



Sime Darby Plantation Berhad
Group Sustainability

Grievance Response Standard Operating
Procedure



Policy Instrument Control Table

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Contents

1. SCOPE AND PURPOSE	3
2. GRIEVANCE MANAGEMENT	3
3. ASSIGNMENT OF CASES	5
4. MONITORING AND REPORTING OF GRIEVANCE	6
5. AWARENESS AND COMMUNICATION	7
6. REFERENCES RELEVANT TO PROCEDURE	7
7. PROCESS OWNER	7



Glossary

The definitions of the key terms used in this Procedure are as follows:

TERMS	DESCRIPTIONS
Operating Unit (OU)	In terms of job assignment in the helpline, reference to Operating Unit denotes Regional Human Resources (Upstream) or Human Resources Personnel at operations (Downstream)
Case / Issue / Grievance	Refers to a formal complaint, concern or problem that is raised by an individual or group towards SDP or its affiliated company represented by management (supervisor, manager, head) within the workplace.
Call handler / Operator	The formal grievance channels comprising Suara Kami by Elevate and Worker Helpline by Ulula is managed by a team of call handlers or operators. These personnel are third-party providers that communicate directly with the complainants.
Complainant	Individuals that use the helpline to raise grievances are referred to as complainant. Workers and individuals who have raised issues through informal channels are also referred as complainants.
Informal channels	For this purpose, informal channels shall refer to non-system platform channels, where complainants may raise grievances directly to OU Management, Careline or Gender Representatives (not exhaustive). The cases are required to be logged into Suara Kami webform and will follow the same process flow as cases received via formal channels.
Grievance Unit (GU)	The GU will support the systematic and effective handling of grievances from individuals or third-parties to Sime Darby Plantation or its group of companies.

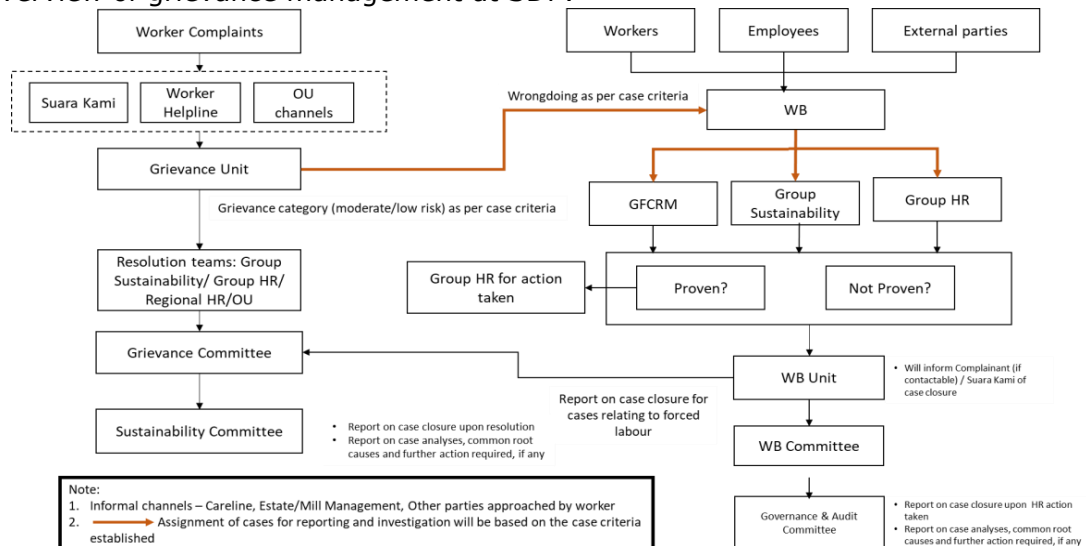
1. SCOPE AND PURPOSE

- 1.1 This Procedure shall outline the procedural aspects of the Grievance Unit in response to the following:
 - a. The intake and logging of grievances received through formal and informal channels
 - b. The assignment of grievances received for investigation
 - c. The cancelling, withdrawing, closing or reopening and investigation
- 1.2 This Procedure shall apply to all grievances received via formal channels and informal channels including but not limited to:
 - a. Whistleblowing
 - b. Workers helpline
 - c. Suara Kami helpline
 - d. Informal grievances received at OU level through Region HR, Careline or Gender Representatives that are required to be logged into Suara Kami webform
- 1.3 The main purpose of this procedure is to support all Malaysian operations (upstream and downstream) in ensuring effective and timely grievance management for workers through a centralised unit governed by the Sustainability Committee.

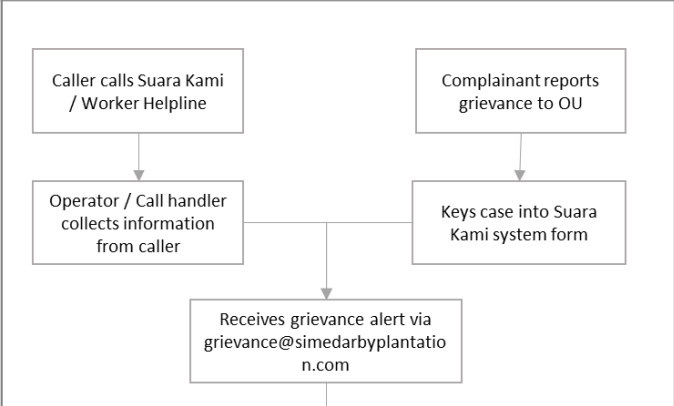
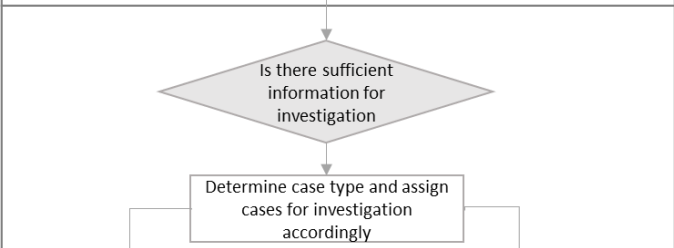
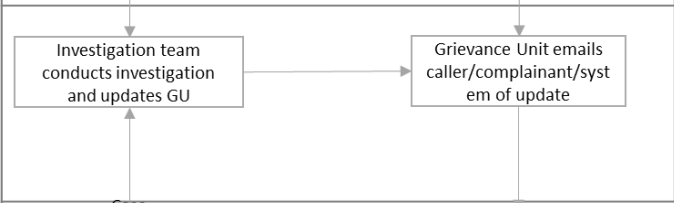
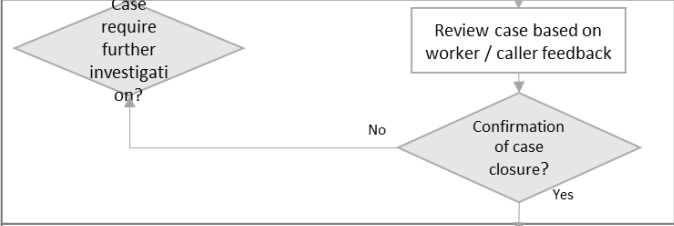
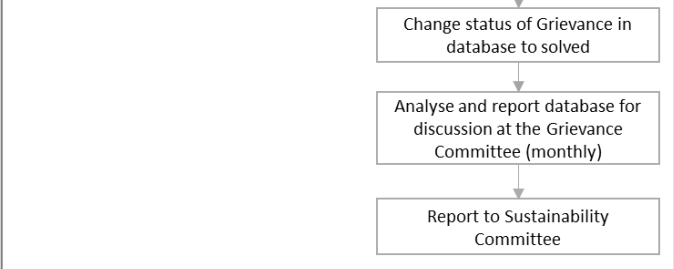
2. GRIEVANCE MANAGEMENT

- 2.1. The Grievance Unit (GU) key role is to capture informal and formal complaints and concerns systematically, address issues that can be readily resolved, refer issues to the investigating team when substantive expertise is necessary, and follow up with both the complaint owner or call handler to ensure that the issue is resolved in a fair and timely manner.
The main objectives of the establishment of the GU are as follows:
 - a. Manage a central database of grievance received through formal and informal channels.
 - b. Monitor the grievances received by ensuring the management of cases are in accordance to the stipulated protocols and procedures.
 - c. Analyse the grievances received and report key issues to the Grievance Committee and Sustainability Committee as board oversight.
 - d. Raise awareness of available grievance channels within SDP.

Overview of grievance management at SDP:



2.2. Cases shall be assigned according to the procedure in Appendix 01. The full procedure can be seen in the flowchart below.

Process	PIC	Details
	OU	<p>Formal channels: Suara Kami helpline Worker Helpline (ULULA)</p> <p>Informal channels: Operating Unit Gender Representative Careline</p> <p>The PIC at OU's reports case details into the Suara Kami System Form. Complainants can also report grievances direct through the formal channels.</p> <p>The GU receives an email alert through grievance@sime-darbyplantation.com of the complaints made.</p>
	GU	<p>GU ensures that all the required information is complete and comprehensive.</p> <p>GU will request for more information if insufficient.</p> <p>Determine case criteria and assign the investigating team accordingly.</p>
	GU / IN	<p>GU shall email complainant/ operator to acknowledge receipt of case within 48 hours of email alert.</p> <p>Wrongdoing cases will be channeled to the Whistleblowing Unit for further investigation. Investigation team conducts investigation and updates GU of outcome and remediation action.</p>
	GU	<p>GU follow up with investigation team and reviews case for feedback to complainant / operator.</p> <p>GU shall confirm with the complainant the case closure and level of satisfaction of the complainant.</p>
	GU	<p>In the event the complainant is not satisfied, GU shall alert the Grievance Committee and reviews the case if investigation should be reopened.</p> <p>GU shall update the database and prepares report for Grievance Committee.</p> <p>The Grievance Committee shall present a report of all grievances managed to the Sustainability Committee for complete governance.</p>

2.3 Informal grievance handling

For the purpose of this procedure, informal grievances shall refer to grievances that are made not through the third-party systems such as the Worker Helpline – by Ulula, Suara Kami helpline – by Elevate and Whistle Blowing. This shall comprise:

- Grievances logged by OU's
- Careline handling of grievances
- Gender Representatives reports

Relevant parties within SDP who receive worker complaints, including complaints received via Careline and Gender Representatives, shall be required to record cases into the Suara Kami System Form (<https://suarakami.zendesk.com/hc/en-us/requests/new>). This includes grievances received via suggestion boxes and forms. The Suara Kami system shall automatically alert the GU of a new case via email, similar to how a case is logged by the Suara Kami operator.

The cases reported shall be assigned for investigation according to the case criteria and timeline in Appendix 01. The grievance management procedure shall apply as above.

3. ASSIGNMENT OF CASES

- 3.1. The GU will review the assignment and channel the cases following the criteria provided in Appendix 01. Grievances approved for investigation assignment will be marked by the GU in the Grievance database.
- 3.2. The GU may recommend that certain cases need not be investigated due to:
 - a. Lack of information and the subsequent inability to contact the complainant to revert with relevant information
 - b. The complaint has been satisfactorily closed at OU level
 - c. The case is an enquiry in nature and can be addressed through FAQs (on common enquiries) provided to the helpline operators

In such event, the Grievance Committee will deliberate on the appropriateness of not initiating investigations into the complaint and if need be, to request for an investigation to commence. Such cases would be channeled for case assignment.

- 3.3. The timescale of investigation is guided as follows:

No	Criteria	Example of Complaints	Timeline	
1	Inquiries or confirmation from operating units without interview of witness or review of documents	Request for repatriation, inquiries on housing on conditions or wages, request for transfers	Non anonymous	2 weeks
			Anonymous	Not more than 4 weeks
2	Investigations involving interview of complainant and review of documents (not complex) - Complainant willing to give his/her details so that HQ can interview the complainant	Any form of complaint or grievance where the complainant is identified and available for verification of the allegations. Does not involve interviews with randomly selected workers.	Non anonymous	Not more than 4 weeks
			Anonymous	Not more than 3 months



3	<p>Investigations involving interview of randomly selected workers / witnesses and review of documents (complex), where complainant is not disclosed.</p> <ul style="list-style-type: none"> - Complainant not willing to give his/her details but gives the name of the alleged. In this case many, a group of randomly selected workers will have to be interviewed to validate the allegations, hence, resulting in an extended period of investigations 	<p>Harassment or disrespect by supervisor, unfair termination, discrimination</p> <p>Fraud, misappropriation, manipulation of documents</p>	<p>Non anonymous and anonymous</p>	<p>Not more than 3 months</p>
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- 3.4. Should an investigator have a personal connection to the case being investigated and if the personal connection interferes or is deemed to interfere with the discharge of his or her duties, the relationship must be disclosed, before and investigation commences, or as soon as the situation arises.
- 3.5. The conflict of interest may be made informally during the opening meeting of an investigation or via a brief statement in writing to the GC.
- 3.6. The GC reserves the right and discretion to disqualify the investigator/personnel and reassign the investigation should the need arise.

4. MONITORING AND REPORTING OF GRIEVANCE

- 4.1. GU shall track and monitor ongoing cases under investigation and where necessary, liaise with the Investigating Team on the weekly status of investigation progress and expected completion date (for medium/high risk cases that is in queue for investigations). Additionally, for cases investigated by RHR and OU, cases are shared to Group HR and Upstream Business Support (to be shared to region management) respectively for oversight on a weekly basis.

- 4.2. GU shall monitor the helpline systems for updates by the Investigation Teams and the helpline operators. For cases that have completed investigation, operators will be given 14 days to inform the workers of the outcome and case will be considered closed if workers are still not reachable by the end of the duration.
- 4.3 Repeated callers will also be monitored. SDP HR may speak directly to workers in non-anonymous cases when:
- 3 cases have been reported in a 2-month period and in each of these cases the complaint was not upheld – and:
 - Evidence proves the worker intentionally provided untruthful information for each case (e.g. lying, purposefully withholding information or knowingly giving wrong information)
- 4.3 GU shall prepare a report for deliberation at the Grievance Committee. Following which, the final agreed report shall be submitted to the Sustainability Committee. However, should the need arise, the report is to be prepared as and when required.
- 4.3 GU shall track common issues in the grievance database and may propose intervention initiatives. Formal analysis may be conducted for reporting to the Grievance Committee and Sustainability Committee.

5.0 AWARENESS AND COMMUNICATION

- 5.1 GU shall ensure that workers are aware of the available grievance channels through the distribution of promotional items (posters, cards, stickers), briefings by third party helpline providers and refreshers during muster and social dialogues. Surveys may be conducted to gauge the level of awareness from time to time.
- 5.2 OU management will be given periodic updates on the survey outcomes/analysis of grievances received and refreshers on communicating grievance channel/management to workers.

6. REFERENCES RELEVANT TO PROCEDURE

This SOP shall be read in conjunction with the following, where applicable:

- a. Grievance Unit Terms of Reference
- b. Workers Helpline SOP
- c. Suara Kami Helpline SOP
- d. Whistleblowing Response Procedure

7. PROCESS OWNER

Social Performance and Advocacy Unit, Group Sustainability.



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Appendix 01

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
1. High risk of forced labour present						
1.1	Recruitment	Deceptive recruitment, being charged recruitment fee (fees for application, recommendation, recruiting, hiring, placement, administrative, overhead and processing fees, and fees at any stage of the recruitment process, during or after employment. Fees to any parties, including agent, sub-agent, intermediary or employer) Examples of fees include pre-departure fees such as passport preparation fees and transportation and lodging costs.	ILO 6 Deception ILO 8 Debt Bondage	WB	Human rights	Group HR
		Contract substitution for materially worse conditions (e.g. lower wages, different production facility, undisclosed fees for housing). Workers are requested to sign a contract that is different from their original contract signed / or what they verbally had agreed to in home country	ILO 6 Deception	WB	Human rights	Group HR
1.2	Resignation	Workers are requested to pay for the return transportation to their home country at the end of employment i.e. airfare, airport transfers etc., against the terms stipulated in employment contract	ILO 6 Deception	WB	Human rights	Group HR
		Workers are requested to pay fees/penalties if they have provided notice or fulfilled the	ILO 6 Deception	WB	Human rights	Group HR



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
		full resignation period per the employment contract; if the worker has not provided notice, the worker is punished (e.g. withholding wages or charging a fee that is higher than 60% of 1 month workers' gross base wages); termination is conducted unfairly, without proper documentation and procedures	ILO 9 Withholding Wages ILO 3 Restriction			
1.3	Wages	Withholding of wages (incl. standard, OT pay or benefits). or wages delayed not in accordance to Employment Act 1955 (within 7 days after the last day of any wage period)	ILO 9 Withholding Wages	WB	Human rights	Group HR
		Levy deduction, threat of levy deduction, worker indicates their desire to terminate employment – workers are charged remaining balance due on any levies at the end of employment (apart from situations where there is dismissal for gross misconduct)	ILO 1 Abuse of Vulnerability ILO 8 debt bondage ILO 9 Withholding Wages	WB	Human rights	Group HR
1.4	Restriction of movement	Restriction of movement during on and off work time such as being locked in space; no freedom to resign in accordance with legal requirements.	ILO 3 Restriction of Movement	WB	Human rights	Group HR
1.5	Physical Harassment	**Physical (including sexual) assault with serious injury where it involves parties in different positions of authority (e.g. worker	ILO 10 Physical & Sexual Violence	WB	Harassment and violence	Group HR



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
		assaulted by mandor or supervisor assaulted by department head).				(Security will be assigned to immediately respond)
1.6	Verbal harassment	Threats, retaliation, harassment, or abuse by management. Causing workers to feel vulnerable and unable to work or seek their rights to employment queries/benefits/contract termination. Physical and verbal abuse, verbally threatened by supervisor, mandore, manager, assistant manager, peers.	ILO 1 Abuse of Vulnerability ILO 11 Intimidation and threats	WB	Harassment and violence	Group HR
1.7	Sexual Harassment	Any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or intimidation with the aim to coerce an individual into a sexual act, by any person regardless of their relationship to the victim, in any setting, including but not limited to home and work. Note: In serious cases such as rape, operator to park case under General Assistance and to advise on contacting nearest local authorities. Sime Darby Plantation HQ is responsible for re-directing issues under this category to HR Governance and IR at: adeline.amanda@simedarbyplantation.com	ILO 10 Physical & Sexual Violence	WB	Harassment and violence	Group HR



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
1.8	Extortion	Forced to pay a sum of money by a superior	ILO 5 Abuse of Vulnerability	WB	Other Criminal Offences	GFCRM
1.9	Repatriation	Denied return upon request or denied repatriation following permit/contract expiry	ILO 3 Restriction of Movement	WB	Human rights	Group Sustainability
1.10	Retention of documents	Passports withheld by the Operating Unit (OU) or other party apart from the purpose of renewal of permit, or no secure storage provided or not accessible at any time	ILO 2 Retention of identity documents	WB	Human rights	Group Sustainability
1.11	Bonded labour	Use of bonded, indentured or prison labour. Examples include: workers are not able to resign as they are required to pay off their debt to the company/someone employed at the Group prior to leaving.	ILO 1 Abuse of Vulnerability ILO 9 Withholding Wages	WB	Human rights	Group Sustainability
1.12	Child labour	Child labour - no person is employed or has access to any work areas at an age younger than 16. Should an underage worker be identified, he/she is removed from the workplace immediately and kept safe. Child labour hired by a contractor – see above definition and example of child labour.	ILO 1 Abuse of Vulnerability	WB	Human Rights	Group Sustainability
1.13	Health and Safety	Locked workplace exits or blocked egress routes, cracks in beams, cracks in columns, cracks on the wall, unattended or bare electric wires, sparking or short circuits, walls or windows shaking.	ILO 5 Abuse Working & Living Conditions	WB	Occupational safety and health	Group sustainability



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
1.14	Facilities	Restriction of movement by the OU or no access to basic necessities (e.g., water supply, electricity supply, toilets, drinking water, external medical facilities, dormitory exit and entry). Degrading living conditions. Repeated inaction from management on fixing/rectifying. Note: This category does not include general maintenance or repair requests)	ILO 5 Abuse Working & Living Conditions	WB	Human rights	Group Sustainability
2. Moderate risk of forced labour present						
2.1	Freedom of association	Issues related to freely associating with any labour (union), political or other group including strike / worker unrest or union-busting allegations.	ILO 1 Abuse of Vulnerability	WB	Human rights	Group HR
2.2	Discrimination	Discriminated based on sexual orientation, race, gender, religion	ILO 1 Abuse of Vulnerability ILO 6 Isolation	WB	Human rights	Group HR
2.3	Contracts	No contract or workers do not understand terms in contract	ILO 6 Deception	WB	Human rights	Group HR
2.4	Forced Overtime	Workers cannot refuse to work overtime.	ILO 4 Excessive overtime	WB	Human rights	Group HR
2.5	Verbal harassment	Pregnant Worker reporting threats and intimidation	ILO 11 Intimidation and threats	WB	Human rights	Group HR



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/GC	Case Classification	Dealt with by
2.6	Acts of fraud & corruption	Witnessing crimes at the workplace or workers reporting excessive crimes like theft involving management	ILO 8 Debt Bondage (e.g. relating to 'kick back' arrangements)	WB	Other Criminal Offenses	GFCRM
2.7	Health and Safety	Lack of personal protective equipment (PPE) when dealing with potentially dangerous processes; no regular fire drills (at least 1 per year); emergency exits are locked or not equipped with proper lighting; missing proper machine safeguarding; missing legally required permits/ licenses. Concerns regarding occupational and non-occupational safety and health including chemical handling; unsafe use of heavy equipment or tools.	ILO 5 Abuse Working & Living Conditions	WB	Occupational safety and health	Group Sustainability
2.8	Health and Safety	**Industrial Disasters at workplace structures such as collapse of structure, fire, explosions	ILO 5 Abuse Working & Living Conditions	WB	Occupational safety and health	Group Sustainability
2.9	Health and Safety	**Immediate concerns regarding safety; occupational fatalities, non-occupational fatalities; serious injuries, medical attention required; burnt.	ILO 5 Abuse Working & Living Conditions	WB	Occupational safety and health	Group Sustainability
2.10	Hours	Complaints/Enquiries related all working hours issues, including overtime	ILO 4 Excessive overtime	GC	Human rights	Regional HR
2.11	Facilities	Complaints regarding to hygiene and quality or price.	ILO 5 Abuse Working &	GC	Human rights	Group Sustainability



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
			Living Conditions			
2.12	Wages	Complaints/Enquiries related to wages, bonuses, overtime compensation, and benefits Pregnant workers report they are not provided with the statutory/company benefits	ILO 4 Excessive overtime ILO 9 Withholding Wages ILO 1 Abuse of Vulnerability	GC	Human rights	Regional HR
3. LOW FORCED LABOUR RISK ISSUES						
3.1	Physical Harassment	Past event - Fights between workers in the workplace		GC	Harassment and violence	Group HR
3.2	Physical Harassment	**Physical (including sexual) assault with serious injury between workers, in the workplace or domestic sphere.		GC	Harassment and violence	Group HR (Security will be assigned to immediately respond)
3.3	Physical Harassment	Domestic abuse, including child abuse		GC	Occupational safety and health	Regional HR
3.4	Physical Harassment	Fights between workers in the workplace (note: however, if serious and unresolved to be considered egregious)		GC	Harassment and violence	Security



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
3.5	Covid-19	Enquiries relating to the pandemic, including restrictions to business operating hours and lock downs, border closures impacting repatriation/return.		GC	Occupational safety and health	Regional HR
3.6	Repatriation	Leave application / request to return to home country due to personal / family issues		GC	Operational	Regional HR
3.7	Health and Safety	Workers seeking medical treatment or insurance compensation.		GC	Occupational safety and health	Regional HR
3.8	Health and Safety	Relationships, marital issues, family matters.		GC	Occupational safety and health	OU/BU
3.9	Health and Safety	**Kidnapping		GC	Occupational safety and health	Security
3.10	Hours	Not attending work or refusal to work due to issues on employment such as minor issues regarding understanding of pay, non-urgent medical concerns.		GC	Operational	Regional HR
3.11	Facilities	Requirement or request to move to another housing unit or complaints regarding house members or housing unit, amenities, or housing area such as minor repairs, leaks, toilet repairs, electrical repairs.		GC	Human rights	OU/BU
3.12	Acts of fraud & corruption	Witnessing crimes at the workplace or workers reporting excessive crimes like theft, no involvement of management.		WB	Other Criminal Offenses	GFCRM



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
3.13	Acts of fraud & corruption	Manipulation of documents (ghost employees, fake overtime etc)		WB	Falsifying Organisational Data or Information	GFCRM
3.14	Others	Non-compliance to SOPs and guidelines (burying of FFB, wrongly grading of fruits etc)		WB	Operational	BU/OU
3.15	Others	Requirement or request for transfer		GC	Operational	Regional HR
3.16	Others	**Death, including suicide.		GC	Occupational safety and health	OU/BU
3.17	Others	Detained by the police or immigration		GC		Security
3.18	Others	Riots between workers within or near the workplace		GC	Occupational safety and health	Security
4. WRONGDOING - OCCUPATIONAL FRAUD & ABUSE						
4.1	Health and Safety	Non-compliance to ESH Policies	N/A	WB	Acts against the interest of the Company, laws, regulations or public policies	Group Sustainability
4.2	Acts of fraud & corruption	Receive or Solicit Bribe/Gratification	N/A	WB	Acts of fraud & corruption	GFCRM



Sime Darby Plantation Berhad

Grievance Response Standard Operating Procedure

2022

Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
		Extortion	N/A	WB	Acts of fraud & corruption	GFCRM
		Give or Offer Bribe/Gratification	N/A	WB	Acts of fraud & corruption	GFCRM
		False Claims	N/A	WB	Acts of fraud & corruption	GFCRM
		Manipulation or Falsify Business Records	N/A	WB	Acts of fraud & corruption	GFCRM
		Giving false or misleading information (including suppression of any material fact or information)	N/A	WB	Acts of fraud & corruption	GFCRM
		Financial statement fraud	N/A	WB	Acts of fraud & corruption	GFCRM
		Misuse of confidential information	N/A	WB	Acts of fraud & corruption	GFCRM
		Criminal breach of trust	N/A	WB	Criminal breach of trust	GFCRM
		Abuse of Power or Position	N/A	WB	Abuse of Power or Position	GFCRM
		Conflict of interest - Procurement Related	N/A	WB	Abuse of Power or Position	GFCRM
		Conflict of interest - Family Members and Close Personal Relationships	N/A	WB	Abuse of Power or Position	GFCRM
		Conflict of Interest - Involvement in Political Activities	N/A	WB	Abuse of Power or Position	GFCRM



Case Category	Case Types	Examples/Definitions	ILO Indicator	WB/ GC	Case Classification	Dealt with by
		Misappropriation of assets	N/A	WB	Misappropriation of assets	GFCRM
		Money Laundering	N/A	WB	Money Laundering	GFCRM
4.3	Others	Breaches of any Group policies and/or COBC	N/A	WB	Acts against the interest of the Company, laws, regulations or public policies	GFCRM/ Other independent body depending on the nature of the complaint
		Non-compliance to Procurement Policies	N/A	WB	Acts against the interest of the Company, laws, regulations or public policies	GFCRM
		Other Criminal Offenses	N/A	WB	Other Criminal Offenses	GFCRM
		Deliberate concealment of any of the above matters or other acts of Wrongdoing	N/A	WB	Other Criminal Offenses	GFCRM
		Hiring of undocumented workers	N/A	WB	Other Criminal Offenses	Upstream Support