



**SD Guthrie Berhad**  
**Group Risk & Special Projects**

Grievance Response Standard Operating Procedure

**Policy Instrument Control Table**
**Document Title** : Grievance Response Standard Operating Procedure

|                        |   |                                     |                     |                          |              |
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## Table of Contents

|  |    |
|--|----|
| 1. Scope and Purpose .....                   | 5  |
| 2. Grievance Management.....                 | 5  |
| 3. Assignment of Cases .....                 | 7  |
| 4. Monitoring and Reporting Grievance .....  | 9  |
| 5. Awareness and Communication.....          | 9  |
| 6. References Relevant to the Procedure..... | 10 |
| 7. Process Owner .....                       | 10 |

## GLOSSARY

The definitions of the key terms used in this Procedure are as follows:

| <b>TERMS</b>             | <b>DESCRIPTIONS</b>  |
|--------------------------|--|
| Regional HR (RHR)        | In terms of job assignment in the helpline, reference to the RHR denotes Regional Human Resources (Upstream) or Human Resources Personnel at Operations (Downstream).  |
| Operating Unit (OU)      | In terms of job assignment in the helpline, reference to the Operating Unit denotes OU management (estate / mill Manager).   |
| Case / Issue / Grievance | Refers to a formal complaint, concern or problem that is raised by an individual or group towards SDG or its affiliated company represented by management (supervisor, manager, head) within the workplace.  |
| Call handler / Operator  | The formal grievance channel comprising <i>Suara Kami</i> by LRQA is managed by a team of call handlers or operators. These personnel are third-party providers that communicate directly with the complainants.   |
| Complainant              | Individuals who use the helpline to raise grievances are referred to as complainants. Workers and individuals who have raised issues through informal channels are also referred to as complainants.   |
| Informal channels        | For this purpose, informal channels shall refer to non-system platform channels, where complainants may raise grievances directly to OU Management, Careline or Gender Representatives (not exhaustive). The cases are required to be logged into the <i>Suara Kami</i> Webform and will follow the same process flow as cases received via formal channels. |
| Grievance Unit (GU)      | The GU will support the systematic and effective handling of grievances from individuals or third parties to SD Guthrie or its group of companies.   |

**1. SCOPE AND PURPOSE**

- 1.1 This Procedure shall outline the procedural aspects of the Grievance Unit in response to the following:
- a. The intake and logging of grievances received through formal and informal channels.
  - b. The assignment of grievances received for investigation.
  - c. The cancelling, withdrawing, closing or reopening an investigation.
- 1.2 This Procedure shall apply to all grievances received via formal channels and informal channels including but not limited to:
- a. Whistleblowing
  - b. *Suara Kami* helpline
  - c. Informal grievances received at the OU level through RHR, Careline or Gender Representatives that are required to be logged into the *Suara Kami* Webform
- 1.3 The main purpose of this procedure is to support all Malaysian operations (upstream and downstream) in ensuring effective and timely grievance management for workers through a centralised unit governed by the Sustainability Committee.

**2. GRIEVANCE MANAGEMENT**

- 2.1 The Grievance Unit (GU) key role is to capture formal grievances systematically, close grievances that fall under queries that do not require investigation, refer issues to the investigating team when substantive expertise is necessary, and follow up with both the complainant and/or call handler to ensure that the issue is resolved in a fair and timely manner.

The main objectives of the establishment of the GU are as follows:

- a. Manage a central database of grievances received
- b. Monitor the grievances received by ensuring the management of cases is in accordance with the stipulated protocols and procedures
- c. Analyse the grievances received and report key issues to the Grievance Committee (GC) and Sustainability Committee as board oversight
- d. Raise awareness of available grievance channels within SDG

2.2 Cases shall be assigned according to the procedure in Appendix 1. The full procedure can be seen in the flowchart below.

| Process  | PIC   | Details   |
|--|-------|---|
| <pre> graph TD     A1[Complainant calls Suara Kami] --&gt; B1[Operator/ Call handler collects information from caller]     A2[Complainant reports grievance through WBU] --&gt; B2[Keys case into Suara Kami Webform]     A3[Complainant reports grievance to OU] --&gt; B2     B1 --&gt; C[Received grievance alert via grievance@sdguthrie.com]     B2 --&gt; C     C --&gt; D{Is there sufficient information for investigation}     D --&gt; E[Determine case type and assign cases for investigation accordingly]     E --&gt; F[Investigation team conducts investigation and updates GU]     E --&gt; G[GU emails caller/ complainant/ system of update]     F --&gt; H{Case require further investigation?}     G --&gt; I[Review case based on worker/ caller feedback]     I --&gt; J{Confirmation of case closure}     H -- YES --&gt; J     H -- NO --&gt; F     J -- YES --&gt; K[Change status of grievance in database to solved]     J -- NO --&gt; L[Analyse and report database for discussion at the Grievance Committee]     L --&gt; M[Report to Sustainability Committee]                     </pre> | OU    | <p><b>Formal channels:</b><br/><i>Suara Kami</i></p> <p><b>Informal channels:</b><br/>Operating Unit<br/>Gender representative<br/>Careline</p> <p>The PIC at OUs reports case details into the <i>Suara Kami</i> System Form. Complainants can also report grievances directly through formal channels.</p> <p>The GU receives an email alert through <a href="mailto:grievance@sdguthrie.com">grievance@sdguthrie.com</a> of the complaints made.</p> |
| <p style="text-align: center;">Is there sufficient information for investigation</p> <p style="text-align: center;">Determine case type and assign cases for investigation accordingly</p>   | GU    | <p>GU ensures that all the required information is complete and comprehensive.</p> <p>GU will request more information if insufficient.</p> <p>Determine case criteria and assign them to the investigating team accordingly.</p>   |
| <p>Investigation team conducts investigation and updates GU</p> <p>GU emails caller/ complainant/ system of update</p>   | GU/IN | <p>GU shall email the complainant/ operator to acknowledge receipt of the case within 48 hours of the email alert.</p> <p>Wrongdoing cases will be channelled to the Whistleblowing Unit for further investigation. The investigation team conducts the investigation and updates GU on the outcome and remediation plan.</p>   |
| <p>Case require further investigation?</p> <p>Review case based on worker/ caller feedback</p> <p>Confirmation of case closure</p>   | GU    | <p>GU follow up with the investigation team and reviews the case for feedback to the complainant/ operator.</p> <p>GU shall confirm with the complainant the case closure and level of satisfaction of the complainant.</p>   |
| <p>Change status of grievance in database to solved</p> <p>Analyse and report database for discussion at the Grievance Committee</p> <p>Report to Sustainability Committee</p>   | GU    | <p>In the event the complainant is not satisfied, GU shall alert the Grievance Committee and review the case if the investigation should be reopened.</p> <p>GU shall update the database and prepare a report for the Grievance Committee.</p> <p>The Grievance Committee shall present a report of all grievances managed to the Sustainability Committee for complete governance.</p>  |

### 2.3 Informal grievance handling

For the purpose of this procedure, informal grievances shall refer to grievances that are made not through third-party systems such as the *Suara Kami* helpline and/or Whistleblowing. This shall include grievances raised through OU management directly or other forms such as complaint / suggestion boxes, raised to Careline personnel or the Gender Committee.

These grievances shall be recorded as cases in the *Suara Kami* System using the Webform (<https://suarakami.zendesk.com/hc/en-us/requests/new>).

The cases reported shall be assigned for investigation according to the case criteria and timeline in Appendix 1. The grievance management procedure shall apply as above.

## 3. ASSIGNMENT OF CASES

3.1 The GU will review the cases following the criteria provided in Appendix 1 assign them for investigation accordingly and marked in the GU Database.

3.2 The GU will review if the grievance requires investigation or can be closed based on the following scenarios:

- a. Lack of information and the subsequent inability to contact the complainant to revert with relevant information
- b. Cases which only require OU to address the issue directly and no investigation is required
- c. The case is an enquiry in nature and can be addressed through FAQs (on common enquiries) provided to the helpline operators

In such an event, the GC will deliberate on the appropriateness of not initiating investigations into the complaint and if need be, to request for an investigation to commence. Such cases would be channelled for case assignment.

3.3 The timeline for the investigation is guided by the criteria as follows:

| No | Criteria  | Example of grievances   | Timeline      |         |
|----|---|---|---------------|---------|
| 1  | Inquiries or confirmation from operating units without interview of witness or review of documents. | Request for repatriation, inquiries on housing conditions and repairs, understanding of wage calculation, requests for transfers. | Non-anonymous | 2 weeks |

|   |  |   |                             |                        |
|---|--|---|-----------------------------|------------------------|
| 2 | Investigations involving interview of complainant and review of documents (not complex).   | Does not involve interviews with randomly selected workers.   | Non-anonymous               | Not more than 4 weeks  |
|   |  |   | Anonymous                   | Not more than 3 months |
| 3 | Investigations involving interview of randomly selected workers/witnesses and review of documents (complex), where the complainant is not disclosed.<br><ul style="list-style-type: none"> <li>- Complainant gives the name of the alleged. In this case, many, a group of randomly selected workers will have to be interviewed to validate the allegations, hence, resulting in an extended period of investigations.</li> </ul> | Harassment or disrespect by supervisor, unfair termination, discrimination<br>Fraud, misappropriation, manipulation of documents. | Non-anonymous and anonymous | Not more than 3 months |

- 3.4 Should an investigator have a personal connection to the case being investigated and if the personal connection interferes or is deemed to interfere with the discharge of his or her duties, the relationship must be disclosed, before an investigation commences, or as soon as the situation arises.
- 3.5 The conflict of interest may be made informally during the opening meeting of an investigation or via a brief statement in writing to the GC.
- 3.6 The GC reserves the right and discretion to disqualify the investigator/personnel and reassign the investigation should the need arise.



**4. MONITORING AND REPORTING OF GRIEVANCE**

- 4.1 GU shall track and monitor ongoing cases under investigation and where necessary, liaise with the Investigating Team on the weekly status of investigation progress and expected completion date (for medium/high-risk cases that are in queue for investigations). Additionally, for cases investigated by RHR and OU, cases are shared with Group HR and Upstream Business Support (to be shared with region management) respectively for oversight on a weekly basis.
- 4.2 For cases that are assigned to RHR and OU personnel for investigation, Group HR and Upstream Business Support will be kept in the loop and progress updated on a weekly basis.
- 4.3 GU shall monitor the helpline systems for updates by the Investigation Teams and the helpline operators. For cases that have completed investigation, operators will be given 14 days to inform the workers of the outcome and the case will be considered closed if workers are still not reachable by the end of the duration.
- 4.4 Repeated callers will also be monitored. SDG HR may speak directly to workers in non-anonymous cases when:
- 3 cases have been reported in a 2-month period and each of these cases the complaint was not upheld – and:
  - Evidence proves the worker intentionally provided untruthful information for each case (e.g. lying, purposefully withholding information, or knowingly giving wrong information)
- 4.5 GU shall prepare a weekly report for deliberation at the GC. Following this, the final agreed report shall be submitted to the Sustainability Committee on a quarterly basis. However, should the need arise, the report is to be prepared as and when required.
- 4.6 GU shall track common issues in the grievance database and may propose intervention initiatives. Formal analysis may be conducted for reporting to the GC and Sustainability Committee.

**5. AWARENESS AND COMMUNICATION**

- 5.1 GU shall ensure that workers are aware of the available grievance channels through the distribution of promotional items (posters, cards, stickers), briefings by third-party helpline providers and refreshers during muster and social dialogues. Surveys may be conducted to gauge the level of awareness from time to time.

- 5.2 OU management will be given periodic updates on the survey outcomes/analysis of grievances received and refreshers on communicating grievance channels/management to workers.

## **6. REFERENCES RELEVANT TO PROCEDURE**

This SOP shall be read in conjunction with the following, where applicable:

- a. Grievance Unit Terms of Reference
- b. *Suara Kami* Helpline SOP
- c. Whistleblowing Response Procedure

## **7. PROCESS OWNER**

Grievance Unit, Group Risk & Special Projects.

## APPENDICES

### Appendix 1

| Case Category                                | Case Types  | Examples / Definitions   | ILO Indicator         | WB /GC | Case Classification | Dealt with by        |
|--|-------------|--|-----------------------|--------|---------------------|----------------------|
| <b>1. High risk of forced labour present</b> |             |  |                       |        |                     |                      |
| 1.1  | Recruitment | Deceptive recruitment, being charged recruitment fees (fees for application, recommendation, recruiting, hiring, placement, administrative, overhead and processing fees, and fees at any stage of the recruitment process, during or after employment. Fees to any parties, including agent, sub-agent, intermediary or employer) Examples of fees include pre-departure fees such as passport preparation fees and transportation and lodging costs. | ILO 2<br>Deception    | WB     | Human rights        | Group Sustainability |
|  |             |  | ILO 9<br>Debt bondage |        |                     |                      |
|  |             | Contract substitution for materially worse conditions (e.g. lower wages, different production facility, undisclosed fees for housing). Workers are requested to sign a contract that is different from their original contract signed / or what they verbally had agreed to in their home country.   | ILO 2<br>Deception    | WB     | Human rights        | Group HR             |
| 1.2  | Resignation | Workers are requested to pay for the return transportation to their home country at the end of employment i.e. airfare, airport  | ILO 2<br>Deception    | WB     | Human rights        | Group HR             |

| Case Category | Case Types                       | Examples / Definitions   | ILO Indicator                   | WB /GC | Case Classification | Dealt with by |
|---------------|----------------------------------|--|---------------------------------|--------|---------------------|---------------|
|               |                                  | transfers etc., against the terms stipulated in the employment contract.   |                                 |        |                     |               |
|               |                                  | Workers are requested to pay fees/penalties if they have provided notice or fulfilled the full resignation period per the employment contract; if the worker has not provided notice, the worker is punished (e.g. <i>Withholding of wages or charging a fee that is higher than 60% of 1-month workers' gross base wages</i> ); termination is conducted unfairly, without proper documentation and procedures. | ILO 2<br>Deception              | WB     | Human rights        | Group HR      |
|               | ILO 8<br>Withholding of wages    |  |                                 |        |                     |               |
|               | ILO 3<br>Restriction of movement |  |                                 |        |                     |               |
| 1.3           | Wages                            | Withholding of wages ( <i>incl. standard, OT pay or benefits</i> ) or wages delayed not in accordance with the Employment Act 1955 (within 7 days after the last day of any wage period).  | ILO 8<br>Withholding of wages   | WB     | Human rights        | Group HR      |
|               |                                  | Levy deduction, threat of levy deduction, worker indicates their desire to terminate employment – workers are charged the remaining balance due on any levies at the end of employment (apart from situations where there is dismissal for gross misconduct).  | ILO 1<br>Abuse of vulnerability | WB     | Human rights        | Group HR      |
|               | ILO 9<br>Debt bondage            |  |                                 |        |                     |               |
|               |                                  |  | ILO 8<br>Withholding of wages   |        |                     |               |

| Case Category | Case Types                       | Examples / Definitions   | ILO Indicator                         | WB /GC | Case Classification     | Dealt with by |
|---------------|----------------------------------|--|---------------------------------------|--------|-------------------------|---------------|
| 1.4           | Restriction of movement          | Restriction of movement during on and off work time such as being locked in space; no freedom to resign in accordance with legal requirements.   | ILO 3<br>Restriction of movement      | WB     | Human rights            | Group HR      |
| 1.5           | Physical harassment              | **Physical (including sexual) assault with serious injury where it involves parties in different positions of authority ( <i>e.g. worker assaulted by mandor or supervisor assaulted by the department head</i> ). | ILO 5<br>Physical and sexual violence | WB     | Harassment and violence | Group HR      |
| 1.6           | Verbal harassment                | Threats, retaliation, harassment, or abuse by management. Causing workers to feel vulnerable and unable to work or seek their rights to employment queries / benefits / contract termination.                      | ILO 1<br>Abuse of vulnerability       | WB     | Harassment and violence | Group HR      |
|               |                                  | Physical and verbal abuse, verbally threatened by the supervisor, mandore, manager, assistant manager, and peers.  | ILO 6<br>Intimidation and threats     |        |                         |               |
| 1.7           | Disrespectful conduct/ behaviour | Any behaviour that can cause discomfort or anger from the other party does not amount to the other party feeling vulnerable or intimidated. This includes calling other parties loudly like " <i>Hoi</i> ".        | ILO 6<br>Intimidation and threats     | GC     | Human Rights            | Regional HR   |
| 1.8           | Sexual Harassment                | Any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or intimidation with the aim to coerce an individual into a sexual act, by any   | ILO 5<br>Physical and sexual violence | WB     | Harassment and violence | Group HR      |

| Case Category | Case Types             | Examples / Definitions   | ILO Indicator  | WB /GC | Case Classification     | Dealt with by        |
|---------------|------------------------|--|--|--------|-------------------------|----------------------|
|               |                        | <p>person regardless of their relationship to the victim, in any setting, including but not limited to home and work.</p> <p>Note: In serious cases such as rape, the operator is to park the case under General Assistance and advise on contacting the nearest local authorities. SD Guthrie HQ is responsible for re-directing issues under this category to HR Governance and IR at: <a href="mailto:adeline.amanda@sdguthrie.com">adeline.amanda@sdguthrie.com</a>.</p> |  |        |                         |                      |
| 1.9           | Extortion              | Forced to pay a sum of money by a superior.  | ILO 1<br>Abuse of vulnerability                                  | WB     | Other criminal offences | GFCRM                |
| 1.10          | Repatriation           | Denied return upon request or denied repatriation following permit/contract expiry.  | ILO 3<br>Restriction of movement                                 | WB     | Human rights            | Regional HR          |
| 1.11          | Retention of documents | Passports withheld by the Operating Unit (OU) or other parties apart from the purpose of renewal of the permit, or no secure storage provided or not accessible at any time.   | ILO 7<br>Retention of identity documents                         | WB     | Human rights            | Regional HR          |
| 1.12          | Bonded labour          | Use of bonded, indentured or prison labour. Examples include workers are not able to resign as they are required to pay off their debt to the company/someone employed at the Group prior to leaving.  | ILO 1<br>Abuse of vulnerability<br>ILO 8<br>Withholding of wages | WB     | Human rights            | Group Sustainability |

| Case Category                                    | Case Types             | Examples / Definitions   | ILO Indicator                                   | WB /GC | Case Classification            | Dealt with by                |
|--|------------------------|--|---|--------|--------------------------------|------------------------------|
| 1.13   | Child labour           | <p>Child labour - no person is employed or has access to any work areas at an age younger than 16. Should an underage worker be identified, he/she is removed from the workplace immediately and kept safe.</p> <p>Child labour hired by a contractor – see the above definition and example of child labour.</p>  | ILO 1<br>Abuse of vulnerability                 | WB     | Human Rights                   | Group Sustainability         |
| 1.14   | Health and Safety      | Locked workplace exits or blocked egress routes, cracks in beams, cracks in columns, cracks on the wall, unattended or bare electric wires, sparking or short circuits, walls or windows shaking.  | ILO 10<br>Abusive working and living conditions | WB     | Occupational safety and health | Health, Safety & Environment |
| 1.15   | Facilities             | <p>Restriction of movement by the OU or no access to necessities (e.g., water supply, electricity supply, toilets, drinking water, external medical facilities, dormitory exit and entry). Degrading living conditions. Repeated inaction from management on fixing / rectifying.</p> <p><i>Note: This category does not include general maintenance or repair requests.</i></p> | ILO 10<br>Abusive working and living conditions | GC     | Human rights                   | Regional HR                  |
| <b>2. Moderate risk of forced labour present</b> |                        |  |   |        |                                |                              |
| 2.1  | Freedom of association | Issues related to freely associating with any labour (union), political or other groups including strike/worker unrest or union-busting allegations.   | ILO 1<br>Abuse of vulnerability                 | WB     | Human rights                   | Group HR                     |

| Case Category | Case Types                   | Examples / Definitions  | ILO Indicator  | WB /GC | Case Classification            | Dealt with by                |
|---------------|------------------------------|---|--|--------|--------------------------------|------------------------------|
| 2.2           | Discrimination               | Discrimination based on sexual orientation, race, gender, and religion.   | ILO 1<br>Abuse of vulnerability<br>ILO 4<br>Isolation                | WB     | Human rights                   | Group HR                     |
| 2.3           | Contracts                    | No contract or workers do not understand the terms in the contract.   | ILO 2<br>Deception   | GC     | Human rights                   | Regional HR                  |
| 2.4           | Forced Overtime              | Workers cannot refuse to work overtime.   | ILO 11<br>Excessive overtime   | WB     | Human rights                   | Group HR                     |
| 2.5           | Verbal harassment            | Pregnant workers reporting threats and intimidation.  | ILO 6<br>Intimidation and threats                                    | WB     | Human rights                   | Group HR                     |
| 2.6           | Acts of fraud and corruption | Witnessing crimes at the workplace or workers reporting excessive crimes like theft involving management.   | ILO 9<br>Debt bondage<br>(e.g. relating to 'kick back' arrangements) | WB     | Other criminal offences        | GFCRM                        |
| 2.7           | Health and Safety            | Lack of personal protective equipment (PPE) when dealing with potentially dangerous processes; no regular fire drills (at least 1 per year); emergency exits are locked or not equipped with proper lighting; missing proper machine safeguarding; missing legally required permits / licenses. | ILO 10<br>Abusive working and living conditions                      | WB     | Occupational safety and health | Health, Safety & Environment |



| Case Category | Case Types        | Examples / Definitions  | ILO Indicator   | WB /GC | Case Classification            | Dealt with by                |
|---------------|-------------------|---|---|--------|--------------------------------|------------------------------|
|               |                   | Concerns regarding occupational and non-occupational safety and health including chemical handling; and unsafe use of heavy equipment or tools. |   |        |                                |                              |
| 2.8           | Health and Safety | Industrial Disasters at workplace structures such as collapse of structures, fire, and explosions.  | ILO 10 Abusive working and living conditions            | WB     | Occupational safety and health | Health, Safety & Environment |
| 2.9           | Health and Safety | Immediate safety concerns; occupational fatalities, non-occupational fatalities; serious injuries, medical attention required; burnt.           | ILO 10 Abusive working and living conditions            | WB     | Occupational safety and health | Health, Safety & Environment |
| 2.10          | Hours             | Complaints / Enquiries related to all working hours issues, including overtime.   | ILO 11 Excessive overtime                               | GC     | Human rights                   | Regional HR                  |
| 2.11          | Facilities        | Complaints regarding hygiene and quality or price.  | ILO 10 Abusive working and living conditions            | GC     | Human rights                   | Group Sustainability         |
| 2.12          | Wages             | Complaints / Enquiries related to wages, bonuses, overtime compensation, and benefits.  | ILO 11 Excessive overtime<br>ILO 8 Withholding of wages | GC     | Human rights                   | Regional HR                  |

| Case Category                           | Case Types          | Examples / Definitions   | ILO Indicator                   | WB /GC | Case Classification            | Dealt with by |
|---|---------------------|--|---------------------------------|--------|--------------------------------|---------------|
|   |                     | Pregnant workers report they are not provided with statutory / company benefits.   | ILO 1<br>Abuse of vulnerability |        |                                |               |
| <b>3. LOW FORCED LABOUR RISK ISSUES</b> |                     |  |                                 |        |                                |               |
| 3.1                                     | Physical Harassment | Past event - Fights between workers in the workplace.  |                                 | GC     | Harassment and violence        | Group HR      |
| 3.2                                     | Physical Harassment | Physical (including sexual) assault with serious injury between workers, in the workplace or domestic sphere.  |                                 | GC     | Harassment and violence        | Group HR      |
| 3.3                                     | Physical Harassment | Domestic abuse, including child abuse.   |                                 | GC     | Occupational safety and health | Regional HR   |
| 3.4                                     | Physical Harassment | Fights between workers in the workplace<br><i>(Note: however, if serious and unresolved to be considered egregious).</i>                               |                                 | GC     | Harassment and violence        | OU/ BU        |
| 3.5                                     | Covid-19            | Enquiries relating to the pandemic, including restrictions to business operating hours and lockdowns, border closures impacting repatriation / return. |                                 | GC     | Occupational safety and health | Regional HR   |
| 3.6                                     | Repatriation        | Leave application / request to return to home country due to personal / family issues.   |                                 | GC     | Operational                    | Regional HR   |
| 3.7                                     | Health and Safety   | Workers seeking medical treatment or insurance compensation.   |                                 | GC     | Occupational safety and health | Regional HR   |
| 3.8                                     | Health and Safety   | Relationships, marital issues, family matters.   |                                 | GC     | Occupational safety and health | OU/BU         |

| <b>Case Category</b> | <b>Case Types</b>            | <b>Examples / Definitions</b>  | <b>ILO Indicator</b> | <b>WB /GC</b> | <b>Case Classification</b>                 | <b>Dealt with by</b> |
|----------------------|------------------------------|--|----------------------|---------------|--|----------------------|
| 3.9                  | Health and Safety            | Kidnapping.  |                      | GC            | Occupational safety and health             | OU/BU                |
| 3.10                 | Hours                        | Not attending work or refusing to work due to issues on employment such as minor issues regarding understanding of pay, and non-urgent medical concerns.   |                      | GC            | Operational                                | Regional HR          |
| 3.11                 | Facilities                   | Requirement or request to move to another housing unit or complaints regarding house members or housing unit, amenities, or housing areas such as minor repairs, leaks, toilet repairs, or electrical repairs. |                      | GC            | Human rights                               | OU/BU                |
| 3.12                 | Acts of fraud and corruption | Witnessing crimes at the workplace or workers reporting excessive crimes like theft, no involvement of management.   |                      | WB            | Other criminal offences                    | GFCRM                |
| 3.13                 | Acts of fraud and corruption | Manipulation of documents (ghost employees, fake overtime, etc.).  |                      | WB            | Falsifying organisational data/information | GFCRM                |
| 3.14                 | Others                       | Non-compliance to SOPs and guidelines (burying of FFB, wrongly grading of fruits, etc.).   |                      | WB            | Operational                                | GFCRM                |
| 3.15                 | Others                       | Requirement or request for transfer.   |                      | GC            | Operational                                | Regional HR          |
| 3.16                 | Others                       | Death, including suicide.  |                      | GC            | Occupational safety and health             | OU/BU                |
| 3.17                 | Others                       | Detained by the police or immigration.   |                      | GC            |  | OU/BU                |
| 3.18                 | Others                       | Riots between workers within or near the workplace.  |                      | GC            | Occupational safety and health             | Regional HR          |

| <b>Case Category</b>                                  | <b>Case Types</b>            | <b>Examples / Definitions</b>   | <b>ILO Indicator</b> | <b>WB /GC</b> | <b>Case Classification</b>   | <b>Dealt with by</b>         |
|---|------------------------------|---|----------------------|---------------|--|------------------------------|
| <b>4. WRONGDOING - OCCUPATIONAL FRAUD &amp; ABUSE</b> |                              |   |                      |               |  |                              |
| 4.1   | Health and Safety            | Non-compliance to ESH Policies.   | N/A                  | WB            | Acts against the interest of the Company, laws, regulations or public policies | Health, Safety & Environment |
| 4.2   | Acts of fraud and corruption | Receive or Solicit Bribe / Gratification.   | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | Extortion.  | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | Give or Offer Bribe / Gratification.  | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | False Claims.   | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | Manipulation or Falsify Business Records.   | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | Giving false or misleading information (including suppression of any material fact or information). | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | Financial statement fraud.  | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |
|   |                              | Misuse of confidential information.   | N/A                  | WB            | Acts of fraud and corruption   | GFCRM                        |

| <b>Case Category</b> | <b>Case Types</b> | <b>Examples / Definitions</b>   | <b>ILO Indicator</b> | <b>WB /GC</b> | <b>Case Classification</b>   | <b>Dealt with by</b>   |
|----------------------|-------------------|---|----------------------|---------------|--|--|
|                      |                   | Criminal breach of trust.   | N/A                  | WB            | Criminal breach of trust   | GFCRM  |
|                      |                   | Abuse of Power or Position.   | N/A                  | WB            | Abuse of power or position   | GFCRM  |
|                      |                   | Conflict of interest - Procurement-Related.                             | N/A                  | WB            | Abuse of power or position   | GFCRM  |
|                      |                   | Conflict of Interest - Family Members and Close Personal Relationships. | N/A                  | WB            | Abuse of power or position   | GFCRM  |
|                      |                   | Conflict of Interest - Involvement in Political Activities.             | N/A                  | WB            | Abuse of power or position   | GFCRM  |
|                      |                   | Misappropriation of assets.   | N/A                  | WB            | Misappropriation of assets   | GFCRM  |
|                      |                   | Money Laundering.   | N/A                  | WB            | Money laundering   | GFCRM  |
| 4.3                  | Others            | Breaches of any Group policies and/or COBC.                             | N/A                  | WB            | Acts against the interest of the Company, laws, regulations or public policies | GFCRM/ Other independent body (depending on the nature of the complaint) |
|                      |                   | Non-compliance to Procurement Policies.                                 | N/A                  | WB            | Acts against the interest of the Company, laws, regulations or public policies | GFCRM  |
|                      |                   | Other Criminal Offenses.  | N/A                  | WB            | Other criminal offenses  | GFCRM  |



**SD Guthrie Berhad**  
**Grievance Response Standard Operating Procedure**

**2024**

| <b>Case Category</b> | <b>Case Types</b> | <b>Examples / Definitions</b>   | <b>ILO Indicator</b> | <b>WB /GC</b> | <b>Case Classification</b> | <b>Dealt with by</b> |
|----------------------|-------------------|---|----------------------|---------------|----------------------------|----------------------|
|                      |                   | Deliberate concealment of any of the above matters or other acts of wrongdoing. | N/A                  | WB            | Other criminal offenses    | GFCRM                |
|                      |                   | Hiring of undocumented workers.   | N/A                  | WB            | Other criminal offenses    | GFCRM                |