



ZSCHIMMER & SCHWARZ

GRIEVANCE PROCEDURE for the implementation of Z&S NDPE Policy January 2023

Scope

Z&S NDPE policy shall apply to all our operations and needs also to be ready to face Grievance issues.

This Grievance Procedure has been designed to align with the United Nations Guiding Principles on Business and Human Rights criteria for effective grievance mechanisms on developed following ASD suggestions.

This procedure covers activities related to the handling of stakeholders' grievances with respect to the implementation of our NDPE policy.

It is regulated in the following way:

- 1) Identification of potential non-compliance.
This is done through suppliers, NGO, customers, public reports. Furthermore, ASD Grievance group identifies every 3 months some grievances and prioritize them.
- 2) We register the grievance and have 10 working days to verify if any of our suppliers is involved.
- 3) Verification and analysis
We verified if any of the supplier is involved in our supply chain in a direct/indirect way. This can be done through the mills list or mainly asking direct to all palm/palm kernel derivatives suppliers. ASD suggests also possible suppliers involved.
- 4) Implementation
We ask every supplier to give an answer if involved or not involved and how the issue is faced. Usually, we ask an answer before 10 working days or as soon as possible. We need an action plan well detailed and time bonded.
- 5) Monitoring
We check periodically through direct questions or website the progress.
- 6) Reporting of the action
If the Grievance is concluded, we report all these information in a form (called Grievance List).
If the Grievance is not solved in the agreed time, the following alternatives can be faced:
 - Suspended: temporarily pauses purchasing from supplier but continue to engage to resolve the non-compliance(s).
 - Excluded: end of purchasing relationship or avoid purchasing from supplier (in case of spot market or lack of ongoing relationship).



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- The suspension or exclusion can be extended to all or only a subset of the entities and operations associated with that supplier.
- We also keep in mind that suspension or exclusion are no remedy in themselves but are intended to encourage remedy.
- Decision is made by all inner functions involved.

For the moment only operative instruction is published. Results are planned to be published in January 2024.



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Grievance List

Grievance ID	Supplier targeted	Parent company	Summary of the grievance	Action taken / Progress	Source	Date of reception and closure	Status
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
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15							
16							
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18							
19							
20							



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Grievance ID:	Grievance ID that will allow you to identify the case internally and follow up.
Supplier targeted:	Name of the facility targeted by the grievance, and which is alleged to be in non-compliance.
Parent company:	Parent company of the targeted facility.
Summary of the grievance:	Summary of the non-compliance case and its implications.
Action taken / Progress:	Details of the actions taken by your company to resolve the non-compliance case.
Source:	Link to the report or other documents useful for the monitoring of the resolution.
Date of reception and closure:	Date the grievance was addressed by your company and the resolution date if it is resolved.
Status:	Resolution status of the grievance (Grievance Under Investigation, Grievance Monitored, Grievance Closed, etc.).