



Port Hawkesbury Paper LP Woodlands Unit: Complaints & Dispute Management Policy

The purpose of this Policy is to outline a set of procedures to effectively and fairly respond to complaints and disputes in a professional and timely manner. These procedures apply to situations such as external disputes/complaints arising with service providers, suppliers, or other affected stakeholders; statutory or customary law; workers rights and internal staff disputes/complaints; and Indigenous rights.

Customized Dispute Resolution Through Culturally Appropriate Engagement

The Dispute Resolution Process may be customized and adapted, considering culturally appropriate engagement. In such circumstances, reasonable efforts will be made to ensure means/approaches for dispute resolution are in harmony with the customs, values, sensitivities, and ways of life of the affected parties. If through reasonable effort, a customized dispute resolution process cannot be agreed upon, the issue will be documented following existing company procedures.

Complaint

A complaint is an expression of dissatisfaction, made to PHP Woodlands, related to its activities, operations, policies, employees, or the complaints handling and dispute resolution process itself.

Dispute

Means an unresolved complaint. In other words, it is a matter that has been dealt with as a complaint under this Policy, but where the complainant is still not satisfied with the outcome.

General Principles:

1. All persons with whom Woodlands staff comes into contact shall always be treated with respect and dignity.
2. For circumstances in which the dispute or complaint is of a sensitive or personal nature, and requiring discretion, information will only be disclosed to the parties directly involved.
3. No staff member shall be penalised or disadvantaged resulting from the raising of a dispute/complaint.
4. All rational comments, complaints or questions shall be considered seriously, and a response provided within an appropriate period.
5. All disagreements shall first be attempted to be resolved through rational dialogue between the Woodlands staff member first involved and the person(s) raising the dispute.
6. If the dispute/complaint cannot be resolved by the initial Woodlands staff member involved, the following steps will apply as necessary to reach a conclusion:

Internal Disputes:

1. Any staff member involved in an internal dispute or making a formal complaint may take the dispute/complaint to their immediate supervisor (i.e. Team Leader, or Woodlands Manager as applicable) for resolution.
2. Upon being requested to review the dispute/complaint, the immediate supervisor shall meet and discuss the issue with all staff members involved, within 15 business days. He/she shall then, if possible, make a decision to resolve the dispute/address the complaint, and explain the decision to all staff involved.
3. If the dispute/complaint cannot be resolved satisfactorily under step 2, either party to the dispute/complaint or the immediate supervisor may take the issue to the next level of management (i.e. Manager), who shall investigate and resolve the issue as per item 2 above, or refer it to the Woodlands Manager.
4. The Woodlands Manager shall investigate the issue as noted above and will also seek input, as appropriate, from other PHP personnel. The Woodlands Manager shall then take a final decision to resolve the dispute/complaint and meet with the staff involved to explain the decision, within 15 business days from the date the issue was referred to the Woodlands Manager.
5. Environmental & safety disputes, complaints and concerns may be documented through 11.06 incident report process and will be reviewed during regular SERC meetings.

External Disputes/Complaints with Service Providers or Suppliers:

1. Any staff member, service provider or supplier involved in a dispute may take the issue to the next level of Woodlands management (i.e. Superintendent or Woodlands Manager as applicable) for resolution.
2. Upon being requested to review the dispute, the next level of management shall meet and discuss the issue with the service provider or supplier and the staff member. He/she shall then, if possible, make a decision to resolve the dispute, and will explain the decision to all parties involved within 15 business days.
3. If the dispute cannot be resolved satisfactorily under step 2, any party to the dispute or the Team leader or Manager may take the dispute to the next level of management (i.e. Manager), who shall investigate and resolve the issue as per item 2 above, or refer it to the Woodlands Manager.
6. The Woodlands Manager shall investigate the issue as noted above and, will also discuss the issue with, if appropriate, other PHP personnel. The Woodlands Manager shall take a final decision to resolve the dispute and communicate this to the parties involved, within 15 business days from the date the issue was referred to the Woodlands Manager.
4. Note: A dispute resolution which involves performance improvement shall be handled in accordance with Work Instruction 11.04 Disciplinary Corrective Action for Violations

External Disputes/Complaints with Members of the Public:

1. A staff member, who becomes involved in a dispute with, or receives a complaint from, a member of the public or an outside organization, shall take the issue to his/her immediate supervisor (i.e. Team Leader, Manager, or Woodlands Manager as applicable) for discussion.
2. The dispute shall be documented as specified in Work Instruction 11.08 -Tracking of Public Inquiries.
3. Upon being requested to review the issue, the immediate supervisor shall meet and discuss the issue with appropriate staff members. As required by the circumstances, they shall also obtain additional information or meet with the outside party to fully understand the issue. The immediate supervisor shall, if possible, make a decision to resolve the dispute with the outside party's input, within 15 business days of being requested to review the issue. If an agreement is reached or if PHP does not receive a follow-up response from the complainant within 30-days, the dispute will be considered resolved.
4. If unable to resolve the dispute satisfactorily, the immediate supervisor shall take the dispute to the next level of management (i.e. Manager), who shall investigate and resolve the issue as per item 2 above or refer it to the Woodlands Manager.
5. If the issue is referred to the Woodlands Manager, they shall investigate as noted above and, will bring the issue to, if appropriate, other PHP personnel. The Woodlands Manager shall communicate the Company's final decision to the parties involved within 15 business days from the date the issue was referred to the Woodlands Manager. If an agreement is reached or if PHP does not receive a follow-up response from the complainant within 30-days, the dispute will be considered resolved.
6. PHP's Woodlands Manager shall make the third party aware that should they desire, they can communicate the issue to the appropriate level of government or government department, and PHP may assist with identifying the appropriate person to contact. The appropriate PHP staff person may also become involved in discussions with government and the third party if required.

External Disputes regarding Tenure Claim and/or Land Use Rights:

Whereas PHP's managed lands are Crown lands licensed by the Province of Nova Scotia, the Province will serve as arbitrator of all disputes related to tenure claim and/or land use rights. Records related to any tenure claim and/or land use rights will be maintained by PHP through the Public Inquiry system. PHP will refer disputes regarding tenure claim and/or land use rights on PHP licensed Crown land to the appropriate provincial authorities within 15 business days of becoming aware of such disputes.

Dispute of substantial magnitude:

Is a dispute that involves one or more of the following:

- Where the negative impact of management activities* on local communities* or on Indigenous Peoples'* legal* or customary rights* is of such a scale that it cannot be reversed or mitigated;
- Physical violence;
- Significant destruction of property;
- Presence of law enforcement or military bodies;
- Acts of intimidation against workers and stakeholders.

Disputes of substantial magnitude shall be reported to the Woodlands Manager as soon as it is practical and safe to do so.

If the dispute escalates and becomes a dispute of substantial magnitude, operations may be required to cease in the area directly related to where the dispute exists.

A dispute can become of substantial magnitude if it is of substantial duration, implies a significant number of interests and has a significant negative impact to the forest resource / value.

Disputes of substantial magnitude are not common and represent the exception.