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1. OBJECTIVE

All operations with environmental and social impacts have the potential to create grievances. Therefore, the purpose of this procedure is to detail the method used by OOPC to identify, manage and address grievances. It is also aimed at both internal stakeholders (staff, contractors, etc) and external stakeholders (Communities, NGOs, government, Human Rights Defenders etc). OOPC welcomes and will analyse all relevant input from stakeholders on the Grievance Management provisions and process to ensure an effective grievance mechanism and its continuous improvement.

2. APPLICATION FIELD


This procedure applies to all stakeholders associated with OOPC.

3. ABBREVIATIONS

REC	Record
MD	Managing Director
HSEM	Health Safety & Environmental Manager
IMS	Integrated Management System
OOPC	Okomu Oil Palm Company
HRM	Human Resources Manager
HRD	Human Resource Department
HOD	Head of Department
CLO	Community Liaison Officer
CO	Communication Officer
UNION	A body under the Nigerian legislation responsible for workers within OOPC.
NGOs	Non-governmental Organizations
TFT	The Forest Trust
ISO	International Organization for Standardization
RSPO	Roundtable on Sustainable Palm Oil

4. DEFINITIONS


- **Grievance:** is a concern or complaint raised by an individual, group, or community in relation to activities undertaken by OOPC
- **Collective Grievance:** is a complaint raised by two or more persons in a unionized manner.
- **Internal Stakeholders:** Employees, Contractors, Suppliers, staff and union
- **Internal Grievance:** internal dispute resolution by which an employee may have his or her grievances addressed

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- **External Stakeholders:** Communities, Government organizations/institutions, NGOs that are affected by or have an interest in OOPC activities, products and performance.
- **Engagement:** actions taken by OOPC to communicate understand and involve stakeholders in the decision-making processes when appropriate.
- **Stakeholder Engagement Plan:** system used to identify stakeholders and manage engagement based on the level of interest and influence an individual or group has on company operations.
- **Minor grievance:** can be resolved with some information sharing or dealt with directly by CLO, CO, HRM or HOD, with no compensation or negative impact on the company.
- **Medium grievance:** a problem generated from a department or Okomu as a whole that is affecting an external stakeholder. This grievance can be resolved by CO, CLO, and HOD, or together that requires corrective /preventive action and/or has cost implication for the department to correct the action. This grievance must have no compensation involved and if it has potential for a negative impact on the company, it must be resolved. HOD can handle internal department grievance (pay, work schedule, harassments etc). If not resolved, it becomes a major. Medium grievances are handled at company's level but the head office must be informed at 3 stages of the process: when Okomu engages with the grievance raiser, when Okomu drafts an action plan (or not) and when Okomu implements the plan.
- **Major grievance:** will be addressed directly by the MD and **MUST** be related immediately to the Socfin's Grievance Coordination Team on receipt. This grievance may involve some form of compensation or have a negative impact on the company.

5. RESPONSIBILITY

- HSEM will be responsible for receiving and collating grievances from CLO, in person or through e-mails. HSEM will confirm receipt of all grievances, record them on OOPC/Form 1.55, and file copies of each form. HSEM will refer all forms to the HRD for further investigation. HSEM will ensure that this procedure is implemented and monitored. HSEM will act as Okomu's Grievance coordinator and liaise with the Socfin's Grievance Coordination Team on all Medium and Major Grievances
- CLOs can also receive grievances from community boxes, in person and record them on OOPC/Form 1.53. The forms will then be given to HSEM (CLOs will only assist OOPC with external grievances)
- Minor and medium grievances will be handled by HRM, HOD, CO & CLO who will conduct investigations, where necessary and applicable, in order to ensure an unbiased response is obtained and the grievances is resolved and recorded in OOPC/Form 1.53 and OOPC/Form 1.52 .
- Any unresolved minor and medium grievances will be forwarded to the MD who will review them (OOPC/Form 1.53) and attempt to resolve or distribute

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grievance process for investigation. MD will appoint a person to investigate. The investigation shall be documented on OOPC/Form 1.52 and submitted to the MD for a final decision.

6. PROCEDURE


6.1. Introduction

The following commitments will be obligatory for all OOPC grievance management activities irrespective of their seriousness:

- OOPC shall set up a process for recording and addressing external and internal grievances that are culturally appropriate and based upon the traditional mechanisms of raising and resolving issues.
- The policy and process shall be described in written form and communicated as per Internal and External Communication Procedure (GP 10) in a way that it is accessible to all stakeholders such as general meetings, community notice boards, policy notice boards in respective departments, and on the company's website.
- OOPC must commit to assess how grievances are received and responded to, based on the principles of transparency and accountability for all stakeholders.
- All stakeholders will be able to raise grievances without fear of reprisals, costs or retribution.
- All grievances will be responded to within 15 working days, either with a resolution or an update on progress if a resolution has not been found. All grievances should be resolved within 30 days or brought to the attention of the MD.
- OOPC shall decide and announce to the stakeholders the schedule for the periodic reporting on the management of the grievances received and maintain a soft copy version of the complaints register.

6.2. Confidentiality

- OOPC recognize that confidentiality is very important when dealing with all cases as experience has shown that grievances become much more difficult to resolve informally if information about the matter becomes common knowledge. The party reporting the grievance may request that their identity remain confidential. Any party may appoint a third-party to submit their grievances provided that the third-party follows this procedure. Any party may log a grievance entirely anonymously however this blocks the ability to engage on a dialog for resolution or asking for clarifications.
- Witnesses may need to be given details of the grievances. Where this is the case, they must be made aware that these details must not be disclosed,

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even after the case has been concluded. All participants, including witnesses, should be made aware of their responsibilities. Witnesses will be asked to sign statements, and where appropriate will be allowed to provide anonymous statements, which may be shared with the relevant parties only.


- Any breach of confidentiality by the complainant, the individual against whom the grievance has been raised, or witnesses, relating to this procedure, will be treated as a serious disciplinary offence.

6.3. Internal Grievance


- Where an internal stakeholder feels aggrieved on any decision or action of management, the issue must first be discussed with his/her immediate superior or manager or the HOD or HRD who will try to resolve the issue as quickly as possible within the time constraints of this procedure. If resolution is accepted by the complainant, it should be stated in OOPC/Form 1.52
- If the stakeholder is not satisfied with the outcome of the meeting with his/her superior or manager or the HOD or HRD, the stakeholder must make it known to HRD or HOD in writing that he/she is not satisfied, stating the reason for their dissatisfaction and the HRD shall follow the procedure in clause 5.0.
- If the stakeholder is not satisfied with the decision of the MD, the stakeholder may write formally to the union for intervention.
- Upon the receipt of a formal complaint, the Union shall check if the stakeholder had complied with the above stages.
- If the Union is satisfied that the stakeholder has complied with the above stages, the Union shall request a formal meeting with the MD to discuss the issue.
- If the Union is not satisfied with the meeting with the MD, the union must follow their union constitution.

6.4. Collective Grievance

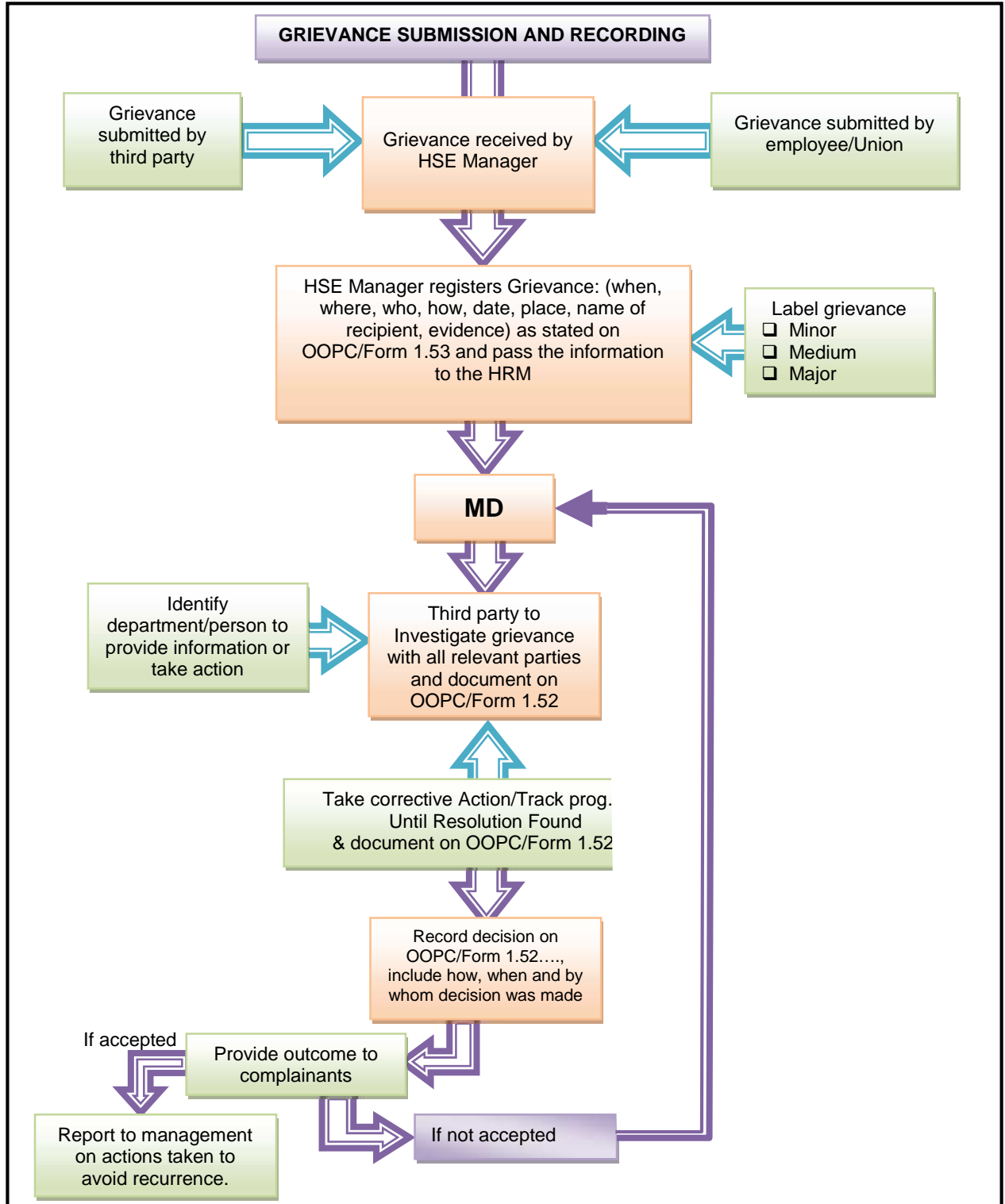
- Where the union/stakeholder observes, suspects or feels that an aspect of the subsisting collective agreement or company's policy and procedures have been breached, or acts on behalf of a stakeholder or union member, the union/stakeholder will formally write to HRD stating the aspect of the agreement, policies and procedures that have been breached. The union/stakeholder shall fill OOPC/Form 1.53 and send to the HRM/HSE Manager.
- On receipt of a formal union complaint, the HRD will investigate the claim and thereafter, invite the union representatives to a meeting to resolve the grievance.
- If the grievance is not resolved at the office of the HRD, the grievance will be upgraded to a major grievance and forwarded to the MD.
- If the grievance is not resolved by the MD, the Branch union shall write to the State union executive informing them of the grievance.


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- The State union executive will schedule a time to hold a meeting with the MD to find an amicable resolution to the grievance.
- If the grievance is not resolved at the State level, the State union executive will write to the National headquarters informing them of the impasse.
- On receipt of the complaint from the state executive, the National headquarters of the union will strive to resolve the impasse/grievance by having an audience with the MD.
- If the grievance or impasse is not resolved at the level of the National headquarters of the union, the National headquarter will declare a dispute and the Statutory dispute resolution procedure will then be adhered to.
- It will be an offence that will be sanctioned, not to comply with this grievance procedure and all processes of the grievance must be documented on OOPC/Form 1.53, 1.52 and minute, using OOPC Form GF15

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6.5. Individual & Collective Grievance Management Process



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6.5.1 Receipt of Grievance

The HSE Manager receives all grievances and ensures OOPC/Form 1.55 is completed. Grievances can be submitted through the following channels:

- OOPC mail box at the entry locations of OOPC concessions.
- OOPC Website: <http://www.okomunigeria.com/>
- E mail: hsesec@okomunigeria.com
- In writing: Okomu-Udo Ovia South west LGA P.M.B 1449, Benin City, Edo State Nigeria Attention: HSE Department (Grievance section)
- Lagos office- Mandilas Building, 35A, Simpson Street, Lagos Island, Lagos State, Nigeria

6.5.2 Registration of a Grievance

Once a grievance is received at the HSE Department, it is then documented and recorded in the HSE data base and passed to the HRD for further investigation (see 6.5.3). After resolution, the HRD will respond to the complainant in written form of the resolution (see 6.5.4).

6.5.3 Investigating unresolved and major Grievances


The MD will assign all major investigations to a relevant third party to resolve these grievances. All investigation should be completed as quickly as possible, but will depend on the nature of the complaint or concern and the required action to be taken. The grievance database should record all actions taken as part of the investigation process, including dates of communications with different departments, responses and expected actions. In some instances, further evidences may be required, which will involve a third party outside of the organization. All grievance investigations must be handled on a strictly confidential manner with no conflicts of interest, personal or professional gain or bias. The HSEM will track all grievances, minor, medium or major.

6.5.4 Recording and Reporting Decisions

All decisions must be recorded on OOPC/Form 1.52 and communicated with all parties involved in writing to ensure that all parties are in agreement. The complainant may not always be satisfied with the resolution on offer, which is why in some instances; several different resolution options may be advisable.

6.6. External grievance

This applies to an external stakeholder who wishes to register a grievance. The grievance should be submitted in writing with the stakeholders contact information on community, government or NGOs letter head. The letter should state the nature and background to the dispute and the proposed solution to resolve the matter.

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The submission of the grievance should, at a minimum, include provision of the following:

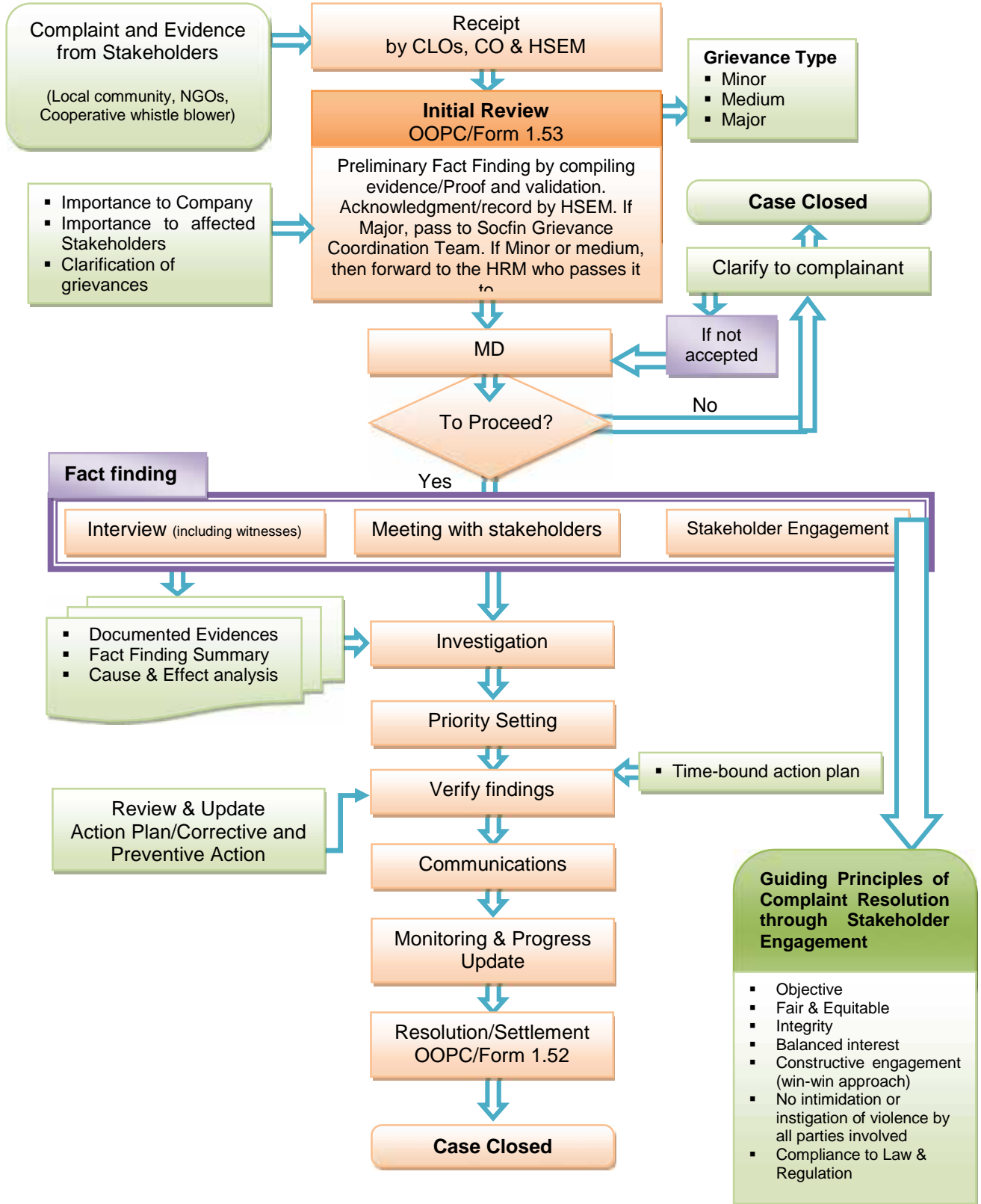
- Full Name
- Name of Organization (as applicable)
- Address
- Phone No./Fax No./Email Address (at least one contact point)
- Description of the grievance in details
- Evidences to support the grievance


External stakeholders can submit their grievances via the under listed channels:

- The Community Liaison Officer
- OOPC Website: <http://www.okomunigeria.com/>
- E mail: hsesec@okomunigeria.com or transparency@socfin.com
- In writing to:
 - Okomu-Udo Ovia South west LGA P.M.B 1449, Benin City, Edo State Nigeria Attention: HSE Department (Grievance section) or through the Community Liaison Officer or Communication Officer; or
 - Socfin S.A.
Attn.: Grievance Coordination Team
4, Avenue Guillaume
1650 Luxembourg
Grand-Duché de Luxembourg

OOPC's grievance procedures and social and environmental standards shall be communicated to all interested and affected stakeholders through strategies identified in its stakeholder communication strategy.

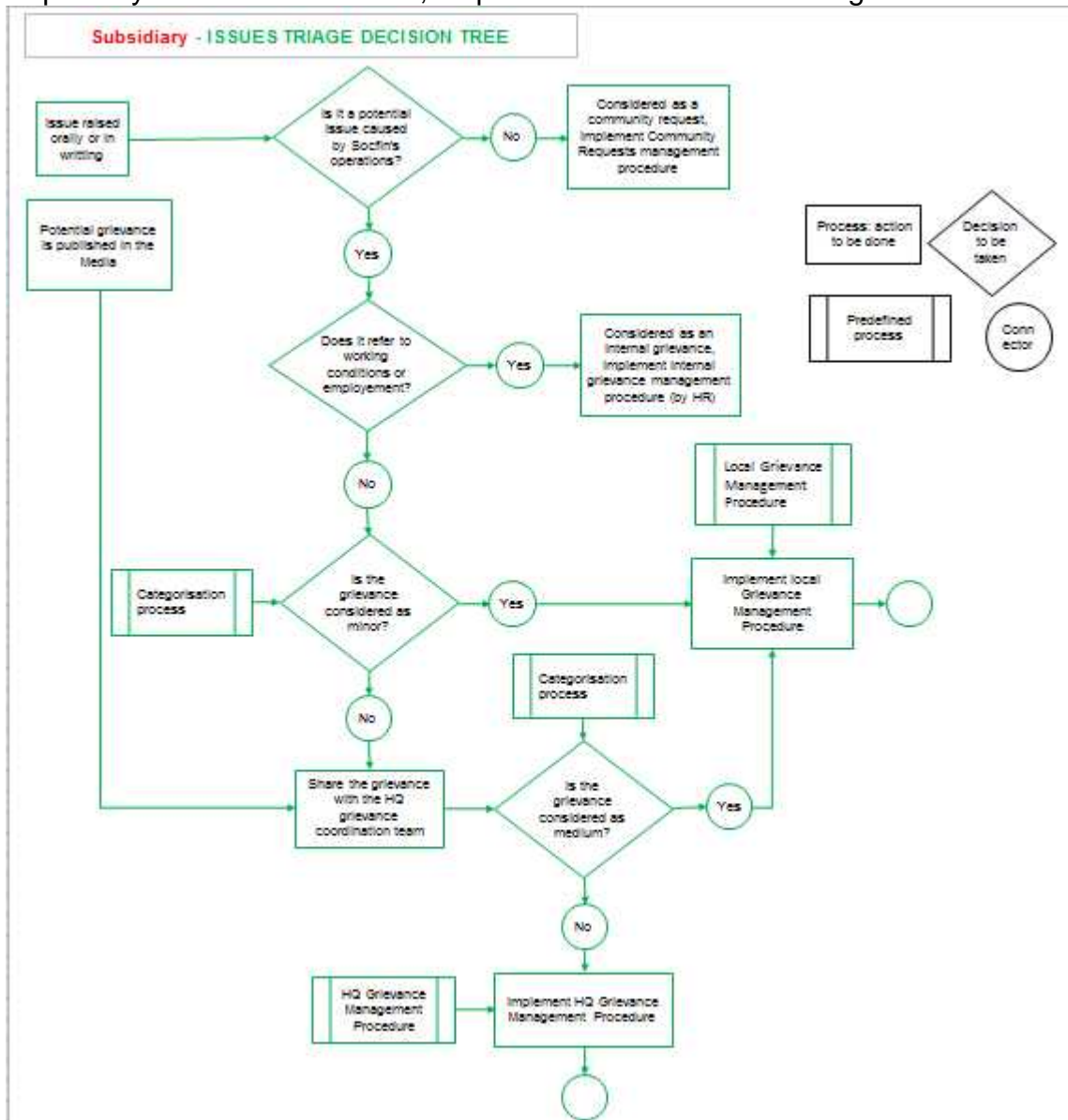
EXTERNAL GRIEVANCE MANAGEMENT PROCESS




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6.6.1 INTERPRETATION OF THE EXTERNAL GRIEVANCE MANAGEMENT PROCESS

A Complaint/evidence is received from stakeholders through the recognized channels (see 6.6), with an initial review and acknowledgment by the HSEM, who forwards it to Socfin Grievance Coordination Team if major. If Minor or medium, it's forwarded through the HRM to the MD to indicate whether to proceed. If "NO," the grievance will be clarified to the complainant by the HRM and closed, but if complainant is not satisfied it will be referred back to the MD for further decision. If "YES", the grievance investigation will proceed using the fact finding approach by conducting various interviews (witnesses inclusive), meetings with stakeholders and stakeholders' engagement, if necessary. In addition to grievances submitted through the official channels listed in 6.6 above, issues raised through unofficial channels, such as the media and the internet, will be recorded as grievances on request by either TFT or Socfin, as per described in the following chart.




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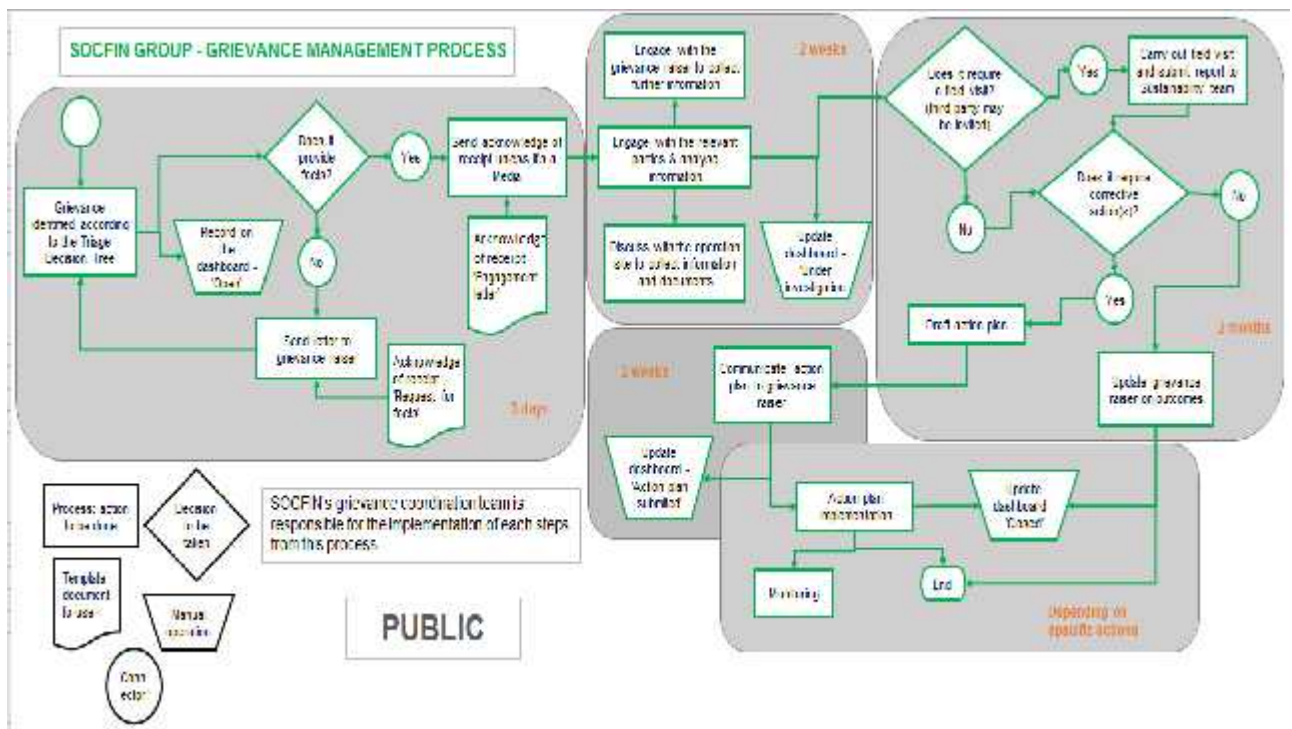
All information required to effectively process and investigate the grievance will also be entered in the database (see OOPC/Form 1.55).

During investigation and resolution processes:

- Communicate by arranging a meeting with the complainant and all affected stakeholders. Discuss the investigation process and solutions and get complainants consent to the intervention.
- Set priorities by indicating if complaint is Minor, Medium or Major as defined.
- Verify findings by reviewing and updating the action plan/corrective and preventive action. Each case is expected to be addressed within 30 working days, beginning from the date of receipt. Depending on the procedural complexity of the case, the time frame for each stage could be adjusted by the head of the investigation team and a new time frame communicated to the stakeholder and MD. Also review all relevant supporting documents, determine the underlying cause, engage all impacted stakeholders and coordinate with the respective department and/or a specialist responsible for addressing the complaints properly.
- Monitor by continuously reviewing internal reports, and recommendations-recommendations may be an operational action plan, corrective actions, and improvements to existing policies and/or continuous engagements with stakeholders.
- Resolution options can require a one-off action or warrant ongoing procedures depending on the nature of the complaint or concern. The complainant may not always be satisfied with the resolution on offer, which is why in some instances, several resolutions are advisable.
- Open communication with the complainant during the grievance process is important to present information transparently and in an appropriate format. Once presented with a set of responses, the complainant must decide whether to accept or reject the resolution. If the resolution is accepted then it must be recorded in the database with the grievance signed off as resolved. The complainant will also receive a written record of the resolution to ensure that all parties are in agreement. The affected stakeholder has the option of access to independent legal and technical advice, the ability to choose individuals or groups to support them and/or act as observers, as well as the option of third party mediator. The full range of options is available to ensure that resolution is achieved as transparently as possible.
- Close case if complainant and affected stakeholders are satisfied with the action taken.
- If the response is rejected, then additional responses will either be required or the grievance escalated to more senior management (MD). Alternatively, the complainant has the right to escalate the complaint to a third party outside the company, for assistance and finding a resolution such as the RSPO Complaints System. Okomu will provide free guidance on how to access the RSPO Complaints System (see www.rspo.org/members/complaints) for the affected stakeholder.

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- OOPC will make every effort, to the extent appropriate, to resolve grievances amicably. If grievances are not resolved, OOPC will seek the expertise of a neutral third party outside OOPC for assistance in finding a resolution in line with the third party’s grievance management mechanism or framework.
- All proposed actions to be taken must be presented to the MD for approval before implementation.
- Major grievances will be handled according to the below chart in conjunction with the Socfin Grievance Coordination Team




7. RECORDS

- OOPC/Form 1.53
- OOPC/Form 1.52
- OOPC/Form 1.55
- Grievance letter or email
- Statements/evidence (if available)
- Form GF15 (minutes)

8. REFERENCE

- RSPO Criteria 1.2, 4.2, 5.1.9 and 6.5.4
- ISO 9001:2015, 14001: 2015, 45001:2015 Clause 7.4
- Socfin Group Grievance Management Process
- Socfin Group Responsible Management Policy

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- e) EBRD(2012) Grievance Management Guidance Note
- f) CAO (2008) The Office of the Compliance Advisor Ombudsman: A Guide to Designing and Implementing Grievance Mechanisms For Development Projects.
- g) IFC (2007) Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets.
- h) IFC (2012) Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- i) IFC (2009) Good Practice Note: Addressing Grievances from Project-Affected Communities: Guidance for Projects and Companies on Designing Grievance Mechanisms.

9. REVISION STATUS

Rev.	Date	Details
0	17/09/15	Initial Release
1	18/08/17	Edit sentence in Section 5- Responsibility Edit sentence in §6.4 Edit sentence in §6.5 Edit sentence in §6.5.1
2	11/05/18	Added sentence in Section 1-Objectives Added NGOs and TFT in Section 3-Abbreviations Edited definitions for Medium and Major in Section 4-Definitions Added sentence for HSEM in Section 5-Responsibility Edited sentence in Bullet 1; §6.2 Added transparency@socfin.com in §6.6 Added sentences in §6.6 Added sentences in External Grievance Management Process chart Replaced 'Community grievance boxes at various communities within OOPC's footprint' with the 'Community Liaison Officer' Added sentences and figure in §6.6.1
3	04/03/19	Added sentences in §6.6.1
4	05/05/20	Added ISO & RSPO in §3- Abbreviations Changes clauses of ISO & RSPO in §8- References