MEXINOL

Community Feedback Mechanism

Appendix C to: Stakeholder Engagement Plan

ESIA and Pre-Construction Phase

[Updated for Translation: July 2025]

PACIFICO MEXINOL PROJECT

HSSESP-SP-SEP-0004 Rev 04 (ESP)

APPENDIX C: Community Feedback Mechanism

1. Introduction

In accordance with IFC Performance Standards and international best practices, the Project has established a community feedback mechanism (CFM) to address external and community comments, issues and complaints. A grievance is a complaint or concern raised by an individual or organization who believes they have been negatively affected by the Project at any stage of its development. Complaints may take the form of specific complaints about actual damage or injuries, general concerns about Project activities, incidents and impacts, or perceived impacts.

The Community Feedback Mechanism provides a structured way to receive and resolve feedback and complaints throughout all stages of the Project lifecycle. Grievances must be addressed promptly through an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected communities, and that is free of charge and free of retaliation. The mechanism must be appropriate to the magnitude of the impacts and risks posed by a project and be beneficial to both the company and its stakeholders. To address the specific needs of women and vulnerable populations, the mechanism will include gender-sensitive protocols, including special situations such as gender-based violence.

Furthermore, the mechanism should not prevent access to other judicial or administrative remedies, and does not replace any legal process, existing employee grievance systems, normal intercompany dialogue, or other existing management procedures.

The CFM must take into account comments/complaints that may be:

- reveal the name of the person filing the complaint or anonymously;
- real or perceived ;
- of any individual or group;
- on any matter related to the Project activities or, during the construction and operation phases, related to a third party, such as one of the Project Contractors; and
- with or without a request for compensation for the impacts of the Project.

The CFM applies to all activities and components of the proposed project, including all contractors and subcontractors. It is applicable to all phases of the Project, including pre-construction, early-works, construction, commissioning and operation, and must be updated periodically to ensure it remains relevant and appropriate to the scale and phase of the Project, and accessible to affected communities.

Once project construction begins, it is anticipated that the CLO will be the company's designated individual responsible for ensuring comments and complaints are resolved, but may bring in others to support the process. It is important that the CLO be a member of the project team who manages or supports community outreach and engagement. It should be noted that the Project will also have a worker grievance system that will be part of the ESMP and will act as the internal grievance process for workers, contractors, subcontractors, and other members of

the Project workforce. (See ESMP document HSSESP-SP-SEP-0003-Rev 0 Worker Grievance Mechanism).

Mexinol's CFM is based on the following principles:

- **Legitimate** : to create an environment of trust for stakeholders and be accountable for the proper performance of the grievance mechanism processes;

- **Accessible** : to ensure that all stakeholders are aware of available grievance mechanisms and to provide appropriate assistance to those who have access difficulties;

- **Predictable** : provide a clear and recognized procedure with an indicative timeframe for each stage, specifying the types of processes and outcomes available and the means to monitor implementation;

- **Fair**: ensure that whistleblowers have reasonable access to sources of information, advice and expertise necessary to participate in a reporting process based on fair, documented and respectful terms;

- **Culturally appropriate:** Respect for local customs and culture in the Project area;

- **Confidential:** To ensure the confidentiality and physical protection of whistleblowers, safeguard personal data collected in connection with a report, and provide the option for whistleblowers to file anonymous complaints when necessary;

- **Transparent**: keeping the parties involved in a complaint informed about the progress of its resolution, and providing sufficient information on the performance of the mechanism to generate confidence in its effectiveness and satisfy any public interest that may be at stake;

- **Inclusive**: to ensure that the mechanism is open and accessible to all people, regardless of gender, race, ethnicity, religion, sexual orientation, disability or age;

- **Rights compatible**: to ensure that outcomes and solutions are in accordance with internationally recognized human rights;

- **Continuous learning**: Leveraging the measures used to identify lessons learned to improve the mechanism and prevent future injuries and damage.

- **Based on engagement and dialogue**: Continually consult with stakeholders to the extent that the design and operation of the grievance mechanism is intended for them and focus on dialogue as a means of addressing and resolving grievances.

2. Advertising the Community Feedback Mechanism

A summary of the CFM (in Spanish and Yoreme), how it is used, details of the process for receiving and responding to community comments and complaints, response times, and safeguards to ensure confidentiality will be posted and communicated on the Project website and orally disseminated to stakeholders and community members prior to early-works and construction.

Where appropriate, it will also be shared through flyers and posters in local communities.

3. Methods for receiving comments and complaints

Stakeholders can file complaints through several methods, including

- Face-to-face: To any project staff through regular contact within the community, as well as with the EPC

- Electronic: Via the Project's email address (contacto@pacifico-mexinol.com); or by filling out the contact form available on the project website ([Contact Mexinol](#)).

- WhatsApp: +55 52 668 152 9066

3.3 Community Comments and Complaints Process

To facilitate monitoring, evaluation, and response to complaints, standardized information must be collected and recorded on the Community Comment Investigation Form. The assigned CLO will administer the community comment and complaint process by handling correspondence, coordinating internal resolutions, managing the community comment log, and submitting reports (external and internal).

The CLO will need to liaise, support, and work with other working groups within Mexinol and EPCs to develop a solution and response. Before the initial work begins, CLO will ensure that the community feedback process is promoted in the community through targeted awareness campaigns led by the CLO, making specific efforts to have female staff reach out to women and vulnerable people in the community. (See SEP for further details)

In some cases, a complaint may be inadmissible (the nature of the complaint exceeds the Project's area of influence; outside the scope of the Project), and the CLO will clearly communicate in the Acknowledgment the reasons why the complaint cannot be considered and, where possible, will provide information to help the individual redirect their complaint to the appropriate institution or individual. The complaint will be entered in the register as inadmissible.

The key tasks in implementing the community feedback procedure are summarized in Figure 1-1 below.
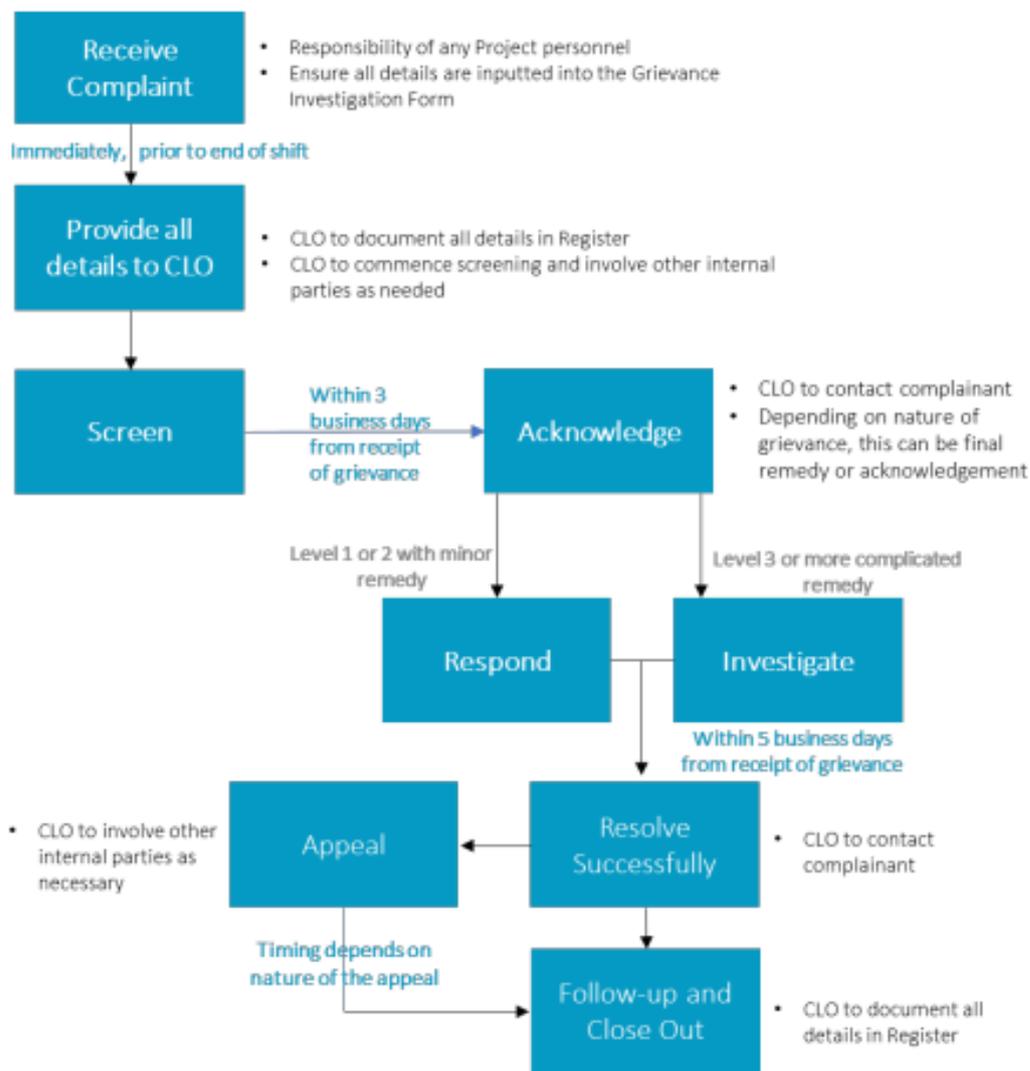
Receive Complaint
- Responsibility of any Project personnel
- Ensure all details are inputted into the Grievance Investigation Form

Immediately, prior to end of shift

Provide all details to CLO
- CLO to document all details in Register
- CLO to commence screening and involve other internal parties as needed

Screen

Within 3 business days from receipt of grievance

Acknowledge
- CLO to contact complainant
- Depending on nature of grievance, this can be final remedy or acknowledgement

Level 1 or 2 with minor remedy

Level 3 or more complicated remedy

Respond

Investigate

Within 5 business days from receipt of grievance

Resolve Successfully
- CLO to contact complainant

- CLO to involve other internal parties as necessary

Appeal

Timing depends on nature of the appeal

Follow-up and Close Out
- CLO to document all details in Register

Figure 1-1: Community feedback and complaint mechanism

3.2 Community Comments and Complaints Log

Regardless of the manner in which community comments and complaints are received (e.g., by email, phone, or in person), Project staff in contact with the complainant will gather contact information, the nature of the complaint, and any other information necessary for the complainant and immediately (during their shift) provide all necessary details on the Public Complaint Investigation Form to the CLO.

At the end of the work, the project staff receiving the complaint will say to the complainant: [Example] "Thank you for your concern. I will forward this information to our Community Liaison Officer, who will contact you usually within 3 business days. If it is urgent, we will contact you as soon as possible."

The CLO will ensure that all community complaints are recorded in the registry. This activity will involve capturing full details of the complaint and may include phone calls or meetings with the complainant, reviewing records of previous incidents or similar occurrences, and any available evidence, supporting documents, or statements.

The database entry will include the following information:

- Date of receipt

- Description of the Concern/Complaint

- Settlement

- Risk level

- Classification by category

- Dates of the complaint handling process

- Responsibilities

- Complaint resolution

- additional information

- Petitioner's name and date (confidential and if available)

- Information on receipt of complaints (how it was provided)

3.3 Categorization of the comment/problem/complaint

Inquiries received by Mexinol will fall into one of five categories defined as follows:

- Complaint—An expression of discontent, regret, pain, censure, resentment, or grief. A direct, tangible incident along with its alleged damage, impact, or dissatisfaction that occurred as a result of company or contractor actions, perceived or actual. Complaints are typically accompanied by a request for resolution and rectification.
- Concern—A matter that engages a person's attention, interest, or care, or that affects a person's welfare or happiness. Related to questions or requests for information or general perceptions unrelated to a specific impact or incident and/or recorded in an individual grievance. Concerns are good indicators of where stakeholders lack or misunderstand information.
- Issue—A point in question or a matter that is in dispute, as between contending parties in an action at law. A pre-existing complaint or concern between two non-Project entities, one of which may attempt to use the company's activities as the leverage to achieve resolution. Issues should be transmitted to the entities directly involved along with an explanation as to how they can affect the company. Issues may evolve into loss of the Project's social license to operate if not handled properly.
- Request—The act of asking for something to be given or done, especially as a favor or courtesy; a solicitation or petition. A communication from a stakeholder asking for something (donation, community project, job, contract, or some other benefit for a group or individual). Requests may evolve into loss of the Project's social license to operate if not handled properly.

- Guidance—A piece of advice or information aimed at resolving a problem or difficulty, especially as given by someone in authority.

Categorization helps with internal tracking and monitoring trends over time. In addition to the five categories of type, the following additional thematic categories used in the record are listed below :

Social / Human Rights	Land
	Community Health
	Security
	General unmet expectations
	Workers
	Commitment
	Others [insert]
Environmental	Environmental protection
	Noise
	Traffic
	Air
	Water / Waste
	Others [insert]

3.4 Selection Comment/Problem/Complaint

Each complaint will be reviewed from Level 1 to Level 3, based on the definitions provided in Table 1-3 , to determine the appropriate response. The screening and risk assessment phase is expected to be completed within a target timeframe of 24 to 72 hours, depending on the risk level.

Category	Problem description	Type of problem	Management approach
Level 1 (Low risk)	A complaint/claim for which an approved Project response already exists and a response can be provided immediately by the CLO (e.g., dust problem resolved with the provision of a car wash voucher).	Routine	Inform CLO so that the complaint can be logged and CLO uses the approved responses and the approved resource to handle the response.

Level 2 (Medium Risk)	A complaint is characterized by being a unique situation, of a local nature, and that will not affect the reputation of the Project (for example, property damage).	Non- routine	Define the response action to community complaints and seek management or other functional (e.g., legal) approval as needed.
Level 3 (High risk)	Repeated, widespread, and/or high-profile complaints/claims that may result in a negative impact on the Project's activities and/or reputation. They could affect the health and safety of project workers and/or community members. Level 3 complaints may indicate a breach in management plans or procedures (e.g., a waste management spill).	Potentially significant	Prioritize through existing Emergency Response or other management procedures and define the appropriate management strategy to resolve the complaint.

3.5 Acknowledge the community complaint

The CLO will formally acknowledge a complaint within 72 hours of its submission, informing the complainant that the Project's goal is to respond with a solution within 5 days (depending on the risk level). Verbal and then written feedback (when possible) may be provided so that a record of the correspondence can be retained and recorded.

The acknowledgment should include a summary of the complaint, the approach to responding to it, and an estimated timeframe for the final response. If necessary, this step can be used as an opportunity to clarify any issues with the complaint or request further information if needed.

If a Level 1 or Level 2 complaint requires a remedy that is easy to issue, then this step can also be used as the "respond" step below, where the action would be closed if the complainant accepts it.

3.6 Investigate

The CLO will lead the investigation of the complaint, when necessary, which may include gathering relevant documents, meeting with the complainant in person, consulting with

appropriate project personnel, contacting external stakeholders, and other activities. The results of the investigation will be used to document the decision-making process and inform the proposed remedy. During the investigation, the CLO will ensure that all relevant internal parties are involved in the remedy approval process, as needed.

The CLO will speak with the person who filed the complaint to learn as much as possible about the case. What exactly happened? When? Who were the people involved? It's important to listen carefully to the person as they express their complaint. In many cases, simply listening empathetically helps defuse the situation.

The CLO will communicate and explain the complaint to the appropriate person at the Project or the contractor. For example, if the complaint involves one of the employees, contact your company's human resources manager, your direct supervisor, and the employee themselves.

Determine the possible corrective action(s) or mitigation of the complaint. The nature of the corrective action, the timeframe within which it should be implemented, and the person responsible for its implementation will be recorded in the Community Feedback Database. In addition to addressing the complaint immediately, the Project or contractor (depending on the individual involved) will determine if any procedural changes are required to reduce the likelihood of the complaint recurring in the future.

Notify and discuss with the affected party the proposed corrective actions and the time required for their implementation. When necessary, CLO will obtain written authorization from the affected party to proceed with the implementation of the corrective action.

3.7 Reply and close

Once the response has been internally approved, the CLO will take final corrective action and formally respond using the appropriate communication vehicle. The CLO is responsible for ensuring that all information regarding the complaint is documented and that actions are tracked in the Complaints Log.

If the complainant accepts the proposed resolution, the agreed-upon actions are implemented. The CLO is responsible for assigning the action items, the actions, and the timeframes for implementing the resolution. These are recorded in the Complaints Register along with any supporting documentation. If necessary (usually for a Level 3), a follow-up mechanism can be established to verify implementation.

After resolution, the complaint must be formally closed. This includes asking the complainant to sign a completion form (usually for Level 2 and 3 complaints that required a non-standard investigation and remedy) to document satisfaction with the resolution actions, document the actions taken, and close the complaint in the Registry.

In cases where a complainant is dissatisfied and/or unwilling to accept the proposed resolution actions, the appeals process will be initiated and the complaint may be escalated to the Project Director and/or the Social Performance Manager.

A complaint is closed when no further action can or is necessary. The closure status will be classified in the community feedback database as follows:

- **Resolved** . Claims where a resolution has been agreed and implemented and the Claimant has signed the Confirmation Form.

- **Unresolved** . Claims where an agreed resolution could not be reached and the case has been authorized for closure by Management.

- **Abandoned** . Complaints in which the complainant is unreachable after one month of receiving a complaint and efforts to trace their whereabouts have been unsuccessful.

The CLO is responsible for updating the Grievance Mechanism Register and the logistics associated with case closure.

4 Training

All project staff will be trained on the Community Feedback Mechanism, including how to identify a complaint/grievance and the process for recording and handling it.

5 Gender and vulnerable peoples consideration

Established forms of gender segregation and defined roles and responsibilities may affect women's access to and utilization of a community feedback mechanism. Women may also be inhibited or hindered from reporting specific incidents (e.g., harassment, inequality in obtaining employment). In some communities, women may have lower literacy rates than men and be less familiar with formal processes. Mexinol will ensure that the community feedback mechanism staff includes female personnel who are aware of and sensitive to the role of women in local society and the issues they face.

The Project has developed a separate Gender-Based Violence and Harassment Risk Management Plan / Complaint Management Protocol in consultation with formal resources experienced in supporting GBVH. [See ESMP document HSSESP-SM-GBVH-0001-Rev 01].

6 Monitoring and evaluation

As part of the continuous improvement process, the project manager and/or the Social Performance Manager will conduct a quarterly review of the Community Feedback Mechanism and report to the Management Team. The purpose of the quarterly review is to: assess whether community complaints are being correctly classified; identify trends in complaints; and ensure that complaints are addressed in a timely manner.

Monthly reporting indicators include, but are not limited to:

- Number of grievances received, in total and at the local level, country level on the website, disaggregated by complainants gender and means of receiving (telephone, email, discussion)

- Number of grievances received from affected people, external stakeholders

- Number of grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.

- Categorization of grievances (as relevant to the project – for example, noise/compensation/safety), disaggregated by complainants gender

- Profile of those who lodge a grievance (gender, age, location), by category of grievances.

- Average time of complaints resolution process, disaggregated by gender of complainants and categories of complaints

- Number of awareness trainings on the CFM, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants will be annexed to the report)

- Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

  o Breakdown of complaint topics (e.g., health, safety, etc.); the goal is to gradually reduce the number of complaints under each topic by 60% year over year. The intention is to learn from complaints and respond to them qualitatively in a way that, over time, reduces their occurrence rate.

  o Breakdown of the source of the complaint (e.g., Mexinol or Project Contractor);

As part of the continuous improvement process, the project manager and/or the Community Manager conduct a quarterly review of the CFM and report to the HSSE&SP and Project Management Team. The purpose of the quarterly review is to: assess whether community complaints are being correctly categorized; identify trends in complaints; and ensure that complaints are addressed in a timely manner.

There will be an annual audit of the CFM by Corporate ESG Manager to ensure implementation and that complaints are appropriately addressed. This will include , but is not limited to:

- Compliance with the process.

- Lessons learned.

- Integrity of the complaints register.

- All data on claims received year after year.

- Trend analysis .

It's important to also note that the Worker Grievance Management Procedure also has specific KPIs, including but not limited to:

- Number of grievances raised by workers, disaggregated by gender of workers and worksite

- Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.

- Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.

- Average time of complaints resolution process, disaggregated by gender of complainants and categories of complaints

- Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

7. Reporting

Transparent documentation of engagement activities enables monitoring of stakeholder perceptions and concerns regarding project development and facilitates the identification of additional stakeholders and stakeholder groups with whom to engage.

Attendance will be recorded at all consultation meetings, and minutes will be compiled afterward. Meeting minutes will be kept to record all stakeholder comments or concerns received during the meetings, and key points from the consultations will be recorded in the stakeholder engagement activity log.

8 Quality assurance and controls

The CLO's duties will include overall responsibility for guiding grievances through to resolution, collaborating with other key project personnel and contractors at different stages of the process as needed. Mexinol is ultimately responsible for administering and monitoring the Community Feedback Mechanism. Project contractors will be required to report and coordinate with Mexinol any grievances involving contractors.

Mexinol will attempt to respond to all complaints as quickly as possible, and more quickly in cases where a rapid resolution is required.

9. Functions and responsibilities

The following table summarizes the key roles and responsibilities related to the management and implementation of the CFM. These roles and responsibilities will be reviewed periodically to ensure sufficient and appropriately qualified resources.

Role	Responsibilities
CLO (CFM Manager)	• Responsible solely for community feedback mechanism and all actions as stated throughout this procedure • Liaise with EPC CLOs and associated staff to ensure the CFM is actively used and coordinated throughout the Project, including with all subcontractors
Project Director	• Decide, together with the CLO, whether a given stakeholder management issue should be escalated within the organization or among EPCs, subcontractors • Ultimate responsibility of the leadership driving the CFM and associated stakeholder engagement • Promote accountability for the overall outcome of participation and feedback

Social Performance Manager	• Prioritize Local Community Development and Local Community Relations projects/initiatives based on consultation and participation with local communities and authorities • Identify risks in the relationship with local communities and propose solutions in agreement with the Corporate ESG and Project Director . • Liaise with the project manager and project management on higher risk issues • Liaise with EPCs community managers on all social performance issues • Support, as needed, by providing specialized responses to the grievance resolution process for potential complaints related to social and human rights. • Approve, when necessary, the establishment of an internal review committee to resolve claims whose complexity requires more in-depth analysis or poses risks to the company, as well as to resolve repeated claims.
Social and Gender Relations Manager	• Implement the full range of community engagement actions detailed in the SEP • Ensure that affected communities are informed about the Project, its activities, and its impacts, ensuring that stakeholder comments, questions, and concerns are considered and addressed. • Manage all complaints, including following up with the complainant if they are a woman or belong to a vulnerable group. • Managing the GBV Complaints Plan and coordination with the CLO responsible for the Community Feedback Mechanism for all issues pertaining to women and vulnerable people
Communications Manager	• Manage all complaints and responses according to the CFM process • Collaborate with the functions that are relevant to the matters reported by the petitioner for the management of the complaints received • Review, recognize and implement corrective measures and their follow-up, as well as for the formulation of the response. Manage the complaint registry.

	• With community relations and social managers, communicate the complaint management process to communities and the outcome of complaint investigations to the communities in their area of responsibility.
	Other functions that may correspond to the CFM:
	• Work closely with the company to prepare/validate communications materials aligned with company standards and ensure messaging, branding, reputation management, and, occasionally, government relations.
	• Coordinate external communication
Contracts/Purchasing Manager	• Interact with local businesses/suppliers to communicate opportunities, requirements, the contracting process, and enforce contract terms and requirements.
	• Provide support/lead the resolution of complaints related to contracting and procurement.
Finance Manager / EPC Finance Manager	• Appropriate budgets will be set aside t and managed through the HSSE&SP function, including with EPCs, to ensure that any grievances requiring monetary resolution are adequately covered in the Project budget.
Human Resources Manager	• CLO to liaise with HR Manager on issues where cross-coordination between Worker Grievance Mechanism and Community Feedback Mechanism overlap
Environmental Manager	• Support, as needed, by providing specialized responses to the complaint resolution process for potential environmental-related complaints.
HSSE&SP Manager	• Support, as needed, by providing specialized responses to the complaint resolution process for potential H&S-related complaints.