

THE ROYAL ESWATINI SUGAR CORPORATION



EXTERNAL GRIEVANCE PROCEDURE

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1. Introduction

The External Grievance Procedure is a non-judicial process established by the Royal Eswatini Sugar Corporation (RES) to ensure the fair, timely, and objective resolution of external grievances.

- This process aligns with best practice models, ensuring accessibility and responsiveness to social barriers faced by marginalized and vulnerable groups.
- It incorporates international guidelines to protect the rights of these groups and prevent exclusion, addressing grievances sufficiently to avoid negative impacts on affected, impacted, and interested stakeholders.

2. Purpose

The purpose of this process is to formalize the management of grievances from RES stakeholders. It provides:

- A platform for individuals and organizations to voice concerns or submit grievances if negatively impacted—directly or indirectly—by RES' activities.
- Transparency regarding how external grievances will be managed in a timely, consultative, and transparent manner.

3. Scope

This external grievance procedure applies to all external stakeholders involved in or impacted by RES operations, processes, and activities, including activities conducted on behalf of RES by contractors.

4. Exclusions:

To maintain efficiency and focus, the external grievance handling procedure excludes specific types of complaints and concerns that are managed through designated specialized processes. Below are the exclusions, along with references to their corresponding management or escalation mechanisms:

4.1 Internal Employee Grievances

- Complaints related to internal staff, employment terms, workplace conduct, or HC issues are handled under the organization's Internal Human Capital Policies and Procedures. Employees are advised to follow the established internal grievance channels provided by the HC department.

4.2 Compliance Violations

- Allegations related to regulatory non-compliance, fraud, corruption, or ethical misconduct are excluded. These issues are addressed through the organization's Whistleblowing Policy, which provides confidential and anonymous reporting mechanisms.

4.3 Supply Chain Complaints

- Grievances concerning supplier performance, contractual disputes, or procurement issues are managed under the Procurement Policies and Procedures Manual, RES Terms and Conditions of Purchase for Goods and RES Terms and Conditions of Purchase for Services. Stakeholders are encouraged to reach out to the Supply Chain Management team for assistance.

4.4 Legal Disputes

- Matters involving ongoing or potential litigation, arbitration, or other legal proceedings are excluded. These are managed directly by the organization's Legal Department or external legal advisors.

4.5 Product Quality

- Complaints related to product quality are excluded from the external grievance handling procedure. These are managed through the organization's Customer Complaint Process which addresses issues such as product defects, performance concerns, or non-conformance with product specifications. Customers and stakeholders are encouraged to report product quality issues directly through their key customer contact who will then report it in through the Customer Complaints Process.

5. Definition and terms

Complainant	An individual, group or organisation that submits a complaint or grievance to the Company.
Complaint / grievance	A complaint or grievance is an issue, concern, problem or claim (perceived or actual) that is brought to the attention of the company by an individual, group, organization or community who allege damage, impact or dissatisfaction because of the actions of the company.
Contractors	An individual or firm that has entered a contract to provide goods or services to the Company. The term covers those entities directly contracted by the Company as well as subcontractors.
Closed Grievance	A grievance is "closed" when a resolution that is accepted by both parties and meets the legal or social requirements has been reached.
Engagement	The manner in which RES communicates and interacts with its stakeholders.
External Stakeholders	Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way by the decisions of the business, such as customers, suppliers, community and the government.
Grievance Process	A formalized way to receive, assess, and resolve complaints.

concerning performance or behaviour of the company, its contractors, or employees, including adverse supply chain, environmental and social impacts.

Internal Stakeholders Groups or individuals within a business who work directly within the business, such as employees and contractors.

Non-judicial grievance mechanisms Includes those administered by a company individually or jointly with stakeholders, by an industry association or a multi-stakeholder group. They are non-judicial however, may use adjudicative, dialogue-based or other culturally appropriate and rights-compatible processes.

Vulnerable groups Vulnerable groups refer to women, children, Indigenous People, People living with disabilities and the LGBTIQ community.

5.1 Categories of Grievances

Table – 1

Category	Description	Grievance Owner
Level 1	When answer can be provided immediately and or RES is already working on a solution	Stakeholder Contact Officer
Level 2	Once-off grievance that will not affect RES' reputation.	Supervisor level or above
Level 3	Repeated, extensive and high-profile grievance that may damage RES' reputation	GM or above

5.2 Limits and redirection

Table – 2

Grievances outside the scope	Redirection
Already introduced in court	Legal Service
From affiliate's employees regarding their contract or work conditions	Their employer
From employees of suppliers of goods	Their employer
Commercial nature made by partners or suppliers of goods and services.	Business unit in charge of relations with these third parties
From local authorities or a national company	Corporate Social Investment
Complaints related to requests regarding social funds or local development projects	Corporate Social Investment

6 Principles

6.1 Confidentiality

The fact and substance of a complaint will remain confidential for both parties until the complaint is resolved. Exceptions apply for limited disclosure required for investigation or other necessary actions.

6.2 Data Protection

Parties involved in collecting and transmitting personal data as part of a complaint shall comply with applicable data protection laws.

- Disclosure of sensitive personal data shall be avoided unless strictly necessary.
- When disclosure is essential, the disclosing party shall obtain consent from the relevant individual(s).

6.3 Transparency and Accountability

All complainants will:

- Be heard, taken seriously, and treated fairly.
- Benefit from a consistent and predictable process.

The company will:

- Ensure accountability for agreed remedies.
- Treat stakeholders input seriously, address concerns through a clear and transparent process, and follow through with actions and communication.

6.4 Appropriate Protection

Stakeholders are encouraged to voice concerns freely, with assurances of no retribution.

Special attention will be given to:

- Reducing risks to individuals raising issues of corruption, misconduct, or sensitive matters.
- Respecting local social norms, including gender norms.

6.5 Accessibility

Accessibility of the grievance process will be ensured through:

- **Clear communication:** Easy-to-understand information on the process and its workings.
- **Ease of use:** Simple and appropriate methods for filing complaints at no cost.

6.6 Proportionality

The grievance process will be proportional to the risks and impacts faced by affected stakeholders. Its scope and complexity will align with the severity of adverse impacts and the interaction with stakeholders.

6.7 Cultural Appropriateness

The process will consider culturally appropriate methods for addressing complaints, seeking input from local communities to align with their customs and attributes.

6. External Grievance Process

6.1 Communication

The company will:

- Communicate this procedure to external stakeholders to raise awareness and offer transparency.
- Provide multiple channels for lodging grievances, including in-person, written, and electronic methods.

Table – 3 Communication Channels

Channel	Contact
Telephone	+268 2313 4988
Written	Email public.affairseexternalgrievance@res.co.sz
	RES Public Affairs, P.O. Box 1 Simunye
Website	Online lodgement form at www.res.co.sz
In - person	Public Affairs Office, Lusoti Village off MR3 Road, Simunye

6.2 Roles and Responsibilities

Roles and responsibilities of RES personnel that will be involved in the investigation and resolution are outlined in Table – 4

Table – 4 Roles and responsibilities

Roles	Responsibilities
Stakeholder Contact Coordinator (SCC) – CSI Manager	<ul style="list-style-type: none">• Receive grievance and assign a grievance owner.• Ensure the grievance process procedure is being followed correctly.• Liaise with the external stakeholder(s).• Maintains grievance register and monitor any correspondence.• Supporting the executive leadership team if needed, to resolve the grievance.• Monitor grievances and report findings to Group Public Affairs Manager.• Raise internal awareness of the grievance process among employees and contractors.
Recipient (any employee, incl. Contractors)	<ul style="list-style-type: none">• Must be aware and understand the procedure.

Roles	Responsibilities
	<ul style="list-style-type: none"> Refers complaints to the Stakeholder Contact Officer.
Grievance Owner (business unit representative)	<ul style="list-style-type: none"> Investigating the grievance and liaising with the SCC. Developing resolutions and actions to rectify any issues. Follow up and track progress of grievance.
Group Public Affairs Manager	<ul style="list-style-type: none"> Supports the Stakeholder Contact Coordinator and Grievance Owner or any person overseeing the process in the resolution process, especially the investigation when the grievance is directly related to operational activities. Monitor grievance register and reports for quarterly management review updates. Provide grievance report updates to the Social and Ethics Board Sub Committee.
Managing Director	<ul style="list-style-type: none"> Approves and signs the Grievance Procedure and is accountable for grievance management. <p>Ensures RES gets the resources (human and financial) to manage grievances efficiently.</p>

7 Grievance Resolution Process

The resolution of grievances will follow the structured process outlined below to ensure consistency, fairness, and transparency:

Table 5 – Grievance resolution process

Item	Description
Step 1: Grievance Lodgment	<p>Stakeholders may lodge grievances through the following reporting processes:</p> <ul style="list-style-type: none"> • Email, letter, or telephone directed to the Stakeholder Contact Officer. • Website: Complaints can be submitted via the RES website (www.res.co.sz). • In-person: Grievance lodgment forms are available on the website or can be physically collected from the Public Affairs Office in Simunye.
Step 2: Grievance Received and Recorded	<ul style="list-style-type: none"> • If a grievance is submitted orally, the RES Officer or Stakeholder Contact Coordinator (SCC) will complete the lodgment form in the presence of the complainant and read it back for confirmation. • Grievances communicated via telephone must be confirmed in writing by the complainant. • The SCC will record all grievances in the RES Grievance Register.
Step 3: Acknowledgement	<p>The SCC will determine whether the grievance falls within the scope of the procedure.</p> <ul style="list-style-type: none"> • Rejected grievances: If unfounded, the SCC will notify the complainant in writing, explaining the reasons for rejection. • Accepted grievances: The SCC will acknowledge the grievance in writing within 3–5 business days.
Step 4: Investigation	<ul style="list-style-type: none"> • The grievance owner will lead the investigation and review, and communicate outcomes to the SCC. • The SCC will document and provide feedback to the complainant within 2 weeks.
Step 5:	<ul style="list-style-type: none"> • Resolutions will be developed collaboratively between internal representatives and the complainant, where feasible.

Item	Description
Resolution Development and Implementation	<ul style="list-style-type: none"> Stakeholder acceptance of the resolution will be documented internally. Agreed resolutions or actions will be implemented within specified timeframes.
Step 6: Grievance Resolved	<ul style="list-style-type: none"> A grievance is considered resolved when the resolution has been implemented to the satisfaction of both parties. Both parties will acknowledge resolution by signing a closure document.
Step 7: Grievance Unresolved	<ul style="list-style-type: none"> If the complainant is dissatisfied with the proposed resolution, the grievance will remain open and escalated internally. If unresolved internally, the grievance will be referred to an external mediator.
Step 8: External Mediation and Litigation	<ul style="list-style-type: none"> If mediation results in an agreeable resolution, the grievance will be closed, and the recommendations implemented. If mediation is unsuccessful, the complainant may seek resolution through litigation in court.
Step 9: Reporting, Monitoring, and Evaluation	<ul style="list-style-type: none"> The SCC will produce a quarterly report for Management and Board Subcommittees to identify trends and ensure grievances are addressed effectively. Random follow-up conversations with complainants may be conducted by Management to assess process effectiveness. To uphold transparency, aggregated grievance data will be disclosed in RES annual reports, maintaining stakeholder confidentiality.
Step 10: Procedure Review	<ul style="list-style-type: none"> The procedure shall be reviewed as and when necessary to ensure it remains relevant.

9 Revision and Approval

Rev.	Date	Nature of Changes

10 Forms/ Records/Procedures / Registers:

RES' Stakeholder Map
Grievance lodgement form
External grievance registers



Annex 1 Grievance Lodgement Form

Name			<input type="checkbox"/> Please do not use my name when talking about this concern in public
Company			
Date		Time	
Preferred Contact Method:	<input type="checkbox"/> Telephone <input type="checkbox"/> Email <input type="checkbox"/> Mail Please provide contact details: _____		
Supporting Documents Attached?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Please provide details of your grievance			
What outcome are you seeking?			
Additional Information			

Acknowledgement

Complainant's Signature:.....

Date :

RES' Rep Name:.....

Designation:.....

Signature:

Date:

Stakeholder Contact Officer use only

Stakeholder Reference:	<input type="checkbox"/> Customer	<input type="checkbox"/> Government Ministry
	<input type="checkbox"/> Supplier	<input type="checkbox"/> Government Regulatory Agency
	<input type="checkbox"/> Community	<input type="checkbox"/> Local Government
	<input type="checkbox"/> Individual	<input type="checkbox"/> Other



Annex 2 External Grievance Registers

Stakeholder	Date received	Stakeholder Grievance contact Owner Officer	Grievance	Level (1, 2, 3)	Grievance description	Cause of grievance	Outcomes	Resolution “accepted” or “not accepted”	Action / Noted