
Teck Coal Limited

Elk Valley Operations

Feedback Mechanism – The Process

Final December 2012

Reviewed internally September 2015

Communities of Interest reviewed December 2015

Teck Feedback Mechanism

1. Objectives

This procedure defines the way in which the Teck's coal operations in the Elk Valley, under the guidance of the Community and Aboriginal Affairs department, designs and implements its feedback mechanism in order to achieve the following objectives:

- **To meet Teck standards and international standards**

Teck's Environmental, Health, Safety and Community (EHSC) Management Standards require that every project or operation have a mechanism in place to respond to the interests of communities of interest (COIs) and to ensure that Teck respects human rights and that it fulfills the commitments it has made to the standards of organizations such as ICMM (the International Council on Mining and Metals), MAC (the Mining Association of Canada) and the United Nations.

- **To identify risks early**

Feedback from COIs shows how concerns are changing, and highlights areas of potential risk that need to be managed (for example, an increase in enquiries about water quality may indicate that people think their water sources are becoming contaminated).

- **To monitor risks**

Monitoring the results of the feedback mechanism, assessing whether individual concerns have been managed, and tracking trends in issues and concerns are part of the overall risk management process.

- **To be transparent and consistent**

When consistently applied, the feedback mechanism will help show COIs that all groups have a channel to communicate with Teck's coal operations and that any concerns will be resolved fairly.

- **To minimize conflict and legal disputes**

The feedback mechanism gives COIs a way to articulate concerns. If this mechanism were not available, they might feel the need to express those concerns through public demonstrations or recourse to legal mechanisms.

- **To build and maintain social licence to operate**

The feedback mechanism supports the engagement activities of Teck. It helps to identify and respond to issues early and therefore build trust. This is an important contributor to the maintenance of Teck's social licence to operate.

2. Scope

The feedback mechanism is available to all COIs in the area of influence of Teck's coal operations. This includes Elkford, Sparwood, Fernie, the Crowsnest Pass, The Regional District of East Kootenay Area A, and the Ktunaxa Nation. The feedback mechanism applies to the activities of Teck's coal operations and all personnel, including both employees and contractors.

3. Validity

This first version of the procedure has been subjected to a community engagement process and is aligned with Teck guidelines. Internal consultations will take place also. All revised versions will take into account any complaint or conflict resolution mechanisms that may have been introduced in the area of influence since the previous revision.

Thereafter, the procedure will be reviewed and updated every two years. The updating process will include participative community consultation throughout the area of influence.

(External Reviewed: March 2012, January 2014, December 2015). Next review due early Q1 2018

(Internal Reviewed: September 2015) Next review due Q3 2016

4. Definitions

Term	Definition
<i>Feedback Mechanism</i>	A process that allows each of Teck's coal operations to receive feedback from communities of interest about matters related to the operation(s) that are of interest to them, and to effectively organize a response to that feedback.
<i>Community of Interest (COI)</i>	An individual or group that may be affected by, have an interest in, or have the ability to influence Teck's coal operations.
<i>Area of Influence</i>	Geographical area and / or communities that may be impacted by any of Teck's Elk Valley coal operations. This includes Elkford, Sparwood, Fernie, the Crowsnest Pass, The Regional District of East Kootenay Area A, and the Ktunaxa Nation.
<i>Feedback</i>	Any comment, enquiry or complaint from communities of interest about Teck or about one of its coal operations and its activities outside of the regular consultation process. Feedback may include questions, issues, ideas, concerns, suggestions, complaints or compliments.
<i>Feedback Coordinator</i>	A member of the staff appointed to implement the feedback mechanism.
<i>Feedback Register</i>	A database containing a record of all feedback received and the response to it. The register includes all commitments made during the course of acknowledging, evaluating, investigating, responding to and following up on feedback. NOTE: Anonymity of feedback provider will be ensured by the Feedback Coordinator and the Manager, Community and Aboriginal Affairs unless the person providing feedback wishes that his/her name be passed along to another party or parties.
<i>Grievance</i>	A concern or complaint communicated by a Community of Interest. Concerns and complaints can result from real or perceived impacts of any of Teck's coal operation activities.
<i>Investigation Team</i>	The team of managers and/or professionals put together to assist the Feedback Coordinator in the investigation of Level 3 and Level 4 feedback.
<i>Subject Matter Experts</i>	The Department with the specialized knowledge and/or skills needed to assist in the investigation of specific feedback (for example, Environment for a series of dust complaints).
<i>SMART</i>	Social Management and Responsibility at Teck is a toolkit containing a series of tools and checklists to assist Teck staff with the management of social issues and performance throughout the mining life cycle.

5. Principles

The mechanism is based on principles that reflect international best practices. As such, it must be:

- Legitimate, trusted, fair and empowering
- Publicized and readily accessible
- Transparent, but allowing confidentiality for COIs
- Based on engagement and dialogue
- Where possible, established from the very start of a project to support the development of positive relations with communities
- Predictable and consistent in its process, with time-bound steps
- Implemented in a structure and mindset that supports its operation
- A source of continuous learning

6. Responsibilities

General Manager

The General Manager of each coal operation and department is responsible for its overall performance in responding to feedback from COIs.

Manager, Community and Aboriginal Affairs

The Manager Community and Aboriginal Affairs is directly responsible for the design and implementation of the feedback mechanism process.

Coordinator, Sustainability

The Coordinator, Sustainability will act as a Feedback Coordinator. This person will exercise his/her duties as Feedback Coordinator in addition to the other duties defined in his/her job description.

The Feedback Coordinator is responsible for the day-to-day implementation of the feedback mechanism. This includes effective communication of the mechanism to COIs and internally, through induction and refresher training, to company and contractor personnel. It also includes coordinating feedback investigation and response. The Coordinator Sustainability will provide quarterly reports to Senior Management at the sites and at Teck Coal Sparwood Office as well as to the Teck Coal Elk Valley Communities of Interest Advisory Initiative's Steering Committee as a standing meeting agenda item. The reports will be captured in the meeting minutes which will be distributed to the Advisory Partners for their awareness. The reports will summarize feedback received through various means during the quarter and Teck's response to the feedback.

7. Channels of Communication

Teck Coal will provide a number of channels for communication of feedback. These will be:

- Technologically and culturally appropriate
- As inclusive as possible
- Without cost to communities or individuals
- Accessible to traditionally excluded or vulnerable groups including Indigenous people (vulnerability may be related, for example, to gender, education, age, land ownership, sickness, disability, family status, or poverty level)
- Capable of responding to both oral and written communications

The channels of communication for Teck's Elk Valley coal operations will include:

- Secure clearly labelled (Appendix 1) drop boxes with Feedback Submission Forms (Appendix 2) at Teck's Sparwood Office, Mountain View Office and the Recruitment Centre - these drop boxes will be checked once per month and the contents forwarded to the Feedback Coordinator who will ensure that they are entered into the Feedback Mechanism (TrackLine).

- Secure drop boxes with Feedback Submission Forms at the Elkford Aquatic Centre, the Sparwood District Office, the Fernie Chamber of Commerce, the College of the Rockies Fernie Campus, the Municipal office in the Crownsnest Pass, St. Mary's Band Office and the Ktunaxa Nation Council Office in Cranbrook - these drop boxes will be checked once per month and the contents forwarded to the Feedback Coordinator who will ensure that they are entered into the Feedback Mechanism (TrackLine).
- Mailing address (PO Box 1777, Sparwood), a feedback dedicated e-mail address (feedbackteckcoal@teck.com) and toll-free phone number (1-855-806-6854) - the Feedback Coordinator will ensure that the messages are checked daily whenever possible but at least twice per week and ensure that they are entered into the feedback mechanism as appropriate.
- Website: www.teck.com/feedback
- Verbal feedback – A COI may request that the Feedback Coordinator, or any member of the External Relations team, take note of a verbal complaint or other feedback. Once this has been done, the resulting feedback will be entered into the feedback mechanism in the same way as if it had been received in written or electronic form.
- Presence of one or more Teck Communities and Aboriginal Affairs team members or other Teck employees at well-publicized public engagements (often associated with projects and the EA process).
- Opportunity to submit feedback through the mayor (or appropriately, community-designated delegate) of each of the four communities, as a third party channel of communication.
- Proactive request for feedback – If one of the coal operations becomes aware of complaints or accusations made publicly (for example, in the press, on websites or in public meetings) but not presented directly to the operation, the Feedback Coordinator may, with the approval of the Manager Community and Aboriginal Affairs, approach the COI involved and suggest that the complaint be formalized through the feedback mechanism .

Feedback Submission Forms (see Appendix 1) will be made available to COIs and they will be encouraged to use them. However, use of the form is not obligatory. The Feedback Coordinator will enter feedback that is received in any other format into the feedback mechanism.

If feedback is received verbally, the Feedback Coordinator will – if possible – prepare a Feedback Submission Form, read it back to the COI providing the feedback, and request a signature or other form of acknowledgement.

Feedback in any format, initially provided to personnel at sites, will be forwarded to the Manager Community and Aboriginal Affairs and/or the Feedback Coordinator for processing in the TrackLine system. Applicable site personnel will be kept informed of the progress of the mechanism.

8. Publicizing the mechanism

The Feedback Coordinator, upon approval from the Head of Communications and the Head of Community Relations, will use appropriate media to ensure that all COIs are aware of the feedback mechanism and that it is understood internally and by contractors. This may include, for example:

- Leaflets, electronic newsletters, printed and electronic newspapers (Appendix 1)
- Posters
- Information campaigns directed to workers, contractors and their families
- Website
- Information stands
- Distribution of Feedback Mechanism information card (Appendix 3)
- Public meetings with large or small groups, including regular meetings scheduled for other purposes
- Inclusion of contact details on any printed materials distributed in community eg. Newspaper advertisements, educational brochures

The communications program will promote not just awareness, but also an understanding of the purpose and benefits of the mechanism. This will include communication of the following:

- Who can use the feedback mechanism and what it is for
- Communications channels for submitting feedback
- A summary of the mechanism
- Timing for acknowledgment and resolution of feedback
- Assurance that the right to use other grievance resolution mechanisms (for example, judicial action) is not affected
- Assurance that the use of the feedback mechanism is without cost to the COI
- Internal communications will also be used to raise workers' and contractors' awareness of the mechanism and how it works. An explanation of the mechanism will be included in contractor training.

9. Receiving, documenting and acknowledging receipt of feedback

The Feedback Coordinator will give written acknowledgement (by letter or e-mail) of the receipt of all feedback except anonymous feedback. If literacy is an issue, then personal contact will be made to ensure that acknowledgement is received and understood.

Acknowledgement of receipt will be communicated in writing (by letter or e-mail) within 5 working days from the date of receipt of the feedback.

The acknowledgement of receipt will:

- Thank the COI for his/her/its group's feedback
- Explain the next steps in the process
- Give the deadline for a full response to the feedback
- Indicate that the Feedback Coordinator will be the COIs contact person at the Teck Coal Sparwood Communities Office, and provide his/her complete contact information

The deadline for a full response will be a maximum of 20 working days from the date of receipt of the feedback according to the Feedback Response Workflow (Appendix 4)

The Feedback Coordinator will document receipt of the feedback, including anonymous feedback, by entering it in the TrackLine system. This system will serve as a register which contains details of all feedback and responses and is fundamental for monitoring and reporting to Management and to the community.

10. Evaluating and investigating feedback

The following table shows the different levels of feedback that are covered by the feedback mechanism, and the type of response that is appropriate for each one. The first step, whenever feedback is received, is to determine what level it belongs to. Any feedback that makes reference to human rights issues will be assigned to Level 4 and investigated accordingly.

Term	Response Activity and Party
Level 1a Feedback - Positive feedback that requires thanks and acknowledgement	Assessment and response by Feedback Coordinator
Level 1b Feedback – Feedback that is not related to the site or Teck and needs to be directed elsewhere	Sign off by Manager Community & Aboriginal Affairs (C&AA)/person with responsibility for C&AA (this may be the same as the Feedback Coordinator)
Level 1c Feedback – Feedback that is a specific donation request	Sign off by C&AA /person with responsibility for C&AA (this may be the same as the Feedback Coordinator)
Level 2a Feedback - a question or request for information	Assessment and response by Feedback Coordinator with involvement of specialist departments to collect or provide information requested Sign off by C&AA/person with responsibility for C&AA
Level 2b Feedback - a suggestion or recommendation with regard to practices or performances	Assessment and response by Feedback Coordinator with involvement of specialist departments to collect or provide information requested Sign off by C&AA/person with responsibility for C&AA
Level 3 Feedback - a grievance that is not a breach of law or company policy and is not related to death or serious illness OR a recurrent question /request for information	Investigation by Feedback Coordinator and representative of relevant specialist department Sign off by C&AA/person with responsibility for C&AA and Specialist Department Head and site manager
Level 4 Feedback - a repeated or widespread grievance OR a grievance that is a breach of law or company policies OR a direct accusation of breach of human rights OR relates to death or serious illness	To be investigated by Feedback Coordinator, representative of relevant specialist department and mine manager as required. Sign off by C&AA/person with responsibility for C&AA and site manager

The Feedback Coordinator will:

- Assign the feedback to one of the levels in the table above, to determine the type of response and the level of seniority required to respond and to approve the response.
- If the feedback is Level 3 or 4 (grievance), appoint an Investigation Team, and lead an investigation.
- If the feedback involves human resource issues (for example, a complaint of sexual harassment or a gender-sensitive issue), ensure that the matter is turned over to Human Resources.
- Determine whether (a) specialist department(s) and/or subject matter expert (s) need(s) to be involved in the investigation, especially if a grievance is involved (for example EHS for an environmental or safety complaint or Procurement for a local purchasing opportunity).
- Involve the General Manager in the investigation of a serious grievance (Level 4)

In the case of Level 3 or 4 feedback, the Feedback Coordinator and the Investigation Team will work together to identify the root cause of any complaints. It is necessary to understand the root cause of the problem in order to manage risk and to develop a response that will prevent the grievance from occurring again.

In some cases, grievances are linked to an operation’s performance and in others they have to do with perceptions of its performance. The investigation will differentiate between these causes, as very different responses will be required.

If possible, investigators will speak with the COI that initiated the grievance in order to ensure that the grievance and its causes have been properly understood.

11. Preparing and communicating the response

Once the feedback has been evaluated and – in the case of Level 3 or 4 feedback – an investigation has been completed, the Feedback Coordinator will prepare a response. If necessary, he/she will be supported in this task by personnel from the specialist department(s), the Investigation Team and Management.

The language of the response will be appropriate to ensure understanding by the COI that initiated the feedback, especially when describing technical matters. The response will be supplemented by face-to-face, verbal explanations wherever this is necessary.

The response to the COI will be communicated by the deadline that was committed to in the acknowledgement of receipt and not more than 20 working days from the date of receipt of the feedback.

If more work is needed to resolve a grievance, the response will provide an update on progress, explain the additional steps that are necessary, and propose timing for those steps.

The General Manager will receive and approve responses to Level 3 and 4 feedback (grievances). If appropriate, a Teck representative will meet personally with the COI that initiated the feedback. This reinforces the message that the operation takes the resolution of grievances seriously.

For Level 1b feedback, where the feedback is not related to an operation, the response will explain the circumstances and how it was determined that the operation is not involved. A copy of the response may be sent to the authority, institution, company or individual that the feedback should have been directed to.

The response to anonymous feedback will be handled case by case. This may include a notice in an area newspaper and/or a posting at the drop boxes. The Feedback Coordinator will ensure that nothing in the response suggests the COI's identity.

12. Seeking and documenting the response of the community of interest

For all feedback except anonymous feedback, the Feedback Coordinator will ask the COI – either verbally or in writing as part of the response – whether he/she/it is satisfied with the response. The Feedback Coordinator will record the COI's satisfaction or dissatisfaction in TrackLine.

If the COI affirms that he/she/it is satisfied, the feedback case will be closed. If possible, the COI's affirmation will be obtained in writing.

If the COI is not satisfied, the feedback case will not be closed. The Feedback Coordinator will propose potential next steps. If necessary and feasible, the feedback may be re-evaluated or re-investigated. The option of referring a grievance to an independent third party may be proposed (see Section 13 below).

13. Access to an independent third party

Where necessary, in the resolution of grievances, an independent third party may be called upon. The independent third party must be mutually agreed upon by the COI delivering the grievance and Teck.

An independent third party can be any individual or organization external to the coal operation including:

- A community authority such as a neighbourhood council
- An Indigenous authority, such as an elders' council or tribal council
- Local or national government authorities including an ombudsman's office, where this exists
- Other trusted and respected persons (for example, academics or religious leaders)
- Local or international NGOs

The process that will be developed may involve the participation of an independent third party for the following purposes:

- To manage an appeals process
- To act as mediator in reaching resolution
- To participate in additional investigation

This process may also include the establishment of a commission or panel of several third parties and COIs. This commission or panel would then help resolve grievances related to specific issues such as land compensation issues, human rights or protecting the environment.

14. Avoiding conflict of interest

In order to avoid conflict of interest or the perception of conflict of interest, the coal operation will ensure that any person or department allegedly implicated in a grievance does not have a central role in investigating or responding to that same grievance. For this reason:

- If the Feedback Coordinator is allegedly implicated in a grievance, the investigation and response will be led by the Manager Community and Aboriginal Affairs
- If the Manager Community and Aboriginal Affairs is allegedly implicated in a grievance, the investigation and response will be led by a General Manager
- If a specialist department is allegedly implicated in a grievance, then at least one other specialist department will take part in the investigation
- If a General Manager is allegedly implicated in a grievance, the investigation and response will be led by a high-level manager from the corporate offices of Teck Resources or by the General Manager of another operation or project

15. Following up and reporting on feedback

The Feedback Coordinator and the Manager Community and Aboriginal Affairs will monitor the feedback mechanism annually to evaluate:

- Whether the mechanism is being implemented as planned
- Whether it is working effectively
- What trends exist and what these trends indicate about performance of the mine, perceptions of performance and areas of concern and possible improvement

As part of the community consultation process described in Section 3 above, Teck's coal operations will develop performance indicators and agree to these with COIs. These indicators, and the way in which they will be monitored and reported, will then be included in the next version of this procedure, not later than March 31, 2016. The indicators will, in any case, include all relevant corporate indicators required for quarterly Streamline reporting to the Corporate Environment and Risk Management Committee (CERMC) and annual inclusion in Teck's Sustainability Report.

The Feedback Coordinator will ensure that all commitments assumed as a result of feedback, including mitigation measures and other promises of improvement, are entered into TrackLine and monitored to ensure their implementation.

The results of monitoring will be incorporated into the applicable coal operation's existing reporting system, including reporting back to the community, and will be used to identify emerging issues that need attention. Monitoring will occur at least quarterly.

Appendix 1

Drop Box Insert/Newspaper Ad



We Want to Hear From You

Let us know if you have any questions or feedback about Teck's operations in the Elk Valley.

You can submit feedback by:



Phone toll-free to **1.855.806.6854** and leaving a message.



Send an email to **feedbackteckcoal@teck.com**



Fill out a feedback form, available at locations throughout the Elk Valley.



send a message through **www.teck.com/feedback**

Once we receive your feedback we will contact you to acknowledge receipt and then follow up with a response. If you don't receive acknowledgement of your feedback within three weeks, please call us at 1.855.806.6854.

Feedback boxes and forms can be found at:

Elkford:

Elkford Mall • Chauncey Ridge Food Mart Mall

Sparwood:

District of Sparwood Office • Teck Sparwood Office • Teck Shared Services Office • Teck Recruitment Centre

Fernie:

The College of the Rockies, Fernie Campus • Fernie Chamber of Commerce

Crowsnest Pass:

Municipality of the Crowsnest Pass Town Office • Crowsnest Pass Chamber of Commerce

Ktunaxa Nation, Cranbrook:

St. Mary's Band Office • Ktunaxa Nation Government Building



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Once we receive your feedback we will contact you to acknowledge receipt and then follow up with a response. If you don't receive acknowledgement of your feedback within three weeks, please call us at 1.855.806.6854.

Feedback boxes and forms can be found at:

Elkford:

Elkford Mall • Chauncey Ridge Food Mart Mall

Sparwood:

District of Sparwood Office • Teck Sparwood Office • Teck Shared Services Office • Teck Recruitment Centre

Fernie:

The College of the Rockies, Fernie Campus • Fernie Chamber of Commerce

Crowsnest Pass:

Municipality of the Crowsnest Pass Town Office • Crowsnest Pass Chamber of Commerce

Ktunaxa Nation, Cranbrook:

St. Mary's Band Office • Ktunaxa Nation Government Building

Teck

Appendix 2

Feedback Submission Card

We want to hear from you

Please let us know if you have any questions or feedback about Teck's operations in the Elk Valley.

You can submit feedback by:



Phoning toll-free to 1-855-806-6854 and leaving a message.



Sending an email to feedbackteckcoal@teck.com



Filling out this feedback form and leaving it at a community feedback box:

Elkford:

District of Elkford Office • Chauncey Ridge Food Mart Mall

Sparwood:

District of Sparwood Office
Teck Sparwood Office • Teck Shared Services Office • Teck Recruitment Centre

Fernie:

The College of the Rockies, Fernie Campus • Fernie Chamber of Commerce

Crowsnest Pass:

Municipality of the Crowsnest Pass Town Office

Ktunaxa Nation, Cranbrook:

St. Mary's Band Office • Ktunaxa Nation Government Building



Or mail to:

Feedback Coordinator, Teck Coal
PO Box 1777, Sparwood, B.C., V0B 2G0

After we receive your feedback we will contact you to acknowledge receipt and then follow up with a formal response.

If you don't receive acknowledgement of your feedback within three weeks, please call us at 1-855-806-6854

We want to hear from you

Please let us know if you have any questions or feedback about Teck's operations in the Elk Valley.

Date:

Contact details (Anonymous feedback is welcome and will be investigated internally by Teck but we will be unable to respond directly)

Name:

Address:

Phone:

Email:

Please indicate how you would prefer us to communicate with you

Letter Phone Email In person

Other:

Feedback

(Please include any dates and as much detail as possible)

Thank you

Appendix 3

Feedback Information Card

We Want to Hear From You

Let us know if you have any questions or feedback about Teck's operations in the Elk Valley.

Teck



Phone toll-free to **1.855.806.6854** and leave a message.



Send an email to **feedbackteckcoal@teck.com**



Fill out a **feedback form** available at locations throughout the Elk Valley.

Appendix 4

Feedback Response Workflow

Feedback Response Workflow

