



## Grievance Procedure for Stakeholder Issues

Under our RSPO certification, we are obligated to deal with issues openly:

RSPO Principle 1 states the need for a commitment to transparency

RSPO Principle 6.3 further states that there is a mutually agreed and documented system for dealing with complaints and grievances, which is implemented and accepted by all parties.

This procedure is given to ensure that local and other interested parties understand the communication and consultation process for raising any issues with NBPOL.

NBPOL accepts its responsibility as a corporate citizen of PNG and wants local communities to be aware and involved in the communication and consultation methods it uses.

NBPOL recognises that any dispute resolution mechanisms must be established through a fair and transparent process of *open and consensual agreements* with affected parties.

NBPOL aims to resolve grievances (including those originating from employees) through Consultative Committees and realises that any system must resolve disputes in an effective, timely and appropriate manner that is open and transparent to any affected parties

### **NBPOL recognises key facts:**

Firstly that there are both external and internal stakeholders and secondly that our interactions with stakeholders are many and varied and that grievances are only part of the communication process. Because of this any interactions with external stakeholders are recorded in the grievance books held on site along with grievances from internal parties.

Anybody with a grievance is encouraged to consult their manager or the manager of the nearest property. All incidents will be lodged and this will in no way prejudice the relationship the complainant has with that manager. The incident will then be assessed on site. Minor incidents will be followed up locally, whilst those involving any law breaking may involve the security department. Any serious incident, as well as being recorded locally will be raised with senior management and the sustainability department on a designated incident form. The senior management and / or sustainability department will then decide what further action to take if any.

All completed incident forms are recorded centrally with the sustainability department.



External stakeholders who have a grievance can also contact the company head office directly. There are two ports of call for this. Land matters would be addressed to the Company Secretary and environmental, social or health and safety matters by the Sustainability Department.

In both cases the following protocol will be followed:

The external complainant writes a letter to the company. Oral complaints can be heard, but NBPOL encourages complainants to record their grievances in writing if possible.

A follow up letter or phone call from the company will clarify the grievance if the letter is not clear.

If requested, the writer of the grievance is invited to sit down and discuss the matter with the relevant company representatives. This will be done in a timely manner. NBPOL recognises that not responding or 'dragging out' grievances only serves to exacerbate the situation.

The writer of the grievance will be allocated a date and time for the meeting which is acceptable to both parties.

The writer is invited to attend with other members of their community if appropriate. The delegation is requested to be no more than three members.

Experience has taught NBPOL that smaller parties can more amicably settle grievances.

After the grievance has been evaluated, or the meeting held, then further action may be taken. A site visit may be carried out, or it may be passed onto a more relevant department for further action. This is most commonly the security department or the legal department. Further monitoring may also be suggested at this point.

For internal grievances the company policy handbook and regulations is available for all workers. NBPOL abides by the Industrial Relations Dispute Settlement Machinery prescribed by the Industrial Relations Act (2005) allowing collective bargaining and recognises the rights of freedom of association.

### **Landowner issues**

Since 1999 all development of NBPOL plantations has occurred at the request of landowners on customary land, that is, land owned communally by local inhabitants. In PNG this accounts for 97% of all land. When developed for oil palm, this land is not alienated but remains the property of the traditional landowners and is sub-leased to NBPOL. They are paid a per hectare lease and also a royalty percentage on all fruit produced from the estate as well as receiving shares in NBPOL. These leases typically run for 25 years, after which the developed plantations and all building on them revert back to being the property of the traditional landowners. NBPOL is then in effect manager or tenant for the land.



Obviously whilst this brings benefits directly to the local community it also brings its own challenges. The landowners form what are termed Incorporated Land Groups (ILGs) to manage the money that is produced from the estates. These ILGs obviously have a special relationship with the company and they have their own channel of communication with the company Lands Department also called the Mini-Estates Department which was set up in 1999 especially for this purpose. The methods of dealing with grievances and general communications between the ILGs and the Mini-Estates Department, is clearly spelt out in the company management guideline MG21 which is available to ILGs.

This procedure applies to all NBPOL operations in Papua New Guinea

*Last reviewed June 2009*