

## **CSC Sugar/Sugaright Grievance Policy (Updated June 2024)**

**Introduction:** As a sugar trading and refining company, we are committed to upholding the principles outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs). We recognize our responsibility to respect human rights throughout our operations and supply chain. This Grievance Policy is designed to provide a transparent and accessible mechanism for addressing grievances related to our business activities, in line with the UNGPs.

### **Objectives:**

1. Provide a platform for individuals or communities affected by our operations or supply chain to raise grievances.
2. Ensure grievances are addressed promptly, fairly, and effectively, in accordance with human rights principles.
3. Demonstrate our commitment to accountability, transparency, and continuous improvement in managing human rights impacts.

### **Policy Framework:**

1. **Scope:** This policy applies to all stakeholders, including employees, contractors, suppliers, communities, and other individuals or groups affected by our operations or supply chain.
2. **Principles:**
  - **Access to Remedy:** We recognize the right of individuals and communities to seek remedy for grievances related to our business activities.
  - **Transparency:** We are committed to transparency in our grievance process, including communication of outcomes and actions taken.
  - **Fairness and Impartiality:** Grievances will be addressed impartially and in a fair manner, with due consideration to all perspectives and evidence.
  - **Confidentiality:** Information related to grievances will be treated confidentially, with respect for the privacy and safety of those involved.
  - **Non-Retaliation:** We prohibit retaliation against individuals who raise grievances in good faith.
3. **Grievance Mechanism:**

### **Submission of Grievance:**

Employees are encouraged to first attempt to resolve grievances informally through discussion with their immediate supervisor or HR representative.

Grievances can be submitted through various channels, including email, phone, in-person, or through designated confidential phone number on the Sugaright and CSC Sugar web-sites.

Grievances can be related to any workplace issue, including but not limited to harassment, discrimination, working conditions, safety concerns, or disputes with colleagues.

**Documentation:** Grievances should be documented in writing whenever possible, providing details such as the nature of the grievance, individuals or groups affected, and desired outcome.

**Review and Acknowledgment:**

Upon receipt of the Grievance Form, the HR department will acknowledge receipt within [specify timeframe, e.g., 3 working days].

The HR department will review the grievance and determine the appropriate course of action.

**Investigation:**

Depending on the nature and severity of the grievance, an investigation may be conducted by HR personnel or an appointed investigation committee.

The investigation will be conducted impartially, and all parties involved will be given an opportunity to present their side of the story.

Confidentiality will be maintained throughout the investigation process to the extent possible.

**Resolution:**

Following the investigation, HR will propose a resolution to the grievance based on the findings and in consultation with relevant stakeholders.

The proposed resolution will be communicated to the employee who raised the grievance within [specify timeframe, e.g., 5 working days] of the completion of the investigation.

If the employee accepts the proposed resolution, appropriate actions will be taken to implement it.

If the employee is not satisfied with the proposed resolution, they may request further review, which will be conducted by the CEO of Trading or Refining.

**Follow-Up:**

HR will conduct follow-up meetings with the employee to ensure that the resolution has been effectively implemented and to address any remaining concerns.

A record of the grievance and its resolution will be maintained by the HR department for future reference.

**Confidentiality and Non-Retaliation:**

All information related to grievances will be treated with the utmost confidentiality to protect the privacy of the parties involved.

Retaliation against employees who raise grievances in good faith is strictly prohibited and will result in disciplinary action.

#### 4. **Monitoring and Reporting:**

- We will monitor the effectiveness of our grievance mechanism and make improvements based on feedback and lessons learned.

**Conclusion:** At CSC Sugar, we are dedicated to respecting human rights and addressing grievances in accordance with the UNGPs. This Grievance Policy reflects our commitment to accountability, transparency, and continuous improvement in managing human rights impacts throughout our operations and supply chain. We encourage stakeholders to utilize this mechanism to raise grievances, and we are committed to addressing them promptly and effectively.