



GRIEVANCE MECHANISM SOP

1. Purpose

The purpose of this document is to establish a transparent and fair system for handling complaints and grievances applicable to all stakeholders involved in Bonsucro certified operations. This policy covers environmental, social and operational concerns and is aligned with the United Nations Guiding Principles (UNGPs) on Business and Human Rights. It ensures that the grievance procedure is legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue. All stakeholders can express their concerns as described in the grievance procedure which also clearly outlines how grievances will be handled.

2. Scope:

This procedure applies to all internal, external and vulnerable stakeholders of Mills and registered agriculture farms as per Stakeholder Mapping document No. JDWSML/BS/SHM/01.

3. Terms/Definitions:

3.1 Grievance:

A formal complaint or concern raised by an individual or group related to sugarcane operations, environmental concerns and community impacts.

3.2 Grievance Mechanism:

A structured, transparent system for receiving, investigating and addressing grievances accessible to all of its contractors, or employees, includes adverse supply chain, environmental and social impacts.

3.3 Internal Stakeholders:

Individuals or groups who may be directly involved in sugarcane operations or organization such as workers.

3.4 External Stakeholders:

Individuals or groups outside of the organization that have an interest in or are affected by the organization's activities, decisions and performance such as customers, suppliers contractors, local community and government agencies.

3.5 Vulnerable Stakeholders:

Individuals or groups more likely to be negatively impacted by sugarcane operations. Stakeholder which are at higher risks of marginalization or exploitation such Religious Minorities, Women, Indigenous people and Disable persons.

3.6 Confidentiality:

The issue is only discussed with those that have a genuine need to know. These individuals may include the parties directly involved in the incident, witnesses, those who may make a decision on potential disciplinary action and those involved in the investigation.

3.7 Fairness:

Grievances will be fairly and impartially investigated with the view of a fair outcome for all parties.

3.8 Sensitivity:

Certain grievances may involve particularly personal information about the individuals involved. These revelations will be dealt with in a sensitive manner.

3.9 Resolution:

If a formal grievance processed is commenced it will be given the resources required to ensure that it is investigated and resolved in a timely.

3.10 No Victimization:

All parties (i.e., complainant, the person(s) complained about and any witnesses) to a formal grievance will be advised that any form of victimization or reprisal against any other party will result in immediate disciplinary action which may include termination of employment.

3.11 Anonymity:

If a grievance is received anonymously, the Grievance owner will promptly address it after thorough verification

4. Mode for Grievance Submission

JDW Sugar Mills Ltd, will inform its internal and external stakeholders about the procedure in order to increase awareness and offer transparency regarding the channels for stakeholders to express their complaints. Complaints raised by internal and external stakeholders addressed to following channels including:

4.1 For Mill Site:

- Personal visit to complainant office at Dy. Manager Admin Office (Present Incumbent: Asif Nazir)
- Telephone Ext. or Mobile: Stakeholders can contact to officers as follows
 - Dy. Manager Admin: at +68-5672161-3 ext. 355; or +923006714056
 - Email: Grievances sent to asifnazir@jdw-group.com
 - Complaint Box: Stakeholders can complete a grievance form or application and put in complaint box fixed at different places in the mill premises.

4.2 For Growers (In case of grievance against Mill)

- Personal visit to complainant office at Cane Department office Muhammad Irfan
- Complainants can contact to grievance officers as follows
- Program Officer Cane department: 0300-6794482
- Complaint Box: Stakeholders can complete a grievance form or application and put in complaint box fixed at different places in cane department and Yard.

GRIEVANCE MECHANISM SOP

4.3 Grievance mechanism for registered growers:

The procedure also addresses situations where stakeholders may have grievances against registered growers, as detailed below:

- **Direct Contact with Grower:** Relevant stakeholders may contact the growers directly to express or submit their grievances.
- **Mediation by Group Manager:** Stakeholders can contact the Group Manager for mediation.
- **Conflict Resolution:** In case of conflict, stakeholders can use informal or formal means such as local panchayat/local bodies systems, law enforcement departments, or the judiciary.

5. Procedure for Receiving Grievance:

5.1 Complaint Box:

The Grievance Officer collect the all grievances from complaint box daily. The Grievance Officer will review the grievance form according to grievance level and process the grievance in accordance to this procedure.

5.2 Phone/Email/Personal Visit:

If a grievance is received over the phone, e-mail or formal & informal way against Mills Operation, Grievance Officer will complete a Grievance Record Form (see annex I) for further processing. Mills Management follow the whole procedure mentioned below to solve any issue but in second way initially try to solve issue by contacting with 3rd party mediator to discuss problem and try to solve.

5.3 Record:

All grievances will be logged in the Grievance Record (see Annex I) for record of correspondence.

5.4 Screening:

The Grievances Officer will screen the grievance based on its category and allocate the appropriate time and method for processing and resolution. This will depend on the level of severity to determine the grievance owner and the approach to addressing the grievance.

See below table categorizing the different levels:

Grievance Level	Detail	Grievance Owner
Level 1	JDW Sugar Mills Limited is already working on resolution or an immediate answer can be provided	GM Admin & HR, HODs
Level 2	Grievances that will not affect JDW Sugar Mills Limited reputation	EDO / GM Mill
Level 3	Extensive high-profile grievances or repeated that may damage JDW Sugar Mills Ltd, reputation	Group GM HR / COO/ CEO

5.5 Acknowledge:

The Grievance Officer will acknowledge and categorize the grievance, providing a time frame for resolution. Communication will be made either verbally or in written form. **See Annex I.**

5.6 Investigation:

After Lodging, Grievance Officer sent grievance to Manager Admin to categorize the grievance. After finalizing the Grievance level, Manager Admin send the grievance to the Grievance Owner for investigation who analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

5.7 Outcome and Action:

The grievance owner is responsible for assigning actions, monitoring actions undertaken and meet the deadlines. Once all actions have been completed and the grievance owner feels the grievance has been resolved, the grievance owner will then inform the MANAGER Admin to further advise the external/Internal stakeholder/s via their preferred method of contact.

5.8 Follow up and close out:

Grievance Officer contacts the external/internal stakeholder/s according the nature of grievance after the grievance is resolved to verify that the outcome was satisfied and also gather any feedback on the grievance process.

If required, Grievance Officer may need to follow up with the stakeholder on numerous occasions to confirm all parties are satisfied.

Categories	Grievances	Closing Time
A	Harassment, Abuse, Corruption etc.	One working day
B	Worker and social welfare	2-5 Days or according to grievances
C	Work environment	Week or according to grievances

5.9 Appeal:

If the stakeholder(s) are not satisfied with the resolution and/or does not agree with the proposed actions, then Grievance Officer bring the matter to the attention of the Group GM HR, COO, CEO who will review the grievance and documents gathered throughout the investigation and determine whether further actions are required to resolve the grievance.

If JDW Sugar Mills Limited is unable to resolve a complaint or a stakeholder is not satisfied with the outcome, JDW Sugar Mills Ltd. seek advice from 3rd party mediator.

5.10 Reporting:

Outlining the number of grievances information, time frame of resolution and outcomes of grievances will be reported to Group GM HR/COO/CEO twice a year. JDW Sugar Mills Limited evaluate and update the Grievance Mechanism procedure every three years (or when required) to continually improve its stakeholder engagement.

GRIEVANCE MECHANISM SOP

5.11 Record of grievances:

All records, including grievance forms, investigation notes, resolutions and minutes of meetings securely stored on JDW Sugar Mills Limited office to ensure privacy, anonymity of complainant and confidentiality is maintained for all parties involved.

6. Role and Responsibilities:

Role in Grievance Mechanism	Responsibilities
Grievance Officer	<ul style="list-style-type: none"> • Collect the complaints from the complaint box • Maintaining strict confidentiality of grievance • Send them to Manager Admin • Maintains grievance record and monitor any correspondence.
Manager Admin	<ul style="list-style-type: none"> • Segregate the grievance according to the grievance nature and time of response. • Liaise with the external and internal stakeholder(s). • Maintaining strict confidentiality throughout the grievance handling process to protect the privacy of all involved parties • Monitor grievances and report findings to GM Admin & HR. • Raise internal awareness of the grievance mechanism among employees and contractors. • Fully aware and trained about Grievance mechanism • aware about grievance confidentiality
Grievance Owner (GM Admin & HR), DGM (Cane), DGM (Cane Development), (EDO, HODs), & Grievance Committee	<ul style="list-style-type: none"> • Investigating the grievance according to the nature of grievance and liaising with the stakeholder contact officer. • Developing resolutions and actions to rectify any issues. • Follow up and track progress of grievance • Committee tasked with periodically reviewing and updating the organization's grievance handling procedures to ensure they remain effective and compliant with relevant laws and regulations.
Head Office Grievance Committee This committee entails in case If any stake holder hasn't satisfied with the investigation of Mills grievance Committee or if any member of Mills committee has any grievance. In above both cases head office forms a committee & solve grievance.	<ul style="list-style-type: none"> • Investigating the grievance and liaising with the stakeholder or with committee members. • Developing resolutions and actions to rectify any issues. • Follow up and track progress of grievance

3rd Party Mediator

- Receive grievances from individuals or groups affected by the organization's operations
- Collects relevant information and documentation related to the grievance including interviewing the complainant and other affected parties if necessary
- Collects relevant information and documentation related to facilitates a dialogue between the complainant and the organization to try to reach a mutually acceptable resolution to the grievance



GRIEVANCE MECHANISM SOP

ANNEX I: GRIEVANCE RECORD FORM

Section	Details Required
Date of Submission	
Mode of submission	
Email Address	
Preferred Method of Contact with Griever	<input type="checkbox"/> Phone <input type="checkbox"/> Email <input type="checkbox"/> Surface Mail
Grievance Details	
Nature of Grievance	<input type="checkbox"/> Human Rights <input type="checkbox"/> Environmental <input type="checkbox"/> Social <input type="checkbox"/> Labor <input type="checkbox"/> Land Rights <input type="checkbox"/> Other
Description of Grievance	
Date of Grievance Outcome/completion	
Proposed Resolution	
Do you wish to remain anonymous?	<input type="checkbox"/> Yes <input type="checkbox"/> No
For Official Use Only	
Reference Number	
Received By	
Grievance Priority Level	<input type="checkbox"/> Level 1 <input type="checkbox"/> Level 2 <input type="checkbox"/> Level 3
Grievance category	<input type="checkbox"/> Category A <input type="checkbox"/> Category B <input type="checkbox"/> Category C
Grievance Owner	
Target Resolution Date (DD/MM/YYYY)	