

Grievance procedure for the implementation of Oleon's Sustainable Palm and Soy Sourcing policy

BACKGROUND

Oleon recognizes that sustainable development is integral to the long-term viability and success of its business and launched its Sustainable Palm and Soy Sourcing policy ("Policy") to meet rising market demand for traceable, responsibly produced agricultural products.

Oleon believes stakeholders play important and constructive roles in the implementation of its Policy and related policies. As part of the Policy, Oleon established a Grievance Procedure to enable any stakeholder to raise a grievance against any party. All grievances logged under the Grievance Procedure will be managed in a timely manner.

Oleon will seek input from relevant stakeholders on the Grievance Procedure provisions and procedures to ensure an effective grievance mechanism.

OBJECTIVES

Oleon recognizes that feedback and input from stakeholders is valuable because it helps to enhance transparency in our supply chain and provides a means to gauge progress on the implementation of the Policy. In this respect, the Grievance Procedure favors open and inclusive dialogues with stakeholders over complex administrative processes.

The Object of our Grievance Procedure is part of our broader commitment to implement our Sustainable Palm policy by identifying and addressing non-compliance in our supply chain. In addition, it aims to:

- Establish a prompt, consistent and respectful mechanism for receiving, investigating and responding to Complaints from stakeholders;
- Ensure proper documentation of Complaints and any corrective actions taken; and
- Contribute to continuous improvement in performance through the analysis of trends and lessons learned.

SCOPE

This procedure covers activities related to the handling of stakeholders' grievances with respect to the implementation of the Policy. This includes recording grievances, taking actions to verify claims, rectifying any confirmed issues, reporting the verification results and actions on the ground, delivering the response to stakeholders and managing and monitoring any follow-up action.

Oleon's Policy and this Grievance Procedure apply to all worldwide operations and all suppliers. For the purpose of this Grievance Procedure, the following definition apply.

Term	Definition
Oleon's own operations	All owned operations in all geographies where Oleon operates.
Suppliers	All palm oil suppliers (and associated materials, i.e. palm kernel) whether directly or indirectly supplying Oleon (indirect suppliers include traders, refiners, millers and growers). Suppliers include all subsidiaries to a group that the company is connected to, even those not in their physical supply chain.

When a complaint against a supplier is submitted to Oleon, the Grievance Committee will engage with the supplier to discuss the issues raised in accordance with this procedure, with the end-objective of resolving the issues. In the event that the supplier does not want to engage in the process towards resolution and compliance with the Group's Policy, Oleon will review its commercial relationship with that supplier.

ROLES AND RESPONSIBILITIES

The Grievance Lead at Oleon's Head Office

- The Grievance Lead is responsible for coordinating and performing all tasks necessary for the successful implementation of this Grievance Procedure, including engagement with the external parties who raise the grievances.
- Duties of the Grievance Lead include: to receive, record, classify, and report the grievances to the Grievance Team and Committee and the Verification Team. The Grievance Lead will also monitor media (print and electronic) for news relating to Oleon and its suppliers in order to identify potential grievances. Potential grievances will be assessed by the Grievance Lead using the Grievance Criteria to determine if they qualify for further investigation or referral to the Grievance Committee. The Grievance Lead will maintain an up-to-date grievance list containing details of all grievances handled in accordance with this procedure. The grievance list will be circulated to the Grievance Committee on a quarterly basis.
- The Grievance Lead will be responsible for reviewing action plans created by the Verification Team to address any verified grievances. On a quarterly basis, the Grievance Lead will review

any outstanding time-bound action plans established for past grievances to ensure that progress has been made against the agreed plan.

The Grievance Committee

- The Grievance Committee is responsible for making management decisions in relation to grievances. It is responsible for approving action plans designed to resolve grievances and for approving official correspondence to external parties in relation to verified grievances.
- Senior management representatives from Oleon will form the core of the Grievance Committee and where appropriate Oleon will invite third-party observers to participate.

The Verification Team

- The Verification Team is comprised of Suppliers and/or other third-party service providers as required. The Verification Team may include external parties, such as the Grievance Raiser or a representative of the Grievance Raiser who has been given a clear mandate through a letter of assignment and/or NGOs with knowledge of the area and issues.
- Duties are to study and verify the grievance data/information provided by the external parties and, when necessary, to conduct field investigations to collect additional data to confirm the validity of the grievance and to enable the Grievance Committee to deliberate on and address the grievances.
- The Verification Team will develop report(s) outlining the result of its inquiry and recommended actions to address any confirmed issues. The report will be submitted to the Grievance Lead for approval and sharing with the Grievance Committee.

Oleon's Procurement, Compliance, Communications and other Departments

- Oleon's relevant Department personnel will take the necessary actions to raise and address the grievance with its suppliers; and report the implementation and result to the Grievance Lead.

The Roles and Responsibilities RACI identifies the roles involved in the different steps of the Grievance Process and their responsibility related to each part of the process.

PROCEDURE

Workflows

1. Grievances can be expressed via any of the following channels:
Via email to: CSR@oleon.com
In writing to: Oleon t.a.v. Ludovic Van, Assenedestraat 2, 9940 Evergem, BELGIUM
2. Grievances should include provision of the following information:

- Full Name
- Name of Organization (if any)
- Address
- Phone No./ Email Address (at least one contact point)
- Description of the grievance in detail
- Evidences to support the grievance

Contact details are required to seek further clarification on the grievance. The party reporting the grievance (Grievance Raiser) may request that their identity remain confidential. Any party may appoint a third-party to submit their grievances provided that the third-party follows the procedure.

In addition to grievances submitted through the official channels above, issues raised through unofficial channels, such as the media and the internet, will be recorded as grievances on request by either external stakeholders or Oleon.

3. All potential Policy breaches which come to the attention of the Grievance Lead will be assessed by considering the follow Grievance Criteria:
 - Does the grievance connect to the company supply chain (including parent companies, etc.)
 - Does the grievance contain specific allegations
 - Does the grievance involve a violation the Policy
4. The Grievance Lead records each grievance in the Grievance Log and classifies the grievance scope by identifying the section(s) of the Policy which are relevant to the grievance.
5. The Grievance Lead will establish contact with the Grievance Raiser and formally extend an offer to engage in dialogue about the grievance; Grievance Lead will then summarize all available information about the grievance for the Grievance Committee to review. The Grievance Lead will maintain all the files and documents, including all the correspondences sent by the Grievance Committee to external parties.
6. The Grievance Committee reviews the summary from the Grievance Lead and determines whether a grievance investigation is required.
7. If it is determined that the grievance is unmerited or no field action is required, the Grievance Lead will submit a Response Letter the Grievance Raiser.
8. If the Grievance Committee determines that the grievance is merited, the Verification Team will begin an investigation.

9. The Grievance Lead will work with the Oleon Procurement Department to engage directly with the suppliers. The Grievance Lead may undertake interviews and dialogues with relevant stakeholders; and where necessary collect additional data to substantiate the validity of the grievance.
10. If it is confirmed that a supplier has breached the Policy, the Grievance Committee will authorize the Grievance Lead to send an official letter to the relevant Oleon supplier requesting them to take steps to resolve the issues raised.
11. Following completion of the verification report, the Grievance Lead will contact the Grievance Raiser and formally extend an offer to engage in dialogue about the grievance findings. The Grievance Lead will confirm whether the Grievance Raiser wants to engage in dialogue about the grievance findings and, if required, schedule a meeting/teleconference.
12. Any party that reported a grievance and is unsatisfied with the written response from the Grievance Committee can send its complaint to the Grievance Committee providing information on the issues that they consider to be insufficiently addressed. If deemed necessary, the Grievance Committee, with the assistance of the Verification Team, can conduct the following:
 - Invite the concerned party to obtain a direct explanation.
 - Together discuss other options that may be undertaken to resolve the remaining grievance.
 - Involve external independent observers (e.g. relevant experts or important stakeholders) in the verification process.
13. For cases related to media reports (print and electronic) the decision to respond to the media will be decided by the Grievance Committee.

Timelines for handling complaints and grievances

This Grievance Procedure is intended to be used to address a wide range of stakeholder concerns which will often involve numerous parties with conflicting interests. As such, the resolution of such grievances will at times involve lengthy processes of enquiry and mediation between various stakeholders and it will be necessary to apply a flexible approach in order to resolve such complex issues. However, it is important that grievances are addressed in a timely manner in order to demonstrate the credibility of Oleon's Policy. In this context, Please see the Process Flow document and the Roles and Responsibilities RACI for service level agreements for each step in the process.