

 Olam Agri	Procedure for handling complaints against CIB-Olam	Réf.	ProR/CRS /
		Fréq. rév.	-
		Date rév.	-
		Date doc.	23/02/24

Procedure for handling complaints against CIB-Olam

1. Context

The purpose of this procedure is to define the process for handling complaints addressed to CIB regarding its activities and those of its subcontractors. It defines the admissibility, registration and complaint handling process.

This procedure is available on the internet at <https://www.olamagri.com/products-services/wood-products/forest-concessions.html>. It can also be obtained on request in hard copy by a stakeholder or by e-mail. Residents of CIB concessions will be informed of this procedure and copies will be distributed regularly in the villages.

2. Objectives

Conflicts between CIB and its stakeholders can compromise the success of its social and environmental activities. They must therefore be managed and controlled with the greatest transparency so that no one can feel aggrieved. The objective of this procedure is to have a flexible system in place to facilitate decision-making and provide a clear, appropriate and comprehensive response to complaints against CIB or its subcontractors.

CIB is committed to ensuring a transparent and open process and to making public information relating to the handling of complaints to CIB.

3. Scope and guiding principles

This procedure applies to all operations of CIB and its subcontractors. It must be used to report and address all non-conformities relating to CIB's internal procedures and commitments to communities or its workers, as well as practices deemed unacceptable by policies and standards followed by Olam, notably the "Olam Living Landscape Policy"¹ or the "Code of Conduct for Suppliers"². These non-conformities include non-compliance with laws relating to human or labour rights, local communities and Indigenous people, the environment, non-compliance with protected areas, conversion or degradation of critical habitats, peatlands or other natural habitats (HCVF, HCSF).

If non-conformities in CIB's operations or those of our subcontractors are reported to it, the extent and nature of the non-conformities will be assessed, and a work plan established by CIB to resolve the problem internally and/or with its subcontractors.

¹ <https://www.olamagri.com/content/dam/olam-agri/sustainability/pp/pp-pdfs/olam-agri-living-landscapes-policy.pdf>

² <https://www.olamagri.com/content/dam/olam-agri/about-us/ethics-and-compliance/ethics-and-compliance-pdfs/olam-agri-supplier-code-french.pdf>

Complaints relating to illegal or unfair conduct relating to the individual conduct of employees of CIB or its subcontractors may also be reported through the mechanism described in this procedure.

The permanent contact established by the CIB with its stakeholders encourages dialogue and communication. They must always serve as a basis to avoid dissatisfaction and to find solutions to conflicts.

4. Definition of terms used in this procedure

Complaint: written complaint indicating dissatisfaction between an internal or external stakeholder and the CIB in the course of its activities. The complaints concerned by this procedure may be related to the following issues (non-exhaustive list):

- Conflicts related to the implementation of forest management plans
- Divergences in the interpretation of legal texts
- Crimes against the agricultural or commercial activities of a resident of the concessions
- Environmental degradation
- Permanent nuisances or disruptions related to the work carried out by the CIB
- Compensatory measures deemed inadequate by stakeholders
- Inappropriate behaviour of an CIB employee in the performance of his or her duties

Complaints received by the CIB are classified into 3 categories:

- **Accusation:** an assertion that the CIB and/or one of its subcontractors is suspected of having committed a reprehensible or illegal act. It may be formal or informal and may be made in a variety of contexts, including legal, social, or professional. An accusation is often accompanied by a justification or evidence to support CIB's alleged guilt. However, it is important to note that any accusation must be supported by verifiable facts and that the presumption of innocence prevails until proven otherwise.
- **Claim:** a request or claim made by a party involved in a dispute, often with the aim of defending its interests, rights, or opinions. A claim may relate to a variety of issues, such as legal rights, territorial claims, requests for reparation or compensation, etc. It generally expresses a disagreement or an unmet need that the party concerned would like to see resolved as part of the conflict management process.
- **Conflict:** a state of tension or opposition characterised by profound disagreement on an issue that cannot be resolved spontaneously. It may result from the existence of a dispute or a complaint against the CIB. At least one of the parties is in a state of tension and does not intend to give in to the opposing party(ies). Conflict management is generally aimed at resolving or easing tensions and promoting solutions that are satisfactory to all parties concerned.

Indigenous people: in the context of CIB, semi-nomadic communities, indigenous hunter-gatherers or Mbendjele or BaAka communities.

Non-conformity : failure to meet a procedural requirement or deviation from a policy ratified by the CIB.

Subcontractors : company or person contractually linked to the CIB for the performance of work in its concessions.

Stakeholder : individual or collective actor (group or organization) directly or indirectly affected by CIB's activities. CIB employees may be considered as internal stakeholders in this procedure.

5. Reference documents and systems

- Olam Living Landscape Policy
- Olam Agri Anti-bribery & Corruption policy
- Olam Agri Code of Conduct

- Olam Agri Supplier Code
- Olam Agri Human & Labour Rights Position Statement
- Strategy and procedure for the involvement of local people in forest management

6. Responsibilites

The application of this procedure is the responsibility of the CR&S department of the CIB. Complaints will be managed by the CR&S Director and the CIB's legal counsel. They will supervise and, if necessary, resolve complaints.

The implementation of complaint resolution actions will be the responsibility of the various departments concerned. The social service will deal more specifically with complaints relating to local communities or indigenous peoples, while the human resources service will be concerned with complaints from employees or subcontractors.

When a complaint concerns the internal policies of the Olam Group (Living Landscape Policy etc.), the CR&S Olam department will be informed and associated with the resolution the non-compliance.

This procedure will be reviewed and updated as necessary.

7. Submission of grievances

Complaints must be addressed in writing and sent to the CIB through the following channels:

- Mail addressed to CIB headquarters in Pokola or Brazzaville
- Mail given to the social service or to a CIB manager during his visits to the villages
- Email sent to crs.congo@olamagri.com or accueil.admin@olamagri.com

In the case of persons who cannot read, the complaint may be written by the CIB's social service or any other external stakeholder.

Complaints will then be forwarded to the CR&S department of the CIB.

- Complaints shall contain at least the following information:
- Name and contact details of the person or body making the complaint
- Detailed description of the complaint
- If possible, evidence to prove non-conformities

If a complaint is made anonymously, contact details should be associated with it so that CIB can inform the complainant of the resolution of the problem.

8. Transparency and confidentiality

The CIB is committed to handling complaints in a transparent manner. The CR&S manager in charge of handling the complaint will record in writing the status of the complaint and update the resolution process. The complainant may request additional information on the handling of his or her complaint if he or she so wishes.

CIB will publicly communicate on the results of all land and resource conflict negotiations with local communities.

However, the resolution process may remain confidential if the complainant so wishes.

Negotiations with indigenous peoples on management activities should take place with the community as a whole or through representatives designated by indigenous peoples, and preferably with the support of relevant government agencies and civil society organizations working to defend the rights of indigenous peoples.

9. Handling process

Timeline	Stage	Person in charge
1 week	1.) Receipt and registration of the complaint <ul style="list-style-type: none">- Sending an acknowledgement of receipt to the complainant- Contact of the controllers in charge of the processing- Registration of the complaint if it is admissible	CR&S Manager Legal counsel
1 week	2.) Preliminary review Verification of the admissibility of the complaint. If so, continue at step 3 and request additional information from the complainant if necessary. If not, inform the complainant and closing. In the event of a possible conflict over the land ownership and use rights of riparian communities, forestry operations that are the direct cause of the conflict may be delayed or suspended until the conflict is resolved.	CR&S Manager Legal counsel
1 month	3.) Dialogue, plan investigation, determine resolution <ul style="list-style-type: none">- Informing stakeholders and relevant officials- Collection of responses from relevant stakeholders and managers	CR&S Manager Legal counsel


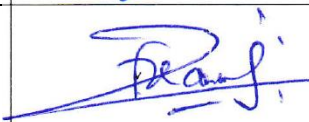
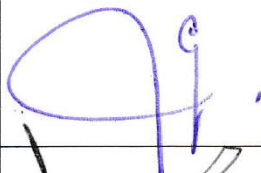
	<ul style="list-style-type: none"> - Agreement of stakeholders and the complainant on the scope of the investigation and the approach to be adopted. - Examination of the possibilities of cooperation with an external partner in the investigation and/or mediation 	
1-3 month	4.) Investigation Process <ul style="list-style-type: none"> - Collection of additional information and field visits if necessary - Review of survey results based on objective evidence 	CR&S Manager
1 month	5.) Conflict resolution <ul style="list-style-type: none"> - Identification of one or more appropriate solutions - Agreement on evidence provided by complainant, affected parties and final decision. - Signing of an acceptance agreement by the complainant - Agreement on timetable and action plan 	CR&S Manager Relevant Departments
6-12 months	6.) Monitoring and archiving <ul style="list-style-type: none"> - Resolution report and closing. - Non-resolution report: and referral to external mediation. - Monitor implementation of corrective actions. - In the event of persistent problems/non-compliance with a subcontractor, consider terminating the contract. 	CR&S Manager

10. History and development of the document

History

Version	History	Date	Author	Role
Initial version	1.0 version	May 2019	V. Istace	CR&S Manager
Old version	1.1 version	January 2020	V. Istace	CR&S Manager
Old version	1.2 version	April 2022	V. Istace	CR&S Manager
Old version	1.3 version	June 2023	V. Istace	CR&S Manager
Current version	1.4 version	February 2024	B. Nguessan	Deputy CR&S Manager

Development of the document

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