
	INTERNAL GRIEVANCE MECHANISM		Revision #: 2.2
			Effective Date: 15/05/2025
Document #: HRM - 6.5.4	Prepared by: Emmanuel Tete Darko - Admin & HR Manager	Date: 15/05/2025	
	Approved by: Willem Baert - General Manager	Date: 15/05/2025	

1.0 Preamble

Internal Grievances are concerns that are expressed by employees of the Company. They normally come as representing the concerns of a segment of the Labour Force. There are also internal grievances that may be individualistic, affecting only a particular employee or group of employees as opposed to the generality of employees.

2.0 Scope




This policy applies to all PSG employees.

This Internal Grievance Procedure provides a systematic and orderly channel through which aggrieved and disadvantaged employees can seek a settlement or solution in a timely, orderly, and satisfactory manner. Using this document, the company aims to establish and implement an accessible and impartial grievance management system, ensuring confidentiality and anonymity if requested by the complainant and pay special consideration towards the specific needs of women.

3.0 Procedure

The mechanism for the receipt, registration, attention, resolution, maintenance of records and communicating the status of the internal grievances within the company is set out under the procedure below:

- 3.1 The aggrieved employee shall first seek a timely redress through his/her immediate Superior, Foreman, or Supervisor. The employee is expected to communicate his/her concern either in writing or verbally with the superior within 3 days of the occurrence of the issue creating the grievance.
If the immediate Superior is the cause of the grievance, the aggrieved employee can also engage the superior directly in a respectful manner to attempt to settle the differences.
- 3.2 If the Employee is not satisfied with the decision he/she receives in (3.1) above or he/she does not receive a timely answer, he/she shall refer the matter to the segment of staff body that he/she belongs to i.e. either the Junior Staff Local Union (JSLU) or the Senior Staff Local Union (SSLU) and the body will re-discuss the matter with the said Superior of the employee for settlement within three (3) days.
- 3.3 If the matter is not resolved in (3.2) above, the staff body shall seek redress with the Sectional/Departmental Head. After meeting with the employee and staff body, the Sectional/Departmental Head will re-discuss the matter with the said Superior of the employee, investigate the matter, and communicate a solution or explanation either in writing or verbally within 5 working days.
- 3.4 If satisfaction is not received in (3.3) above, the matter shall be referred to the Admin/HR Manager or, in his absence, his designate for solution. The Administrative & HR Manager, Departmental/Sectional Head, and a representative of the JSLU or SSLU shall deal with the matter within a period of one week (7 days), and it is expected that the matter should be resolved at this level.

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3.5 The complainant, if not satisfied with (3.4) above, could petition the office of the General Manager for redress.

The General Manager would endeavor to address the grievance by involving all relevant parties within a timeline to be communicated by the GM. The GM shall communicate the response to the resolution to the aggrieved employee through the Admin/HRM within 14 days.

3.6 There shall be grievance log where all grievances received shall be recorded, maintained, and kept up-to-date. All grievances received shall be responded to - communicated directly to the complainant(s) or Union or posted on notice boards, in case of anonymous grievance. The features of the grievance log among other things will include date of receipt, name of complainant or anonymous, name of recipient, date and location, steps taken to resolve the grievance, proposed solutions and whether the grievance has been closed or otherwise and verification that status/progress of the grievance has been communicated to the complainant or published to make the grievance and its determination available in an understandable language to all.

If the matter is still not resolved as in (3.5), the matter shall be dealt with in accordance with the provisions of the Ghana Labour Act, 2003 (Act 651), Section 108, with a view to resolving it. The employee with a grievance shall not be prevented from the use of other judicial or non-judicial processes independent of the company's internal grievance mechanism.

3.7 Where a mutual resolution is not found through this mechanism, another option to explore is the RSPO complaint system. Employees are encouraged to visit the RSPO complaint system websites listed below for further guidance:
<https://rspo.my.site.com/Complaint/s/>



3.8 An employee who submits a grievance shall not be subjected to victimisation of any kind by the employer or by a fellow employee or a supervisor for registering a grievance.

4 Fixed-Term Contract Employee

4.1 If the employee is on a fixed-term contract (FTC) and he/she is not satisfied with the decision in (3.1), he/she has to seek redress with his/her Sectional/Departmental Head, who would investigate the matter and communicate settlement/solution to the employee either in writing or verbally within 5 working days.

4.2 If the fixed-term contract employee is not satisfied with the decision of the Sectional/Departmental Head as in 4.1, he/she has to seek redress in (3.4).

4.3 If the fixed-term contract employee is not satisfied with the decision in (4.2), he/she has to seek redress as in (3.5) before (3.6) or (3.7) if the need arises.

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5 Local Managerial Staff

- 5.1 The Aggrieved Local Managerial Staff, whose immediate Superior is not the General Manager (GM) can seek immediate redress with the General Manager either directly or through the Admin/HR Manager or an assembly of a selected team of three (3) Managers to engage the GM on his/her behalf with a view to resolving the issue.
- 5.2 The Local Managerial Staff, whose immediate Superior is the General Manager (GM), when aggrieved or dissatisfied with his/her Superior, can assemble a selected team of three (3) Managers to engage the GM on his/her behalf with the view to resolving the issue.
- 5.3 If the Local Managerial Staff is not satisfied with the decision in 5.1 or 5.2, he/she shall seek redress in (3.6) or (3.7) if need be.



6 Expatriates

- 6.1 If the Expatriate, whose immediate superior is not the General Manager (GM), is not satisfied with the superior, he/she will first seek redress with the General Manager (GM).
- 6.2 If the Expatriate is not satisfied with the decision(s) of the GM as in (6.1), then he/she will seek redress with the Group Sectional Head.
- 6.3 If the Expatriate whose immediate superior is the General Manager (GM), is not satisfied with his superior, he/she will seek redress with the Group Sectional Head.
- 6.4 If the Expatriate is not satisfied with the Group Sectional Head as in (6.2) and (6.3) above, he/she shall seek redress with the Group Chief Executive Officer through the Group Director of Administration.

The complainant shall have the right to remain anonymous or to be present at all levels if he/she so wishes and or accompanied by a representative or companion.

Non-Retaliation. The Company and Union will ensure that there is no coercion, retaliation, intimidation, or harassment directed against any employee who makes a report or serves as a witness on behalf of another employee. If any employee feels that he or she has been retaliated against for making a report or participating in the investigation process, the alleged violation should be reported using the procedures above.

The Gender Committee and the placement of suggestion boxes at the various Sections/Estates/Departments are additional avenues for employees to let their grievances be heard and addressed.

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The Heads of Sections/Estates/Departments should always log grievances received in the Grievance Book at the Offices of their respective Sections/Estates/Departments.

The boxes also address PSG's commitment to anonymity and confidentiality.

NB: PSG Limited, as a responsible corporate entity, offers equal opportunity to all employees.

The name of the employee should be kept **CONFIDENTIAL** when the grievance concerned is being addressed in public.