

# Grievance Procedure

for the Olam business  
and its third party suppliers

Updated on 31 May 2020

# Grievance Procedure

## 1 Purpose

The purpose of this procedure is to define the process of handling grievance made against the Olam palm business, including our third-party suppliers. It defines the admissibility, registration and processing of complaints.

## 2 Objective

Provide a clear, appropriate and comprehensive response to the grievance in order to prevent disputes as far as possible and resolve any issue in relevance to Olam Sustainable Palm Oil Policy. We are committed to ensuring a transparent and open process with updates on the grievance provided on the Olam's website.

## 3

Words, Terms, Acronyms or Abbreviations	Definition
CR&S	Olam's Corporate Responsibility & Sustainability Function
Grievance/ Complaint	Breach of Olam Supplier Code (OSC) aligned with the Sustainable Palm Oil Policy, to RSPO, or to a code that is equivalent to the OSC and approved by Olam
RSPO	Roundtable on Sustainable Palm Oil
RSPO P&C	RSPO Principles and Criteria
SCCS	Supply Chain Certification System

### Group company

Refers to the RSPO Membership Rule 7 November 2019.

Companies having common individual owner(s), corporate group, smallholders group manager, supply chain group manager, group of companies operate under a common brand and cooperative unions.

## 4

### Scope

This Grievance Procedure applies to our upstream palm operations in Gabon, our third-party suppliers, and its group company as per the definition in section 3.

When a complaint against a supplier is submitted to Olam, we will engage with the named supplier to discuss the issues raised in accordance with this procedure, with the 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 Policy, Olam will review its relationship, which may include ceasing doing business with the supplier.

If any supplier is found to be non-compliant, they will be investigated, and corrective actions sought. We will request our direct supplier(s) to suspend the group company/ producer/ mill, engagement could continue for corrective action. Corrective action for non-compliance after cutoff date (Feb 2017) may include compensation/ conservation/ restoration of peatland or forest by working with expert stakeholders and communities where feasible. This applies to both their own plantations and their third-party supplies. See Annex 1 Procedure for Supplier Reinstatement after Suspension.

# Grievance Procedure

## 5 Reference Documents and System

- Olam Sustainable Palm Oil Policy;
- Olam Supplier Code;
- Olam Code of Conduct;
- RSPO P&C,SCCS and Membership Rules;

## 6 Responsibilities

### 6.1 Procedure Revision

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

### 6.2 Procedure Implementation

The rules of procedure will be managed and implemented as appropriate by CR&S, HR, Social, or the relevant business unit. The roles and responsibilities of the various units are as follows:

#### 6.2.1 CR&S in charge

The CR&S in charge is responsible for managing external complaints arising from stakeholders. They supervise and direct, if necessary, the resolution of the grievance.

#### 6.2.2 HR in charge

The HR in charge is responsible for managing complaints or claims made by employees and contract or seasonal workers. They supervise and direct, if necessary, the resolution of the grievance.

#### 6.2.3 Business Unit in charge

The Business Unit is responsible for managing all complaints from customers and suppliers. They 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.

## 7 Submission of Grievance

The grievance may be made to:  
Address : C4-2-10, Solaris Dutamas, No. 1,  
Jalan Dutamas 1, 50480 Kuala Lumpur, Malaysia.  
Tel : +[603] 64116771  
Fax : +[60] 64416772  
Email : palmsustainability@olamnet.com

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

Grievances regarding Olam's upstream palm plantations in Gabon can be made via this Procedure or directly to:

Address: Galeries Tsika, 2nd floor Opposite to  
City Sport of Mbolo BP 1024 Libreville, Gabon  
Tel : [+241] 02 12 31 31  
Fax : [+241] 01 76 14 84  
Email : gabon@olamnet.com

While grievances can be made anonymously, providing full contact details enables us to better understand and address the concern.

## 8 Transparency and confidentiality

Olam is committed to the transparent handling of grievances. The CR&S or HR in charge 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 in charge 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>Register grievance if admissible</li> </ul>	CR&S in charge
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 (direct supplier/ third party supplier/ past supplier and its group company)</li> <li>Assess allegation in relevance to Olam Supplier Code aligned with the Sustainable Palm Oil Policy, to RSPO, or to a code that is equivalent to the OSC and approved by Olam.</li> <li>Assess information submitted by complainant, request specific info if required</li> </ul>	CR&S in charge Business Unit in charge
1 month	<b>3) Dialogue, plan investigation, determine resolution</b> <ul style="list-style-type: none"> <li>Inform and seek input from party alleged [with or through direct supplier]               <ul style="list-style-type: none"> <li>Responded by party alleged and require further investigation                   <ul style="list-style-type: none"> <li>proceed to following step</li> </ul> </li> <li>Responded by party alleged and 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</li> <li>Consider to consult third party</li> </ul>	CR&S in charge
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 on complaint status [suspension, case closed, monitoring for action plan]               <ul style="list-style-type: none"> <li>NOT VALID – inform complainant</li> <li>VALID – develop action plan</li> </ul> </li> </ul>	CR&S in charge
1-3 month	<b>5) Develop action plan</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> <li>Corrective action for non-compliance after cutoff date (Feb 2017) may include compensation/ conservation/ restoration of peatland or forest by working with expert stakeholders and communities where feasible.</li> </ul>	CR&S in charge
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 closed</li> <li>Case not resolved: proceed to stage 5</li> </ul> </li> </ul>	CR&S in charge

# Annex 1-Procedure for Supplier Reinstatement after Suspension

## Scope

This procedure covers the reinstatement of a direct supplier after it has been suspended due to non-compliance with Olam's Sustainable Palm Oil Policy for no deforestation, no peat and no exploitation ("NDPE") requirement.

This procedure is applicable to the suspended company at Group level. When a direct supplier has been suspended it must demonstrate that it has taken action and/or committed to implementing a time-bound action plan that meets the following requirements at the Group level before being considered eligible for re-entry into Olam's supply chain.

For indirect supplier, we will request our direct supplier to apply suspension and to implement criteria stated in this procedure for their supply chain.

## Minimum criteria for reinstatement of suspended supplier

The following are the minimum criteria for the reinstatement of a direct supplier into Olam's supply chain following suspension:

1. Moratorium/stop-work order on land-clearing and/or peat development and/or exploitation (labour/ human rights infringements) within the concession where the complaint has taken place.
2. A declaration on the total area and details of non-compliance.
3. For pertinent cases - commit to conduct an HCV and where relevant HCSA study to be submitted to the HCVRN Quality Panel.
4. Take corrective action for non-compliance after cut-off date (February 2017) which may include compensation/ conservation/ restoration of peatland or forest by working with expert stakeholders and communities where feasible. This applies to both their own plantations and their third-party supplies.
5. If not yet available, publish a No Deforestation, No Peat and No Exploitation Policy that applies to the group company and supplier.
6. Put in place Standard Operating Procedures that outline the delivery of the NDPE Policy. These SOPs must be socialised and measures taken to embed these within the company. Provide evidence based on satellite imagery to verify the scale of non-compliant development and for on-going monitoring. A report from an independent party accessing non-compliant development for an agreed timeframe can be accepted. For RSPO members, the Compensation and Remediation Procedure (RACP) will apply.
7. Reporting: Supplier must publish a status report outlining actions and progress at least every six months until the case is closed. Any failures in the implementation of the time-bound action plan would result immediately in the suspension being re-imposed.