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1. BACKGROUND

PT. Wahana Citra Nabati (WCN) is committed to processing high-quality palm oil products by ensuring and implementing sustainable palm oil through strategic policies and business practices.

WCN views the use of traceable sources of palm oil as an important step in producing fully sustainable palm oil. To achieve this goal, we work with suppliers to learn more about them and help them adopt better sustainable practices in their own businesses.

WCN is committed to ensuring that all stakeholders play an active role in the development of our sustainability strategy and related policies. Accordingly, we are committed to establishing a grievance procedure that enables stakeholders to submit their concerns. All grievances will be recorded in a grievance list and addressed as promptly as possible, and all findings from investigations will be reported transparently and in full to the public.

2. PURPOSE

The purpose of this procedure is to provide guidance for WCN in implementing its sustainability policies related to WCN's operations and its suppliers. This procedure serves as a reference for WCN management in addressing grievances from external parties, including individuals, government entities, media, and non-governmental organizations. WCN recognizes that feedback and input from stakeholders are highly valuable, as they help enhance transparency within our supply chain and provide a means to monitor the progress of our sustainability policy implementation. In this regard, our grievance procedure prioritizes open and inclusive dialogue with stakeholders.

3. SCOPE

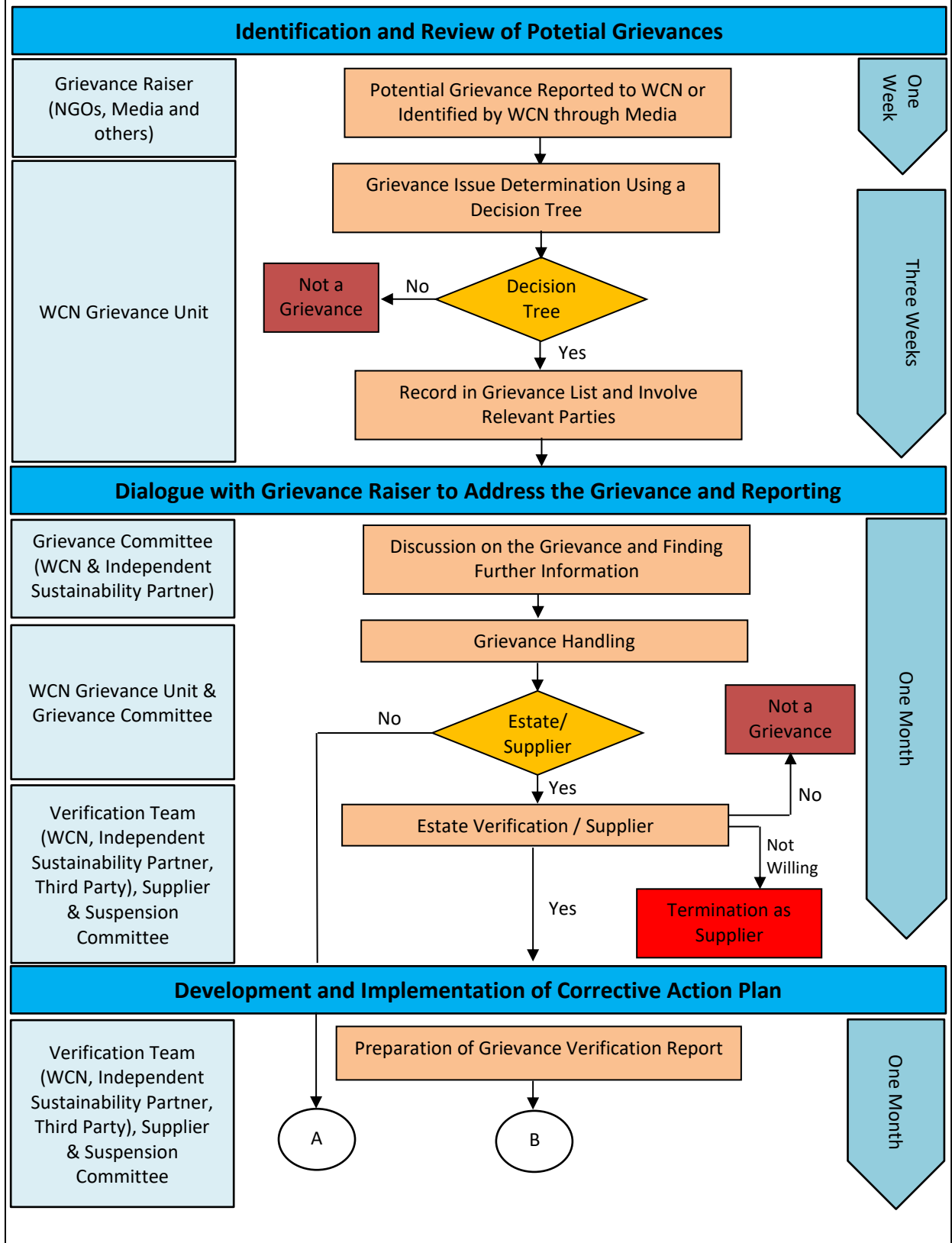
This procedure covers activities related to the handling of stakeholder grievances concerning the implementation of sustainability policies. It includes the recording of grievances, verification of grievances, implementation of corrective actions, reporting of verification results and corrective measures in the field, providing responses to stakeholders, as well as managing and monitoring follow-up actions.

4. DEFINITIONS

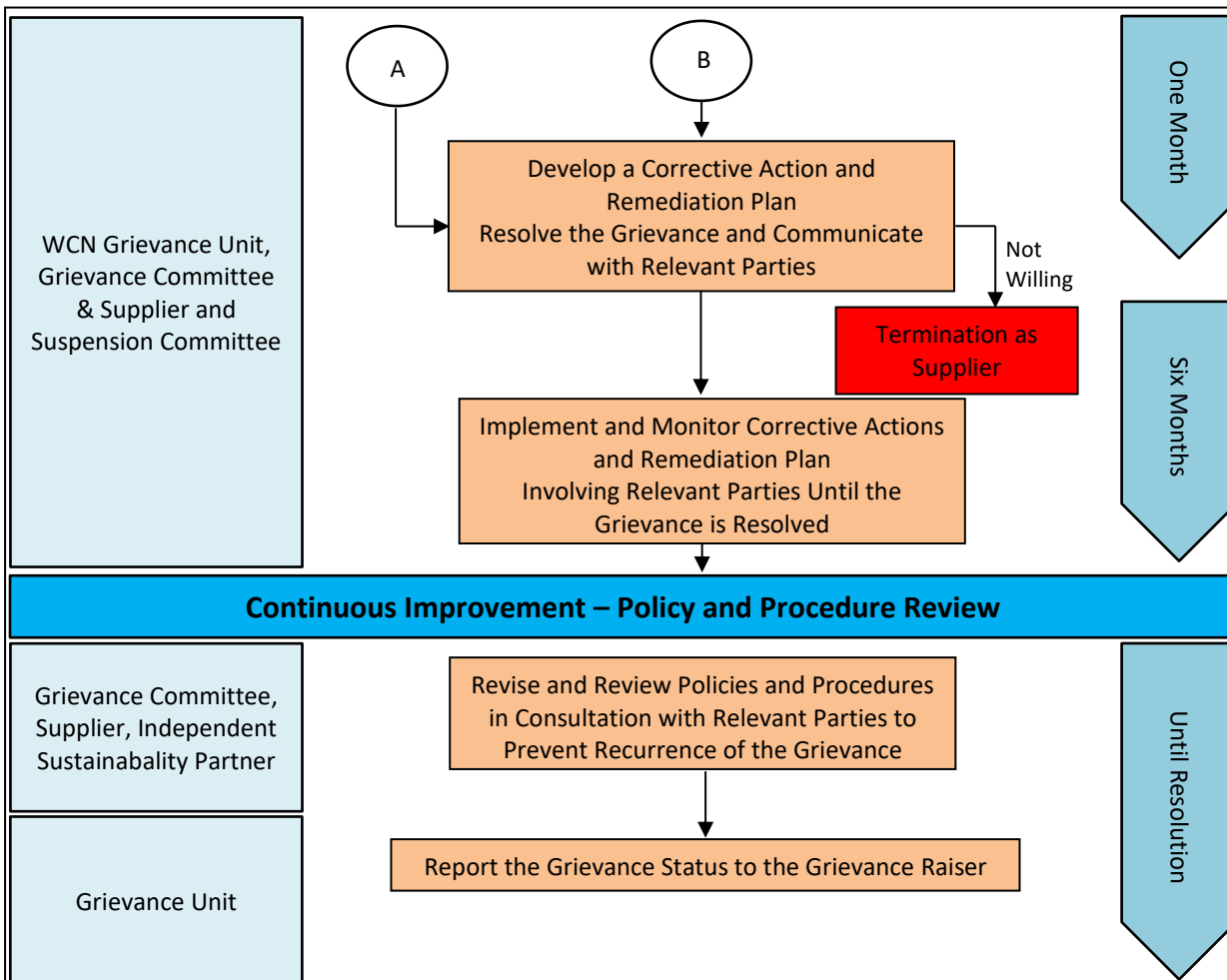
- 4.1. Grievance is an allegation, concern, or issue raised by an individual or group to WCN for the purpose of being addressed and resolved.
- 4.2. Remediation refers to both the process and the outcome of addressing and rectifying adverse impacts that have already occurred.
- 4.3. Leverage is a company's ability to bring about change in relation to wrongful practices by parties causing harm.

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5. FLOWCHART GRIEVANCE HANDLING PROCEDURE



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6. PROCEDURE

a. Grievance Receipt

- Grievance can be submitted to PT. Wahana Citra Nabati through:
 - Email to : comms@wahanacitra.com attn : Rendi Ramadhan.
 - Or Addressed to : Jl. Rawa Sumur I Blok EE No. 5 Kawasan Industri Pulogadung Jakarta Timur 13930 Indonesia. Attn : Rendi Ramadhan.
- Grievances must be accompanied by the following information:
 - Full name of the grievance raiser
 - Organization name (if any)
 - Address
 - Phone number / Fax number / Email address (At least one reachable contact)
 - Detailed explanation of the grievance
 - Evidence supporting the grievance
- The company will ensure the confidentiality of the identify of the grievance as well as any parties involved in the grievance report.

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- The company guarantees protection for the complainant from any form of threats, intimidation, or unfavorable actions from any party. - The company only involves relevant parties in conducting the grievance investigation. - If a grievance is raised through unofficial channels, such as mass media, the internet, or others, it will be recorded as a grievance if it is found to violate established policies or involves direct or indirect suppliers associated with WCN.			
b. Grievance Registration			
- Grievance Validation All reports received through grievance communication channels or those published in the media that implicate WCN in a policy violation will be evaluated by the WCN Grievance Unit using the Sustainability Decision Tree (see Annex A). If necessary, the WCN Grievance Unit will coordinate with the grievance raiser to seek more detailed information and/or evidence of the grievance. The purpose of this validation is to confirm whether the issue qualifies as a grievance. The possible outcomes of this validation are: • Validated grievance • The grievance is not related to PT. Wahana Citra Nabati’s NDPE policy, and if relevant, it will be forwarded to the appropriate department. • The grievance is not validated, and the WCN Grievance Unit must issue a written confirmation to the grievance raiser through WCN’s official communication channel stating that the issue raised does not qualify as a grievance. - Recording of Grievance When the validation confirms that the issue qualifies as a grievance, the WCN Grievance Unit must record it in the grievance list. The Grievance Committee must contact the grievance raiser to confirm that the grievance has been officially registered in the grievance list through WCN’s formal communication channel. - Grievance Scope The target of the grievance will be identified in the grievance list: PT. Wahana Citra Nabati : related to WCN's operational units Direct Supplier : directly related to WCN’s suppliers (Mills or Plantations) Indirect Supplier : indirectly related to WCN’s suppliers through WCN’s direct suppliers.			

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c. Grievance Handling and Remediation

(i) Grievance againsts PT. Wahana Citra Nabati

- The WCN Grievance Unit must prepare a grievance report. This report must include all necessary information regarding the grievance.
- The Grievance Committee, consisting of WCN management and an independent sustainability partner, shall conduct an initial assessment to determine the nature, scope, and severity of the alleged impact and identify WCN's relationship to the impact as Cause, Contribute, or Directly Linked.
- Where necessary, the Verification Team shall conduct an investigation to verify the validity of the grievance, identify the affected parties, assess the actual or potential impacts, and determine the underlying causes and WCN's relationship to the impact.
- The Verification Team shall prepare an investigation report, including findings, root causes, affected parties, WCN's relationship to the impact (Cause, Contribute, or Directly Linked), and recommendations for corrective actions and/or remediation.
- Based on the verification results, the Grievance Committee shall determine the appropriate remediation approach:
 - Cause : WCN shall take appropriate action to cease the activity causing the impact, prevent recurrence, and provide or facilitate appropriate remediation to affected parties.
 - Contribute : WCN shall cease or prevent its contributing to impact, address its contribution, and participate in remediation in proportion to its contribution.
 - Directly Linked : WCN shall use its leverage to influence the responsible party to cease, prevent, and remediate the impact, and shall take appropriate actions to address its business relationship.
- The Grievance Committee shall develop and approve a Corrective Action and Remediation Plan (CARP), including actions, responsible parties, timelines, remediation measures, and monitoring indicators.
- The Grievance Committee must monitor the implementation of corrective actions and remediation until the grievance and associated impacts are adequately addressed and considered resolved.
- Where remediation involves affected individuals or communities, the remediation process shall be conducted through an appropriate, transparent, and participatory process, taking into consideration the views and needs of affected parties.
- WCN shall revise relevant procedures and policies in accordance with the corrective actions and remediation measures implemented to prevent recurrence.
- The Grievance Unit issues a written confirmation to the grievance raiser through official communication channels regarding the outcome and status of the grievance, subject to applicable confidentiality requirements.

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(ii) Grievance Against Direct Supplier of PT. Wahana Citra Nabati

- The WCN Grievance Unit must prepare a grievance report. This report must include all necessary information related to the grievance.
- The Grievance Committee must contact the supplier through PT. Wahana Citra Nabati's Purchasing Department regarding the grievance related to the supplier.
- The Verification Team is responsible for conducting an investigation with the supplier/estate to verify the validity of the grievance received, identify affected parties, assess the actual or potential impacts, determine the root causes, and collect comprehensive information to be submitted to the Grievance Committee.
- The Verification Team shall determine, based on the investigation findings, whether the supplier caused, contributed to, or is directly linked to the alleged impact, and shall prepare recommendations for corrective action and remediation.
- The Verification Team shall prepare an investigation report containing the findings, root causes, affected parties, supplier's relationship to the impact (Cause, Contribute, or Directly Linked), and recommendations for corrective actions and remediation.
- The Grievance Committee, consisting of WCN management, an independent sustainability partner, and the supplier, shall develop a Corrective Action and Remediation Plan (CARP) based on the verification findings.
- Where the supplier is determined to have caused the impact, the supplier shall be responsible for ceasing the harmful activity, preventing recurrence, and providing or facilitating appropriate remediation to affected parties.
- Where the supplier is determined to have contributed to the impact, the supplier shall address its contribution and participate in remediation in proportion to its contribution.
- Where the supplier is directly linked to the impact, WCN shall use its leverage through the business relationship to require the supplier to take appropriate actions to prevent, mitigate, and remediate the impact.
- The Grievance Committee approves the Corrective Action and Remediation Plan, including the actions, responsible parties, timelines, remediation measures, and monitoring indicators.
- The Grievance Committee must monitor the implementation of corrective actions and remediation until the grievance and associated impacts are adequately addressed and considered resolved.
- The supplier shall revise relevant procedures and policies in accordance with the corrective actions and remediation measures implemented.
- The Suspension Committee enforces the suspension or termination of business relations with suppliers who do not cooperate in the verification process, fail to

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implement the approved corrective action and remediation plan, or otherwise fail to demonstrate meaningful progress toward resolution.

- The Grievance Unit issues a written confirmation to the grievance raiser through official communication channels regarding the outcome and status of the grievance, subject to applicable confidentiality requirements.

(iii) Grievance Against Indirect Supplier of PT. Wahana Citra Nabati

- The WCN Grievance Unit must prepare a grievance report. This report must include all necessary information related to the grievance.
- The Grievance Committee, consisting of WCN management, an independent sustainability partner, and the relevant supplier, shall conduct an initial assessment to determine the nature, scope, and severity of the grievance and identify whether the indirect supplier has caused, contributed to, or is directly linked to the alleged impact.
- Where necessary, the Verification Team shall conduct an investigation, directly or through the relevant supply chain actors, to verify the grievance, identify affected parties, assess the impacts, determine the root causes, and establish the indirect supplier's relationship to the impact.
- The Verification Team shall prepare an investigation report and recommendations for corrective actions and remediation to be submitted to the Grievance Committee.
- The Grievance Committee shall develop a Corrective Action and Remediation Plan (CARP) based on the verification findings.
- Where the indirect supplier is determined to have caused the impact, the supplier shall cease the activity causing the impact, prevent recurrence, and provide or facilitate appropriate remediation.
- Where the indirect supplier has contributed to the impact, the supplier shall address its contribution and participate in remediation in proportion to its contribution.
- Where the indirect supplier is directly linked to the impact, WCN and/or relevant supply chain actors shall use available leverage to influence the supplier to prevent, mitigate, and remediate the impact.
- The Grievance Committee approves the Corrective Action and Remediation Plan, including actions, responsible parties, timelines, remediation measures, and monitoring indicators.
- The Grievance Committee must monitor the implementation of corrective actions and remediation until the grievance and associated impacts are adequately addressed and considered resolved.
- The indirect supplier shall revise relevant procedures and policies in accordance with the corrective actions and remediation measures implemented.

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- The Suspension Committee enforces the suspension or termination of business relations with suppliers who do not cooperate in the verification process, refuse to implement the approved corrective action and remediation plan, or fail to demonstrate meaningful progress toward resolution.
- The Grievance Unit issues a written confirmation to the grievance raiser through official communication channels regarding the outcome and status of the grievance, subject to applicable confidentiality requirements.

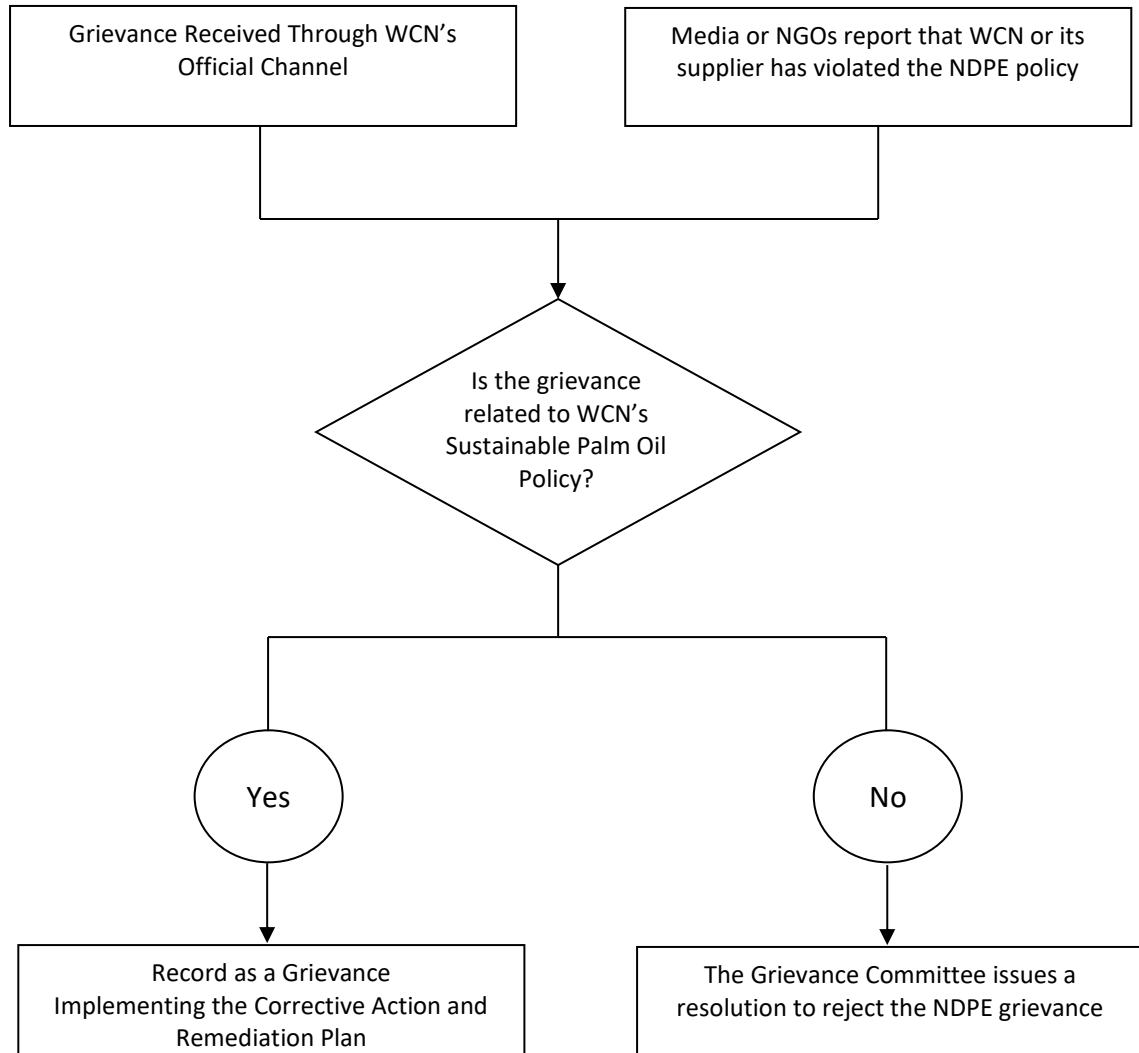
7. Revision Document History

Numb.	Doc Numb.	Doc Name	Revision	Revision Date	Description
1	WCN/PR-140	Grievance on the Implementation of Sustainable Palm Oil	0	1 March 2019	New Document Creation
2	WCN/PR-140	Grievance on the Implementation of Sustainable Palm Oil	1	1 October 2020	Removal of Phone and Fax Numbers as Contact Information
3	WCN/PR-140	Grievance on the Implementation of Sustainable Palm Oil	2	20 October 2022	• Addition of whistleblower protection and confidentiality measures. • Change of attention person.
4	WCN/PR-140	Grievance on the Implementation of Sustainable Palm Oil	3	07 July 2025	Replacement of Attention Person
5	WCN/PR-140	Grievance on the Implementation of Sustainable Palm Oil	4	07 September 2026	Adding the Remediation aspect

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8. Annex

A. Sustainability Decision Tree



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B. Example of a Grievance Report

1. Background of Grievance

Information regarding the background of grievance.

2. Purpose

Purpose of the Grievance and Basis of the Allegation

3. Expected Outcome

Develop a list of expected outcomes from the grievance along with proposed solutions to address the grievance.

4. Field Investigation

Identification of whether field verification needs to be conducted by WCN.
Identification of key issues to be assessed during field verification.

5. Reporting

Results of field verification and proposed corrective actions

C. Example of Grievance Corrective Action Plan

Numb.	Target	Corrective Action	Remediation Action	Responsible Person	Due Date	Status

D. Example of Field Investigation Report

1. Background

Information on the background of the grievance and investigation findings.

2. Investigation Process / Verification

Verification methodology and actions undertaken during the investigation and data collection.

3. Conclusion

Develop conclusions for all issues identified during verification, to be included in the Grievance Report.

4. Recommendation

If the issues raised through the grievance have been verified and validated, a Time-Bound Action Plan shall be developed to address each of the identified issues.

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E. Example of Grievance List

ID	Received Grievance (Source)	Reported by	Received Date	Subject	Scope	Stakeholders	Descriptions & Progress	Status
WCN/G-NDPE/(year) - (number of list)	Email / Letter / Public Media	Grievance Raiser	DD/MM/YYYY	NDPE	Detail NDPE	Name of Stakeholder Involved	Description of Grievance and Short update on current progress	Open/ Ongoing / Closed