



## HALCYON AGRI CORPORATION LIMITED

(the “Company”)

(Company Registration No. 200504595D)

(Incorporated in the Republic of Singapore)

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### GRIEVANCE RESOLUTION PROCEDURE FOR SUSTAINABLE NATURAL RUBBER SUPPLY CHAIN POLICY AND SUSTAINABLE SOURCING POLICY

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#### 1. INTRODUCTION

Halcyon Agri Corporation Limited (“**HAC**”) is committed to provide an open and transparent grievance mechanism processes for local communities, employees and all stakeholders to raise a grievance related to the implementation of HAC’s Sustainable Natural Rubber Supply Chain Policy and Sustainable Sourcing Policy (collectively, the “**Policies**”).

#### 2. PURPOSE

This Grievance Resolution Procedure (“**Procedure**”) serves as guide to review, address, and monitor the outcome of any grievance from stakeholders (including individuals, government agencies, and the relevant non-governmental organisations) concerning the implementation of the Policies. It provides a clear, appropriate and comprehensive methods of handling grievances in order to prevent disputes as far as possible and resolve any grievance in a responsible and timely manner.

#### 3. SCOPE

A grievance is a complaint or concern, associated with the implementation of the Policies, which an individual or a group seeks to address with HAC. A grievance must be raised in writing, by email, online form or by phone through the methods as listed under paragraph 5 below.

This Procedure applies to HAC and all its subsidiaries, including factories and plantations that HAC owns, manages, or invests in and all third party natural rubber agents from whom HAC deals with. It covers activities related to the handling of stakeholders’ grievances regarding the implementation of the Policies.

#### 4. RESPONSIBILITIES

The coordination and implementation of this Procedure will be managed by HAC’s [Sustainability Department]. Its responsibilities include:

- (a) receiving, recording, classifying, and reporting grievances to HAC’s senior management, managing communications and engaging with any party who raises a grievance (“**Grievance Raiser**”);
- (b) identify and engage internal or external resources to investigate and determine the legitimacy of grievances reported;

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- (c) decide on the course of action to be taken to address and rectify valid grievances or claims; and
- (d) monitor and evaluate the progress of action plans.

### 5. SUBMISSION OF GRIEVANCE

Grievance can be expressed via any of the following channels:

- (a) By email – [grievances@halcyonagri.com](mailto:grievances@halcyonagri.com)
- (b) By fax to +6564600850 ATTN: Sustainability Department
- (c) By online form via <https://www.halcyonagri.com/contact-us/>

Grievance should include the following information:

- (i) Full name of Grievance Raiser
- (ii) Name of organisation (if any)
- (iii) Address
- (iv) Phone no./Fax no./Email (at least one contact point)
- (v) Description of the grievance in detail
- (vi) Evidences to support the grievance (if available)
- (vii) Any requests for confidentiality

### 6. GRIEVANCE PROCEDURE PROCESS FLOW

Stage	Actions	Timeline
<b>1. Identification and Review of Potential Grievance</b>	<ul style="list-style-type: none"><li><b>a. Receipt of grievance</b> Acknowledge receipt of grievance</li><li><b>b. Review of grievance</b><ul style="list-style-type: none"><li>i. Preliminary review on the allegation of grievance</li><li>ii. Check admissibility of grievance, assess allegation in relevance to the Policies</li><li>iii. Assess allegation on counter-party (direct supplier/ third party supplier/past supplier)</li></ul></li><li><b>c. Confirm the admissibility of grievance</b><ul style="list-style-type: none"><li>i. If grievance is not admissible, inform the Grievance Raiser</li><li>ii. If grievance is admissible, register the grievance and proceed to Stage 2 - Investigation Process</li></ul></li></ul>	2 weeks
<b>2. Investigation Process</b>	<ul style="list-style-type: none"><li><b>a. Investigation process</b><ul style="list-style-type: none"><li>i. Define the scope and approach of investigation</li><li>ii. Engage Grievance Riser to collect additional information</li><li>iii. Seek input from party alleged (e.g. business units, suppliers, etc.)</li><li>iv. Consider to consult independent third-party for opinion</li></ul></li><li><b>b. Evaluate investigation result</b><ul style="list-style-type: none"><li>i. Assess investigation result based on objective evidence</li><li>ii. If grievance is not valid, inform Grievance Raiser and close the case</li><li>iii. If grievance is valid, proceed to Stage 3 - Resolution and Monitoring Process</li></ul></li></ul>	1 to 3 months

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Stage	Actions	Timeline
<b>3. Resolution and Monitoring Process</b>	<b>a. Develop resolution</b> <ul style="list-style-type: none"><li>i. Agree on investigation findings by party alleged and Grievance Raiser</li><li>ii. Agree on action plan and implementation timeline</li><li>iii. Agree on monitoring progress and reporting</li></ul> <b>b. Monitoring</b> <ul style="list-style-type: none"><li>i. Implementation of agreed action plan</li><li>ii. Monitor and communicate progress until grievance is resolved</li><li>iii. If the grievance is not resolved, repeat Stage 3.a.</li></ul>	6 to 12 months

## 7 TRANSPARENCY AND CONFIDENTIALITY

HAC is committed to the transparent handling of grievances and may report on grievance review, investigation and resolution. The information relating to the grievance including a summary, the date filed, the issue, Grievance Raiser (e.g. NGO, community member, worker), whether the grievance has been assessed and assessment type (e.g. internal, 3rd party), and outcome, may be publicly reported

Notwithstanding, the Procedure allows for dialogue to remain confidential and for the confidentiality of the Grievance Raiser, if requested.

## 8 ENQUIRY

For any enquiries on this Procedure or information related to specific cases please contact:  
Chief Corporate Officer

Category	: Corporate	Date Established	: []
Responsible Office	: Corporate Office	Date Last Revised	: []
Responsible Executive	: Chief Corporate Officer	Document Number	: HAC- GRP_v1