

FUJI OIL GROUP GRIEVANCE PROCEDURE

MAR 2025

1. BACKGROUND

A “grievance” is a complaint, allegation, concern or problem which an individual or a group has raised to Fuji Oil Group to investigate and address. The Grievance Procedure is to provide a platform for stakeholders to raise grievances regarding the implementation of the Fuji Oil Group Policies¹ across its palm oil supply chain.

Fuji Oil group launched its Responsible Palm Oil Sourcing Policy in March 2016, recognising that sustainable development is integral to the long-term viability and success of Fuji Oil’s palm businesses. The Responsible Palm Oil Sourcing Policy has incorporated no deforestation, no peat land development and no exploitation requirements to meet the rising market demand for traceable, responsibly produced palm products. One of the commitment in Fuji Oil Group Responsible Palm Oil Sourcing Policy² is to establish a Grievance Procedure. This grievance procedure is designed to align with the United Nations Guiding Principles on Business and Human Rights³ criteria for effective non-judicial grievance mechanism: legitimacy, accessibility, predictability, equitability, transparency, rights-compatible, a source of continuous learning, and based on engagement and dialogue. This Grievance Procedure complements to formal legal options and does not replace or preclude them.

2. OBJECTIVES

This procedure is to support and enhance the implementation of the Fuji Oil Group Policies¹ by addressing stakeholders’ grievances relating to Fuji Oil Group and its suppliers. It is intended to serve as a guide to review, manage, monitor and address the outcome of stakeholder grievances (from any external parties, including individuals, government organizations and non-governmental organizations) concerning the implementation of the Fuji Oil Group Policies¹ across the Fuji Oil Group’s palm oil supply chain. Fuji Oil Group recognises that feedback and input from stakeholders is valuable to enhance transparency in the supply chain and provide a means to gauge progress on the implementation of the Fuji Oil Group Policy¹.

3. SCOPE

The grievance procedure is open to all stakeholders and applies to Fuji Oil Group’s global business operations and their palm oil suppliers at group level⁴. This procedure covers

¹ Fuji Oil Group Policies refers to our principle and policy which is relevant to our palm oil supply chain, including but not limited to Fuji Oil Group Human Rights Policy and Supplier Code of Conduct : <https://www.fujioil.co.jp/en/sustainability/policy/>

² Fuji Oil Group Responsible Palm Oil Sourcing Policy: https://www.fujioil.co.jp/pdf/en/sustainability/policy/palm_oil.pdf

³ UN Guiding Principles on Business and Human Rights: https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf

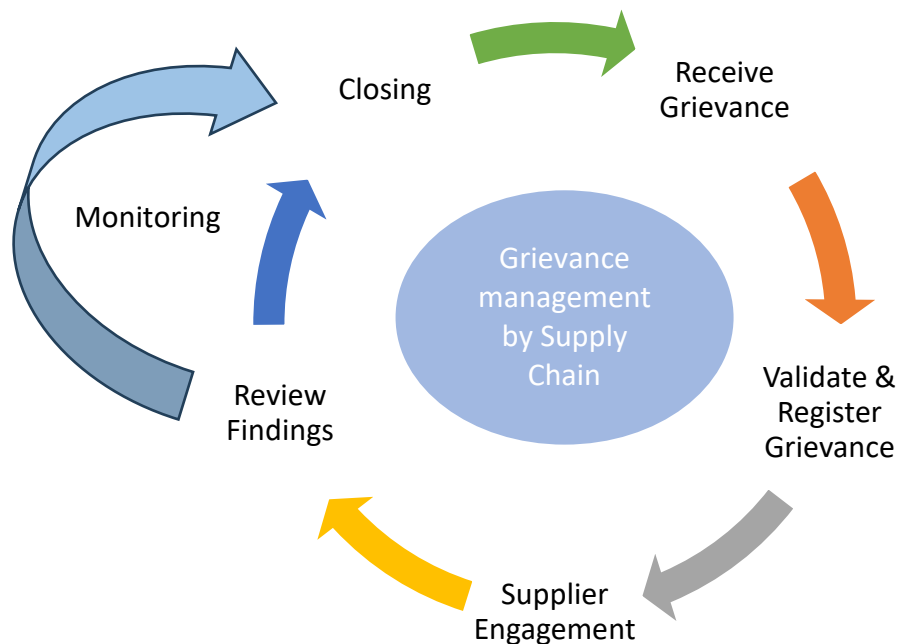
⁴ Supplier at Group Level is defined based on RSPO’s definition of “group”. For further information, please refer to: https://rspo.org/wp-content/uploads/RSPO_Membership_Rules_20202.pdf

activities related to the handling of stakeholders' grievances regarding the implementation of Fuji Oil Group Policies¹. This includes the recording of grievances, taking action to verify claims, rectifying confirmed issues (including suspension), reporting the verification results, responding to stakeholders, managing and monitoring any follow-up action.

The intended target of the grievance can be against Fuji Oil Group, its direct suppliers or indirect suppliers in the supply chain. For local specific grievances from workers, employees and/or local communities, Fuji Oil's operational site has their respective grievance procedure along with a separate resolution process.

4. RESPONSIBILITIES

The Supply Chain Management Group of Fuji Oil is responsible for coordinating and performing all tasks necessary for the implementation of this Grievance Procedure. Dedicated grievance coordinators are appointed to coordinate actions and manage engagements with relevant stakeholders (3rd party service providers, Grievance Raiser, suppliers etc.).



5. PROCEDURE

a) Receiving Grievance

Grievances raised through official channels

Issues raised against Fuji Oil's operations or suppliers will be recorded as grievances if they alleged a breach of Fuji Oil Group Policies¹. Grievances can be raised to Fuji Oil Group via any of the following channels:

Via email:	palm-grievance@fujioilasia.com
By telephone:	+60 392015258
In writing:	02-02-12, Sunway Velocity Office, Lingkaran V Sunway Velocity, 55100 Kuala Lumpur, Malaysia

Attention to:	Fuji Oil Supply Chain Management Group
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Grievances must include the following information:

- ✓ Name of grievance raiser (optional)
- ✓ Name of organization (if applicable)
- ✓ Phone No./Email Address (at least 1 contact point)*
- ✓ Description of the grievance in detail*
- ✓ Evidences to support the grievance*

**Minimum requirement to be included in a grievance report.*

The Grievance Raiser will be notified once the grievance has been received. Supply Chain Management Group may request further information and will keep Grievance Raiser informed throughout the grievance process.

Grievances raised through unofficial channels

Issues raised against Fuji Oil's operations or suppliers through unofficial channels, such as the media and the internet, will be recorded as grievances if they alleged a breach of Fuji Oil Group Policies¹ and are connected to Fuji Oil Group's palm oil supply chain directly or indirectly.

b) Grievance Registration

Upon receive of a grievance, the Supply Chain Management Group shall record each grievance in the public grievance list and update it quarterly. If Grievance Raiser needs immediate verification or updates on the grievances, Grievance Raiser can contact Supply Chain Management Group directly. Relevant stakeholders including Grievance Raiser would be notified of the updated Grievance List on Fuji Oil website (refer [here](#)). In the case of rejected cases, Grievance Raiser will be notified of the reasons and is welcomed to submit new evidences to dispute findings.

c) Grievance Validation

All reports received via the grievance communication channels either officially or unofficially will be evaluated by the Supply Chain Management Group through Fuji Oil's Grievance Procedure ([see Appendix A](#)). If necessary, Supply Chain Management Group will communicate with the Grievance Raiser to obtain further details and/or evidence of the grievance. The aim of the validation process is to confirm if the complaint falls into the category of a grievance, possible outcomes include:

- a. The grievance is valid and will be investigated;
- b. The grievance is invalid and will be rejected*

**Invalid grievance cases are still recorded for internal record keeping.*

d) Monitoring

The Supply Chain Management Group is responsible for overseeing and monitoring all grievances. In cases relating to grievances made against third-party (direct or indirect) suppliers, the Supply Chain Management Group shall receive progress updates on the implementation of the supplier's action plan. Progress updates on outstanding (open) grievances will be requested from suppliers on a regular basis. The progress updates will also be communicated to the Grievance Raiser and updated on the public grievance list quarterly. A review of progress would be performed and depending on the nature of progress made, a new grievance action plan may be developed, or the commercial relationship with the supplier will be reviewed until the grievance is closed. In either scenarios, the Grievance Raiser shall be notified. 3rd party consultation will be carried out whenever necessary during grievance case management.

Grievance against Fuji Oil Group (own operations)

- a. The Supply Chain Management Group shall verify the details of the grievance(s) raised with the alleged Group Company. A site investigation will be conducted and an Investigation Report ([see Appendix B](#)) will be developed providing summary of the issues and recommended actions to close the grievance(s). The Investigation Report will be provided to the Grievance Raiser for perusal and Supply Chain Management Group shall draft a time-bound Grievance Action Plan ([see Appendix C](#)). The Grievance Raiser will be informed of the Action Plan.
- b. The Supply Chain Management Group, shall then take steps to implement the Action Plan together with the Group Company.
- c. The Supply Chain Management Group shall monitor the implementation of the Action Plan regularly until the grievance is closed. The status of the Action Plan will be updated on the Grievance List and to the Grievance Raiser regularly.

Grievance against a direct supplier

Fuji Oil Group shall seek to directly engage the entity to verify the grievance prior to requesting the action plan from the supplier. If a field visit is conducted, an Investigation Report ([see Appendix B](#)) will be developed providing recommended actions for the supplier to include in their action plan.

- a. The Supply Chain Management Group shall contact the supplier-and request a time-bound action plan.
- b. The Supply Chain Management Group shall then monitor the delivery of the action plan regularly until the grievance has been closed. The status of the action plan will be updated on the Grievance List and informed to the Grievance Raiser regularly.

Grievances against indirect supplier

- a. The Supply Chain Management Group shall contact the intermediary (direct) supplier to Fuji Oil Group and request a time-bound action plan from the respective supplier that the grievance has been made against.
- b. The Supply Chain Management Group shall then monitor the delivery of the action plan regularly until the grievance has been closed. The status of the grievance shall be updated on the Grievance List and informed to the Grievance Raiser regularly.

e) Closing Grievance

A grievance will be closed when there is verification of compliance with Fuji Oil Group Policies or the supplier has been suspended. Upon closure of the grievance, the Grievance Raiser will be notified and to seek the Grievance Raiser's feedbacks. In the case of confidentiality of evidence sharing, The Supply Chain Management Group will still take into account any findings including confidential information provided by our suppliers. Subsequently, the Supply Chain Management Group shall update the status of the grievance on the Grievance List.

Any party that is unsatisfied with the closure of the grievance can reply in writing to Supply Chain Management Group and they will be properly reviewed. Where appropriate and necessary, additional follow up action can be initiated including but not limited to a joint discussion/review of the grievance and/or a joint field visit to the grievance site.

All grievances logged under the Grievance Procedure will be dealt within a timely manner, and all investigations and findings will be reported transparently. Fuji Oil Group prohibits any threats, harassment, intimidation, violence, or retaliation towards the Grievance Raiser. Fuji Oil's Grievance Procedure shall adhere to the principles for Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons⁵ by RSPO.

Alternative Grievance Handling Channels

For grievances that Supply Chain Management Group is unable to proceed with investigation in which it involves an RSPO entity or has ongoing investigations by local authorities, it will be escalated to alternative measures of engagement (ie. satellite monitoring partner, customer, RSPO etc.).

Fuji Oil Group acknowledges that the Roundtable on Sustainable Palm Oil (RSPO) maintains a grievance process to which Fuji Oil has an existing commitment. Grievances raised through the RSPO complaints portal will follow RSPO's complaints and appeals procedure.

Timelines

The grievance resolution process often involves numerous stakeholders and the length of time required to process cases may vary depending on the complexity of the grievance. The timeline acts as guidance to the key stages of the Grievance Procedure ([see Appendix A](#)).

To ensure the effective implementation of the Grievance Procedure, a review will be conducted periodically and revised whenever necessary for continuous improvement. The Supply Chain Management Group will consult third party and external stakeholders during the revision of the mechanism.

⁵ RSPO Policy on the Protection of Human Rights Defenders, Whistleblowers, Complainants and Community Spokespersons: https://www.rspo.org/wp-content/uploads/rsपो-pol-t08-003-v1-eng_policy-on-human-rights.pdf

6. SUSPENSION & RE-ENTRY

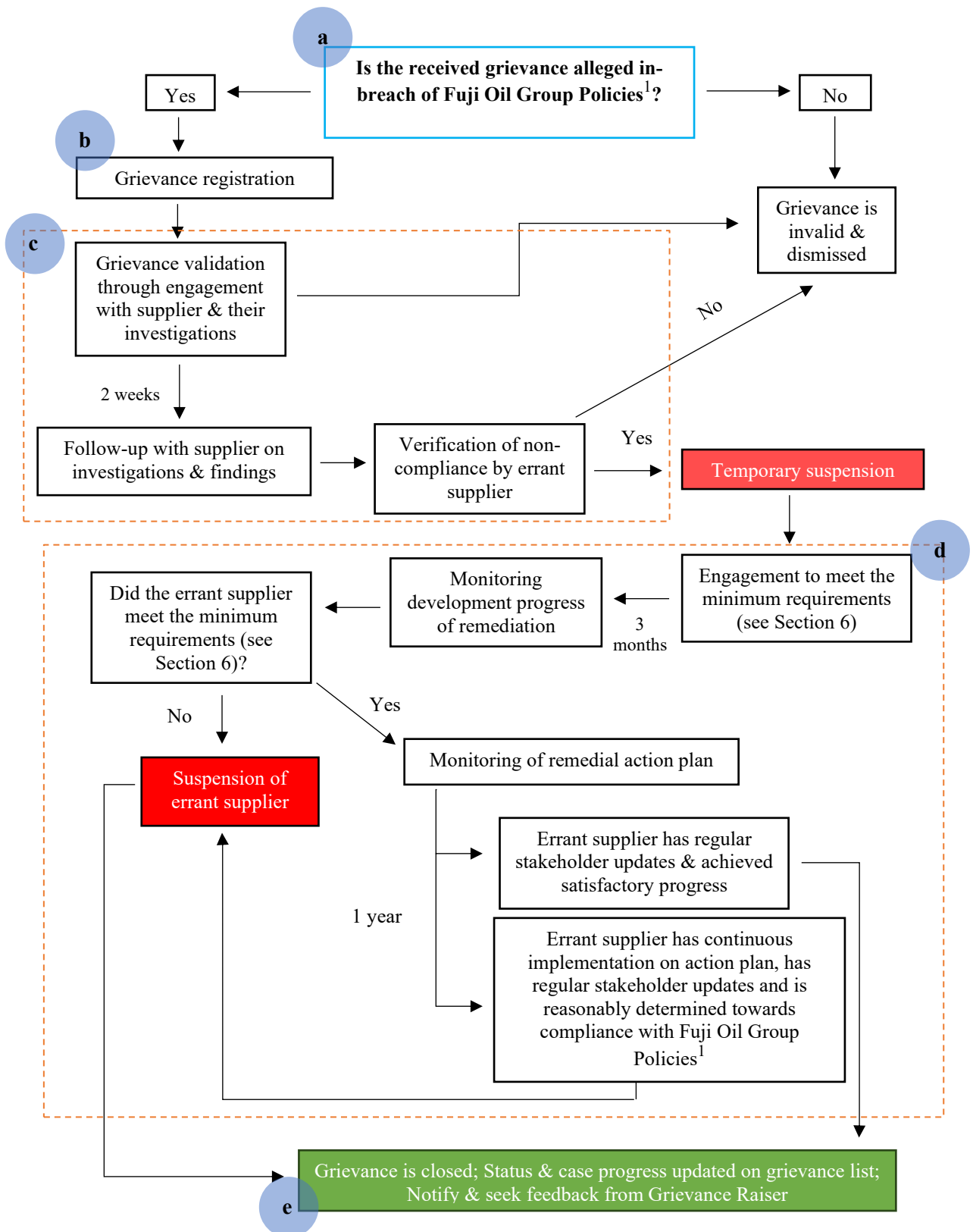
All grievances concluded as valid are subject to the Suspend and Engage Protocol. Upon confirmation of non-compliance, a Stop Work Order (SWO) should be in place by errant supplier prior to development of remedial action plan. If at any stage of engagement process it is identified that errant supplier is not willing to take action to comply with NDPE policy or is showing no progress in their remedial action plan, suspension of errant supplier would be in place.

Business resumption would be considered if there has been a resolution of the grievance, satisfactory progress following remedial action plan progress or the following minimum requirements can be met (but not restricted to):

- Development of group-wide policy that is equivalent to NDPE or a responsible sourcing policy.
- Development of action plan for the grievance(s) within 3 months upon engagement with Fuji Oil's direct supplier or Fuji Oil.
- Provide frequent progress update (ie. quarterly, every 6 months).
- Develop monitoring plan of the grievance following implementation of action plan.

**Other criteria would be considered depending on the type of grievance received.*

Appendix A: Fuji Oil Grievance Procedure



Disclaimer: For indirect supply chain connection to Fuji Oil Group, the grievance management process would need to take into consideration our direct supplier's grievance procedure. Grievance Raiser are kept updated regularly on case progress.

Appendix B: Grievance Investigation Report Template**1. BACKGROUND**

Relevant background information

2. OBJECTIVE

Clearly describe the objective of grievances and rationale of allegation

3. EXPECTED OUTCOMES

List the expected outcomes and proposed resolution to the grievance

4. FIELD INVESTIGATION

- i. Onsite investigation/verification of the grievance to be conducted
- ii. Issues and observations to be identified during verification/investigation
- iii. Methodology to be recorded
- iv. Conclusion of onsite investigation/verification

5. REPORTING

Investigation result and proposed time bound action plan

Appendix C: Grievance Action Plan Template

No.	Target	Action	Deliverable	PIC	Due Date	Status
...	Issue / complaint as reported in grievance	Detailed description of activity	Agreed outcome that must be met for grievance to be considered closed	Person in Charge, Company name and position.	Date for activity to be completed	Ongoing / closed