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|  | Procedure for handling complaints against CIB-Olam | Réf. | ProR/CRS / |
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Procedure for handling complaints against CIB-Olam

1. Context

The purpose of this procedure is to define the process of processing plants addressed to CIB in relation to its activities, including the activities of its subcontractors. It defines the admissibility, registration and complaint handling process.

This procedure is available on the Internet at <https://www.olamgroup.com/products/industrial-raw-materials/wood-products/forest-concessions.html>. It can also be obtained on request in paper form by a stakeholder or by e-mail..

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 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 peoples, 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.

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.

¹ https://www.olamgroup.com/content/dam/olamgroup/pdf/olamgroup/Olam-Living-Landscapes-Policy_French.pdf

² https://www.olamgroup.com/content/dam/olamgroup/pdf/olamgroup/supplier-codes/Olam%20Supplier%20Code_French.pdf

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

Conflict/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 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

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

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

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 Supplier Code;
- Strategy and procedure for the involvement of local people in forest management

6. Responsibilités

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 cib@cibpokola.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 the IPC 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 publish 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. 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 - Agreement of stakeholders and the complainant on the scope of the investigation and the approach to be adopted. | CR&S Manager Legal counsel |


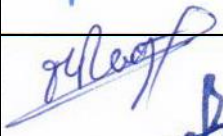

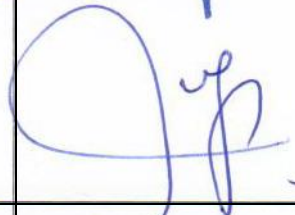
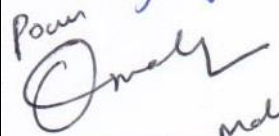
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| | - Examination of the possibilities of cooperation with an external partner in the investigation and/or mediation | |
| 1-3 month | 4.) Investigation Process <ul style="list-style-type: none"> - Collection of additional information and field visits if necessary - Review of survey results based on objective evidence - Decision-making: <ul style="list-style-type: none"> o Invalid complaint: information from the complainant o Valid complaint: launch of a resolution plan | CR&S Manager |
| 1 month | 5.) Develop resolution <ul style="list-style-type: none"> - Agreement on the evidence provided by the complainant and affected persons - Agreement on the timeline and action plan - Agreement on the communication of actions and progress | CR&S Manager Relevant Departments |
| 6-12 ont | 6.) Case monitoring <ul style="list-style-type: none"> - Problem solved - Unresolved issue: back to step 5 - In the event of a persistent problem/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 |
| Current version | 1.1 version | January 2020 | V. Istace | CR&S Manager |

Development of the document

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