

# Grievance Procedure

for the Olam business  
and its third party suppliers

Version 1.0 July 2018

# Grievance Procedure

## 1 Purpose

The purpose of this procedure is to define the process of handling grievances directed against Olam businesses, including our third party suppliers. It defines the admissibility, registration and processing of complaints.

## 2 Objective

Provide a clear, appropriate and comprehensive response to grievances directed against Olam businesses or our third party suppliers, in order to prevent disputes as far as possible and resolve admissible grievances relative to Olam's corporate policies and codes (Living Landscape Policy, Employee Grievance Handling Policy, Olam Supplier Code, and other policies relevant to specific businesses). We are committed to ensuring a transparent and open process with updates on the grievance provided on the Olamgroup.com website.

## 3 Scope and Guiding Principles

This Grievance Procedure applies to all of our upstream operations and supply chain infrastructure (processing plants, warehouses and logistics hubs), and our third-party suppliers. It should be used to report and address breaches of relevant Olam Policies or Codes, resulting in illegality, exploitation of local communities or workers employed by Olam or a third party supplier, or unacceptable practices in land use management as defined in the Olam Living Landscapes Policy and the Olam Supplier Code (including failure to respect laws relating to the environment and human and labour rights, and protected areas; converting or degrading critical habitats, peatlands, and other natural habitats with high levels of organic carbon, using fire in land preparation; and breaching the rights of indigenous peoples and/or local communities).

If breaches of the relevant Olam Policies and Codes are reported in our own operations or those of third party suppliers, we will assess the extent and nature of non-compliance and establish a time-bound plan internally and/or with our suppliers to address the issue and where necessary remediate material negative impacts of non-compliance.

As a last resort we will disengage from suppliers who are unable to demonstrate positive steps to address the cause or remediate the impacts of admissible grievances, in a time-bound manner.

### **Entities addressed in grievances:**

Grievances addressing apparent illegal or unethical behavior by individuals or teams employed by Olam can be reported through the mechanism of the present Grievance Procedure. Grievances in this category will be referred to the process defined in Olam's Code of Conduct, governing the behavior of Olam employees.

Admissible grievances in the scope of the present Grievance Procedure which are directed against a business owned or operated by Olam will be addressed by the management in charge of the relevant Olam entity as set out below. Grievances expressed specifically against Olam's Palm Oil production and trading businesses or suppliers to those businesses will be redirected and treated according to Olam's Sustainable Palm Oil Policy, which established a product-specific grievance system.

Admissible grievances directed against an Olam Supplier will be addressed through an engagement with the named supplier as described above, and Olam may cease the relationship as a last resort.

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## 4 Reference Documents and Systems

- Olam Living Landscape Policy;
- Olam Supplier Code;
- Olam Employee Grievance Handling Policy
- Olam Code of Conduct

## 5 Responsibilities

### 5.1 Procedure Revision

This procedure will be reviewed and updated every 2 years or following organisational change.

### 5.2 Procedure Implementation

The rules of procedure will be managed and implemented as appropriate by the company's Corporate Responsibility & Sustainability (CR&S), Human Resources (HR) teams or the relevant business unit. The roles and responsibilities of the various units are as follows:

#### 5.2.1 CR&S

CR&S is responsible for managing external complaints arising from stakeholders. It supervises and directs, if necessary, the resolution of the grievance.

#### 5.2.2 HR

HR is responsible for managing complaints or claims made by employees and contract or seasonal workers. It supervises and directs, if necessary, the resolution of the grievance.

#### 5.2.3 Business Unit

The Business Unit is responsible for managing all complaints from customers and suppliers. It shall ensure that grievances are properly addressed to named supplier(s), processed and that the resolution is communicated to the complainant in accordance with this procedure.

## 6 Submission of Grievance

The grievance may be made to:

Olam International - Grievance Manager  
New Zealand House, 80 Haymarket, London SW1Y 4TQ.

Tel: (+44) 20 7389 6464

Email: [crs@olamnet.com](mailto:crs@olamnet.com)

\*Emails should be clearly titled 'FAO Grievance Manager, Olam'

Grievances can also be addressed to the relevant Country Office as detailed on the Olam website

The grievance should include provision of the following information:

- Full name
- Name of organisation (if any)
- Contact details (phone/fax/email address)
- Description of the grievance in detail
- Evidence to support the grievance

\*Whilst grievances can be made anonymously, providing full contact details enables Olam to better understand and address the concern.

## 7 Transparency and Confidentially

Olam is committed to the transparent handling of grievances. The CR&S or HR teams will update the status of a complaint, particularly when the complaint is registered, action has been taken and resolution outcome is agreed upon. The Complainant can also contact Olam CR&S regarding the status of complaint in writing.

The system allows for dialogue to remain confidential and for the confidentiality of the complainant if requested.

## Grievance Procedure Process Flow

Timeline	Stage	Person in charge
1 week	<b>1) Receipt and registration of grievance</b> <ul style="list-style-type: none"> <li>Acknowledge receipt of grievance</li> <li>Contact relevant Business Unit or department in charge</li> <li>Register grievance if admissible</li> </ul>	CR&S Business unit Human Resources
1 week	<b>2) Preliminary review</b> Check admissibility of grievance NO - inform complainant YES - continue with stage 3 Admissibility of grievance: <ul style="list-style-type: none"> <li>Assess party alleged to be in breach of Policy (upstream operation/direct supplier/third party supplier/past supplier)</li> <li>Assess allegation in relevance to Olam's relevant policies (e.g, Olam Supplier Code)</li> <li>Assess information submitted by complainant, request specific info if required</li> </ul>	CR&S Business unit Human Resources
1 month	<b>3) Dialogue, plan investigation, determine resolution</b> <ul style="list-style-type: none"> <li>Inform and seek input from party alleged to be in breach (business unit, direct supplier/third party supplier)               <ul style="list-style-type: none"> <li>Response by party alleged, requires further investigation                   <ul style="list-style-type: none"> <li>proceed to following step</li> </ul> </li> <li>Response by party alleged, does not require further investigation                   <ul style="list-style-type: none"> <li>inform complainant</li> </ul> </li> <li>No response from party alleged                   <ul style="list-style-type: none"> <li>decision by Olam and inform complainant</li> </ul> </li> </ul> </li> <li>Agreement on investigation scope and approach with party alleged and complainant (within constraints of anonymity if requested by complainant)</li> <li>Consider involvement of third party investigation/mediation</li> </ul>	CR&S Business unit Human Resources
1-3 month	<b>4) Investigation Process</b> <ul style="list-style-type: none"> <li>Collect additional information, decide if field verification is required</li> <li>Assess investigation result based on objective evidence</li> <li>Decision making               <ul style="list-style-type: none"> <li>GRIEVANCE NOT VALID - inform complainant</li> <li>GRIEVANCE VALID - develop resolution plan</li> </ul> </li> </ul>	CR&S Business unit Human Resources
1 month	<b>5) Develop resolution</b> <ul style="list-style-type: none"> <li>Agree on investigation findings by party alleged and complainant</li> <li>Agree on a time bound action plan</li> <li>Agree on communication of actions and progress</li> </ul>	CR&S Business unit Human Resources
6-12 month	<b>6) Case monitoring</b> <ul style="list-style-type: none"> <li>Implementation of action plan               <ul style="list-style-type: none"> <li>Case resolved</li> <li>Case not resolved: proceed to stage 5</li> <li>In case of persistent breach/non-compliance by third party supplier, consider terminating supplier relationship.</li> </ul> </li> </ul>	CR&S Business unit Human Resources