



GRIEVANCE PROCEDURE

Version 1
30 April 2019



Pacific Inter-Link Grievance Procedure

Introduction

Pacific Inter-Link (PIL) is aware that it is important to implement sustainable practices in its business, ensuring a long term viability and success. In line with that, PIL published and adopted Responsible Palm Oil Policy incorporating its commitment towards No Deforestation, No Peat and No Exploitation (NDPE). There are five main commitments made by PIL in the policy which cover Compliance, Environmental Responsibility, Social Responsibility, Engagement and Inclusivity as well as Transparent and Traceable Supply Chain.

To ensure that PIL meets the commitments made in the Responsible Palm Oil Policy, PIL establishes a transparent grievances mechanism incorporating an avenue for stakeholders to report grievances and a process to resolve complaints in a timely manner. This Grievances Procedure will address the process of receiving, reviewing, investigating, resolving and monitoring of all grievances.

Objectives

This procedure:

- serves as an outline to address all input, feedback and grievances from stakeholders in relation to the operations of PIL and its suppliers.
- defines an open, transparent and consultative process in receiving, reviewing, investigating, resolving and monitoring each feedback and grievance in a timely manner. PIL recognizes that feedback and input from stakeholders is valuable in enabling PIL to build a transparent and traceable supply chain, hence all input and feedback from stakeholders are strongly encouraged.

Scope

This procedure covers PIL's responsibility as a trader of oil palm products and derivatives in handling stakeholders' grievances. It is therefore applicable to all PIL operations and its suppliers. Grievances can be raised by any internal and/or external stakeholders including, but not limited to, individuals, employees, workers, contractors, suppliers, civil society organisations.



References

- Pacific Inter-Link Responsible Palm Oil Policy: <http://www.pilgroup.com/policy>

Procedure

a. Submission of Grievance

Grievances can be submitted via any of the following channels:

Addressed to, **PIL Sustainability Department**

1. Email: sustainability@pilgroup.com
2. In writing: Sustainability Department
Pacific Inter-Link Sdn. Bhd.
30th Floor, Menara Dato' Onn
Putra World Trade Centre, 45 Jalan Tun Ismail
50480 Kuala Lumpur, Malaysia
3. By telephone to: +603-4027 1077
4. By fax to: +603-4027 1020

Grievances must be submitted to PIL in writing / email or any other form of communication for acceptance and action.

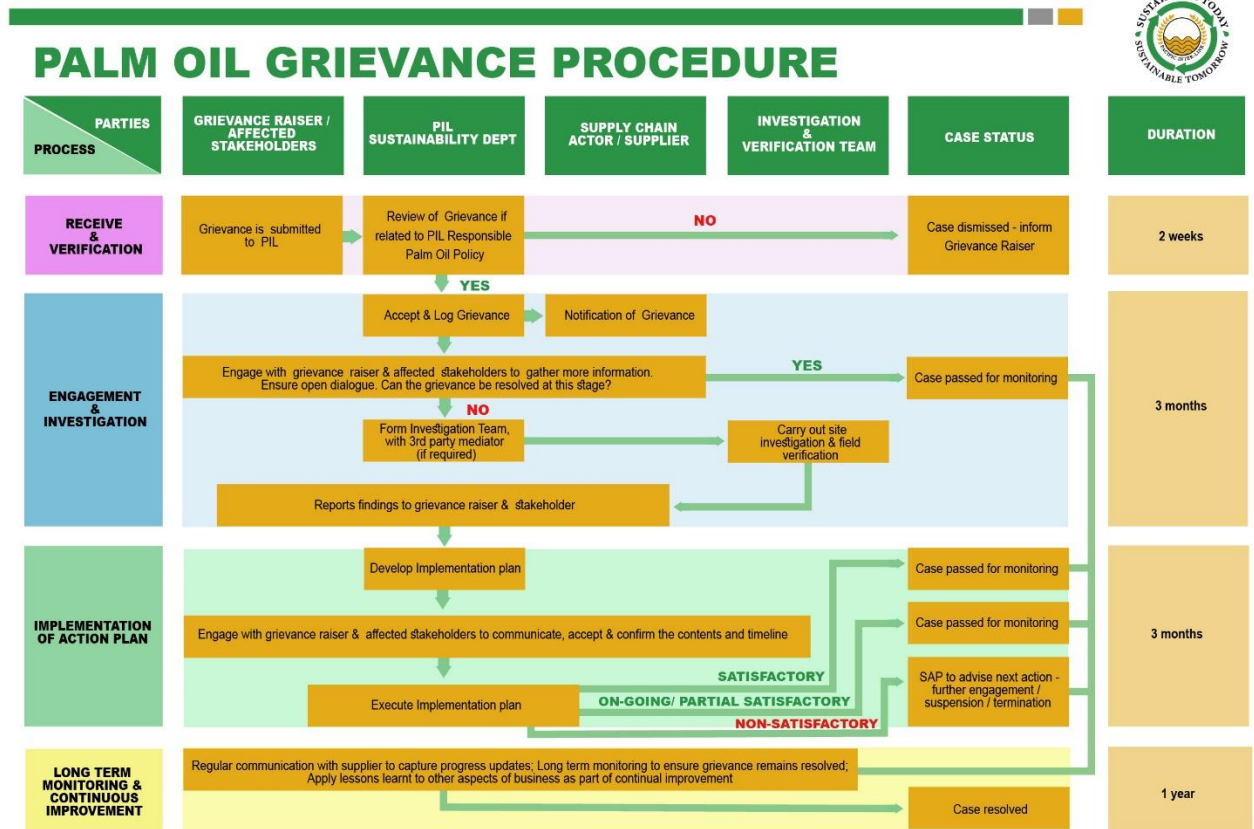
PIL will remain responsible to act upon any comments / views / grievance / observations expressed by anyone in any formal / informal forum or media forum if those are submitted to PIL.

Grievances should include provision of the following information:

- Full Name
- Name of Organization (if any)
- Job Title (if applicable)
- Address
- Phone No. /Fax No. /Email Address (at least one contact point)
- Description of the grievance in detail
- Evidence to support the grievance

b. Process Flow

The process flow for managing grievances is illustrated as follows:



c. Process Flow Description

Receive and Verification

The grievance can be submitted directly to PIL via writing / email / any other form of communication. The Sustainability Department is responsible to initiate investigate and validate the grievance.

If found to be relevant to PIL Responsible Palm Oil Policy, the Sustainability Department shall accept and log the grievance and notify the supply chain actors / supplier.



Engagement and Investigation

Engagement will be carried out with the grievance raiser as well as the supply chain actor / supplier. If the grievance can be resolved at this stage through the engagement process, the case will be passed for monitoring.

If the grievance could not be resolved within the engagement process, the Sustainability Department will form an investigation and verification team. PIL Sustainability Department will lead the investigation and verification team which includes members from the Sustainability Department and independent third party consultants or mediators, as and when required. The investigation team, together with the representatives from the relevant supply chain actor / supplier, will continue to engage with the grievance raiser and relevant stakeholders. This is to ensure open, transparent and consultative dialogue to understand the grievance and the evidence supporting it.

The investigation team will then carry out field verifications of the grievance; this can include but not limited to further stakeholder discussions, onsite observations and data collection. The team will summarise their findings and conclusions, and report them to the Grievance raiser and affected stakeholders.

Implementation of Action Plan

Based on the outcome of the findings, the Sustainability Department will develop an implementation plan with clear actions, ownership and timelines to remediate and resolve the grievance. Further engagement is carried out by the Sustainability Department with Grievance raiser and supply chain actor to communicate, accept and finalise the implementation plan and timeline.

If the implementation plan is carried out accordingly and all parties are satisfied with the outcome, then the case will be passed for monitoring the outcomes of the implementation plan. If the implementation plan requires a longer timeline and the outcome is partially satisfactory, it will be implemented with a monitoring frequency defined to ensure the effectiveness of the action items. In cases where the supply chain actor / suppliers are not showing any signs of improvement, engagement or non-satisfactory actions, then the Sustainability Department will escalate the case to PIL Sustainability Advisory Panel (SAP) for deliberation and advice. The SAP will advise if there is a need for further engagement or supplier should be suspended or terminated. If there are any action item that needs to be revised, this must be raised to the Sustainability Department for further action.



Long Term Monitoring and Continuous Improvement

As part of the Long Term Monitoring and Continual Improvement initiative, PIL will apply long term monitoring of the specific grievance to ensure the issue remains resolved and will relate the lessons learnt from each grievance to other aspects of the business to prevent and minimise the likelihood of similar grievances arising.