



## **GRIEVANCE PROCEDURE**

**OCTOBER 2018**

**FERONIA INC**  
**(the “Corporation” or “Company”)**

The **Grievance Procedure** establishes our commitment as a Company to provide a mechanism to receive and facilitate the resolution of any concerns and complaints by individuals and groups, who are affected by our operations.

The Grievance Procedure is also open to our employees and workers who feel unable to raise an issue or complaint directly with their line manager or local Personnel department.

**Key Objectives**

The key objectives of the Grievance Procedure are:

- To acknowledge and address concerns and complaints promptly (including an assessment of the legitimacy of the grievance relative to this Procedure).
- To communicate and apply an understandable and transparent process.
- To ensure the process is readily accessible to all affected individuals and communities.
- To ensure the grievance procedure is provided at no cost.
- To ensure the grievances will be managed with no fear of retribution.
- To apply a process which will not impede or preclude access to judicial and administrative remedies.
- To safeguard personal information and the identities of individuals at all stages of the process.
- To meet the requirements under IFC Performance Standard 1 and RSPO Principles and Criteria to establish an appropriate mechanism to receive and facilitate the resolution of grievances and concerns.

**Definition of Grievance**

A grievance is defined as a concern or a complaint that arises as a consequence of Company activities, and which affects local communities or other stakeholders.

Affected stakeholders may include local residents and businesses, local or national associations and institutions, formal or informal community leaders and representatives and other interested parties.

**Types of Grievance**

Anyone can raise a grievance if they feel that Company activities are negatively affecting them, their community or their local environment. Examples of grievances may include:

- Negative social or environmental impacts to local residents and communities (such as excessive noise, dust, odour, traffic etc.).
- Damage to community property and assets.
- Environmental damage and concerns as a result of Company operations.
- Practices that endanger the health, safety and security of employees or local communities.
- Failure to meet the labour rights of individuals working directly for the Company.
- Unacceptable behaviour by Company workers or Company representatives.

For the avoidance of doubt, this policy will not apply in the following instances:

- Commercial disputes where the contract stipulates the appropriate procedure for the resolution of contractual issues and disputes.
- Complaints which are not related to the Company or its operations.
- Complaints constituting criminal activity and violence; these should be reported to the appropriate authority.
- Complaints relating to Government policy or Government institutions.
- Complaints of a frivolous or malicious nature.
- Complaints motivated by an intention to obtain financial, personal, political or other advantage not directly related to the grievance.
- Issues, which the Company has previously reviewed, made a recommendation or reached a decision unless justified by new information not known at the time.

### **How to raise a Grievance**

Anyone can submit a grievance to the Company in the following ways:

- By email to: [responsibility@feronia.com](mailto:responsibility@feronia.com)
- By post to: Social Department: Plantations et Huileries du Congo SA, Rue des Poids Lourds 1963, C/Gombe, B.P. 8611 Kinshasa1, RDC
- Delivery in person to PHC sites in Kinshasa, Boteka, Yaligimba, Lokutu, marked for the attention of the Area Social Manager.
- Company suggestions boxes which are available across all sites, and grievances books are available in each office across the plantations

### **Grievance Process**

#### **Step1: Acknowledgement**

The Company will contact the individual to acknowledge the receipt of the grievance. The acknowledgement will include contact information about the Company representative who is dealing with grievance and where possible the timeframe for investigating and responding to the grievance.

### **Step 2: Investigation**

The Company will carry out an investigation into the grievance as soon as is reasonably possible. In some instances the Company may need to contact the complainant for further information during the investigation process. This will include a determination of whether the grievance meets the requirements defined above (Types of Grievance).

### **Step 3: Resolution**

When the Company has investigated the grievance, we will contact the complainant with the findings and our proposed response.

If the Company finds that the grievance does not relate to Company activities or that the subject of the grievance falls within the relevant DRC and International Standards, this will be explained to the complainant in writing.

In other cases the Company will propose a response in writing, in order to address the grievance raised.

Where the complainant is satisfied with the Company response to the grievance and its implementation, the Company will seek verbal and written confirmation and the case will be closed.

Where the response is not to the satisfaction of the complainant, the Company will undertake further discussions to assess whether there are other steps that can be taken to resolve the grievance.

All unresolved grievances will be escalated to investigated by the Company Management Committee, and the ESG Board committee will be advised

Where grievances cannot be resolved internally, either by the Social team or by escalation to the Management Committee, the Company will consider an external independent arbitrator (such as a mediator or court of law).

### **Timescales**

Where possible grievances will be managed to the following timescales:

- Within 7 business days to acknowledge receipt of a grievance.

- Within 30 business days of receipt of the grievance to conduct the investigation and provide a response to the complainant.

Where there are delays to the above timescales, the Company will provide regular progress updates to the complainant regarding the status of the grievance and proposed timescales to expect a Company response.

### **Follow Up**

The Company may contact the complainant at a later stage to check the grievance remains resolved and that Company operations pose no further issues.

### **Confidentiality**

Where a complainant wishes the grievance to remain confidential, the Company will ensure that any contact details are not disclosed without individual consent. If the Company is not able to fully investigate the grievance without disclosing personal information (e.g. giving evidence to relevant authorities), then the Company will discuss with the complainant how they wish to proceed.

### **Anonymous Grievances**

Where the Company receives an anonymous grievance (contact name and details are omitted from the form), it will use its best endeavours to investigate the grievance, however it may be more difficult to carry out a full investigation and the Company will not be able to provide a response or feedback to the complainant.

### **Grievance Process**

The Grievance Process is provided in the appendix of this document.

### **Implementation of the Policy**

The Company will communicate proactively to ensure management, workers, contractors, suppliers and external stakeholders are aware of the Grievance Procedure and are empowered to apply it through the necessary information, access and support.

### **Monitoring & Reporting**

Local grievances will be recorded by the Area Social Manager in each Company location and monitored by the Social and Community Coordinator and Head of Sustainability.

All grievances will be reviewed regularly by Management and reported on a quarterly basis to the ESG Board Committee.

It is also the responsibility of Management to annually review the Company Grievance Procedure and its implementation for effectiveness.