

POLICY DOCUMENT: COMMUNITY GRIEVANCE MECHANISM (CGM) GUIDELINES

Odun Environmental Limited (ODUN)

Document Title: Community Grievance Mechanism Guidelines

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Policy Owner: Head of Administration

Approval Authority: Managing Director

Applicability: All Host Communities where ODUN operates

1. Introduction

The Odun Environmental Limited (ODUN) Community Grievance Mechanism (CGM) provides a formal, transparent, and accessible process for community members to raise concerns or complaints regarding our operations. This mechanism is aligned with the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights (UNGPs).

2. Principles of the CGM

- **Accessibility:** The mechanism must be free of charge, culturally appropriate, and accessible to illiterate or vulnerable groups.
- **Predictability:** Clear timelines for processing complaints (Acknowledgment within 48 hours; Resolution within [e.g., 21] days).
- **Fairness:** impartial investigations without fear of retaliation.
- **Anonymity:** Complainants may request anonymity.
- **Non-Retaliation:** ODUN strictly forbids retaliation against complainants.
- **Confidentiality:** The identity of complainants will be protected unless disclosure is legally required.

3. Types of Grievances Handled

This mechanism covers:

- Environmental impacts (e.g., pollution, noise, waste dumping).
- Social impacts (e.g., land acquisition, disruption of livelihood).
- Employment/Labor disputes regarding community members.
- Conduct of ODUN staff or contractors (e.g., harassment, rude behavior).
- **Note:** Criminal matters will be referred to the Nigeria Police Force immediately.

4. Grievance Channels

Community members can lodge complaints through any of the following channels:

1. On-Site Complaint Boxes: Located at the entrance of ODUN project sites and community liaison offices.
2. Toll-Free Line: 08056999010 (Available Mon-Fri, 8am-5pm).
3. Community Liaison Officer (CLO): In-person visits to the designated CLO during community office hours.
4. Email: grievances@odunenvironmental.com
5. Town Hall Meetings: Raised during quarterly community dialogues.

5. Process Flow

1. **Lodgement:** Complaint received via any channel.
2. **Registration & Acknowledgment:** The CLO records the complaint in the CGM Register and sends an acknowledgment (SMS, written note, or verbal) to the complainant.
3. **Assessment:** Management verifies the validity of the claim.

4. **Investigation:** A fact-finding team visits the site or interviews witnesses.
5. **Resolution:** ODUN proposes a remedy (e.g., compensation, operational change, apology).
6. **Closure:** The complainant signs off on the resolution. If dissatisfied, the complaint is escalated to an independent external mediator or the relevant government regulatory body (e.g., State Ministry of Environment).

6. Confidentiality and Non-Retaliation

ODUN strictly prohibits any form of intimidation or retaliation against a community member for filing a grievance. Any staff member found retaliating will face disciplinary action, including termination.

Approved By:



Ayo Abiodun,

Managing Director

Odun Environmental Limited

Date: 5th May 2026