

# **Complaint management related to sustainable production**

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## 1. Scope

1.1. This process sets out the procedure for filing, receiving, considering and monitoring of complaints redressing related to sustainable production.

1.2. The participants in this process are:

EFKO Management Company JSC:

- Service of the Deputy Director for the supply of tropical oils;
- Production Administration and Product Distribution Department;
- Service of the director of the fat and oil division;
- Regulatory Control and Certification of Specialized Fats and Margarines Department (hereinafter referred to as RC&C Department)
- Supply office

1.3. The process also applies to plantations, mills, smallholders, producers, suppliers and consumers.

## 2. Definitions

**A complaint** is a problem associated with any of the non-conformities with the official statements of EFKO Group in relation to the received raw materials, which was identified by an individual (group of persons) or an employee of EFKO Group.

**The complainant** is any individual or legal person who found a non-conformity with the official statements of EFKO Group in relation to the received raw materials and applied to the company in the prescribed manner.

**The victim of the complaint** is any organization participating in the supply chain of raw materials, in respect of which a non-conformity was revealed with the official statements of EFKO Group in relation to the received raw materials.

**Reference group** is a group of specialists (with qualifications in different fields) that develops, implements and maintains a system in working order within the framework of the sustainability of the supply chain.

## 3. General provisions

3.1. EFKO Group, in its statements on sustainable production, undertakes to ensure a transparent, open and fair process of filing and timely consideration of complaints for all stakeholders.

3.2. EFKO Group takes responsibility for complaints arising in any of its supply chains and informs all stakeholders by publishing the complaint on the website.

3.3. As a consumer of palm oil and as a member of Roundtable on Sustainable Palm Oil (RSPO), EFKO Group admits that the Roundtable on Sustainable Palm Oil (RSPO) has an established grievance procedure and is guided by the RSPO process for complaints that are also filed under the RSPO's own complaints handling system. However, EFKO Group makes decisions independently of the RSPO procedure, especially in cases where EFKO Group's policy or complaint management may require a more specific and transparent approach to stakeholder concerns.

3.4. EFKO Group will continue to consult with stakeholders and regularly review its complaints process to ensure its effectiveness. This process describes the procedure of complaint handling related to non-conformities of the EFKO Group supply chain with the statements on sustainable production.

## 4. Objectives

4.1. The goal of this process is to determine the procedure for filing, receiving, considering and monitoring of complaints redressing related to sustainable production, transforming the existing supply chain and increasing its transparency.

4.2. To achieve this goal, the following tasks are solved:

- development of a mechanism for filing, receiving, considering and controlling of complaints redressing;

– identifying resources for receiving, information processing and building feedback on complaints received.

## **5. Procedure for filing and receiving complaints**

5.1. A complaint can be filed in any available way: e-mail, skype, postal address, website ([https://efko-ingredients.ru/prioda/](https://efko-ingredients.ru/priroda/)). An electronic form for filing a complaint is also posted on the EFKO Group website.

5.2. Any complaint should include following:

- Name\*, Surname
- Name of the organization (if any)
- Title
- Country\*
- Address
- E-mail\*
- Telephone, skype, fax
- description of the complaint in detail\*
- evidence supporting the complaint\* (documents, photo, video, audio files)

\*required fields

After completing the input of the complaint, it is sent to the RC&C Department for consideration.

## **6. Complaint handling process**

6.1. After receiving a complaint via any of the specified communication channels, the responsible employee registers the complaint in the EFKO Group Complaints Journal (Appendix 1) within 1 working day, which is displayed on the company's website. The Journal is updated monthly by the designated employee of the RC&C Department.

6.2. The term for considering a complaint and taking measures to redress the complaint should not exceed 28 days from the date of filing the complaint.

6.3. Complaints related to deforestation are considered within 14 days.

6.4. The reference group analyzes the evidence of the complaint and decides on the validity/invalidity of the complaint.

6.5. If the complaint is not valid, the RC&C Department employee makes a mark "Completed" in the Complaints Journal and informs the complainant about the results of the analysis.

6.6. If the complaint is recognized as valid, the RC&C Department employee formulates a request in accordance with the complaint, and within 2 working days, information and work with the victim of the complaint is carried out.

6.7. All complaints are tracked at the group level. If the complaint is valid, the reference group decides to suspend work with the entire group of companies of the supplier until the complaint is resolved. The Complaint Journal should clearly indicate suspended groups.

6.8. Within 10-20 working days, depending on the type of complaint, the victim of the complaint develops a schedule for addressing the identified non-conformities.

6.9. When complaints handling, the principle "Suspend and attract" is used.

6.10. EFKO Group is ready to provide the victim of the complaint with all kinds of support in the development and implementation of the schedule, as well as in solving emerging problems.

6.11. If the supplier refuses to take measures to remedy or if an adequate solution to the situation is not found, EFKO Group will terminate commercial relations with this supplier.

6.12. After receiving evidence from the supplier that the complaint has been resolved within 2 working days, the reference group makes an analyzes and decides to suspend or re-enter the supplier into the supply chain. The protocol form is presented in Appendix 2.

6.13. A flowchart of the complaint handling process is presented in Appendix 3.

## Appendix 1

### Complaint Journal of EFKO Group

No	Holding/group name, landholder (for smallholders)	Plantation, mill complained of	Date of complaint	The complainant	Description of the complaint	Status	Result of consideration of the complaint

**Protocol of suspension/re-entry of a supplier into the supply chain of EFKO Group**

Supplier complained about	Content of the complaint	Supplier Corrective Actions	Corrective action assessment satisfactory/unsatisfactory
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Conclusion:

Reference group:

\_\_\_\_\_

Title

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

\_\_\_\_\_

Title

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

Flowchart of the complaint handling process

