

Hatton Plantations PLC	Grievance Procedure	Ref No: HPL/GP/01
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1) Purpose & Principles

The estate management and group administrator of HPL implements a complaints / grievance mechanism to protect workers' rights. This procedure provides a safe, confidential, and fair mechanism to raise, investigate, and resolve grievances (concerns, complaints, or allegations) related to working conditions, human rights, child labor, discrimination, workplace violence and harassment (including sexual harassment), environmental harms, ethics, or management practices across our tea operations.

Principles

- **Zero Retaliation:** No person who raises grievance in good faith will face reprisal, punishment, threats, discrimination, demotion, dismissal, loss of benefits, or any other adverse treatment.
- **Confidentiality & Anonymity:** Identities and sensitive information are protected on a strict need-to-know basis. Anonymous complaints are accepted and investigated.
- **Accessibility:** Multiple, free channels; available in languages understood by workers; supports written and verbal reporting.
- **Fairness & Impartiality:** Trained, mixed-gender grievance handlers; union/worker reps engaged; conflict-of-interest checks.
- **Timeliness:** Defined steps and timelines with regular progress updates to the complainant.
- **Transparency & Remedy:** Clear outcomes, corrective actions, and option to appeal.

2) Scope

Covers any grievance raised by workers, community members, Visitors, suppliers, Brokers, NGOs, legal authority, contractors, Service providers, or their workers related to:

- Wages, hours, benefits, contracts, leave, recruitment or termination
 - Discrimination, intimidation, sexual harassment
 - Occupational health and safety (OHS)
 - Freedom of association/collective bargaining
 - Environment (e.g., pesticide handling, waste, water impacts, Air pollution)
 - Ethics, bribery, fraud, or other misconduct by any company representative
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3) Roles & Responsibilities

- **Managing Director / DCEO:** Guarantees non-retaliation; allocates resources; ensures corrective actions are implemented.
- **Grievance Committee (GC):** Trained members including HR, OHS, female representative, union/worker representative, and a manager with decision power. Responsible for intake oversight, investigations, recommendations, and tracking corrective actions.
- **Gender Committee:** At least one senior female lead plus trained focal points per estate to receive and support GBVH/sexual harassment cases.
- **Supervisors/Staff:** Facilitate access to channels, refrain from interference, and cooperate with investigations.
- **All Workers:** May file grievances without fear; must refrain from retaliation.

Conflict of interest: Persons named in a complaint will not take part in handling that case.

4) Reporting Channels (Confidential & Anonymous)

At least **four** parallel channels will be maintained and advertised on noticeboards, meetings, muster sheds, and factory

1. **Grievance Boxes** (locked; checked and collected every Month by Assistant Manager.
2. **In-person** to a trained supervisor, GC member, or gender committee
3. **Email** to the estate office
4. **Union/Worker Representative** submission on behalf of complainant
5. If it is an employment related matter, the worker could complain to the Assistant Commissioner of Labor who will then summon the Management for a discussion and attempt to solve it. In the event of this fails, the worker could go to the Labor Tribunal for a relief.
6. If it is a matter concerning a legal issue, it is referred to the Police Station requesting their assistance. Failure to do so at that level, court action can be taken. In such circumstances, the actions are recorded in the Complaint Book of the office of each estate of HPL.
7. The suggestions, grievances and complaints of the estate workers to community members can directly be discussed with the estate Manager. However, if the person wants to be unrevealed, each office of estate maintains a Suggestion Box to receive the suggestions of such estate workers. This box is opened once a month in front of a special committee which is made up of the following members, unless all workers or staffs can complaint through their **union** too.

Verbal & illiteracy support: Any worker may lodge a verbal complaint; the receiver transcribes it and reads it back for confirmation, without recording the name if anonymity is requested.

Third-party & community: Neighbors or visitors can report concerns via the Phone, email, Letters.

5) Grievance Handling Process & Timelines

Step 1 – Receipt & Registration (Day 0–2)

- Acknowledge receipt to complainant within **2 working days** where contact is known.
- Log case in the **Grievance Register** (Reference No, date, channel, brief issue, parties involved, desired outcome). For anonymous cases, record “anonymous.”

Step 2 – Triage & Assignment (Day 2–5)

- GC chair decided the dates for meeting and sexual harassment, assign at least one **female** investigator and the Gender Focal Point.

Step 3 – Impartial Investigation (14 calendar days)

- Plan interviews; collect documents, Visits, evidence collection system.
- Interview complainant in private; allow a support person/union rep; provide translation; no questioning that blames the victim.
- Interview witnesses separately; interview the respondent; check for patterns.
- Keep detailed, dated notes, store in safety places.

Step 4 – Findings & Determination (5 days after investigation)

- Investigators issue a **Findings Report** (facts, analysis, standard/legal references, credibility assessment, substantiated/unsubstantiated).
- GC reviews and **decides outcomes** (corrective actions, discipline, remediation, policy/system fixes). Document reasons.

Step 5 – Communication of Outcome (3 days after decision)

- Provide the complainant with a **summary of findings and outcomes** in a language they understand, protecting confidentiality of witnesses.
- If anonymous, **post the outcome** (without identifiers) on noticeboards/estates’ communication boards and in monthly worker meetings.

Step 6 – Corrective Action & Remedy (12 weeks to complete initial remediation)

- Implement corrective actions and remedies with clear owners and deadlines. Monitor until closure.

Step 7 – Closure & 90-Day Follow-Up

- Close case when actions are completed and effectiveness is verified. Conduct retaliation checks for 90 days.

If timelines cannot be met (e.g., complex cases), the GC must record reasons and provide an updated timeline to the complainant.

6) Appeals Process (Formal)

- **Right to appeal:** The complainant (or respondent) may appeal within **10 working days** of receiving the outcome.
 - **Appeals Panel:** Senior management, HR department and GC members and a union/worker rep.
 - **Timeline:** Acknowledge within 2 days; review within 14 days; final written decision within 21 days. The Panel may affirm, modify, or overturn the decision and/or order further investigation.
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7) Reporting to the Complainant

- **Acknowledgement:** within 2 working days.
 - **Investigation updates:** At least every 7 days for active cases. (Labor Day)
 - **Outcome report:** summary of findings, decisions, and remedies; includes information on the **appeals process** and anti-retaliation guarantees.
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8) Recordkeeping & Data Protection

- Maintain a **secure Grievance Register** and case files for 5 years, accessible only to Senior Management, GC, HR head, and auditors.
 - Prohibit recording of survivor identities on noticeboards or broadcast channels.
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09) Specific Procedure: Sexual Harassment

Any unwelcome sexual advance, request for sexual favors, verbal or physical conduct or gesture of a sexual nature, or gender-based conduct that has the purpose or effect of violating the dignity of a person, creating an intimidating, hostile, degrading, humiliating, or offensive environment; includes quid pro quo, hostile environment, assault, stalking, coerced content sharing, and online harassment.

Additional Protections & Pathways

- **Confidential Intake:** Survivors may report directly to female member, union women representative, mobile.
- **Immediate Safeguards:** Separation from alleged perpetrator; safe transport/accommodation; schedule changes without loss of pay; no confrontation required.
- **Evidence Handling:** Respect privacy; preserve physical evidence; avoid repeated interviews.

Investigation

- Led by at least one female committee member and an external advisor when feasible.
- No questions about clothing, private life, or past relationships. Focus on facts, impact, and corroboration.

Outcomes & Disciplinary Actions

- Proportionate to severity and due process: written warning, suspension, transfer, termination, and where applicable referral to authorities.
- Systemic remedies: supervisor rotation, training refresh, safe sanitation facilities, anti-harassment campaigns.

Communication to Survivor

- Provide clear written/verbal summary of findings and actions; explain appeal options; offer ongoing support contacts.

10) Worker Awareness & Training

- Induction & annual refresher for all workers (including seasonal/contractors) covering rights, channels, anti-retaliation.

A handwritten signature in blue ink, consisting of a stylized 'H' followed by a series of loops and a final upward stroke.

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Deputy Chief Executive Officer, Hatton Plantations PLC