

Australia Pacific LNG Project

Narrows Crossing Pipeline

Environmental Management Plan

Attachment 5 Grievance and Dispute Resolution
Procedure



Australia Pacific LNG Grievance and Dispute Resolution Policy

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Grievance & Dispute Resolution Policy

1. Scope

This section sets out the objectives and process for establishing an effective means by which all primary and secondary stakeholders associated with the upstream project (the gas fields' and pipeline regions) have a clear pathway to Origin (on behalf of the Australia Pacific LNG project) for the resolution of a dispute, grievance or complaint. Such dispute, grievance or complaint may be associated with the product, facility and adjacent infrastructure, conduct of business with third party suppliers/contractors, or with other stakeholder interests such as the provision of social infrastructure and community engagement mechanisms.

A community complaint, generally, is categorised as an expression of dissatisfaction from a stakeholder in relation to an Origin operated facility, personnel or activities.

1.1 Objectives

In the pre-construction phase of the Australia Pacific LNG gas field and pipeline development, the procedure for managing disputes, grievances or complaints builds upon the existing Origin Landowner dispute resolution procedure. The mechanisms for addressing dispute, grievance or complaints will be adapted as the project progresses. These systems will be continually refined to align with specific construction and operational stages with any changes communicated to stakeholders. The project will utilise widely recognised standards to manage these issues. Organisations such as the Sustainable Minerals Institute at the University of Queensland, and the globally recognised Office of the Compliance Advisor/Ombudsman (advisory to the International Finance Corporation) offer leading guidance for the establishment of best practice processes in these fields.

Dispute, Grievance and Complaint Management Process

Origin's approach to managing community concerns is through active and transparent engagement with stakeholders to ensure that stakeholder concerns are identified and resolved early.

Process elements:

- Individual stakeholders are provided with the name and direct contact details of community relations staff during any consultation activities
- Contact information will also be provided independently via a dedicated project 1800 phone line, website, published contact listings, network groups or through public information sessions
- At the time of initial contact, information is provided to the stakeholder explaining the Australia Pacific LNG process to resolve issues or concerns. If initial contact occurs indirectly (through staff or contractors), the matter is immediately (within one business day) referred to community relations staff for action
- Disputes, grievances or complaints received through the 1800 number, email address or direct phone/email/face-to-face meeting are registered and contact made within one business day to outline the Australia Pacific LNG response process. Origin aims to investigate issues within five business days, recognising that complex matters may require a longer time

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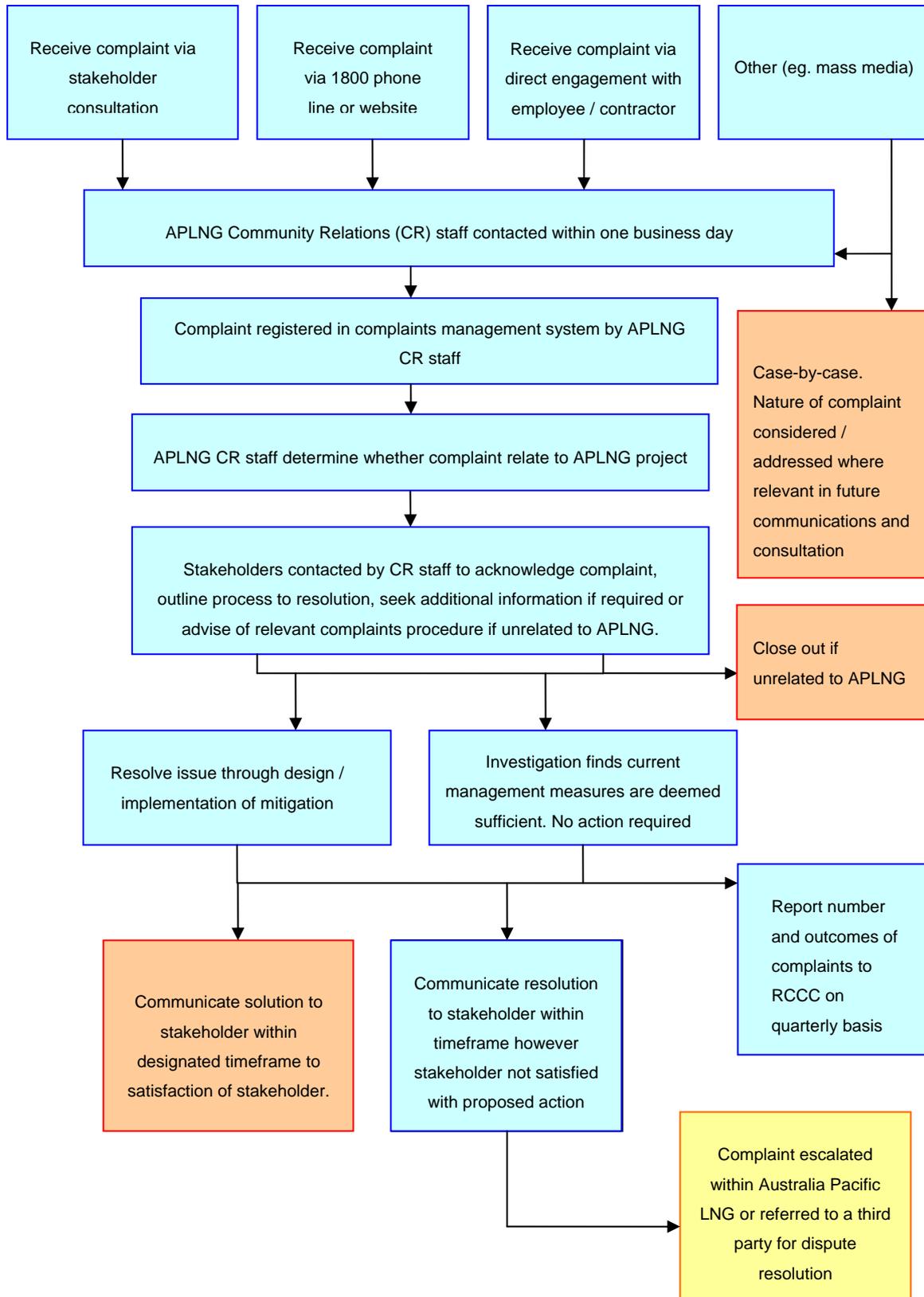
- Complaints received through a Community Information Session or in a group presentation are acknowledged within 10 business days, accounting for potential increased number of possible issues arising from a mass audience
- A dispute, grievance or complaint put forward in mass media – for example a letter to the editor – is treated on a case-by-case basis and a pathway forward will be determined by the Australia Pacific LNG Corporate Communications group and the Origin Stakeholder Relations team
- Where a stakeholder is not satisfied with the information or resolution put forward by the community relations staff, the matter may be escalated within the company or may involve, by mutual agreement, an external third party. Where possible, Australia Pacific LNG aims to resolve complaints within 20 business days
- In instances where a dispute, grievance or complaint arises out of commitments or initiatives that are specifically related to the SIMP for the project, Australia Pacific LNG may, when necessary, seek to involve the Regional Community Consultative Committee (RCCC) or partner agencies on relevant aspects of the SIMP in efforts to effectively resolve the stakeholder's concern
- All disputes, grievances and complaints will be reviewed to ensure they are genuine and relate to Australia Pacific LNG project activities. If it is determined that they do not relate to Australia Pacific LNG guidance will be provided to the complainant on the correct avenues for lodging the complaint.
- Disputes, grievances and complaints received by Australia Pacific LNG will be logged and tracked at all stages of the process to ensure accurate records are maintained for the purpose of monitoring, reporting and reviewing social performance. Such processes align with Australia Pacific LNG's business objectives, and are a mandatory requirement of the upstream project's SIMP. Origin Energy has a dedicated incident management system which will be used to record, track, report on and evaluate complaints and responses.

Statistical data arising from disputes, grievances or complaints will be analysed and collated to satisfy the monitoring, reporting and review processes attached to the SIMP and for discussion with the Regional Community Consultative Committee (RCCC) when and if necessary. Key reporting aspects will include the number of complaints received, complaint type, specific and recurring issues, response and resolution outcomes, and the implementation

Figure 1 below illustrates the typical steps that Australia Pacific LNG will follow in finding resolution to a dispute, grievance or complaint.

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Figure 1 Process steps in complaints and grievance procedure



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Australia Pacific LNG's process for gas field and pipeline dispute, grievance and complaint management is based on Origin's core values which describe behaviours that the Company expects employees to demonstrate in their actions and the decisions they make in pursuing the outcomes we are committed to achieving. Origin's core values are:

Caring: We care about our impact on customers, colleagues, the community, environment and shareholders.

Listening: We listen to the needs of others, knowing that an unfulfilled need creates the best opportunities.

Learning: We constantly learn and implement new and better ways, sharing information and ideas effectively.

Delivering: We deliver on the commitments made in all areas of performance.

Project information and transparency

Australia Pacific LNG has established communication channels with the community that are based on transparency, responsiveness and pre-emptive engagement on potential issues.

Australia Pacific LNG will continue to develop and enhance communication methods to ensure community needs and concerns are responded to in a timely and informative manner. Opportunities will continue to be provided for stakeholders to engage directly with project personnel to develop a broader understanding of the Project's impacts (both positive and negative) and to ensure community inputs are considered in Project planning.

Dedicated response staff

The Australia Pacific LNG upstream project has a team of local community relations staff working with communities, local government, agencies and associations. Community relations staff are dedicated to managing the relationships with all stakeholders and providing ongoing support throughout the life of the Project. Australia Pacific LNG aims to minimise potential for stakeholder concerns through the establishment of strong and trusted working relationships even before development activities occur. Ongoing, regular consultation is a key means by which the project can achieve this.

Employee and contractor awareness

Australia Pacific LNG project employees involved in construction and operation of the LNG facility will undertake a community awareness program as part of the Project's induction process. A key component of the awareness program will be familiarisation with Australia Pacific LNG's dispute, grievance and complaint management process, and appropriate logging/referral steps to ensure community relations staff can respond to potential stakeholder concerns within specified timeframes.

Response Process

As the upstream operator of the Australia Pacific LNG project, Origin has established a dedicated community relations team based in Miles, Roma, Chinchilla and Brisbane, consisting of:

- Community relations manager
- Landholder liaison officers

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- Local government liaison officer
- Brisbane based stakeholder officers

This team is responsible for, and will act as the initial point of contact or referral for addressing stakeholder concerns with local and regional issues that directly concern Australia Pacific LNG in relation to the construction and operations of the gas fields and gas pipeline or matters related to or contained within the Social Impact Management Plan for the upstream project. The preferred approach to addressing stakeholder concerns is always through one-on-one personal contact.

Australia Pacific LNG is committed to ensuring that any dispute, grievance or complaint is dealt with in a fair and objective manner. Australia Pacific LNG also aims to provide a range of contact avenues that will allow all stakeholder groups to have direct access to project personnel. The avenues currently available to contact the project are:

- dedicated project telephone hotline: 1800 526 369
- project website: **www.aplng.com.au** and **www.origintogether.com.au**
- Project email address: contact@aplng.com.au
- Community information offices:
 - Roma: 93 Arthur Street, Phone (07) 4620 1503
 - Chinchilla: 1 Warrego Highway, Phone (07) 4672 6600
 - Miles: 105 Murilla Street
 - Gladstone: 84 Goondoon Street, Phone 1300 776 205
 - Brisbane: Level 3, 135 Coronation Drive, Milton, Phone (07) 3858 0600