

	Standard Operating Procedure	Sustainability Department
	EXTERNAL COMPLAINT AND GRIEVANCE	Date: 28/04/2023

1. AIM

To establish procedures for submitting and managing complaints and grievances and ensuring fair resolution processes that are known and acceptable by all parties involved.

2. SCOPE

This SOP applies to all complaints and grievances from external parties/stakeholders including local communities, government agencies, NGOs and CSOs, business partners, etc. who are affected by the company's operations and activities. Complaints and grievances regarding land should however refer to the Land Matter SOP.

3. RESPONSIBILITY

- The Managing Director has the overall responsibility for implementing this procedure and coordinating third party or legal mediation, where necessary. All external grievances and complaints that are non-community related are handled directly by the Managing Director.
- The Sustainability Manager is responsible for coordinating the various departments within PSG to facilitate the resolution processes regarding community-related complaints. Also, the manager supervises the Community Relations team in addressing the complaint or grievance.
- The Community Relations team is responsible for performing the administration and implementation of the outlined processes and procedures. The team is also responsible for explaining the procedure in an appropriate language for the understanding of complainants and local communities.

4. DEFINITIONS

The definitions provide a context for understanding complaints and grievances and how they are handled. Definition of terms in this procedure is not intended to specify or limit the nature of complaints and grievances that can be reported and/or the processes of resolution.

Complaint is an expression of dissatisfaction or discontent made to the company regarding its operations, activities or impacts. Complaints are usually minor issues raised about the company.

Grievance is a formal complaint raised about the company's operations, activities and impacts that are usually of a major concern.

Complainant is any individual, group or organization that raises a complaint or grievance about the company. It includes local communities and its members, NGOs and CSOs, government agencies, etc.

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Operations refers to the company's core business of oil palm and rubber plantation, palm oil processing and other related activities.

Joint committee refers to an investigating body responsible for follow up and investigation in the process of resolving complaints or grievances. This committee will be set-up case-by-case, where relevant and the representation of the committee will include PSG staff, complainant, community representatives and any other third parties relevant to the resolution of a complaint or grievance.

External Grievance Log captures all external complaints and grievances regarding PSG's operations, activities and impacts. It indicates the description of complaint or grievance, anonymity and resolution process including investigation, response to complainant, time frame of resolution and status.

5. ANONYMITY

This procedure ensures anonymity if the complainant wishes to remain anonymous when reporting a complaint or grievance. Other means that ensures anonymity includes reporting complaints or grievances through;

- Community leaders or spokespersons
- Human Rights Defenders
- Community engagement meetings with PSG Community Relations team

Any party may log a grievance entirely anonymously. The anonymity option is chosen on the Grievance Form and External Grievance Log to ensure complainant remains anonymous throughout the resolution process. However, in some cases the anonymity can hinder the company's full ability to engage in dialogue for clarification and/or resolution.


6. PROCEDURE

In the following, the various steps of submitting and addressing complaints or grievances will be described. For a visualization of the processes, see under 9. CHART.

6.1 Submitting a complaint

- a. The complainant submits an informal (oral) or formal (written) complaint or grievance through the Community Relations team of the Sustainability Department. Informal complaint or grievance has to be formalized by filling the Grievance Form and signed by the complainant.

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- b. The complaint or grievance is captured in the PSG External Grievance Log to acknowledge receipt of complaint or grievance. The details include name and contact information of complainant, description of complaint or grievance, date of incident and supporting documents, if any. If the complainant wishes to remain anonymous, his/her name will be omitted from the log.
- c. A response is provided to complainant on the procedure and process of resolution within 4 working days. For local communities the response is provided through phone call or visit to complainant by Community Relations team. For non-community, the response is provided through an official letter from the Managing Director or a designated company staff.

6.2 Investigation

Complaints and grievances captured in the External Grievance Log must be assessed to know if it is justified.

- a. Investigation
 - The Community Relations team will, if required, confirm from the complainant should there be other information needed to provide clarity to PSG about the complaint or grievance.
 - The Sustainability Department liaises with PSG department responsible for the operations or activities that resulted in the complaint or grievance.
 - Adequate information is gathered from the responsible department to determine if the complaint or grievance is justified or not.
- b. Response to complainant
 - If the complaint or grievance is not justified, an immediate response is provided to complainant, including the evidence/report of the investigation. If complainant is satisfied, the process is documented in the External Grievance Log and the grievance is closed.
 - If the complaint or grievance is justified or complainant is not satisfied with the investigation report supported with evidence is referred to a Joint Committee. The complainant is informed of the process of the Joint Committee. The investigation and response to complainant must be completed within 7 working days after acknowledgment of complaint or grievance.
- c. Joint Committee investigation
 - Further information/evidence is gathered including historical and/or local knowledge from PSG, local communities and relevant third parties.
 - Findings of the investigations is shared with the complainant as well as a proposed resolution. The Joint Committee investigation and proposed resolution must be completed within 5 working days after the referral, subject to availability of the complainant.

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6.3 Resolution

If the complainant is satisfied with the proposed resolution

- A plan of actions or activities are designed in consultation with the complainant including an acceptable time frame of resolution. The complainant can choose a third party or representative to be part of the design. This must be completed within 7 working days after complainant accepts proposed resolution.
- The Joint Committee monitors the progress of the implementation of the agreed actions and if the complainant is satisfied, the process is documented in External Grievance Log as closed. The time frame of resolution is within 7, 14-12 or 30 days depending on the nature and processes of the resolution.

If the complainant is not satisfied with the proposed resolution or implementation of the agreed actions

- a. Renegotiation
 - Consultations with complainant to revise components of the proposed resolution or planned actions that he/she considers unfavorable or unacceptable.
 - A revised resolution or actions are agreed on by both parties within 7 working days after consultation.
- b. Mediation
 - Information/evidence is shared with a mutually agreed third party mediator for further review within 7 working days after complainant has expressed dissatisfaction with proposed resolution or implemented actions.
 - A proposed resolution or actions are presented to both parties for consideration within 7 working days after mediator receives information/evidence.

If complainant is satisfied with the renegotiation or both parties are satisfied with the mediation

- The revised/proposed resolution or actions are implemented.
- The process is documented in the External Grievance Log as closed.

If the complainant remains dissatisfied with the outcome of the renegotiation or mediation, 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 or seek legal action. PSG 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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7. FPIC PROCESS

Complainants have the option to choose individuals or groups to represent them in the complaint or grievance resolution processes as well as the option of third-party mediator or legal/technical advice. The company will ensure that complainants and other parties who participate in the grievance investigation or resolution process do so without risk of reprisal or intimidation. The process of FPIC will be explained to complainant upon filing a complaint as well as other parties who participate in the grievance resolution process.

8. REFERENCES

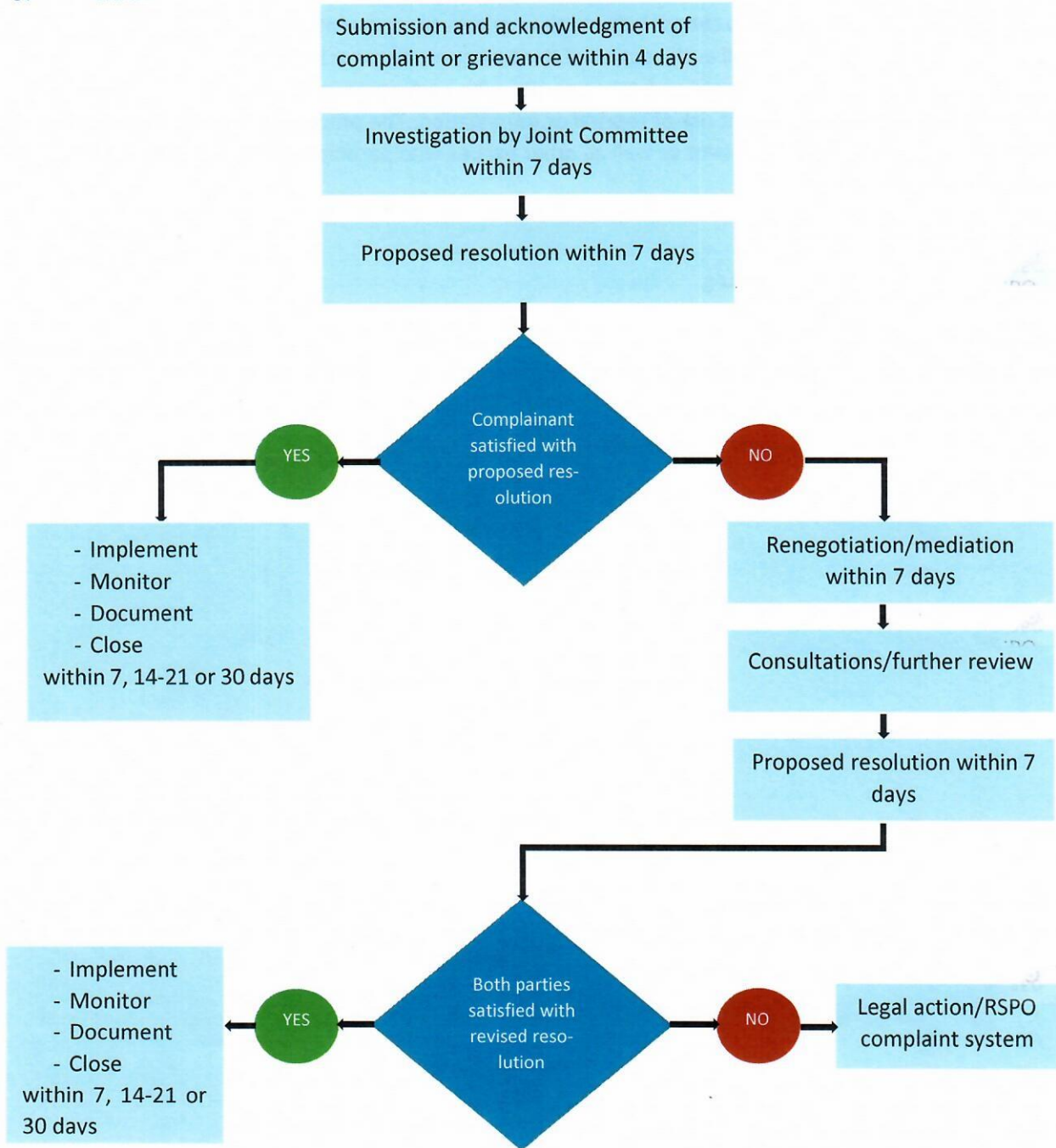
- External Grievance Log
- Land Matter SOP and Log
- FPIC SOP

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9. CHART



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