



Standard Operating Procedure RECEIVING AND HANDLING GRIEVANCE

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|----------------------|-------------------|
| Creation date | 02/04/2019 |
| Review date | // |
| Communicated | 02/04/2019 |
| Version | 01 |
| Company | Siat |
| Confidentiality | External |
| Archiving | 3 years, GSM |
| GR-STAK-505 \ | GSM-SOP-01 |

QHSE and SUSTAINABILITY DEPARTMENT

Objective

This procedure presents the steps to follow from the reception till the treatment of any grievances from any stakeholders including staff, community members, smallholders, out growers, suppliers and/or sub-contractors.

This procedure is designed to address grievance that may arise through the operations; it is aimed at:

- Developing a culture that view grievance as an opportunity to improve the organization and the way it works;
- Setting in place a grievance handling procedure that is employee focused and helps the company to prevent grievances from recurring;
- Ensuring that all grievances are documented, resolved in a determined timeframe; objectively and with sensitivity and in complete confidentiality when requested or needed;
- Ensuring that the views of each complainant and respondent are respected and that any party to a grievance is not discriminated against or victimized;
- Ensuring that there is consistent response to grievances.

Application Domain

This procedure applies to any kind of external grievances from stakeholders as defined below, which is addressed to the company. The grievance may be individual or collective.

This procedure does not apply to customer complaint regarding the product or any other marketing complaint unless the grievance meets the definition below (refer to customer complaint procedure).

Definition

Grievance mechanism: "is a formal (legal or non-legal) complaint process that can be used by individuals, workers, communities and/or civil society organizations who are being negatively affected by certain business activities and operations." (*Managing community relations in the palm oil sector*).

A complaint: should occur before the formal grievance is filed. A complaint is any oral, unwritten accusation, allegation, or charge against the company or its employees. It should be a timely expression of a problem. Complaints must be expressed and discussed with the relevant person (e.g. employee's immediate supervisor, community relations department, HR manager, etc.) before any grievance is filed. If the complaint cannot be resolved, a grievance may be raised as below.

A grievance: is defined as a formal written allegation by any stakeholder that there has been a violation, misinterpretation, misapplication, discriminatory application, or unreasonable application of an official policy, procedure, rule, or regulation by the company or its employees. For illiterate people, the complaint can be escalated to a grievance and registered by a third party or by the HOD in charge of the grievance depending on the complainant.

The grievance must disclose the information in good faith, must be substantially true, must not seek any personal gain and must contain enough information and evidences to allow the grievance committee to decide on the case.

Complainant: person(s), organization(s), stakeholder(s) raising a complaint or filing a formal grievance.

Defendant or respondent: company or company employee against whom a complaint has been raised.

A whistleblower: is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within the organization. The information of alleged wrongdoing can be classified in many ways: violation of company policy/rules, RSPO Standards, law, regulations, or threat to public interest, as well as fraud, and corruption. Those who become whistleblowers can choose to bring information to surface either internally or externally.

Anonymity: is used to describe situations where the acting person's name is unknown. The important idea here is that the person is non-identifiable, unreachable, or untraceable.

Responsibilities

HR manager is responsible for handling internal complaints from employees (e.g. raised by employees, union etc.).

CR manager is responsible for handling complaints coming from communities or social stakeholders as well as any other stakeholder that are not listed upon request of Siat or subsidiary management (e.g. Social NGOs).

OG manager is responsible for handling complaints coming from raw material suppliers (e.g. Smallholders, OutGrowers, privates, Planteurs Villageois.) If a complaint of this group is with regard to the interests of their communities then it might be transferred to CR department).

HSE manager is responsible for handling complaints coming from environmental NGOs.

MD/DG/COO/Chef de site is responsible for handling complaint and grievances coming from authorities or para-public organizations.

Marketing is responsible for handling complaints coming from their sub-contractors (e.g. transporters).



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GSM manager is responsible for handling complaints and grievances coming from international organizations with the support of the manager responsible at the concerned subsidiary(ies).

Grievance committee is responsible for handling all complaints when they are raised to grievances with the support of the manager responsible upon request. The committee is responsible for handling all anonymous grievances as well as grievances raised against management including the above managers. The grievance committee consists at least of 5 members and always an odd number of members from different departments; women must be represented by three members minimum. CR, COO and HR managers are excluded. HSE or RSPO manager is a member (except if the grievance involves his/her department). Members of grievance committee commit by being a member to not disclose any information in their possession even to their own hierarchy. Breaking that rule exposes them to immediate exclusion from the committee as well as sanction.

*"Manager" should be here understood as the highest position in the department.

Procedure

COMMUNICATION

For stakeholders to effectively participate and express their complaints, there need to be clear communication channels. Stakeholders need to know how to use them. Stakeholders need to feel secure in doing so. Siat employees who voluntarily limit access to these means of communication will be sanctioned.

Communication methods

| | |
|----------------------------|------------------------------------|
| Worker representative, | Gender committee, |
| Worker committees, | Harassment procedure, |
| Meetings and assemblies, | Community representatives, |
| Suggestion box, | Community committees. |
| Poster, boards, brochures, | Smallholder Association executives |
| Company web-site, | Outgrower Association executives |
| Union, | |

Communication means

Verbal
Email
Phone call
Siat websites complaint form*
Letter
Meetings minutes

* www.presco-plc.com/contact-us
www.siatnigeria.com/contact-us
www.gopdc-ltd.com/contact-us

COMPLAINT TO GRIEVANCE

Employees are encouraged to report their complaints to the workers' representatives. Community members are encouraged to report their complaint to the community committee. If those channels don't give satisfaction complainant(s) discuss the complaint verbally with the relevant responsible manager or the most immediate supervisor who has the authority to make adjustments in the matter (see above for responsibilities). If the complaint cannot be discussed with the designated manager in charge or cannot be solved in a way or a timeline satisfactory to the complainant(s), then it might be raised as a grievance. If the complaint concerns a case of harassment, then refer to the harassment procedure.

LOG BOOK

Grievance received are recorded in the logbooks. (Refer to "Communication procedure").

CR, HR departments and the grievance committee must maintain logbooks where complaints, grievances, requests or any other formal demands are recorded. For the other departments, if the demands are not frequent (e.g. less than one in a month), documents can be kept in a dedicated folder (demands and replies together).

SUGGESTION BOXES

Employees may use the suggestion box to address grievances. The suggestion boxes are checked the first Wednesday of every month (or any other frequency indicated on the box). Suggestion boxes are managed by the HR department. Letter collected are transferred the same day to the relevant department or straight to the Grievance committee if the letter is confidential.

LEGAL ISSUE

Any complaint or grievance that might be linked to an illegal activity could be handled by this procedure but must also be communicated to the authorities in the same time.

CONFLICT

For grievance regarding destruction of food crops, non-respect of the boundaries, destruction of forest products, act of vandalism, no respect of the terms of contract/agreement between parties the "Conflict management" procedure apply (in absence of such procedure follow the current procedure).



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ANONYMITY OF COMPLAINANTS AND WHISTLEBLOWERS

Complainants and whistleblowers that wish to remain anonymous are encouraged to use the complaint form available on the website on the section "contact us". This form can be completed without indicating the identity of the person who wants to share the information. The filled forms are sent directly to the GSM. The complainant might fill the form. In order to receive a response and stay anonymous he/she can give an email address that doesn't betray his/her identity.

In case the complainants or whistleblowers don't have access to the internet the following actions are possible:

- Write an anonymous letter, put it in an envelope in one of the suggestion boxes (the letter might contain either a phone contact or an email address to answer to).
- Write a non-anonymous letter, put it in an envelope and give it to a HOD with the mention "Confidential". The HOD will then transmit it to the COO secretariat.

It is the responsibility of any person who receives a "confidential" envelop to keep secret the identity of the person who gave it to him. Any failure to do this and revelation of identity will be considered as a major disciplinary case.

Any envelop that is known as confidential received by a recipient should be addressed to the grievance committee.

The recipient who knows that the complainant(s) want to stay anonymous, makes a copy of the letter, strikes through on the copy all information that can make the identification of the complainants possible and then follows the "complaints and grievances" procedure by forwarding the masked copy to the relevant person.

COMPLAINT AND GRIEVANCE FROM OG/SH/PRIVATES/PV AND ANY OTHER RAW MATERIAL SUPPLIERS

The below procedure might be applied to any cases. However, it's strongly recommended to bring the case to the OG/SH/Privates/PV representatives especially if the complaint raised is in regard to financial aspects. The grievance committee and/or MD,DG, OG, COO manager could redirect the grievance to the representatives committee if it's a linked with commercial aspects.

PROACTIVITY IN MAINTAINING A MULTI-WAY COMMUNICATION

The current SOP should be discussed and approved by the community's representatives and workers' representatives. All workers, community committees as well as OG/SH/private committees must be informed of the existence of this procedure respectively by HR, CR, OG departments in a proactive manner. Upon request it must be communicated to any other stakeholders.

Communication channel with relevant stakeholders (workers' representatives, communities, OG/SH, NGOs, authorities etc.) must be open and relationship cultivated. Frequent communication is crucial and should be systematized.

... see Flowchart below

Documents/Files/Appendices

Grievance form available on Siat websites; Log books

Filing

Community relation folders, HR folders, HODs folders

References

IFC, Managing community relations in the palm oil sector, 2015, 114p

SAI, IFC Measure & Improve Your Labor Standards Performance, performance standard 2 handbook for labor and working conditions, 2010, 183p

IFC, Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, 2007, 201p
RSPO P&C, 2018, 91p

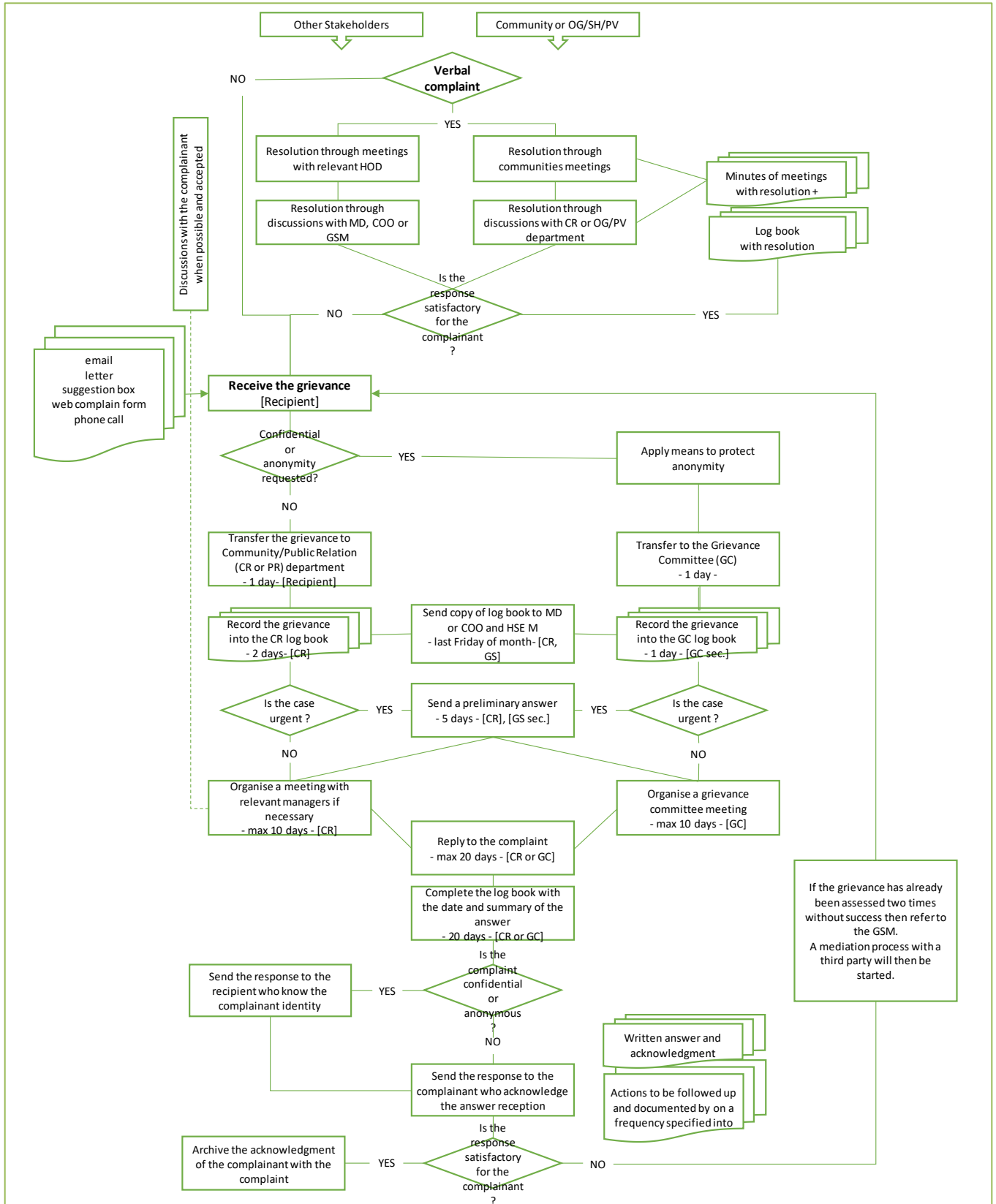


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Flowchart – Stakeholders, communities, OG/SH/PV/Private’s complaint or grievance





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Flowchart – Employees’ complaint or grievance

