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PROCEDURE FOR ATTENTION AND RESOLUTION TO COMPLAINTS AND SOCIAL CLAIMS

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PROCEDURE FOR ATTENTION AND RESOLUTION OF SOCIAL COMPLAINTS AND CLAIMS (PARQUERS)

1. OBJECTIVES

1.1 Main Purpose

Proactively address and resolve complaints and claims filed by the local community and others interest groups, through an efficient process of permanent dialogue to ensure an adequate management and construction of concerted, effective and timely solution proposals.

1.2 Specific Objectives

- Have tools and accessible communication channels that allow interaction
concerted, assertive and comprehensive manner to the claimant with the company that expedites the communication and solution of the presented case.
- Contribute to building a culture of local peace, where any complaint or claim related to
with the activities of the company, are expressed and channeled through appropriate mechanisms
for its timely attention, guaranteeing the protection of anonymity of the complainants (if so
require it), and without risk of retaliation or intimidation¹[1].
- Take advantage of the window of opportunity that is generated when applying the procedure for
resolution of the complaint or claim presented, transforming the uncertainty or concern
manifested by the local community or other interest groups in an opportunity to improve
strengthen the relationship and continuous improvement.
- Prevent escalation to conflict, strengthening trust and credibility with the community
and interest groups, under a continuous process of dialogue, planning and compliance with
agreements.

Strengthen relationships with communities and interest groups, demonstrating receptivity,
respect and transparency.

Contribute to the continuous improvement of internal processes.

- Comply with the requirements and standards of sustainable oil palm production

2. RANGE

¹ The company has a protection against retaliation policy *IDE-K-RH-00-011* that ensures the protection of complainants.

This procedure applies to the entire organization, its communities of direct and indirect influence or other interest groups that are presented as possibly affected by the positive or negative impacts generated in the process of operation.

3. RESPONSIBLE

Internal group of officials from the Grupo Palmas (GP) companies responsible for the operation of the PARQUERS is detailed below:

Position Name	Roles
Central Operations Manager	Responsible for making decisions for the implementation of the Action plan.
Sustainability Management	Responsible for making decisions for the implementation of the Action Plan.
Manager of Administration/Administrator.	Responsible for informing the Central Operations Management of the monthly report and status of the registry of complaints and social claims
Relations Coordinator Community (RRCC) which is the Manager of the PARQUERS.	Responsible for contacting the claimant, coordinating, promoting consultation meetings and monitoring the implementation of the action plan.
Area with direct or indirect responsibility for the impact generated	Responsible for investigating the root cause that has generated the impact that is the subject of the claim, carrying out the supporting and objective report, in addition to being the main person responsible for implementing corrective stockings.

4. DEFINITIONS

Interest Groups: Person or group of persons who are directly or indirectly affected by the company activities.

RSPO: Roundtable on Sustainable Palm Oil.

Complaint: Verbal or written statement by a person or group of people about their disagreement with any activity, action or project that the company has or is carrying out.

Claim: Means by which any person or group of people demands explanations for the breach by the company of one or more obligations arising from its commitment assumed with the person or group of interest.

5. REFERENCE DOCUMENTS

Principles and criteria for sustainable oil palm production of the Roundtable on Sustainable Palm Oil (RSPO)^{2[2]}, in particular:

Principle 4: Respect for the Community and Human Rights and Provision of Benefits

Criterion: 4:2 There is a mutually agreed and documented system for handling complaints and claims, which is implemented and accepted by all affected parties.

Criterion 4.6 Any negotiations related to compensation for loss of legal rights, customary or use is managed through a documented system that allows peoples indigenous peoples, local communities and other interested parties, express their opinions through their own representative institutions.

6. DESCRIPTION OF THE PROCEDURE

6.1 Reception Phase: This phase begins when the complaint or claims are presented individually or collectively and/or through their communal authorities through the following communication channels:

- a) Documentary: through a written document, presented in one of the different Service Centers described in the next stage or in the administration office.
- b) Verbally: Manifested in meetings and/or visits in direct contact with the manager of the PARQUERS.
- c) Telephone call to the Coordinator of Community Relations, through the telephone number: 942416152.
- d) Entering the following digital media:

• Website: www.Palmas.com.pe/sustainability.

• Email: complaintsyreclamos@palmasteescucha.com

• Telephone: 080018169 (free line).

- e) Mailboxes for complaints, claims and social suggestions: located in the control booths with proximity to the communities of influence, strategically located that allows greater coverage, decentralization and easy access for communities and interest groups, which are called

^{2[2]} Principles and Criteria for the production of sustainable palm oil 2018

also care centers. These mailboxes have easy-to-fill formats, which will allow to the claimant to have the data in the format to attend to your case

In exceptional cases, to present through the means of public communication, made through of newspaper articles, radio, television, social networks, etc. will be addressed through direct treatment and participatory investigation of causes following the same steps of the present procedure.

6.2 Care phase: When complaints and/or claims are expressed due to a situation of uncertainty and perception of alleged damages or affectations generated by the activities of operation, production or administration (Complaints), or also for cases of alleged breaches of commitments generated by the Representatives of the Grupo Palmas Companies (Claims), the procedure that will allow early attention, preventing its escalation and transforming the presence of a possible source of conflict in an opportunity for continuous improvement, and strengthening of the relationship with communities, social actors or other interest groups.

6.2.1 Receipt of Complaint or Claim and Registration (day 01)

Any complaint or claim presented will be dealt with directly and preferably in the form immediately by the Manager of the PARQUERS.

In the event that the claimant chooses to use the complaints and claims mailbox, he or she will go to the closest control where you will be attended by staff (Liderman staff) who will deliver the *Complaint or Claim Submission Format*: [IDE-R-AD-00-010 document on which](#), the claimant will manually fill in the data relevant to your care. Each format has printed a correlative code that will allow its registration and monitoring, this in turn, will generate a self-copied to be delivered to the claimant for management (record the information in this document is useful to achieve a first consensus regarding what the complaint or claim means for the inhabitant or social group that presented their claim, knowing their perceptions and expectations), this format will be immediately communicated to the coordinator of Community Relations or Manager of the PARQUERS for your attention, administration, management and channeling of solutions; data that will enter the registry. Additionally, in the form, the claimant may choose whether or not to carry out monitoring your case through the Group's website, if so, the case will be presented in the gp portal

The physical documents will be carefully kept while the procedure is carried out. respective; the digital record will be constantly updated in accordance with compliance

of the stages of the procedure and for its follow-up. Additionally, it will be checked if the claimant grants his authorization for his complaint or claim to be published on the Website: www.Palmas.com.pe/sustainability communication channel to make your complaint or claim public and/or follow up on authorized cases.

6.2.1.1 Provisional Protection Measures: If the claimant requires that his complaint or social complaint is presented anonymously, you can use the same communication channels communication described above, means where it is not necessary to capture personal data every time, a registration number is assigned to the cases presented for follow-up. In the same way, appropriate measures will be adopted to safeguard the interests of the claimant or organization presenting their case. The company prohibits any act of retaliation against human rights defenders, as well as intimidation and bullying.

6.2.1.2 Special Measures for Attention to Persons with Disabilities and/or Illiterate: To illiterate and/or disabled people, which does not allow them to communicate their claim of directly or through established communication channels, you may present your claim before the authority of the community where you live, and if you require that your case be remain anonymous, you can tell the community authority who may become an intermediary between the claimant and the company to present the complaint, on which the procedure will be developed according to the description of this process. In the same way, the claimant will have the option of accessing independent legal or technical advice, the claimant may choose individuals or groups that support them and/or act as observers, as well as the option of a third party as mediator.

This first stage will initiate the early warning that implies implementing the following stages.

6.2.2 Investigation and alert to those involved (days 02 to 07)

This phase will investigate and analyze the probable causes and relevant aspects of the problem, reason of the complaint or claim. In the same way, the degree of internal responsibility of the work areas of the GP Companies and/or contractors; and the possible involvement of external actors (other members of the population, private producers, authorities, etc.), who are will be included in the inquiry process as one more actor to be consulted. Depending on each case, the level of involvement of the external actor will be defined, it can be from a simple query about

their perspective of events or even participate actively in the joint construction of solutions.

6.2.3 Inspection and Design of the Participatory Action Plan (days 08 - 20)

The RRCC coordinator or PARQUERS Manager will contact the person who submitted their claim, or the representative(s) designated by the community, to agree on the date and time of inspection in the referred area.

In the company of the designated person or representative(s) of the Community, a field inspection, applying the **Form of Assistance to Inspection of Possible Impacts**, registered in the **PARQUERS Presentation Format**, an instrument that will allow the participation of those involved, causes of the impact or affectation object of the claim and detailed information for discern responsibilities (or not) and the possible corrective and improvement measures to be taken. Of identify external stakeholders, they will be invited for the participatory inspection, focused on verifying causalities and building solution proposals that benefit all the parts.

The PARQUERS internal group will be informed of the results of the inspection to evaluate proposals for solution in correlation with the levels of social and environmental responsibility.

As a result of the inspection carried out, an Action Plan will be built together with the parties involved applying the mutual benefits approach, aiming to meet the needs and priority interests of both parties, to generate more sustainable results and to strengthen of relations with the community and interested parties. This will be recorded on the Report Sheet Inspection of Complaints and Social Claims IDE-R-AD-00-006 of Complaints and Claims, in which reflects the agreed Action Plan, which details corrective or mitigation actions assumed by all those involved and deadlines for **follow-up and monitoring**.

6.2.4. Not Finding Direct or Indirect Responsibility of the Palmas Group Companies

If direct or indirect responsibility is NOT found on the part of the GP companies for the reason of the claim after the participatory inspection, it will be recorded as DISMISSED, this will be described in the *Attendance Sheet for Participatory Inspections in Response to the PARQUERS Registry: IDE-R-AD-00-011* or in a simple record that will be attached to the informative response letter where will describe the process and the results, this letter will have a period of 15 calendar days for the

claimant observes it or gives its response for a new reevaluation. Once the term of _____
will close and terminate the case. _____

If a response letter is received within the aforementioned period, a second inspection will be summoned.
participatory in which the regimental justice of the peace will be invited to the jurisdiction where the object is located
claim, as mediator and observer of the entire procedure. In the same way, it will be reported
to the claimant that he may resort to independent technical and legal advice, that freely and
will be able to choose individuals or groups to support them and/or act as observers, as well
such as the option of an additional external mediator.

6.2.5 Implementation of the agreed Action Plan (day 20 or more)

According to the classification of the Complaint or Claim presented, the RRCC coordinator or Manager of the
PARQUERS, will monitor and control the fulfillment of actions, activities or projects,
commitments assumed by the responsible internal area, information that will be channeled to the
Complainant or to the representatives of the Community, to inform the status of implementation of the
Action Plan or pending social commitment.

If there are external stakeholders, follow-up and monitoring will be given to the status of compliance with the
commitments assumed (activities and actions reflected in the agreed Action Plan), in
accordance with the terms agreed between the parties involved, in the same way, the closing of the
case will depend on the following typification:

- a) Simple Cases or Administrative Management: Cases that correspond to topics, documentaries
and/or administrative will take a period of 20 business days.
- b) Complex Cases: Cases that, according to the Participatory Action Plan, require the
formulation and/or execution of projects will take an approximate period of time of one (01) year
to more (depending on the case).
- c) Cases involving third parties: Cases that, according to the participatory inspection, are
identified third party involved. These cases will take a variable time, it will depend on the
terms agreed in the Action Plan agreed upon by all parties.

To close the case and in accordance with the compliance deadlines agreed in the Action Plan,
A meeting will be held with all those involved, to evaluate the implementation of the Plan of
action, focused on verifying the effectiveness, satisfaction and conformity of all those involved
with the project executed.

6.2.6 Notification to the Claimant (day 15 to 20)

In the event that the implementation of the Action Plan or the social commitment assumed requires a considerable period of time (>1 month) for the formulation and/or implementation of a project to resolve the case, the claimant will be informed of the process of his case and the terms demanded by the project implementation. The charge of the letter must be filed physically and electronically.

6.2.7 Solution to the claim (day 20 or more),

With the *Action Plan Implementation Report File*: [IDE-R-AD-00-007](#) , it will be filed .
and completed the process; framed the satisfaction and conformity of the Claimant expressed with the affix their signatures to the document. Likewise, promoting principles of access to information, transparency and inclusive participation, it will be contemplated to inform the community in a meeting with the presence of the authorities or through an informative letter where the results.

7. DISPUTE RESOLUTION

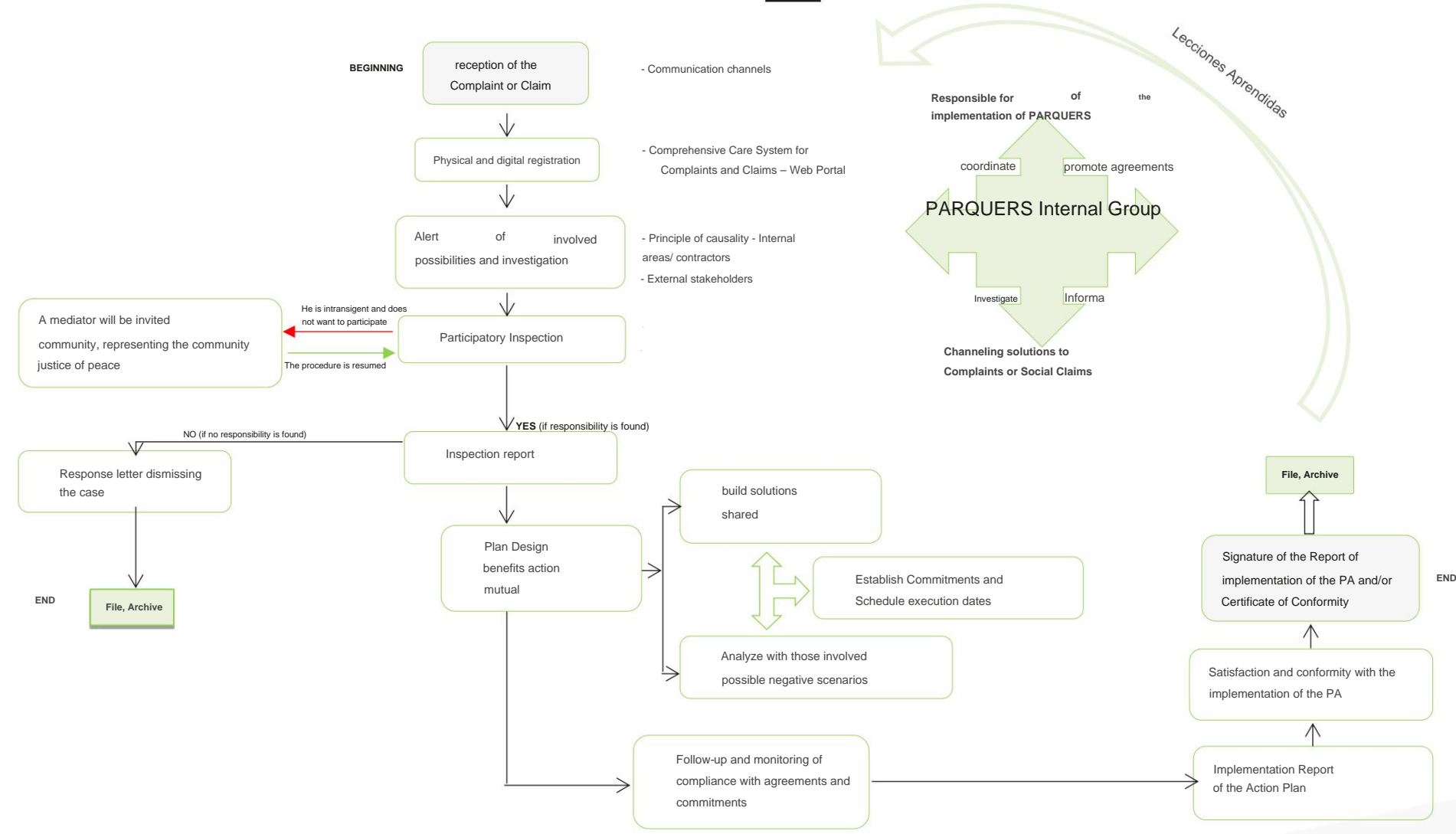
When the Case is not resolved in a First Stay: In the event that the claimant is NOT agree with the implementation of the action plan and/or do not have the will to continue with the procedure, the RRCC coordinator or PARQUERS manager will generate written evidence in this regard (act of non-compliance, report or similar) and will refer it to the area responsible for the object of the claim and the PARQUERS internal group to the evaluation of the solution proposals and rethinking the Action Plan. Then a mediator or community conciliator, who represents the community justice of peace, at its most basic levels of entity Social. In the same way, this conflict resolution mechanism includes the option that the denouncer can resort to independent technical and legal advice, the denouncer free and will You will be able to choose individuals or groups to support and/or act as observers, as well as the option to an additional external mediator.

The Justice of the Peace of the jurisdiction or the external mediator (social actor) and the advisor chosen by the complainant will be the actors included in this scenario with whom coordination will be carried out for the development of an inspection visit to the claimant's home, resume the proposal to follow the procedure and make proposals for solutions.

If the problem persists and the claimant differs from what is proposed and does not admit mediation through the Judge of Peace of the jurisdiction, but failing that, mutual resolution and mediation is not possible, the claimant in freedom and will you can raise your claim to legal instances and/or to the RSPO Complaints System, for which information will be provided to start your submission process. In the responses by of the GP in this case, all attempts at dialogue and development of solutions will be annexed to the regimental body.

8. FLOW CHART

Annex: **PROCEDURE FLOW CHART FOR ATTENTION AND RESOLUTION OF SOCIAL COMPLAINTS AND CLAIMS (PARQUERS - PRC)**



9. PARTICIPATORY INSTRUMENTS TO APPLY IN THE PROCEDURE

All documentation that has been received must be duly filed both through digital as well as physical. Documents in reference:

1. Written documents from the community, representatives or interest group (if the complaint or claim is presented through a document).
2. Complaint or Claim Submission Format: [PDE-R-AD-00-004](#)
3. Attendance Sheet for Participatory Inspections in Response to the PARQUERS Registry: [PDE-R-AD-00-005](#)
4. Complaints and Claims Inspection Report Sheet: [PDE-R-AD-00-006](#)
5. Action Plan Implementation Report File: [PDE-R-AD-00-007](#)
6. Informative letter of the status of the complaint or claim presented.
7. Attendance Format for Participants (applied in meetings, workshops, talks, etc.): [PDE-R-AD-00-008](#)

Note: The times are referential, and may vary depending on the development of the facts, however, it is advisable to stick to the procedure (facts and periods).

Attachments:

[IDE-P-AD-00-008-1. IDE PROCEDURE FOR ATTENTION AND RESOLUTION TO COMPLAINTS AND CLAIMS SOC. V2](#)

Directed to:	Cleaning Assistant; assistant operator of Landfill; Industrial Chief; Operator of Landfill;
Changes to this document: reception	The specification of the management of and management of cases presented in the Web, email and free line
Management system:	RSPO
ISO Requirement:	RSPO ---> 1. ETHICAL AND TRANSPARENT BEHAVIOR ---> 4 RESPECT FOR THE COMMUNITY AND HUMAN RIGHTS AND PROVISION OF BENEFITS
