

Grievance and Remedy Policy for our Supply Chain

If the Group has caused direct, negative impacts on workers' human rights through its activities, it should provide remedy to those affected. This is part of our broader responsibility to respect human rights, as described in the United Nations Guiding Principles on Business and Human Rights (UNGPs). The UNGPs encourage organisations to establish, or participate in, effective operational-level, or company grievance mechanisms to support the provision of remedy.

The UNGPs also state that in order "to make it possible for grievances to be addressed early and remediated directly, business enterprises should establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted."

In our supply chain situation, grievance mechanism for workers can be one of two types:

- Those which operate at a direct or workplace level (i.e. those operated by suppliers)
- Those which operate across a supply chain (i.e. a mechanism operated by the Group for workers not in their direct employ)

As part of our policy, we require:

- Suppliers to apply the Rule of Law – ROL
- Suppliers to put in place grievance procedures that are accessible for workers and report on the number and subject of grievances they receive from their workers
- The Group to work with suppliers to build management capacity for the effective handling of worker complaints
- Suppliers to ensure workers' knowledge of their rights in relation to the available grievance channels and that this is communicated at induction and regularly afterward

We must be careful to:

- Ensure that access to state systems and ROL are not obstructed
- Recognise the value of our leverage to lobby for remedy
- Ensure that operational grievance mechanisms OGM are operated in a timely and transparent fashion

- Ensure that any remedy is fit for purpose
- Make sure that there is sufficient resource and priority given to awareness raising and building local grievance handling capability

What might remedy look like?

Remedy describes actions that a supplier or the Group might take in order to reverse, or fix, negative impacts on workers.

What will be an appropriate remedy for a given situation is highly context-specific and deciding on it requires careful consideration of the facts of an individual grievance, the background and local context, as well as the worker's perspective on what would be appropriate.

Types of remedy might be:

- Apology
- Payment of money owed (e.g. back pay, overtime pay)
- Reversal of an employment decision (e.g. where a worker was unfairly dismissed)

The outcome of a grievance mechanism may also create actions which are not remedy for past harm, but aimed at preventing future similar negative impacts.

These might be:

- Training of supervisors and managers
- Promotion of information about workers' rights
- Opening up future opportunities to disadvantaged groups.

We should ensure that our watchwords are PROTECT, RESPECT and REMEDY and require suppliers to do the same

David Toon
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