



LESTARI  
CAPITAL

POLICY DOCUMENT

# GRIEVANCE POLICY

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# Grievance Policy

This document provides guidelines for resolution and the treatment of grievances by our stakeholders. Employees are required to review the elements of the Policy below. Also, the employee's signature is required to confirm the reading of the organization's Policy.

## Background

Lestari Capital envisions a world where no ecosystem is left stranded and where every natural area is recognized and cherished for the value of the services it provides to both local communities and the global commons. That started us on this purposeful journey to help companies ensure their corporate sustainability standards and certifications ultimately result in the long-term conservation of natural ecosystems and the communities that depend on them.

We believe that learning and improvement are perpetual and critical to being able to last and thrive in business and in life. With that mindset, our Grievance Policy will ensure that grievances are handled appropriately, and that complaints and comments are taken seriously, while providing an opportunity for us to learn, adapt and improve how we serve our stakeholders.

## Purpose

1. This Policy is intended to ensure that Lestari Capital handles grievances fairly, efficiently and effectively, and that complainants feel confident that their grievances are listened to and acted upon promptly and equitably
2. Our Grievance Management System aims to:
  - a. allow us to respond to complaints and related questions in a timely and cost-effective manner
  - b. increase stakeholder confidence in our administrative process, and
  - c. provide information that we can use to improve the quality of our products, services, operations and our overall organization
3. This Policy provides guidance to our staff and to external stakeholders about the key principles and concepts of our grievance management system.

## Scope

4. This Policy applies to all staff and counterparties of Lestari Capital, and where appropriate and relevant, include individuals, government organizations, media and non-governmental organizations concerning the implementation of the Policy.

## General Terms

5. A Complaint or Grievance is any expression of dissatisfaction about the conduct, operations, product/services offered by Lestari Capital or its staff or the action or lack of action taken regarding operations, facilities or services provided by Lestari Capital or by a person or body acting on behalf of the company.
6. A Grievance Appeal (GA) is a grievance that has been managed according as prescribed by the Grievance Management Process outlined in Annex 1 of this Policy, but its resolution falls short of the complainant's expectation the complainant has chosen to formalize the complaint by completing a Complaint form.
7. An Unfiled Grievance (UG) is a grievance that has been received by Lestari Capital, by telephone, email, regular mail or in person, but has yet to be submitted in writing using the Lestari Capital Complaint Form in Annex 2 of this policy.
8. A Resolved Grievance (RG) is a grievance that has completed the Grievance Management Process. Remediation by Lestari Capital is successful, and the Complainant is satisfied with the outcome.
9. The Grievance Administrator (GA) is the named person who is responsible for ensuring all grievances undergo the full process towards resolution. The Administrator is accountable for the proper application of the grievance management process to all cases and serve as the first point of contact for the majority of incoming complaints. The Administrator initiates the grievance management process and ensure all steps are adhered to in timely fashion.
10. The Grievance Owner (GO) is assigned by the Administrator according to the main subject of the complaint. The GO would be a Lestari Capital senior staff who is most qualified to handle discussions related to the subject of complaint. The GO will lead the investigation, develop resolution options, and coordinate closely with the GA to ensure overall progress is made with a perceptible sense of urgency.
11. The Grievance Committee is responsible for making management decisions in relation to grievances. It is responsible for approving action plans designed to resolve grievances and for approving official correspondence to external parties in relation to verified grievances.

Senior management representatives from Lestari Capital and members of its advisory board will form the Grievance Committee and if required, Lestari Capital will invite independent witnesses to participate. The role of non Lestari Capital members in the Committee is advisory, where advice will be provided to Lestari Capital on implementation in accordance to its sustainability policies.

12. For cases where the grievance relates to third party entities, Lestari Capital will engage with the third party's senior management to request for remedial action or accept Lestari Capital's recommendations for resolution.

## Grievance Management Process – Verbal Grievances

13. Verbal complaints or grievances are mainly those made directly to a Lestari Capital staff as part of an ongoing engagement; or any other complaint that is made directly by the complainant either face-to-face or over a video or voice call in real-time.
14. Lestari Capital employees who receive such verbal complaints should first determine if it can be quickly and satisfactorily resolved as part of the scope of their authority. When receiving a verbal complaint, employees must give full attention to the concerns raised by the complainant. At all times, be calm, respectful, courteous and sympathetic, if not empathetic. Take note of all details, regardless of how insignificant they might first appear.
15. After reviewing the complaint, managers and/or staff handling the complaint should, within the limits of their jurisdiction, suggest an action plan to resolve the complaint. If this action plan is acceptable, the staff member should clarify the agreement with the complainant and agree on a way in which the results of the complaint will be communicated to the complainant (i.e. by another meeting or in writing).
16. If the proposed action plan is not acceptable to the complainant, the staff member or manager should ask the complainant to make his or her complaint in writing to Lestari Capital and provide a copy of the process and complaint form to be completed.
17. In both situations, details of the complaint should be recorded on a complaint form.

## Written Grievances

18. Grievances should be submitted to this email:

[notices@lestaricapital.com](mailto:notices@lestaricapital.com)

When a complaint is received in writing, it must be forwarded to the designated Grievance Administrator, who must enter it in the Complaint Register and send an acknowledgment receipt within three (3) working days in order to establish a relationship of confidence with the person who filed the complaint.

19. If necessary, further clarification should be obtained from the complainant. If the complaint is not made by the stakeholder but on his behalf, the stakeholder's consent, preferably in writing, must be obtained in advance from the stakeholder.
20. After receiving the complaint letter, a copy of the complaint procedure must be given to the stakeholder. Clearly explain to the complainant the grievance process, the time it can take and realistic expectations.

21. Immediately on receipt of the complaint, Lestari Capital should launch an investigation, and within 10 working days be in a position to provide and update to the complainant, either in writing or by arranging a meeting with the individual(s) concerned.
22. The grievance administrator must record all relevant information about the complaint and keep it as simple and accurate as possible.
23. If the complaint raises potentially serious concerns, legal advice should be obtained. If legal action is taken at this stage, any investigation by Lestari Capital under the grievance management process should cease immediately.
24. If the issues are too complex for the investigation to be completed within 10 working days, the complainant should be informed of any delays.
25. If a meeting is organized, the complainant may, if he or she wishes, be accompanied by a colleague, relative or representative, such as a lawyer.
26. At the meeting, a detailed explanation of the results of the investigation should be given and an apology should also be made if deemed appropriate. This type of meeting gives Lestari Capital the opportunity to show the complainant that the matter has been taken seriously and has been thoroughly investigated.
27. Finally, the results of the survey and meeting should be documented and any weaknesses in Lestari Capital's procedures should be identified and modified.

## **Role of Managers**

28. The manager who receives a complaint will evaluate the information to determine whether it falls within the scope of this Policy. If so, the manager will collect and review all available information and attempt to resolve the issue informally through discussions with the complainant.
29. Managers are required to involve human resources before taking any disciplinary action against employees. Managers must ensure that all staff involved in resolving the complaint are aware of their responsibility to maintain the confidentiality of the matter and to respect the privacy rights of all parties involved.

## **Informal Complaint Files**

30. Details of informal grievances should be noted as soon as possible and may include information such as when, where and how the alleged issue relates to the complaint, who was involved and the names of potential witnesses. These notes may be required if a formal complaint is subsequently filed. Grievances that are resolved amicably to the complainant's satisfaction will not be followed up. However, all records relating to the resolution of informal grievances must be kept within each department in accordance with current policies and by-laws. Any disciplinary action resulting from an informal complaint will be maintained in accordance with established human resources procedures and policies.

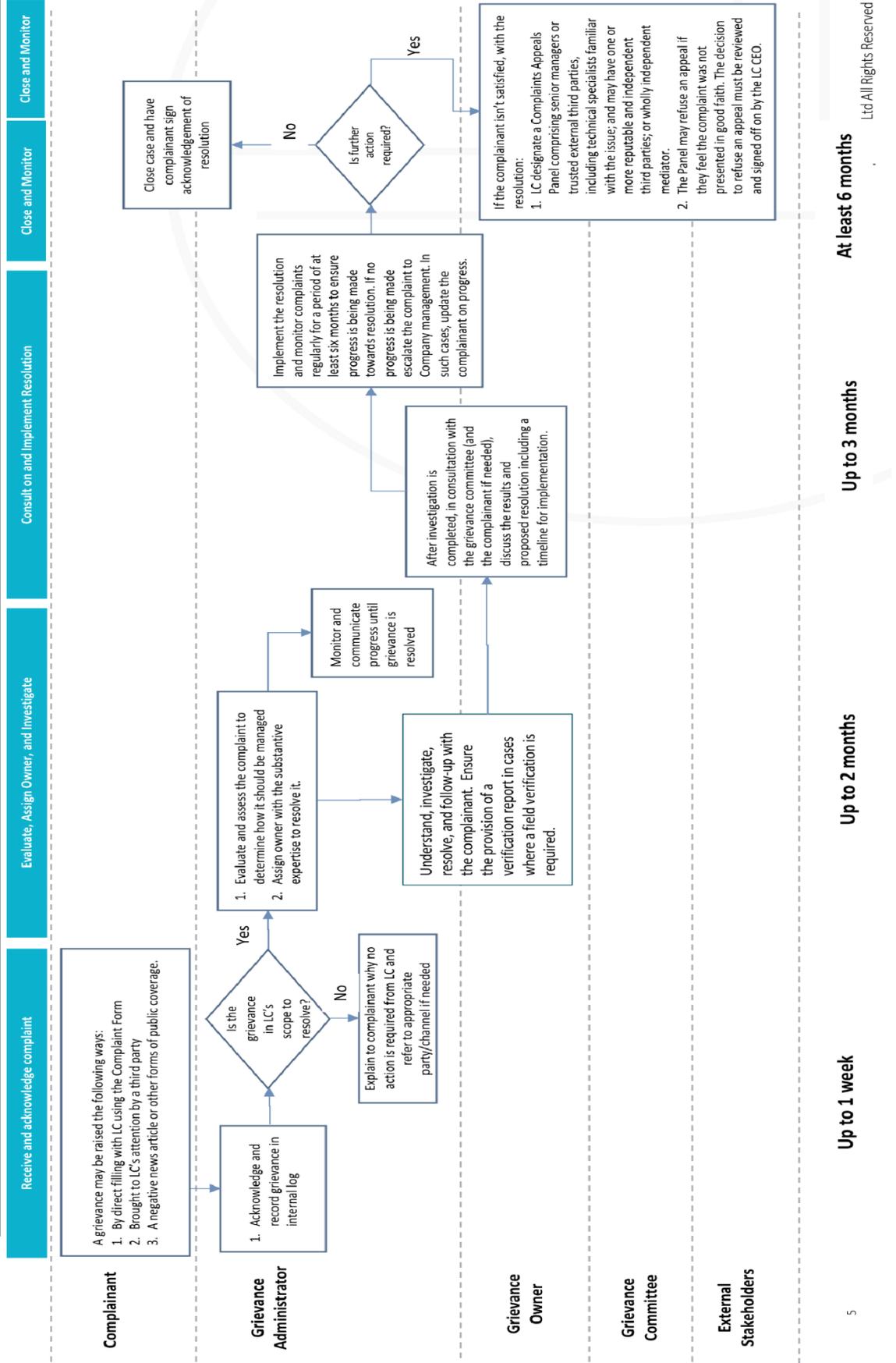
## Unresolved Grievances

30. If the problem cannot be resolved amicably or if the complainant requests a formal investigation into the alleged misconduct, he or she must submit a formal complaint form.

# ANNEX 1:

# GRIEVANCE MANAGEMENT PROCESS

# GRIEVANCE MANAGEMENT PROCESS



# ANNEX 2: COMPLAINT FORM

# COMPLAINT FORM

YOUR INFORMATION	
<b>Name:</b>	<b>Phone:</b>
<b>Address:</b>	
<b>Contact Name (if filing for someone else):</b>	<b>Contact Position:</b>
COMPLAINT INFORMATION	
<b>Complaint Date:</b>	<b>Complaint Recorded By:</b>
<b>Complaint Details:</b>	
<b>First Response Corrective Action, if any:</b>	
<b>Suspected Cause:</b>	
<b>Corrective Action Person(s):</b>	
<b>Corrective Action Follow-up:</b>	
<b>What steps should be considered to avoid a repeat of the problem:</b>	
<b>Date:</b>	

\_\_\_\_\_  
Name of person completing this form

\_\_\_\_\_  
Signature