



Standard Operating Procedure
EXTERNAL COMMUNICATION

Creation date 23/07/2014
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Version 03
Company SNL
Confidentiality Internal
Archiving PR office, 3 years

SUSTAINABILITY DEPARTMENT – RELATION WITH COMMUNITIES

SNL-CR-510\ CLO-SOP-2

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 SIAT's concessions and any stakeholders, complainants or whistleblowers.

Definitions

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, regulation, 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 a person be non-identifiable, unreachable, or untraceable.

Responsibilities

The PRO and CRO are 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" envelop is responsible for keeping the identity of the person secret.

The COO is responsible for receiving confidential communication and removing any identifiable information of the complainant from the document before forwarding it to the concerned person(s).

Procedure

Contact persons:

SIAT main contact person for the local population is the Community Liaison Officer (CLO)/Public Relations Officer (PRO).

In the villages, the main contact persons for SIAT are the village chiefs or the freely elected representatives who have the responsibility to spread information towards the rest of the population.

Means and ways of communication:

Communication can be done through several ways:

- Direct phone calls (only from community to SIAT. No decision, official matter, grievance or significant case can be handled by SIAT and its subsidiaries by phone without any sort of trace),
- Mails,
- E-mail,
- Meetings,
- Form on the website.

Process for communication from SIAT towards the community:

STEP 1: SIAT 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 CLO/PRO receive the acknowledged copy of the letter, he/she fills in a Communication Log Book (see Appendix).

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

Communication from the community towards SIAT

STEP 1: For written communication, the entity willing to contact SIAT 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 his name, or community member's name, the village(s) name(s), contact information, date and object of the communication.

STEP 2: For verbal communication, the entity willing to contact SIAT can call the CLO/PRO or come directly to his office during working hours.



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

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

STEP 4: The CLO/PRO files all communication letters in the “communication-community” folder.

STEP 5: For any grievance, the CLO/PRO 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 GSM.

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

The COO opens the envelop, 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 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 Group Sustainability Manager and the Group COO.

Documents/Files/Appendices

Appendix: Communication Log Book

Filing

Communication-community folder
SOP 2 - Social manual procedures

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