GROUP EMPLOYEE GRIEVANCE REDRESSAL POLICY

May 2019
KUALA LUMPUR KEPONG BERHAD
GROUP EMPLOYEE GRIEVANCE REDRESSAL POLICY

1. INTRODUCTION

1.1. Kuala Lumpur Kepong Berhad (“KLK” or the “Company”) has set out its Group Employee Grievance Redressal Policy to provide a formal and transparent platform for its employees to air their grievances, file complaints or report problems in relation to KLK and its operations, in reference with the UN Guiding Principles on Business and Human Rights.

1.2. A grievance is defined as concerns, problems and complaints that an employee might have in relation to acts of any individual in KLK and/or the practices by the Company, subsidiaries and other third-party service providers in the course of its business.

2. SCOPE

2.1 This Policy is applicable to all employees* of KLK, its subsidiaries and associate companies.

2.2 Areas for possible grievance may include but not limited to the following:

(i) The Company not honouring terms and conditions of employment, e.g. minimum pay, working hours and contractual leave;
(ii) Violence and discrimination based on race, ethnicity, religion, gender, sexual orientation;
(iii) Harassment for example derogatory jokes or comments, unwanted sexual advances, request for sexual favours, derogatory or sexually oriented communication material; and
(iv) Abuse of authority such as usage of intimidation, threats, blackmail or coercion by management against an employee for reporting harassment, physical abuse, verbal abuse and/or usage of insulting and offensive words.

3. RAISING A GRIEVANCE

3.1 The following Grievance Procedure is a general guide for the employee’s usage. However, each location can have their own specific procedure which should not deviate from the core principles of the procedures as set out herein below:

Note:
* Employees would also include contract and temporary workers of the KLK Group, as well as any worker hired by a third party and working on a KLK operation
<table>
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<tr>
<th>Step</th>
<th>Procedure</th>
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| 1    | - Employee to raise his grievance in writing using the prescribed grievance form to his immediate Superior.  
- Alternatively, instead of writing, an employee can also raise his grievance through hotlines set up in the respective operating countries as set out in Paragraph 4.1(i) of Alternative Method.  
- The Superior will take the necessary action within three (3) working days upon receiving the grievance.  
- If the matter remains unresolved, proceed to Step 2.  
- Should the grievance relate to his direct Superior, proceed straight to Step 2. |
| 2    | - Employee to raise the grievance with his head of department (HOD)  
- HOD to take necessary action within seven (7) working days  
- If the matter remains unresolved, proceed to Step 3 |
| 3    | - Employee to report the Grievance to Head of Human Resource  
- Grievance should be addressed preferably within ten (10) working days of receipt of the grievance. |

3.2 For employees covered under the scope of Collective Agreement ("CA"), the grievance redressal procedure under the respective CA will apply. For clarity purpose, as provided under the Malaysian law, regardless whether employees are members of the labour union, they can seek recourse through the grievance procedure under the CA if they wish to do so.

3.3 It must be noted that the various timelines mentioned above are subject to change depending on the complexity of each grievance. Should there be any delay, it is to be communicated in writing or in the manner that can be understood by the person who raise the grievance.

3.4 Grievances raised will be dealt with promptly in a fair and transparent manner.

3.5 The Company will provide a female representative for employees to raise sensitive issues like sexual harassment if they so wish. As far as practicable, the identity of the victim will be protected.

3.6 The Form provided in Appendix 1 should be used by Employees who wish to submit their Grievance.

3.7 A grievance report should include the following details:  
- Name, Job Title and Name of Organisation of employee making the report;  
- Mailing Address;  
- Contact number;  
- Email Address (if available);  
- Detailed description of the grievance;  
- Evidences to support the grievance (images, videos, recordings, documentary evidence and etc.)
4. ALTERNATIVE METHOD

4.1 Alternatively, grievances can be channeled via the following additional means: -.

(i) Direct communication via **Hotline** -
Malaysia - +605 2408000 (Ext 2201)
Indonesia - +6281294222892
Liberia - +231881722677

(ii) **Email to** -
Malaysia - hr@klk.com.my
Indonesia - pengaduan.jkt@klk.co.id
Liberia - arthur.w@epo.lr.co

(iii) **By post to** -
Malaysia - Bangunan Mayban Trust Ipoh
Level 9, No. 28, Jalan Tun Sambanthan
30000 Ipoh, Perak, Malaysia

Indonesia - PT. KLK Agriservindo
Ruko Puri Mutiara
Block C, No. 3,5,6 & 7
Sunter Griya
Jakarta Utara 14350

**Hand Deliver**\* to -
Liberia - Equatorial Palm Oil Office
Big Joe Town, Lower Harlands ville
Buchanan City
Grand Bassa County, Liberia

(Note: \* Currently there is no postal service in this part of the operating centre)

(iv) Written grievances can also be dropped in the suggestion box available at the respective offices.

(v) Anonymous letter – the Company does not encourage anonymous letters to ensure a proper investigation can take place and the Company ensures that no reprisal against complainants. However, if such letter contains genuine and factual complaint, the matter will be investigated based on the leads provided, and the appropriate action will be taken accordingly.

5. NON-REPRISAL

5.1 The Company has zero tolerance of reprisal or intimidation against those who report grievances. The Company will, in line with the prevailing laws will protect the complainant against any loss or retribution in connection with the disclosure of grievance.

5.2 The Company will take all necessary steps to protect the identity of the complainant and/or victim of sensitive cases like sexual harassment.
Appendix 1

Grievance Form
The purpose of the Grievance Form is for employees to formally submit their grievance according to the Grievance Procedure.

Employee's Name: _______________________________  Job Title: _______________________________

Department/OC: _______________________________  Job Title: _______________________________

Request for Anonymity*  □ Yes  □ No

* Tick where appropriate

The grievance (the date, time and location of the incident must preferably be included)
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________

Solution desired:
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________

Signature :

Date :

[Step 1] – Immediate supervisor was notified on : ________________    :________________

[Step 2] – Head Of Department was notified on : ________________    :________________

[Step 3] – Human Resource Department was notified on : ________________    :________________

Grievance resolved at Step ____.

I, ______________________________ agree to the settlement of the grievance as follows:-
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________
_________________________________________________________________________________

Employee’s signature  HOD’s Signature  HHR’s Signature

cc. HR Department