



1. Objective & Scope

- 1.1 The purpose of this document is to ensure that the grievances/complaints of all stakeholders including employees must be redressed with fairly and consistently and complaint handling must follow the effectiveness criteria of UNGP: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on engagement and dialogue.
- 1.2 This document is intended only as a statement of policy and management guidelines. It does not form part of individual contracts of employment or otherwise have a contractual or other legal effect. The Company reserves the right not to follow this Procedure where it considers it appropriate to do so.
- 1.3 This policy is applicable to all stakeholders who are related to BFSML and the Supply chain.

2. Responsibility

- 2.1 All employees
- 2.2 Farmers
- 2.3 All Management

3. Grievance Handling Committee

- 3.1 On site, a grievance handling committee is formulated under the supervision of the Site Head. The formation of the committee is as follows:
- Site Head – Committee Chairman
 - Head of Finance
 - Head of Administration
 - Agriculture Head
 - A representative from CBA (workers' representation)
- 3.2 The Grievance Committee shall be responsible for ensuring that grievances are dealt with effectively in accordance with the Grievance Procedures set out for the implementation of this Policy. In doing so, the Committee shall adhere to the following principles
- Take grievances seriously taking on board because the employee feels aggrieved, unhappy, or dissatisfied,
 - Investigate the facts and surrounding circumstances, and show the employees that this has been done thoroughly and sensitively.
 - Actively look for a solution that will satisfy the employee, where practical, without causing disproportionate difficulty for the organization or the Employee's colleagues,
 - Provide feedback to the employee about what can and cannot be done to resolve the grievance,
 - Take necessary follow-up action

4. Grievance Handling Procedure

4.1 Complaint Boxes



- 4.1.1 It is envisaged that the majority of routine grievances can be resolved on an informal basis. Therefore, the grievance should first be discussed with the employee's immediate manager, who will investigate the matter in an attempt to resolve the issue on an informal basis.
- 4.1.2 If it is not appropriate to raise the matter informally, or if the employee does not receive a satisfactory outcome, the grievance should be made in writing to the Site Head, setting out full details and put in the Complaint Boxes installed at different locations.
- 4.1.3 The Personal Assistant of the Site Head will open the complaints box and collect all the complaints.
- 4.1.4 He will write down all particulars in the Grievances / Complaints Register (FT/HR/016) and present it to the Site Head, along with complaints.
- 4.1.5 The Site Head will make arrangements for the proper investigation of the grievance/complaint and hearing to be conducted by a concerned HOD or assigned manager, or the case will be referred to the Grievance Handling Committee.
- 4.1.6 The hearing will normally be held within ten working days of receipt of the written grievance, although this may need to be extended depending on the length of the investigation and the availability of the appropriate manager.
- 4.1.7 Employees must take all reasonable steps to attend disciplinary meetings. However, the employee must notify the Company forthwith if they are unable to attend a meeting, and a re-scheduled meeting will be arranged within (usually) 5 days of the date originally proposed for the meeting.
- 4.1.8 During the hearing, the person accompanying the employee may consult with the employee and address the hearing but may not answer questions on the employee's behalf.
- 4.1.9 Following the hearing, a written response will be given to the employee, normally within five working days.
- 4.1.10 If the employee is unsatisfied with the response, he may appeal in writing to the Site Head, setting out full details. The Site Head will arrange for a further hearing to be conducted by a more senior manager than the manager responsible for the original decision or send it to the Head of HR in the Head Office.
- 4.1.11 Following the hearing, a written response will be given to the employee, normally within five working days.
- 4.1.12 If the employee wishes to lodge a grievance after their employment has ended, the Company and the employee may either go through the hearing and appeals part of the Procedure, or the parties can agree to deal with matters based on a written grievance and response (without a hearing). The parties will discuss whichever option is easiest at the time.
- 4.1.13 If an individual has a complaint against the site head, they have the right to escalate their complaint to the head office under the supervision of the Chief Operating Officer (COO). This escalation process ensures that complaints are handled at a higher level of authority and oversight, providing an opportunity for a fair and impartial investigation.
- 4.1.14 If the complainant remains dissatisfied with the steps taken to address their concerns, they retain the full right to pursue legal recourse. This includes seeking resolution through legal channels to address any grievances or unresolved issues related to the operator's



actions or conduct. Legal options may include filing a lawsuit, arbitration, or mediation, depending on the nature of the complaint and applicable laws and regulations.

4.2 Complaints Through Telephone/Message/WhatsApp

- 4.2.1 Apart from complaint boxes, a mobile number is displayed at different locations of the site for logging a grievance/complaint.
- 4.2.2 The employee can call or drop an SMS / WhatsApp on the given number with his name, designation, department, site, and details of the grievance/complaint.
- 4.2.3 All the complaints will be logged on the Grievances / Complaints Register (FT/HR/016) and allocated to site heads for further investigation.
- 4.2.4 The site heads will direct the grievance to the concerned HOD or Grievance Handling Committee according to the nature of the grievance/complaint.
- 4.2.5 After investigation, the response will be shared with the complainant.

4.3 Grievances / Complaints from External Customers (Farmers)

- 4.3.1 In case farmers have any grievance with mills regarding the price of sugar cane, fertilizer provision, services, mill staff behavior, etc., he can voluntarily register his complaint on the help desk number provided on each farmer location.
- 4.3.2 The Mills Office superintendent or any person designated by the Head of AGRI, log farmer complaint on Grievances / Complaints Register (FT/HR/016).
- 4.3.3 If the severity of the complaint is low and can be resolved through a discussion with the farmer by the Agri field officer or relevant Agri Manager, then it will be marked to the designated officer for resolution, as the majority of routine grievances can be resolved on an informal basis.
- 4.3.4 If the nature of the grievance/dispute is high and needs the involvement of the Agri head, such complaints will be sent to the respective Site Agri Head for further investigation and resolution.
- 4.3.5 If the nature of the complaint is critical, or the Agri department is a party, or there is a conflict of interest, such complaint will be handled through the Grievance Handling Committee, which comprises the following members:
 - (a) Head of Finance or designate
 - (b) Head of Internal Audit
 - (c) Head of Administration
 - (d) Designated person from Agri Department
- 4.3.6 The designated person/committee will evaluate the root cause of the assigned complaint and take appropriate corrective action.
- 4.3.7 The Office Superintendent or designated person by Head of Agri will note the suggested root cause and corrective action on the Grievances / Complaints Register (FT/HR/016).
- 4.3.8 The Office Superintendent will be responsible for collecting the Complainant's feedback about satisfaction/dissatisfaction

4.4 Confidentiality & Impartiality

- 4.4.1 All the investigation and proceedings of the grievance handling will remain confidential.






- 4.4.2 In case a complaint is lodged against an employee who is part of the Grievance Committee, then that person will not be included in the investigation in order to ensure confidentiality of the complainant and impartiality of the committee.
- 4.4.3 In case a complaint is lodged against the site head, the grievance will be addressed through a committee comprising of Head office management chaired by the COO.
- 4.4.4 If the complainant remains dissatisfied with the steps taken to address their concerns, they retain the full right to pursue legal recourse. This includes seeking resolution through legal channels to address any grievances or unresolved issues related to the operator's actions or conduct. Legal options may include filing a lawsuit, arbitration, or mediation, depending on the nature of the complaint and applicable laws and regulations.
- 4.4.5 All members of the Grievance Committee and those assigned for record keeping, as well as any staff member questioned concerning an issue at hand, are bound to keep confidentiality at all times and hold in confidence all documentation and information exchanged in the process.

5. Related Document

- 5.1 Grievances / Complaints Register (FT/HR/016)

6. Distribution list

- 6.1 Site Head
6.2 Agri Head
6.3 SVP HR
6.4 Site Administration Head
6.5 Notice Board

Prepared by:	 (Name & Signature)	 (Date)
Reviewed by:	 (Name & Signature)	 (Date)
Approved by:	 (Name & Signature)	 (Date)