

GRIEVANCE POLICY

POL-HRD-GEN-010-08

1. Basic Principle

Hargy Oil Palms Limited believes that all stakeholders, both internal and external, should be confident that their grievances will be heard, addressed promptly, and handled impartially, without fear of retaliation. Hargy Oil Palms Limited is committed to fostering a respectful and inclusive environment where concerns are resolved fairly.

2. Scope and Application

This Policy applies to all Hargy Oil Palms Limited employees, non-employees (e.g., contractors), subsidiaries, and stakeholders who wish to submit grievances related to Hargy Oil Palms Limited's operations or perceived impacts.

In receiving and handling grievances, Hargy Oil Palms Limited commits:

- a. To comply with the applicable laws and regulations of the countries in which it operates.
- b. To act impartially and respectfully toward complainants, acknowledging the sensitivity of their concerns.
- c. To resolve grievances in a timely and effective manner.
- d. To ensure confidentiality where appropriate or requested.
- e. To assist stakeholders in raising concerns, including internal employees, where needed and deemed appropriate.

This Policy aligns with the SIPEF Group framework for grievance procedures for certification or regulatory compliance.

3. Grievance Resolution Framework

Grievances should be first addressed through local-level mechanisms at the office or worksite where the grievance originated. If resolution is not achieved:

- a. The grievance should be escalated through the appropriate supervisory or managerial channels as per the Hargy Oil Palms Limited internal grievance management procedure.
- b. Where a local resolution is not possible or where a grievance poses substantial risk, it must be referred to the Group level.

4. Complainant Rights and Protections

- a. Hargy Oil Palms Limited recognises the right of complainants to seek independent legal or technical advice.
- b. Complainants may involve support persons, observers, or third-party mediators.
- c. Hargy Oil Palms Limited respects anonymity and will protect the identities of whistleblowers, human rights defenders, and complainants, where requested.
- d. Complainants will not face retaliation, penalty, or discrimination for lodging a grievance. Any breach of this protection by Hargy Oil Palms Limited employees will result in disciplinary measures, up to and including dismissal, and may also lead to legal consequences.
- e. The outcome of any grievance process may be subject to appeal or challenge.

5. Accessibility

The grievance procedures implementing this policy will be communicated and made accessible to all employees

General Manager

Issue No: 8
Issued by: Sustainability Department Manager

Issue Date: 22/09/2025 Approved by: General Manager

Page 1 of 1