 Stages of the Processing of External Claims

It is necessary to differentiate in the processing of a claim if in its complete flow involves two stages that respond to the same processing: on the one hand, it must be identified that there is *i) a stage of internal processing of an External Claim* and *ii) a Stage of alternative resolution of External Claims*.

6.5.1 Internal Processing Stage of an External Claim

Corresponds to the normal process of **entering – managing – closing** an External Claim.



a) Claim Entry

The processing and internal management of complaints entered in the different channels available for entry. And it will be systematized in a numbered record of entry of claims of interested parties; **Annex No. 1** (R.01/PG-HSEC-01) and will also be entered in the database that is built for this purpose.

b) External Complaint Management:

This management includes the following sequence of tasks:

- Classification of the claim according to the criteria, characteristics and risks for the company and the normal development of its projects.
- Consolidation of information of the claim entered
- Internal referral in the organization
- Definition of the solution strategy and/or action plan
- Final answer.

c) Closing of the External Complaint:

It corresponds to the sending of a response to the claimant by the most appropriate means to notify the action plan and verify if there the claimant agrees with the response. For this action, an external stakeholder complaint closure form has been defined; **Annex No. 2** (R.02/PG-HSEC-01)

At the time of closing the internal complaint management procedure, a record of the executed action plan and subsequent actions is left for follow-up in the complaint database.

6.5.2 Alternative Resolution Stage of External Stakeholder Complaints

Solek has a corporate mechanism that, although oriented to the claimant, may have a closure that is not satisfactory to the claimant and therefore, and only once all the remedies provided for in the internal processing stage of the claim of the interested parties have been exhausted, it may give rise to the alternative resolution stage of the External Claim that has 3 levels, which in turn may only advance to the next one once the previous stage has been exhausted, which are:

a) Friendly Resolution

In the event that the claimant is not satisfied with the response provided by the organization, for the purpose of reviewing the case again, a friendly resolution instance will be available; which corresponds to the two-way communication process designed to allow an agreement to be reached when the parties have some interests that are shared and others that are opposed. This is a mechanism that allows for the resolution of disputes in an agile manner. The parties, if they so wish, may each appoint a friendly mediator who will be responsible for seeking the best solution to the dispute.

b) Mediation

Communication process in which an impartial and neutral third party leads people, so that they communicate collaboratively, and find a solution that considers the needs and interests of each one.

This alternative dispute resolution process may be implemented to: Facilitate the mutual recognition of the parties and the legitimacy of all interests and contributions, guarantee and respect the willingness of the parties, both in the acceptance and continuity of the process, ensure that all parties are equal and enjoy the same opportunities (horizontality in the process), use resources in a sustainable way and ensure the legitimacy and competence of the mediators, which will result in the success of the mediation process.

This mediation considers the review of the claim, its procedure and the response by a specialized professional or impartial or neutral third party, who establishes a complete view of the case to directly evaluate the alternative solution to resolve the controversy generated by the non-satisfaction of the claim.

c) Ad Hoc Arbitration

Having exhausted the two previous instances without reaching an agreement, the parties may resort to ad hoc arbitration.

The arbitration shall be understood by one (1) arbitrator, the venue shall be the city of Santiago de Chile, and the parties shall cover the costs of the arbitration in equal proportions. On the other hand, the parties who have initiated a court case, may at any time choose to submit the dispute to arbitration, which will be binding on the parties who must sign an arbitration contract in which the basic rules for the continuation of the same will be established.

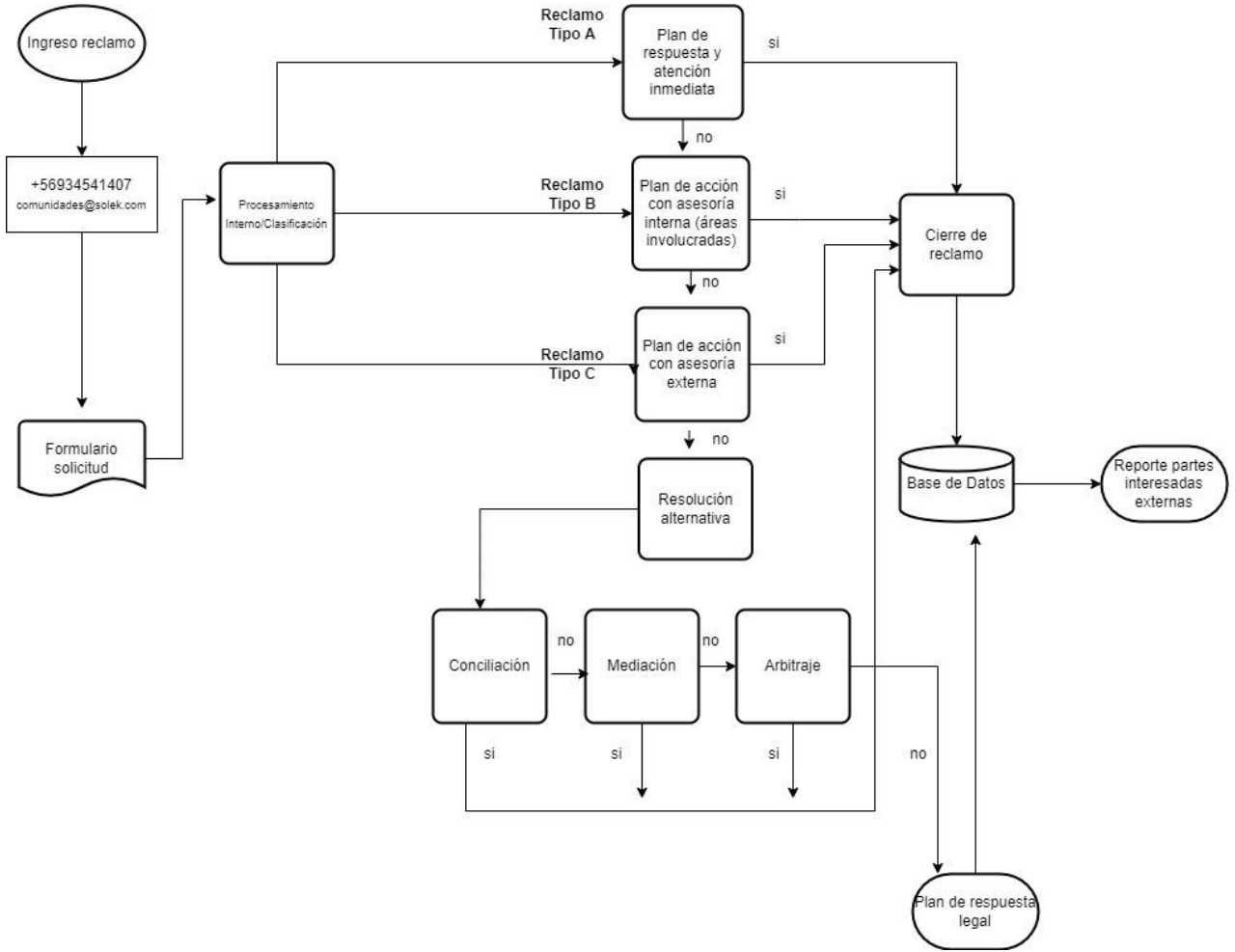
6.6 Prosecution

External Claims may eventually not follow any of the procedures described above and go directly to court. At this stage, the claimant has decided to initiate legal proceedings against the company for the resolution of their claim, in which case, it must be referred directly to the legal area of the company for management and resolution.

6.7 What to do in the face of an External Complaint?

- a. Know the existence of the complaints management procedure of external parties of the Company.
- b. Listen carefully: (without taking a position or anticipating judgements)
- c. Refer to the communication channels for the entry of External Claims
- d. In case of complications in the submission of the claim by the claimant, inform or immediately contact the representative of the Claim Committee.
- e. Deliver to the person responsible for the management of External Claims of the company and/or representatives of the Claims Committee, by email the background information that is known to them.
- f. Be available to supplement background and manage solutions that allow a satisfactory closure of the claim.

6.8 Flowchart: Managing External Stakeholder Complaints



7.0 ANNEXES AND RECORDS

Annex No. 1 External Stakeholder Claim Entry Record



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**REGISTRO INGRESO RECLAMO DE
PARTES INTERESADAS EXTERNAS**

CÓDIGO : R.01/PG-HSEC-12

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FECHA : mayo 2022

REGISTRO INGRESO RECLAMO DE PARTES INTERESADAS EXTERNAS

Pregunta	Queja	Reclamo	Solicitud	Sugerencia	Consulta
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NOMBRE DEL PROYECTO	
NOMBRE DE SOLICITANTE	
RUT	
DOMICILIO / COMUNIDAD/COMUNA/REGIÓN	
TELEFONO	
EMAIL	
DIA/HORA/ CANAL DE COMUNICACIÓN	
Anterior	
N° FORMULARIO DE REGISTRO DE RECLAMOS EXTERNOS DE PARTES INTERESADAS	
<i>DESCRIPCIÓN DE LA SITUACIÓN</i>	
INFORMACION ESPECIFICA (Adjuntar evidencia o documento complementario si procede)	
NOMBRE Y FIRMA PROFESIONAL QUE RECEPCIONA RECLAMO	
NOMBRE Y FIRMA SOLICITANTE	

Annex No. 2 External Stakeholder Claim Closure Record



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CÓDIGO : R.02/PG-HSEC-01

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FECHA : Mayo 2022

REGISTRO DE CIERRE DE RECLAMO DE PARTES INTERESADAS EXTERNAS

NOMBRE DEL PROYECTO	
NOMBRE DE SOLICITANTE	
RUT	
DOMICILIO / COMUNIDAD/COMUNA/REGIÓN	
TELEFONO	
EMAIL	
DIA/HORA/	
CANAL DE COMUNICACIÓN	
N° DE REGISTRO DE CIERRE DE RECLAMO	
RESPUESTA DE CIERRE DE RECLAMO	
INFORMACION ESPECIFICA (Adjuntar evidencia o documento complementario si procede)	
NOMBRE Y FIRMA DE PROFESIONAL QUE ENTREGA RESPUESTA	
NOMBRE Y FIRMA SOLICITANTE O QUIÉN RECIBE LA RESPUESTA	

8.0 REFERENCES

- PG-HSE-03 – Communication and Participation Procedure

9.0 CHANGE LOG

Revision	Date	Modification
00		