	<b>Standard Operating Procedure</b> <b>External communication</b>	Creation date: 18/01/2020
		Communicated: 28/02/2020
		Review date: //
		Version: 01
		Company: Goldtree holding
		Confidentiality: Internal
		Archiving: CRO; 3 years
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## Objective

This procedure presents communication modalities set by the company to ensure good communication with surrounding communities, stakeholders, complainants or whistleblowers.

## Application Domain

This procedure applies to all populations surrounding Goldtree's concessions and any stakeholders, complainants or whistleblowers.

## Definition

**Grievance mechanism:** "is a formal (legal or non-legal) complaint process that can be used by individuals, workers, communities and/or civil society organizations who are being negatively affected by certain business activities and operations." (Managing community relations in the palm oil sector).

**A complaint:** should occur before the formal grievance is filled. A complaint is any oral, unwritten accusation, allegation, or charge against the company or its employees. It should be a timely expression of a problem. Complaints must be expressed and discussed with the relevant person (e.g. employee's immediate supervisor, community relations department, HR manager, etc.) before any grievance is filed. If the complaint cannot be resolved, a grievance may be raised as below.

**A grievance:** is defined as a formal written allegation by any stakeholder that there has been a violation, misinterpretation, misapplication, discriminatory application, or unreasonable application of an official policy, procedure, rule, or regulation by the company or its employees. For illiterate people, the complaint can be escalated to a grievance and registered by a third party or by the HOD in charge of the grievance depending on the complainant. The grievance must disclose the information in good faith, must be substantially true, must not seek any personal gain and must contain enough information and evidences to allow the grievance committee to decide on the case.

**Complainant:** person(s), organization(s), stakeholder(s) raising a complaint or filing a formal grievance.

**Defendant or respondent:** company or company employee against whom a complaint has been raised.


**A whistleblower:** is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within the organization. The information of alleged wrongdoing can be classified in many ways: violation of company policy/rules, RSPO Standards, law, regulations, or threat to public interest, as well as fraud, and corruption. Those who become whistleblowers can choose to bring information to surface either internally or externally.

**Anonymity:** is used to describe situations where the acting person's name is unknown. The important idea here is that the person is non-identifiable, unreachable, or untraceable.

## Responsibilities

- Community Relation Officer (CRO) is responsible for receiving and dealing with external stakeholder communication in a timely and appropriate manner, and keeping records of communications and actions taken.
- Any person who receives a "confidential" envelope is responsible for keeping the identity of the person secret.
- The Chief Operating Officer (COO)/ General Manager (GM) is responsible for receiving confidential communication



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and removing any identifiable information of the complainant from the document before forwarding it to the concerned person(s).

## Procedure / Instruction

### Contact persons:

Goldtree's main contact persons for the local population are the Community Relation Officer, the HR manager, the Out-grower Manager and the ICS manager. In the villages, the main contact persons for Goldtree are the town chief or the members of the OPGA (= Oil Palm Growers Associations) that have the responsibility to spread information towards the rest of the population. The Goldtree buying agents and the ICS/Extension officer also act as an intermediary for communication between the communities and the company.

### Means and ways of communication:

Communication can be done through several ways:

- Direct phone calls (only from community to Goldtree)
  - +232 30 08 88 78 (CRO)
  - +232 30 08 88 03 (HR manager)
  - +232 30 08 88 08 (Out-grower manager)
  - +232 30 08 88 99 (Chief Operations Officer)
  - +232 30 08 89 03 (HSE manager)
- E-mail ([enquiries@goldtreeholdings.com](mailto:enquiries@goldtreeholdings.com))
- Meetings
- Official letters, invitations, etc. at the Goldtree office in Daru
- Depositing complaints/suggestions in grievance/suggestion boxes provided at each chiefdom centre.

### Goldtree's Process for communication with the communities:

Goldtree's responsible person CRO will hand carry an original letter and a copy to the entity concerned (individual or community). The letter should mention the date, object, and names of recipient/s, and (if applicable) the location of meeting. If the letter leads to the organization of a village meeting, a meeting report should be written after every meeting by the CRO, and kept in the appropriate communication folder. Below the steps to following:

**STEP 1:** Goldtree hand carries an original letter and a copy to the entity concerned (individual or Committee(s)). The letter should mention the date, object, and names of recipient. If the recipient concerns villages, the committee/representative is in charge of spreading the information within the community.

**STEP 2:** The recipient(s) sign and acknowledge the copy of the letter and give it back to the company.


**STEP 3:** Once the CRO receives the acknowledged copy of the letter, he fills in a Communication Log Book (see Appendix 2.1).

**STEP 4:** If the letter leads to the organization of a village meeting, a meeting report should be written after every meeting by the CRO and kept in the "Communication-community" folder.

### Communication from the community towards Goldtree

**STEP 1:** For written communication, the entity willing to contact Goldtree sends a letter to the company that acknowledges reception by signing and reverting copy of the letter. The sender(s) should mention in the letter their name, or community member's name, the village(s) name(s), contact information, date and object of the communication.



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**STEP 2:** For verbal communication, the entity willing to contact Goldtree can call the CRO or come directly to their office during working hours.

**STEP 3:** The CRO registers the verbal or written communication in the Communication Log Book (see appendix 2.1) and deals with it accordingly.

**STEP 4:** If the communication requires a response from Goldtree, a response is given within 30 days of reception and records of this are kept.

**STEP 4:** The CRO files all communication letters in the “communication-community” folder.

**STEP 5:** For any grievance, the CRO refers to the Receiving and Handling Grievance Procedure.

#### **Anonymity of complainants and whistleblowers**

Complainants and whistleblowers that wish to remain anonymous are encouraged to use the complaint form available on the website on the section “contact us”. This form can be completed without indicating the identity of the person who wants to share the information. The comments are sent directly to the Group Sustainability Manager or RSPO Manager.

In case the complainants or whistleblowers don’t have access to the internet the following actions are possible:

- Write an anonymous letter, put it in an envelope in one of the suggestion boxes (the letter might contain either a phone contact or an email address to answer to).
- Write a non-anonymous letter, put it in an envelope and give it to a HOD with the mention “Confidential”. The HOD will then transmit it to the COO secretariat.

It is the responsibility of any person who receives a “confidential” envelope to keep secret the identity of the person who gave it to him. Any failure to do this and revelation of identity will be considered as a major disciplinary case.

#### **Reception of a confidential letter**

Any envelope that is known as confidential received by a HOD should be addressed to the CRO who records it in the log book (without opening it) and transfers it to the COO/RSPOM with a code number “YYYY/MM/number in the month”.

The COO/RSPOM opens the envelope, makes a copy of the letter, strikes through on the copy all information that can make the identification of the complainants possible and then follows the “complaints and grievances” procedure by forwarding the masked copy to the relevant person.

#### **Timeline**


After receiving a complaint, or any kind of information related to this procedure, including requests for documents or information, an acknowledgement receipt shall be issued within 10 days after reception and the request addressed within 30 days. A response is given to the anonymous complainant if contact details have been provided.

#### **Informing RSPO/sustainability manager**

Any complaint from stakeholders or those coming from whistleblowers and related with the definition above (violation of company policies/rules, RSPO Standards, laws, regulations, or threats to public interest, as well as fraud, corruption violence or related to management behavior) should be communicated by the COO to the Sustainability Manager and Sustainability Coordinator Natural Habitats Europe Africa.

### **Documents / Files / Appendices**

Appendix 2.1: Communication Log Book

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**Filing**

Communication-community folder  
 Social manual procedure – SOP 02

Written By	Reviewed By	Approved By
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<i>For any changes in the content or in the form of this document, please contact the Internal Control department which will ensure that changes are embedded in the Change Management Process</i>		



