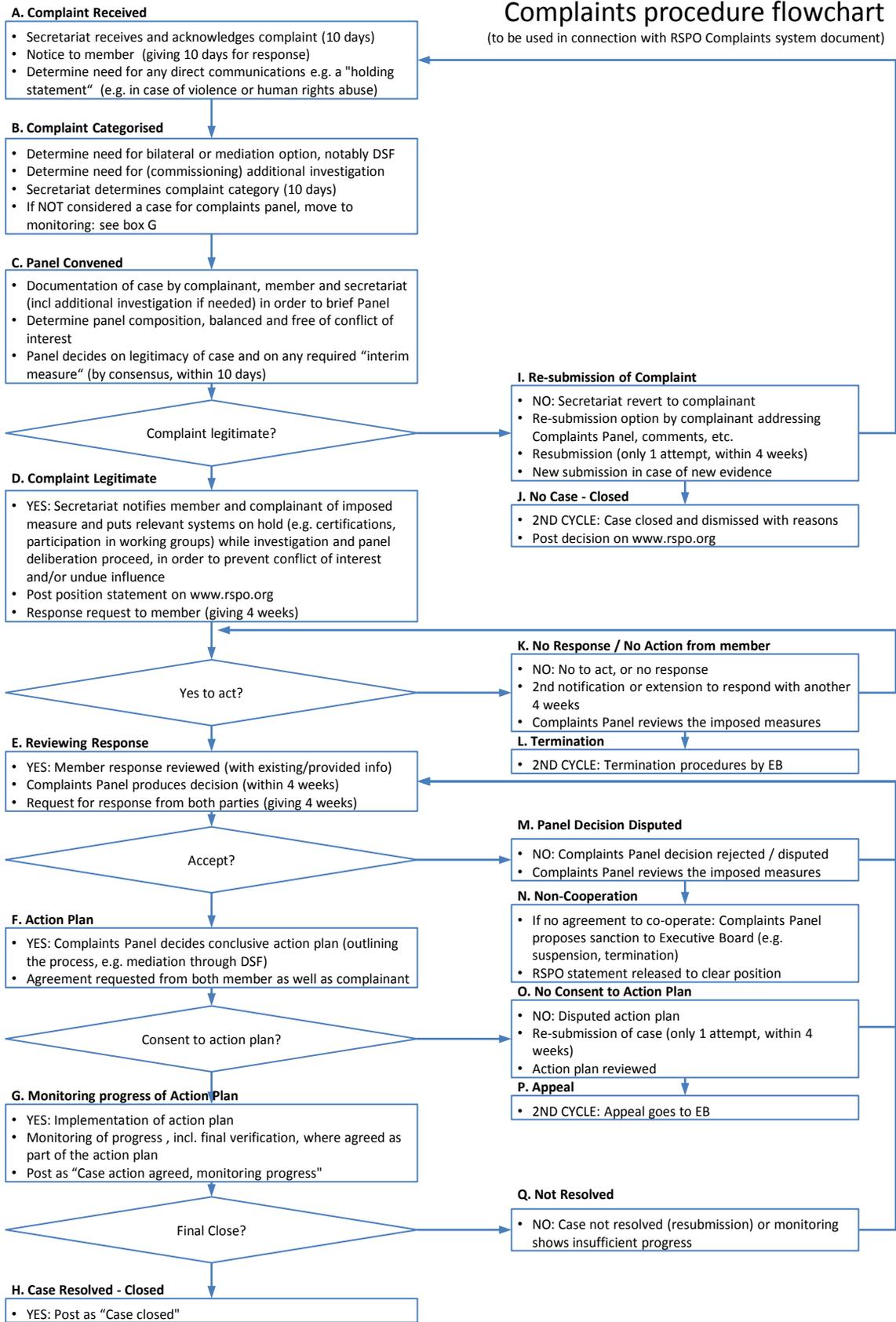


Complaints procedure flowchart

(to be used in connection with RSPO Complaints system document)



Receipt and Acknowledgement

The RSPO Secretariat is the point of entry for all complaints to be addressed through the RSPO Complaints System. Complaints entering via other points will be forwarded first to the Secretariat. The Secretariat receives all complaints submitted and in turn acknowledges its receipt to the complaining party, in writing, no later than ten working days after they have been received. The Secretariat has the right to return incomplete complaints to the submitting party, with an explanation of what is needed to constitute a complete submission that can then be further processed. Such complaints may be re-submitted at the complainant's discretion, upon the receipt of which the Secretariat shall have another ten working days in which to acknowledge receipt. In all cases of receipt of a complete complaint, the Secretariat shall indicate as part of its acknowledgement to the complainant its initial determination of what category of complaint this is, and the next step(s) to be taken to address it.

The Secretariat is not required to accept cases that are not submitted in writing, but can address such non-written complaints at its discretion. In all cases the Secretariat keeps a record of all cases it addresses.

The RSPO Secretariat determines the need for any direct communications or actions e.g. a "holding statement" that publicly states that RSPO has received a complaint, is taking the issue seriously and will be looking into it as a matter of urgency through the RSPO systems. Such urgent communications may be needed especially in case of reported violence or human rights abuse.

Complaint in relation to any other breaches, notably of the RSPO Code of Conduct, by an RSPO Member to be handled by the Complaints Panel

Breaches of the RSPO Code of Conduct by an RSPO Member, including non-certified members

Where a complaint involves a potential breach of a member's adherence to the RSPO Code of Conduct, the Secretariat shall, after acknowledging the complaint, investigate the charge(s) against the member by first asking the member to respond to the content of the complaint and any additional investigation if needed. The Secretariat shall then bring the original complaint and its response from the member to the Complaints Panel for its consideration with advice about its legitimacy.

In cases where disputes come to light or newly arise after certification has been granted, per section 4.2.4 of the "RSPO Certification Systems" document on partial certification requirements, the member may face suspension of their status of certification. An "interim measure" may be needed to assure RSPO's credibility. In these instances, the Complaints Panel shall have up to 10 working days to impose such a measure on the member. (For operations that are already moving certified product or have forward contracts, Green Palm and/or Utz Certified will need to be notified of any changes in member status.)

The Complaints Panel has 10 working days from the time of receiving a briefing about the complaint to decide on its legitimacy and next actions. The Panel may request additional information and/or commission further investigation of the complaint. Preferably this is connected as part of planned certifications audits or surveillance audits, including consultations with stakeholders in relation to these verifications. Therefore, the member may initially be requested to submit a time-bound plan for certification of its operations. This informs the panel about any need for additional field investigation (commissioned) by the Secretariat.

The Secretariat (in consultation with the Complaints Panel) will set timelines for its receipt of the findings of said additional information, and the complainant shall be notified of this timeline. Under normal circumstances this time period (and other steps to provide information or a decision) shall be 4 weeks, unless specified otherwise. Any delay or extension of the originally-stated timeline will be communicated to the complainant as well as the member in question.

Upon receiving all of the information the Complaints Panel needs, the Panel shall have 4 weeks within which to issue a decision to the member, including the imposition of any corrective actions and penalties on the member, and process and monitoring requirements during progress of implementation. Monitoring would normally be the responsibility of the RSPO Secretariat.

The Complaints Panel and Secretariat will document how the measures undertaken to resolve complaints are implemented and details of what sanctions can be imposed if there is further non-compliance with the agreed remediation. It is the responsibility of the Executive Board to determine ultimate sanctions, both with respect to non-complaint members as well as any mendacious complainants.