



SIPEF
GRIEVANCE POLICY
2024



REVISION HISTORY

Revision Number	Revision Date	Description	Sections Affected	Reviewed By	Approved by
0	12 June 2024	Date of approval	Original version	ExCom	BOD



1. Introduction

SIPEF believes that all stakeholders, internal and external, should be confident that their Grievances will be heard and handled impartially without fear of reprisals. SIPEF is committed to maintaining a positive and respectful work environment for all Employees and stakeholders. SIPEF recognises that Complaints and Grievances may arise from time to time, this Grievance Policy is established to address and resolve such issues promptly and fairly.

2. Purpose

The Grievance Policy aims to provide Employees and stakeholders with a process for raising and resolving Complaints and Grievances in a transparent and impartial manner. This Grievance Procedure provides the framework for all Country Level grievance procedures already in place, such as those for existing certification standards.

3. Scope

The Grievance Policy applies to all SIPEF Employees, Non-employees (contractors), SIPEF group and its subsidiaries, and stakeholders who wish to submit Grievances regarding SIPEF and its perceived impacts upon them or others.

Any Grievance should be first resolved through the existing grievance procedure and mechanism at the local office or where the grievance was first received. If a resolution cannot be achieved there, it must be elevated for resolution where possible. If this is not possible at the Country Level, or if the Grievance submitted poses a Substantial Risk, the grievance is escalated to the Group Level.

4. Definitions

Terms	Descriptions
Grievance	A formal written complaint made by, among others, Employees, Non-employees, communities, or Related Stakeholders submitted through SIPEF’s website, email (grievances@sipef.com), or via Country Level.
Complaint	An unwritten expression of dissatisfaction or concern relating to SIPEF’s activities which does not require a written response.
Request for Information	An inquiry about a Complaint or Grievance which has been submitted through the Grievance Procedure.
Employees	An individual who is in an employment relationship with SIPEF or its subsidiaries according to national law or practice.
Non-employees	SIPEF’s own workforce which includes both individual contractors supplying labour to SIPEF (“self-employed

	people”) and people provided by SIPEF primarily engaged in “employment activities”.
Grievant	Employees, Non-employees, and/ or stakeholders that bring forth a Grievance against SIPEF group, SIPEF employees, or part thereof.
Complainant	Employees, Non-employees, and/ or stakeholders that bring forth a Complaint against SIPEF group, SIPEF Employees, or part thereof.
Grievance Manager	Designated Employees responsible for, among others, recording, overseeing, managing, and reviewing Grievances in SIPEF as described in this Grievance Policy.
Grievance Committee	A designated group of Employees who help assign Grievances to the Grievance Committee Representative, depending on the subject matter.
Grievance Committee Representative	Member(s) of the Grievance Committee that has been appointed to coordinate investigation and draft response to the Grievant and to send the draft response for review by the Grievance Manager.
Group Level	SIPEF group or SIPEF HQ, a Belgian agribusiness group as listed on Euronext Brussels.
Country Level	A subsidiary of SIPEF group, including PT Tolan Tiga Indonesia, Hargy Oil Palms Ltd, and Plantations J. Eglin SA.
Grievance Procedure	A procedure as described by this Grievance Policy to resolve Grievances submitted through the Country Level, SIPEF’s website, or through email to grievances@sipef.com .
Escalation Process	A Grievance that has been referred from the Country Level to be resolved at the Global Level through the Grievance Procedure.
Urgent Grievance	A pressing and serious Grievance that requires immediate attention and resolution due to its potential grave impact on individuals, groups, or SIPEF.
Substantial Risk	Potential or actual harm or damage to SIPEF group or its subsidiaries, whether reputational or material. This includes, but is not limited to, Grievances submitted by NGOs, Grievances with potential or actual negative publicity, Grievances involving human rights violations, etc.



5. Responsibility

Executive Committee Member

The Executive Committee Member is responsible for approving external communications as required by this Grievance Policy.

Group Director Sustainability (GDS)

The Group Director Sustainability is responsible for approving external communications at the Group Level as required by this Grievance Policy, along with the Executive Committee members.

Grievance Manager (GM)

The Grievance Manager is responsible for, among others, recording, overseeing, and managing Grievances, and reviewing Grievance draft responses submitted by the Grievance Committee Representative as required by this Grievance Policy. The Grievance Manager is the first point of contact and decides whether the Grievance can be handled locally, needs to be escalated to a Grievance Committee or a higher level of management.

Grievance Committee (GC)

The Grievance Committee is responsible for assigning Grievances to the Grievance Committee Representative, determining the urgency of the Grievance, and referring any escalated Grievances received at the Country Level to the Grievance Procedure as stipulated in this Grievance Policy. Grievance Committees are used only for Grievances which are deemed of a serious nature enough to not be addressed only by the Grievance Manager.

Grievance Committee Representative (GC Rep)

The Grievance Committee Representative is responsible for coordinating investigations, drafting Grievance responses, and/ or coordinating meetings or third-party mediation when necessary to address and resolve Grievances impartially and transparently as required by this Grievance Policy.

6. Commitment

When receiving and dealing with a Complaint and Grievance, SIPEF is committed to:

- abide by existing laws and regulations of the country where it operates;
- behave in an impartial and fair manner, respectful of the positions and sensitivities of the people expressing their Complaint or Grievance;
- promptly address the Complaint and Grievance to reach a swift resolution;
- apply strict confidentiality where it is necessary or requested;
- provide assistance, when requested and as deemed appropriate, to Employees and stakeholders lodging a Complaint or Grievance, so that the Complaint or Grievance is meaningful.



7. Complaints Procedure

Employees are encouraged to first attempt to resolve their Complaints with their direct manager and handle them as per their local procedure for resolving Complaints. This may involve discussing the issue with their direct supervisor or manager. If the Complaint is not resolved at this stage or the Employee deems the subject matter is not appropriate to be discussed with their direct manager, a Grievance may be lodged through the grievance procedure available at all SIPEF offices.

8. Grievance Procedure

Grievances that cannot be resolved at the local or Country Level, or Grievances that pose Substantial Risk shall be escalated first to the Country Level Head Office and then to the Group Level through the Grievance Procedure as stipulated in this Grievance Policy.

Grievances submitted through the Grievance Procedure will undergo processing for an estimated 30 days, and Urgent Grievances will be prioritised during the process. For Grievances that require longer to resolve, the Grievant will be informed accordingly.

8.1. Grievance Submission

Grievants can submit their Grievance through any SIPEF office or through SIPEF's [official website form](#) as attached in Annex II, or via e-mail to grievances@sipef.com. The Grievance should contain at least the following information:

- the chronological details of the events;
- the type of Grievance;
- relevant date(s) and time(s);
- names and individuals involved; and
- contact number.

Any Grievance received by any employee at the Group Level must be forwarded promptly to grievances@sipef.com.

8.2. Review and Assessment

Upon receiving the Grievance submission, the Grievance Manager will assess the legitimacy of the Grievance and log the Grievance in SIPEF's Grievance Log. If the submission is not considered a Grievance, the Grievance Manager will reject the Grievance and notify the Grievant. If the Grievance Manager confirms the legitimacy of the Grievance, the Grievance Committee will appoint a representative and update the Grievant upon receipt of the Grievance.

8.3. Decision and Resolution

The Grievance Committee Representative will evaluate the Grievance and coordinate an investigation to find a solution. Grievant may need to submit more information or proof upon request. Once a decision or proposed solution is reached, the Grievance Committee Representative will draft a response. The Grievance Manager will review the draft response before seeking approval from the Group Director Sustainability and a representative of the



Executive Committee. Once the draft response is approved, the Grievance Manager sends the decision or proposed solution to the Grievant.

8.4. Meeting or Third-Party Mediation

If the Grievant does not accept the solution proposed by the Grievance Committee Representative, or if the Grievance Committee Representative cannot issue a solution, the Grievance Committee Representative will facilitate a meeting or a third-party mediation. Once a decision is reached based on the meeting or third-party mediation, the Grievance Committee will draft a response. The Grievance Manager will review the draft response before seeking approval from the Group Director Sustainability and Executive Committee member. Once the draft response is approved, the Grievance Manager sends the decision or proposed solution to the Grievant.

9. Follow-up

The Grievant Manager will send a notification and follow up with the Grievant if there is no response within 5 working days after the decision or proposed solution is sent. If the Grievant does not reply within 10 working days, the case will be closed.

10. Right of Appeal

The Grievant has the right of appeal. If the Grievant does not accept the solution proposed by the Grievance Committee Representative, the Grievant can submit an appeal within 5 working days after the decision is sent. The Grievance Committee Representative will facilitate a meeting or a third-party mediation to find a solution.

11. Confidentiality and Anonymity

Grievant has the option to keep their anonymity throughout the Grievance process. All parties involved in the Grievance Procedure are expected to maintain strict confidentiality regarding all aspects of the Grievance process. This includes the details of the Grievance, the investigation, and any related discussions. Any breach of confidentiality may result in disciplinary action.

12. Non-Retaliation

Retaliation against Grievant is strictly prohibited and will result in disciplinary action.

13. Record Keeping

All records related to Grievances, investigations, decisions, and resolutions will be maintained confidentially by the Grievance Manager in SIPEF's Grievance Log for at least five years from the date of the latest correspondence. All records related to Grievances at the Country Level must also be submitted to the centralized system accessible at the Group Level.

14. Policy Review and Updates

This Grievance Policy will be reviewed periodically to ensure its effectiveness and relevance. Reviews may be triggered by regulatory changes or the evolving company's business. SIPEF will assess the Grievance Policy's suitability and make updates, as necessary. SIPEF will also



carry out consultations with Employee representatives and stakeholders in reviewing and updating this Grievance Policy.

Notification

Employees will be notified of any updates or changes to this Grievance Policy. Training will be conducted to help Employees understand any changes to the Grievance Policy. Employees are expected to comply with the updated Grievance Policy from the date of notification.

Adaptation to Specific Situation

In implementing this Grievance Policy, there may be limitations due to the specific situation in each country where subsidiaries of the SIPEF group operate. Therefore, at the Country Level, additional provisions can be made to adapt to local conditions as long as these additional provisions are in line with this Grievance Policy.

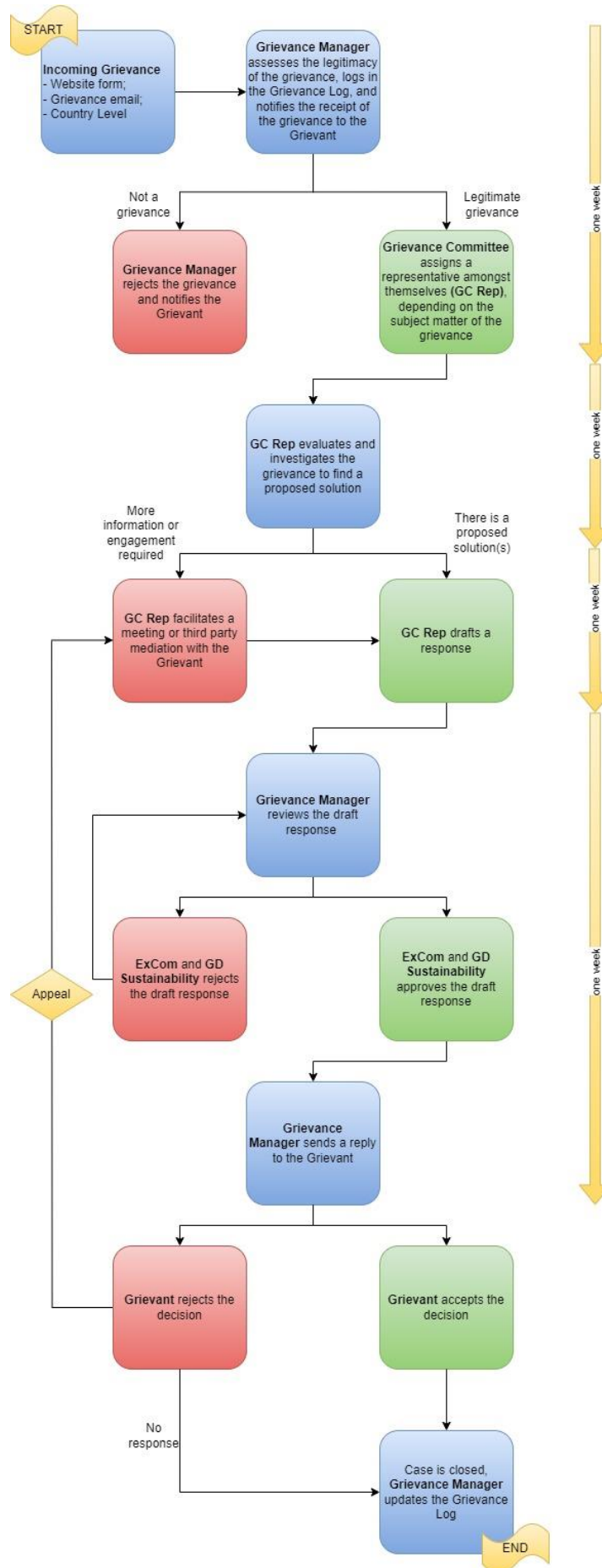
Specific situations include the use of local or national languages and/ or the use of local terms in the stages of submission, response, recording of the complaint or Grievance process, and the use of national law or customary provisions as a reference in considering decisions or resolutions.

15. Contact Information

For any questions or concerns regarding this Grievance Policy or the Grievance Procedure, Employees, Non-employees, or stakeholders may contact grievances@sipef.com.

ANNEX I

Grievance Procedure





ANNEX II
Grievance Form

Name	
Email	
Phone number	
About	<input type="checkbox"/> Land rights <input type="checkbox"/> Human rights <input type="checkbox"/> Environmental <input type="checkbox"/> Health and safety <input type="checkbox"/> Labor or employment <input type="checkbox"/> Corruption <input type="checkbox"/> Sexual harassment <input type="checkbox"/> Other (please specify)
Date, time, and location of the event	
Message	
Attachments	