

Grievance Procedure

For The Nisshin Oillio Group and its stakeholders

VERSION 1.0 July 2019.

Introduction

The purpose of this document is to formalize the management of grievances from The Nisshin Oillio Group's stakeholders to minimize the risks to the business. The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

Objectives

Provide a clear, appropriate and comprehensive response to the external stakeholder's grievance in order to prevent disputes as far as possible and resolve any issue in relevance to The Nisshin Oillio Group Palm Oil Sourcing Policy. We are committed to ensuring a transparent and open process with updates on the grievance provided on The Nisshin Oillio Group's website.

Scope

This procedure covers activities related to the handling of stakeholders' grievances with respect to the implementation of the Policy. This includes recording grievances, taking actions to verify claims, rectifying any confirmed issues, reporting the verification results and actions on the ground, delivering the response to stakeholders and managing and monitoring any follow-up action.

Reference and Document System

- The Nisshin Oillio Group Basic Procurement Policy
- The Nisshin Oillio Group Palm Oil Sourcing Policy

Grievance Channel

When a complaint against a supplier is submitted to The Nisshin Oillio Group, we will engage with the named supplier to discuss the issues raised in accordance with this procedure, with the objective of resolving the issues. In the event that the supplier does engage effectively in the process towards resolution and compliance with the Policy, The Nisshin Oillio Group will review its relationship with that supplier and may cease the relationship as a last resort.

By email to: sustainability@nisshin-oillio.com

Attention: Sustainable Procurement Promotion Team
 Grievances should include the following information:

- Full Name
- Company/Organization
- Address
- Phone No./Fax No./Email Address
- Description of the grievance in detail
- Evidences to support the grievance

Whilst grievances can be made anonymously, providing full contact details enables The Nisshin Oillio Group to better understand and address the concern.

In addition to grievances submitted through the official channel above, issues raised through unofficial channels, such as the media and the internet, will be recorded as grievances if they allege a breach of policy by The Nisshin Oillio Group, or one of its direct and indirect suppliers.

Transparency and Confidentiality

The Nisshin Oillio Group is committed to the transparent handling of grievances. The Sustainable Procurement Promotion Team will update the status of a complaint, particularly when the complaint is registered, action has been taken and resolution outcome is agreed upon. The Complainant can also contact The Sustainable Procurement Promotion Team regarding the status of complaint by writing.

The system allows for dialogue to remain confidential and for the confidentiality of the Complainant if requested.

Grievance Process Flow and Timeline

Sustainable Procurement Promotion Team will be in charge of all the process.

Process	Time Required
<u>Acknowledge and registration of grievances</u> Potential Grievance reported to The Nisshin Oillio Group	14 days
<u>Preliminary review of grievances</u> Validate the issue is a Grievance using the mechanism process flow	14 days
<u>Engagement, dialogue and investigation</u> <ul style="list-style-type: none"> • Record in the Grievance List & engage with relevant parties • Discuss grievance and obtain further information • If a field verification is necessary, and when relevant and appropriate, the grievance raiser will be invited to participate • If immediate action is required but not being taken (e.g. stopping forest clearance), consider requesting suspension 	1-3 months
<u>Resolution and Action Plan</u> <ul style="list-style-type: none"> • Prepare Action Plan to resolve grievance and 	1 month

communicate to relevant parties <ul style="list-style-type: none"> • Communicate outcomes to external stakeholders • Agree on communication of actions and progress 	
<u>On-going monitoring</u> <ul style="list-style-type: none"> • Implement action plan and monitor in consultation with external parties until the grievance is successfully resolved. • If the action plan is not agreed to or executed as intended, consider requesting suspension 	6-12 months

Grievance Mechanism Process Flow

