
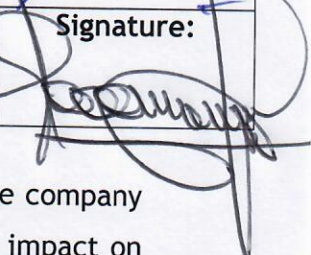
	EXTERNAL COMPLAINTS AND GRIEVANCE SOP		Revision# 1.1
			Effective Date:
	Prepared by: Nicholas Adorsu- CER Manager	Date: 8/5/19	Signature: 
Document #: CR_SOP_002	Approved by: George Quarteng-Mensah- Managing Director	Date: 9/5/19	Signature: 

Preamble: Complaints and grievances from individuals or parties external to the company can be expected to arise for any company whose activities have an impact on its stakeholders or stakeholders which have an interest in the company. For this reason, Plantations SOCFINAF Ghana Limited (PSG) requires to develop and implement a procedure to resolve complaints and grievances received from external stakeholders such as Local Communities, Business Associates, Government Regulatory Agencies, NGO's, Contractors etc. The Complaints and Grievances procedure (the "procedure") provides external stakeholders especially local communities with a means to raise complaints and grievances against and for PSG to respond and resolve those issues where reasonable and feasible. An effective procedure should help PSG to reduce opportunities for complaints and grievances to escalate into incidents.

There is more to stakeholder engagement in dealing with grievances. Complaints are classified as high, medium and low by PSG depending on the gravity of the grievance.

Addressing the grievance involves activities, commitment and responsibilities with time lines so that the issue is not left to chance.

The key processes within a procedure are lodging and receipt of a grievance or complaint, acknowledgement, methods of investigation, findings, resolution, communication, sign-off and closure, escalation and grievance prevention.

Purpose: To ensure that PSG implements a locally and culturally appropriate complaints and grievances management procedure, the implementation of this procedure further supports PSG's values to "uphold and promote fundamental human

rights where we do business” and “...contribute to building productive, respectful and mutually beneficial partnerships in the communities in which we operate..”

Scope: This procedure only applies to individuals or parties' external to the company related complaints and grievances.

Definitions: **Complaints:** refers to concerns, negative comments, expressions of displeasure or discontent, which are relatively minor and either brought to the attention of or raised (for example in the media) about PSG with regard to its activities or impacts.

Grievance: refers to serious concerns, resentment, and allegations, which are made against a PSG regarding its activities or impacts.

Operations: refers to the plantations development and processing of oil palm and rubber.

Stakeholders: refers to persons or groups that are directly or indirectly affected by a project as well as those that may have interests in its operations and/or the ability to influence its outcome either positively or negatively.

Joint Committee: PSG representatives, Complainant, Community representatives, and Third Parties.

Accountability and Responsibility:

The ultimate responsibility for implementing this procedure lies with the Managing Director of PSG. The implementation responsibilities can be delegated to a designated person(s) who must clearly understand his/ her role(s)' and responsibilities. At PSG, the responsibility for the development, structuring and implementation of the procedure lies with the Community and External Relations Department (CERD).

The execution of the procedure should be done by PSG, complainant and /or third parties independent of the grievance. Each party (PSG, Complainant/Third Party) should understand his/her role and responsibilities

associated with the assignment in resolving the grievance. Such people should be qualified to undertake the task before them.

The action plan to resolve a grievance or complaint must be approved by the management member of PSG who is suitably qualified to assess the effectiveness of the proposed response and/or intervention.

Procedures: This procedure applies regardless of the stage in the project lifecycle and nature of the complaints and grievances, that is, all complaints and grievances must be subject to the process outlined in the mechanism. This procedure seeks to address or resolve complaints and grievances expressed against PSG at the initiation level before they escalate into judicial processes.

1.0 The Complainant (s) lodges his/her complaint/grievance to the Community and External Relations Department (CERD) either informal (verbal) or formal (written).

1.1 If the grievance is lodged informally (verbally), it has to be formalized by filling the Grievance Form and endorsed by the Complainant, within a working day.

2.0 The grievance/complaint is recorded, captured into the grievance database; letter of acknowledgement is issued to the complainant and letters to other stakeholders (if necessary) within 2 working days.

3.0 A fact finding and investigation team (Joint Committee and the Complainant) assembled and tasked to produce report for management decision within 7 working days.

4.0 The proposed solution is shared with the complainant for his/her consent and acceptance or rejection.

4.1 If the complainant agrees with the proposed solution, he/ she will sign an agreement for his/her consent.

4.1.1 An action plan should be developed jointly by the parties and implemented together within 5 working days

4.1.2 The joint team monitors progress and signed close-out form finally.

4.2.1 If the Complainant rejects the proposed solution, further detail information would be gathered and other stakeholders may be involved (if necessary) for renegotiation within 10 working days.

4.2.2 The renegotiation report would be shared with the complainant for his/her consent and acceptance or rejection.

4.2.3 If the complainant agrees with the renegotiated report proposed solution subsection 4.1.1 to 4.1.3 would be implemented.

4.3.1 If the Complainant rejects the renegotiation report.

4.3.2 Second renegotiation team involving third parties in line with the complainant wishes would be involved within 7 working days to renegotiation for possible solution.

4.3.3 If the complainant agrees with the second renegotiation report proposed solution subsection 4.1.1 to 4.1.3 would be implemented.

4.3.4 If the Complainant rejects the second renegotiation report. The company may advise the complainant to present the matter to any level if he/she wishes.

References: The following documents shall be referred to and utilized as part of the external complaints and grievances management system. Some of the normative references are Roundtable on Sustainable Palm Oil (RSPO) Principles and Criteria (4.2.1, 4.2.2 and 4.2.3), Universal Declaration on Human Rights (UN 1948), United Nations Global Compact (UNGC) Principles, Guiding Principles on Business and Human Rights (United Nations, 2011), International Covenant on Civil and Political Rights (1966), International Covenant on Economic, Social and Cultural Rights (1966) and SOCFIN Group Responsible Management Policy.



GRIEVANCES AND COMPLAINTS MANAGEMENT PROCEDURE

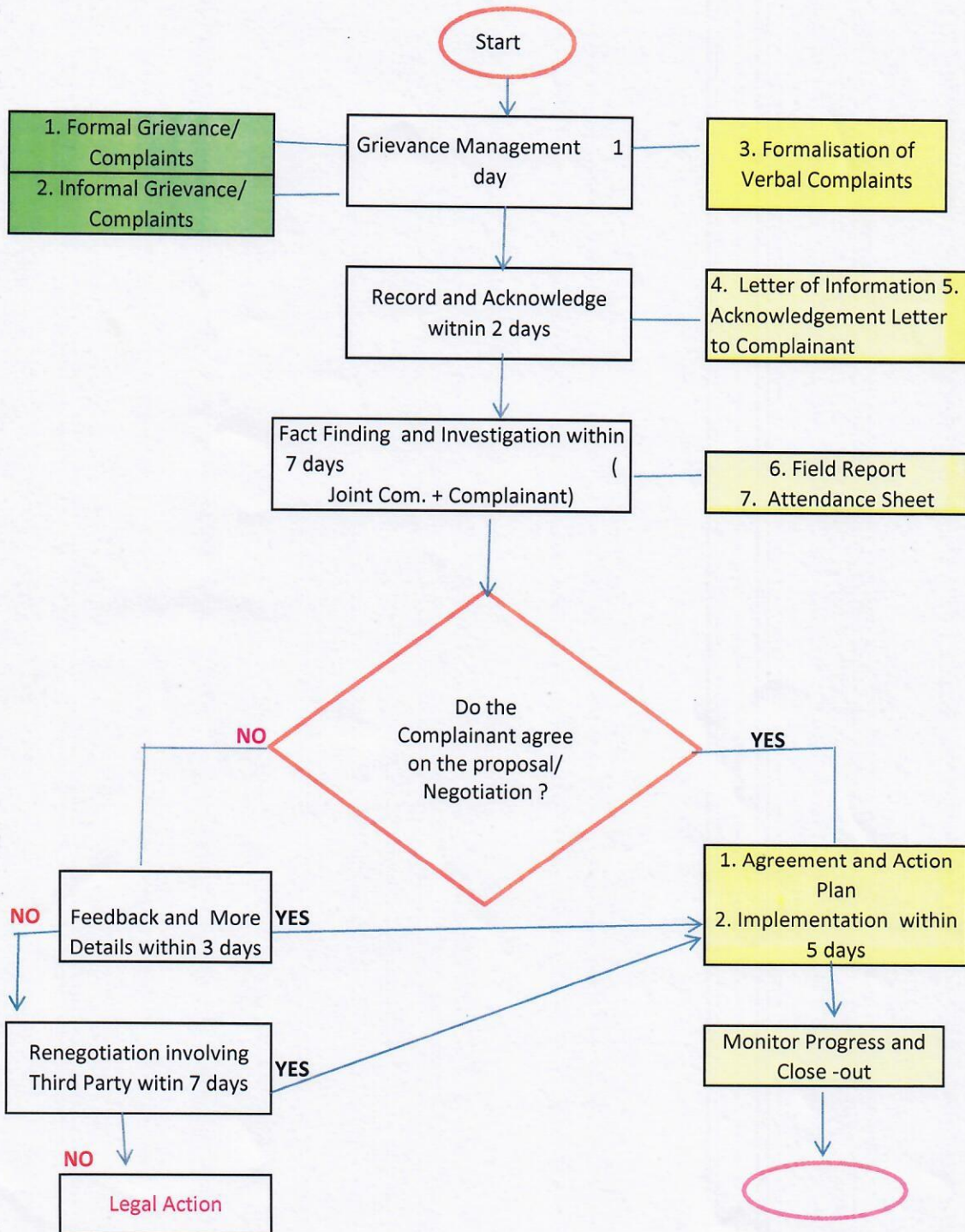


15 - 30 days

PSG Responsible Documents

Community Responsible Documents

Joint Responsible Documents



Handwritten signature or initials.