

Nedspice Grievance Procedure Policy

I. Why

We do our best to undertake our activities with the utmost respect for human rights, environment, and communities. But we acknowledge the possibilities of not adhering to standards set by ourselves or others, especially when it concerns actions carried out by a third party falling under our responsibility. We recognise that feedback and input from employees and other stakeholders is very valuable and helps us to improve our business activities, secure a transparent supply chain and increase compliance with Nedspice Sustainable Procurement Policy and Supplier Code of Conduct. More so, an effective and properly working grievance mechanism upholds mutual trust between stakeholders and ensures that employees feel safe and protected.

II. What

Our Grievance Procedure Policy describes how we handle grievances from external parties, employees, individuals, communities and non-governmental organisations. This Policy sets out the Grievance Procedure Process, the Policy Scope and reaffirms the Reference Docs. The policy ends with where and how grievance can be submitted. With this policy we hope to provide a clear and transparent framework for addressing grievances.

III. Grievance procedure process

| Timeline | Stage | Responsible |
|------------|--|-------------|
| Week 1 | <p>1) Receipt and registration of grievance</p> <ul style="list-style-type: none"> • Acknowledge receipt of grievance • Inform complainant of procedure | |
| Week 2 | <p>2) Preliminary review Check admissibility of grievance (see Policy Scope for requirements)</p> <ul style="list-style-type: none"> • NO – inform complainant • YES – continue with next steps | |
| Week 4 | <p>3) Further review, plan investigation, dialogue and determine resolution</p> <ul style="list-style-type: none"> • Further collection of grievance details • Dialogue with alleged wrongdoer <ul style="list-style-type: none"> ➢ Solution found* with wrongdoer: inform complainant ➢ No-solution found with wrongdoer: proceed to following steps • Agreement on investigation scope with <i>head of business</i> and inform alleged wrongdoer • Consider consulting a third party • Inform complainant of status | |
| Month 1-3 | <p>4) Investigation Process</p> <ul style="list-style-type: none"> • Determine if additional information is required • Decide if field verification (by independent party) is required • Decide on status of grievance <ul style="list-style-type: none"> ➢ Suspension: unable to start action plan now ➢ Proceed: monitor for action plan ➢ Case closed: grievance determined to be not valid | |
| Month 1-3 | <p>5) Develop action plan</p> <ul style="list-style-type: none"> • Agree on investigation findings with complainant and alleged wrongdoer separately • Agree on time bound action plan • Agree on communication of actions and progress • Decide on corrective action for non-compliance after established cut-off date | |
| Month 3-12 | <p>6) Case monitoring</p> <ul style="list-style-type: none"> • Implementation of action plan • Evaluate results after max 12 months <ul style="list-style-type: none"> ➢ Positive results: Case closed | |

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| | ➤ Negative results / case not resolved: proceed to step 5 | |
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IV. Policy Scope

For the purpose of this Policy, a 'grievance' is defined as any type of problem, concern or complaint related to Nedspice business or charitable activities. A grievance may be an act, omission, situation or decision that is perceived to be unfair, discriminatory or unjustified.

This policy covers:

- Any grievance that actively go against the ambitions set out in Nedspice Sustainable Procurement Policy
- Any grievance that go against behaviour that can reasonably be expected of Nedspice or that behaviour which Nedspice is responsible for

Admissibility of grievance

- Assess allegation in relevance to Nedspice Sustainable Procurement Policy, ILO standards and relevant human right laws
- Assess information submitted by complainant, request specific info if required
- Assess complainant party (who or what interest does the complainant represent, in case of supplier also check third party supplier and/or its group company)
- Assess the alleged wrongdoer. Not in terms of right or wrong, but make sure the alleged responsible person, party or act is sufficiently framed and clearly formulated

V. Definitions

***Solution found:**

In case the situation is restored as was before identified grievance took place and/or chance of recurrence of identified grievance is very limited and/or complainant is happy with solution found.

VI. Reference Doc

Nedspice Sustainable Procurement Policy

Nedspice Supplier of Conduct

Nedspice Code of Conduct

VII. Submission of Grievance

"I have a complaint, concern or want give feedback. Where should I go?"

Grievance can be submitted through any of the following channels:

- By email to grievance@nedspice.com
- By telephone to +316 456242828
- In writing to:
attn. Grievance mechanism
Coolsingel 65
3012 AC Rotterdam
The Netherlands

The grievance should include the following information:

- Full name.

If you however prefer to submit the grievance anonymously that is obviously also fine. But please note that this hinders us from requesting additional information which may be required to properly investigate and address the issue.

- Name of organisation (if any)
- Contact details (phone/email address/social media account)
- Description of the grievance in detail
- Evidence to support the grievance (if present)