COFCO International Palm Oil Grievance Procedure

Context

COFCO International is committed to sustainable and responsible sourcing of agricultural commodities, including palm oil and its derivatives. This commitment is reflected in our Supplier Code of Conduct and further specified in our Sustainable Palm Oil Sourcing Policy.

Meanwhile, we strive for open and constructive stakeholder engagement, as stipulated in our Stakeholder Engagement Policy, to ensure we understand and properly manage the direct and indirect impact of our global operations. Given the scale and complexity of palm oil supply chains, we welcome stakeholders - including individuals, government and non-governmental organizations and other civil society organizations to raise any concerns regarding activities not in line with the standards and expectations set forth in our policies. Sound grievance management is considered an effective tool towards more sustainable and responsible palm oil production and sourcing.

Objective

COFCO International’s Palm Oil Grievance Procedure outlines our process to register, address and monitor the resolution of grievances within our upstream supplier operations. It allows us to:

- Manage supply chain grievances systematically;
- Identify suppliers with direct or indirect linkage to raised grievances;
- Engage with above suppliers effectively and provide guidance on our expectations on grievance resolution.

Scope

In context of this procedure, grievances are alleged practices in oil palm production process that do not comply with COFCO International’s Supplier Code of Conduct or Sustainable Palm Oil Sourcing Policy. The procedure applies to all groups owning oil palm plantations, mills and refineries that directly or indirectly supply palm oil or derivatives to COFCO International and its suppliers.
The procedure is managed by our internal grievance management team of the Trading Department, who are the first point of contact with our suppliers, Operations Department and the Sustainability Department.

**Grievance submission**

Our global grievance mechanism – [Integrity Hotline](#) – provides a channel for stakeholders to confidentially and anonymously raise concerns relating to violations of our corporate policies, including those on palm oil supply chain management. It is hosted by Navex Global and provides a secure external channel for grievance management. In addition, we also provide an option to submit grievances related to palm oil sourcing directly via email to our Sustainability Department.

Therefore, the following channels are available for grievances related to palm oil sourcing:

- **Online:** [web submission - Integrity Hotline](#)
- **By phone:** [local phone numbers - Integrity Hotline](#)
- **By email:** sustainability@cofcointernational.com

Please include the following information in grievance reports:

- Name of grievance submitter (optional)
- Name of organization, if applicable
- Mailing address
- Phone number and/or email address
- Detailed description of the grievance (including date and location)
- Supporting evidence

While we expect to receive and address grievances via above channels, we will also monitor and record issues and concerns raised in media and other sources.
**Grievance procedure flowchart**

1. **Receive and assess potential grievances**
2. **Grievance validated and recorded in grievance log; inform local team**
3. **Identify (in)direct supplier linked to grievance; engage with direct supplier and monitor remedial action by (in)direct supplier**
4. **Lack of progress or repeated non-compliance**
   - **Re-evaluate commercial relationship with (in)direct supplier; suspended (in) direct suppliers must present concrete corrective actions before commercial re-engagement**
5. **Remedial action completed and close the case**
6. **Review and improve procedure in consultation with stakeholders to ensure effective management**

**Transparency and reporting**

COFCO International will publicly report on grievances linked to our supply chain and progress on their resolution on a regular basis. This will be done through the publishing and update of our Palm Oil Grievance Log.

**Continuous improvement**

We recognize our limited leverage to tackle grievance which are not directly linked to our own operations and may involve systemic issues within the sector.
and/or region. Therefore, we are committed to building our leverage where possible through collaboration with other stakeholders, including peer companies.

This procedure will be modified as appropriate in accordance with ongoing discussions within the sector on what constitutes an adequate and effective grievance mechanism that delivers on impact and remedy.