

烟台天茂油脂有限公司

YANTAI TIANMAO EDIBLE OIL CO., LTD.

Grievance Mechanism 举报申诉机制

1. Context

背景

TIANMAO is committed to sourcing responsibly produced palm oil in accordance with our Sustainable Palm Oil Policy for Suppliers of Raw Materials. Nonetheless, given the size and complexity of palm oil supply chains, we are aware that practices that breach our policy commitments can occur in upstream supplier's operations.

我司致力于根据我们针对原材料供应商的可持续棕榈油政策，采购符合要求的棕榈油。尽管如此，鉴于棕榈油供应链的规模和复杂性，我们意识到上游供应商的运营中可能会出现违反我们政策承诺的行为。

TIANMAO takes any alleged activity that runs contrary to the standards set out in our policy commitments seriously and we will engage with our suppliers about direct and indirect grievances raised. The grievance management procedure (GMP) described here is used to register, assess, manage and monitor grievances raised against our supplier.

我司认真对待任何违反我们政策承诺中规定的标准的指控活动，我们将与供应商就直接和间接的不满进行接触。此处描述的申诉管理程序（GMP）用于登记、评估、管理和监控针对我们供应商提出的申诉。

2. Purpose and objectives

目的和目标

The TIANMAO GMP facilitates the response to and monitoring of complaints arising within our upstream supplier operations. It describes the procedure and the actions taken by us at each stage. It is a transparent process, so that all relevant parties understand the expectations for each stage. 天茂的申诉管理程序有助于对上游供应商运营中出现的投诉做出回应并进行监控。它描述了我们在每个阶段采取的程序和行动。这是一个透明的过程，以便所有相关方了解每个阶段的期望。

The objective of the GMP is to provide a process which allows us:

申诉管理程序的目标是提供一种流程，使我们能够：

- To engage swiftly and systematically with suppliers that have grievances raised either against them directly or in their or their supplier's operations;

迅速、系统地与直接或在其或其供应商的运营中对其提出不满的供应商接触；

- To assess, manage, and monitor grievances in upstream supply chains;

评估、管理和监控上游供应链中的不满；

- To provide guidance for suppliers on TIANMAO expectations on grievance management, and what information TIANMAO expects to receive from suppliers as feedback on the resolution of issues.

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为供应商提供就天茂对申诉管理的期望以及天茂希望从供应商那里获得哪些信息作为问题解决的反馈的指导。

3. TIANMAO's grievance procedure

天茂的举报申诉程序

3.1 Scope

范围

Grievances are defined as alleged practices in oil palm production that do not comply with TIANMAO's SPOP, e.g. reports of deforestation or poor labour practices. These are often received from sources such as NGOs, the press, or other civil society organisations, but also through the internal company network and industry sources.

申诉被定义为在油棕榈生产过程中被指控的不符合天茂公司可持续棕榈油政策的行为，例如关于森林砍伐或不良劳动行为的报告。这些信息通常来自非政府组织、媒体或其他民间社会组织，也可以通过内部公司网络和行业来源获得。

The procedure is applicable to all production sites (plantations, mills and refineries) that supply TIANMAO palm oil.

该程序适用于供应天茂棕榈油的所有生产场所（种植园、压榨厂和精炼厂）。

The procedure supports the logging of grievances, dissemination of information to the internal grievance team, verification of grievances and classification, and supplier engagement and monitoring. The procedure handled by our International Business Department, who are the first point of contact with TIANMAO's suppliers and updates and progress reports are delivered regularly to senior management.

该程序支持记录申诉，向内部申诉小组传播信息，验证申诉和分类，以及供应商参与和监督。该程序由我们的国际业务部处理，他们是与天茂供应商的第一联络点，并定期向高级管理层提交更新和进度报告。

3.2 Process

步骤

When allegations of practices that do not comply with our policy are received they are registered in our system as a grievance. TIANMAO's traceability data is then screened to ascertain the level of exposure to TIANMAO's supply chains and will be logged according to our suppliers linked to the grievance in question. The complaint is reviewed to determine the validity, priority to TIANMAO, and severity of the allegation. TIANMAO will seek further information from the relevant supplier through whose supply chains TIANMAO is receiving palm products from the subject of the grievance. This process is summarized in the flowchart below:

当收到不符合我们政策的行为指控时，我们会在系统中将他们登记为申诉。然后对天茂的可追溯性数据进行筛选，以确定天茂供应链的暴露程度，并将根据与相关申诉相关的供应商进行记录。对投诉进行审查，以确定指控的有效性、对天茂的优先性和严重性。天茂将向为我们提供棕榈油产品的相关供应商寻求进一步信息。以下流程图对该过程进行了总结：

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1. Grievance received

收到申诉

- **Internal information:** reports from TIANMAO staff who become aware of grievance allegations at TIANMAO suppliers.
内部信息：从天茂员工了解到来自天茂供应商申诉指控的报告。
- **External stakeholders:** Campaigns, direct engagement/reporting, partner intel.
外部利益相关者：活动、直接参与/报告、合作伙伴。



2. Internal grievance review

内部申诉审查

- **Traceability data review** to understand which suppliers have links to grievance
可追溯性数据审查，以了解哪些供应商与申诉有关联。
- **Review validity, priority, & severity of complaint**
审查投诉的有效性、优先级和严重性。
- **Seek further information on issue from relevant supplier**
向相关供应商寻求有关问题的进一步信息。
- **Seek further information from complainant**
向投诉人寻求进一步信息。

If further action needed, continue to next step.

如果需要进一步的操作，请继续下一步。

Timeline: 1 week

处理时限：1周内



3. Supplier engagement

供应商参与

- **Direct engagement with supplier on:** Grievance exposure, action plans to address issue, expectations
与供应商直接沟通：告知申诉内容、提出解决问题的行动计划以及期望。
- **Agreement on mechanism and timelines for follow up with supplier on progress**
就与供应商跟进进展的机制和时间表达成一致。

Timeline: Reach out to supplier within 1 week of acknowledging validity (i.e., total of 2 weeks from receipt)

处理时限：在确认有效后1周内联系供应商（即，自收到之日起2周内）。

Agree action plan within: up to 2 months, depending on severity and complexity.

根据严重程度和复杂性，在2个月内商定行动计划。



4. Monitor progress

监测进展

- **Regular communication with supplier to monitor progress**
与供应商定期沟通以监测进度。
- **assessing 'good progress'**
评估“良好进展”。

If sufficient progress is not made, continue to next step

如果没有取得足够的进展，请继续下一步。

Timeline for progress/resolution: According to timeline agreed in action plan

进展/解决处理时限：根据行动计划中商定的时间表



5. Determine action, if necessary

如有必要，确定行动

- **TIANMAO to take appropriate action with supplier should progress on action plan not be systematically demonstrated.**
如果行动计划的进展没有得到系统的证明，天茂将与供应商一起采取适当的行动。

If the grievance holder does not cooperate or does not take sufficient action to address an issue, TIANMAO will suspend its relationship with them.

如果申诉人不配合或没有采取足够的行动来解决问题，天茂将暂停与他们的合作关系。

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4. Contacts

联系方式

For further information about TIANMAO's palm oil grievance management procedure or information related to specific cases please contact kevin.kong@yjpalmoil.com.

有关天茂棕榈油申诉管理程序的更多信息或与具体案件有关的信息，[请发送邮箱至 kevin.kong@yjpalmoil.com](mailto:kevin.kong@yjpalmoil.com).

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Sustainable Palm Oil Policy

可持续棕榈油政策

YANTAI TIANMAO EDIBLE OIL CO., LTD's Sustainable Palm Oil Policy (hereafter "the Policy") aims to drive the transformational change needed in the palm oil supply chain. TIANMAO is committed to helping oil industry develop while protecting forests and peatlands, and respecting the rights of workers and communities in which we operate.

烟台天茂油脂有限公司可持续棕榈油政策（简称“政策”）目的是推动棕榈油供应链的变革。天茂致力于帮助棕榈油产业发展，同时保护森林和泥炭地，尊重工人和社区的权益。

The Policy applies to all of the palm oil trades of TIANMAO. It applies to all our suppliers.

该政策适用于天茂所有的棕榈油交易。它适用于我们所有的供应商。

1. No deforestation 无毁林

- No conversion of High Conservation Value (HCV) areas.

不转换高保护价值区域。

TIANMAO is committed to identify and protect HCV areas in all estates within our supply chain under the full scope of this policy. The process of identifying if HCVs are present, potentially present or absent in an area where development will take place is led by a Licensed HCV Assessor in collaboration with local stakeholders. HCVs are biological, ecological, important at the national, regional or global level. All natural habitats possess inherent conservation values, including the presence of rare or endemic species, provision of ecosystem services, sacred sites, or resources harvested by local residents. There are six categories of HCVs:

天茂承诺在本政策的范围内，在我们的供应链中的识别和保护高保护价值区域。识别供应链中是否存在或潜在存在高保护价值区域或判定在即将开发的地区是否存在潜在的高保护价值区域的过程，将由 HCV 审核员和当地利益相关方合作共同进行。HCV 是在国家、区域或全球具有重大或极其重要意义的生物、生态、社会或文化价值。所有自然栖息地都具有固有的保护价值，包括稀有或特有物种的存在。提供生态系统服务、宗教场所或当地居民收获的资源。可以分成 6 类高保护价值区域（HCVs）：

- (1) Species Diversity: Concentrations of biological diversity including endemic species and rare, threatened or endangered species, that are significant at global, regional and national levels.

物种多样性：生物多样性集中，包括在全球，地区或国家层面的具有重要意义的特有物种和稀有受威胁或濒危物种。

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- (2) Landscape Level Ecosystems: Large landscape-level ecosystems, ecosystem mosaics and intact forest landscapes that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.

景观级生态系统：在全球，地区或国家层面有重大意义的大型的景观级生态系统、镶嵌生态系统和原始森林景观，并在自然分布和丰富的自然格局中包含绝大多数自然物种的存活种群。

- (3) Ecosystems and Habitats: Rare, threatened or endangered ecosystems, habitats or refuges.
生态系统和栖息地：稀有的，受威胁的或濒危生态系统，栖息地或保护区。

- (4) Ecosystem Services: Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.

生态系统服务：危急情况下基本的生态系统服务，包括保护水资源集中区域和控制脆弱土壤和斜坡的侵蚀。

- (5) Community Needs: Sites and resources fundamental for satisfying the basic necessities of local communities or indigenous peoples (for livelihoods, health, nutrition, water, .etc), identified through engagement with these communities or indigenous peoples.

社区需要：满足当地社区或土著居民基本需要的地点和资源（用于生计，健康，营养，水等），通过与这些社区或土著居民接触来确定。

- (6) Cultural Values: Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or indigenous peoples, identified through engagement with these local communities or indigenous peoples.

文化价值：具有全球或国家文化、考古或历史意义的地点、资源、栖息地和景观，或/和通过与这些地方社区或土著人民的接触，确定对当地社区或土著人民的传统文化的生态、经济或宗教的重要性。

- No conversion of High Carbon Stock (HCS) forests.

不转换高碳储量森林。

TIANMAO is committed to no conversion of High Carbon Stock (HCS) forest in the supply chain.

The vegetation in an area of land can be stratified into six different classes. They are: High Density Forest, Medium Density Forest, Low Density Forest, Young Regenerating Forest, Scrub, and Cleared/Open land. The first four classes are considered potential High Carbon Stock forests.

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天茂承诺不转换高碳储量森林。某一地区的植被可以被划分为六个不同的等级。他们是：高密度森林、中等密度森林、低密度森林、幼龄林、灌木和砍伐迹地/开阔空地。前四类被认为是潜在的高碳储量森林。

- (1) **High Density Forest: Remnant forest of advanced secondary forest close to primary condition.**
高密度森林：接近原始状态的高级次生林。
- (2) **Medium Density Forest: Remnant forest but more disturbed than High Density Forest.**
中等密度森林：比高密度森林受到更多干扰的次生林。
- (3) **Low Density Forest: Appears to be remnant forest but is highly disturbed and recovering with composition of older forest.**
低密度森林：类似于次生林但受到高度干扰并且随着古老森林逐渐恢复。
- (4) **Young Regenerating Forest: Mostly young regrowth forest that have regenerated over 10 years but with occasional patches of older forest.**
幼龄林：大多数是已经再生 10 年以上的年轻的再生森林，但偶尔会出现一些古老森林。
- (5) **Young Scrub: Areas that have been cleared within the last 10 years with some woody regrowth of pioneer species and grass-like ground cover.**
灌木：在过去 10 年之内被砍伐的地区，覆盖的地面再生优势物种的木本植物和草本植物。
- (6) **Cleared/Open Land: Very recently-cleared land with mostly grass or crops and few non-crop woody plants.**
砍伐迹地/开阔空地：最近被清除的土地，大部分是草或庄稼，很少有非作物的植物。

- **No burning for the preparation of new plantings and re-plantings.**
新种植和再种植前没有经过炼山整地的林地。

2. No development on peat 无泥炭地开发

TIANMAO is committed to protecting peat defined as soil containing greater than 65% organic matter, regardless of depth.

天茂承诺保护被定义为土壤中含有大于 65% 有机质额泥炭地，无论深度多少。

- **No new development on peat.**
没有新开发的泥炭地。
- **Explore options for peat restoration where feasible.**
在可行的情况下，探索泥炭地恢复方案。

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3. No Exploitation of People and Local Communities

对当地社区和人无任何剥削

- Respect and support the Universal Declaration of Human Rights.
尊重和支持“世界人权宣言”。

TIANMAO recognizes the inherent dignity of the individual and supports the Universal Declaration of Human Rights by the United Nations.

天茂维护个人的固有尊严并且支持联合国“世界人权宣言”。

- Respect and recognizes the rights of all workers including contract, temporary and migrant workers.

尊重和承认所有工人的权利，包括合同工人、临时工人和流动工人的权利。

TIANMAO is committed to ensuring that the rights of all workers, including contract, temporary and migrant workers, are respected according to local, national and ratified international laws and that international best practices are adopted where legal frameworks are not yet in place. It is our priority to comply with relevant legislative objectives and moral obligations to create, build and promote a harmonious, safe and healthy work environment and culture. The following principles are core elements that will guide TIANMAO's operations: 天茂致力于确保根据当地、国家和批准的国际法尊重所有工人的权利，包括合同工人、临时工人和流动工人的权利，并确保在尚未建立法律框架的地方采用国际最佳措施。我们的首要任务是遵守有关的立法和道德约束，创造、建设和促进和谐、安全和健康的工作环境和文化氛围。下列原则是指导天茂的核心要素：

(1) No Forced or Bonded Labour

无剥削或强迫劳工

TIANMAO and its suppliers shall not knowingly employ or support the use of forced or bonded labour or human trafficking and shall take appropriate measures to prevent the use of such labour in connection with the TIANMAO and suppliers' operations. There will also not be any restrictions on the workers' freedom of movement during their free time. Employer shall not withhold and property, identification cards, passports or other travel documents without workers' prior consent.

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天茂和其供应商不得雇佣或支持强迫或剥削劳工或贩运人口，并应采取适当措施，预防与供应商的有关的业务剥削或强迫劳工。工人在空闲时间内的行动自由也不会受到任何限制。未经雇员事先同意，不得扣押任何财产，身份证，护照或其他旅行证件。

(2) No Child Labour

无童工

TIANMAO and its suppliers shall not knowingly employ or support the use of child labour. Remedial actions which appropriate follow up actions shall be employed if any child labour case is uncovered to protect the welfare of the child.

天茂和其供应商不得雇佣或支持使用童工。如果发现有任何雇佣童工事件，应采取补救行动，并采取适当的后续行动，以保护儿童的权益。

(3) Occupational Safety and Health

职业安全和健康

TIANMAO and its suppliers shall strive to provide a safe and healthy workplace environment and take effective steps to protect employees from exposure to potential occupational safety and health hazards that are likely to pose an immediate risk of permanent injury, illness or death.

天茂及其供应商应努力提供安全健康的工作场所，并采取有效措施，保护员工免收可能造成永久性伤害，疾病及死亡的潜在职业安全和健康危害。

(4) Employment Contracts

雇佣合同

TIANMAO and its suppliers shall encourage that employees should be given written employment contract according to the local laws and regulations, in a language that they understand.

天茂及其供应商应鼓励以雇员能理解的语言，以书面形式依法与雇员签订雇佣合同。

(5) Freedom of Association and Right to Collective Bargaining

结社自由和集体谈判权

TIANMAO and its suppliers shall recognize and respect the right of employees to form and join trade unions of their choice subject to the provisions of relevant national legislation.

天茂及其供应商在遵守相关国家法律法规的情况下应承认并尊重雇员组织工会和参加雇员选择的工会的权利。

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(6) Minimum Income Standard

最低收入标准

TIANMAO and its suppliers shall encourage all workers are paid a wage equal to or exceeding the legal minimum wage and are covered for work-related illness and injuries.

天茂及其供应商应支持向所有工人支付工资相当于或超过法定最低工资标准，对雇员因公患病，工伤有事先保障。

(7) Working Hours

工作时间

TIANMAO and its suppliers shall encourage that working hours comply with national legislation including overtime hours (which are on a voluntary basis).

天茂及其供应商应支持遵守国家法律规定的工作时间，包括加班时间（在自愿的基础上）。

(8) Equal Employment Opportunities

平等就业机会

TIANMAO and its suppliers shall encourage equal opportunities in the work place. All decisions relating to hiring, remuneration, access to training, promotion, termination or retirement will be made based on business needs, job requirements and individual qualifications and without regard to race, religion or gender.

天茂及其供应商应支持在工作场所所有平等的就业机会。所有有关雇佣、报酬、获得培训、晋升、解雇或退休的决定将根据商业需要、工作要求和个人资格作出，不分种族、宗教或性别。

(9) Harassment and Violence

骚扰和暴力

TIANMAO and its suppliers shall not tolerate any type of harassment or violence.

天茂及其供应商不得容忍任何形式的骚扰或暴力。

(10) Whistle-blowing

检举，揭发

总部地址：中国山东省烟台市芝罘岛东路 50 号 (264000)

Add:No.50,Zhifu Island East Road, Yantai City, Shandong, China (264000)

Tel: 86-535-6858625 Fax: 86-535-6813804

烟台天茂油脂有限公司

YANTAI TIANMAO EDIBLE OIL CO., LTD.

TIANMAO and its suppliers shall provide a confidential means for all personnel to report illicit (i.e. unethical or illegal) activities. TIANMAO shall refrain from disciplining, dismissing, or discriminating against any personnel for providing information on such activities.

天茂及其供应商应提供保密方法，提供给所有工作人员向公司报告不正当（比如：不道德或非法活动）的渠道。不得对任何提供此类信息的员工处罚、解雇或歧视。

(11) Grievance Redress Procedure

申诉程序

TIANMAO and its suppliers shall provide a means for all personnel to air their grievances regarding their employment conditions, responsibilities, co-worker issues, promotion opportunities and other issues related to the work environment.

天茂及其供应商应提供能让所有员工就其雇佣条件、职责、与同事协助问题、晋升机会和其他与工作有关的问题表达不满的途径。

● Respect land tenure rights

尊重土地所有权

TIANMAO respects legal land tenure rights, and recognize duties and responsibilities associated with tenure rights, such as respect for the long-term protection and sustainable use of land and national resources. This is done in compliance with the national obligations, constitutions, local laws and regulations of the countries where we are operating.

天茂尊重合法的土地所有权，承认与土地所有权相关的义务和责任，例如尊重土地和国家资源的长期保护和可持续利用。这样做是承担我们在运营国家的责任，和遵守国家宪法和当地法律法规。

● Resolve all complaints and conflicts through an open, transparent and consultative process.

通过公开、透明和协商方式解决所有投诉和冲突。

4. Traceability to Known Sources

追溯到已知来源

TIANMAO is committed to gain visibility of our supply chain. It is necessary to work towards achieving traceability across all supply chain of suppliers.

天茂承诺获得清晰的供应链。实现供应商的所有追溯。

5. Supplier Requirements

烟台天茂油脂有限公司

YANTAI TIANMAO EDIBLE OIL CO., LTD.

供应商要求

TIANMAO is responsible for applying this Policy throughout our supply chain, including making suppliers aware of the policy and their responsibility to comply with it. TIANMAO requires suppliers to verify that the palm oil they supply to TIANMAO meets the criteria of this policy.

天茂负责在整个供应链中实施本政策，包括使供应商重视该政策以及遵守该政策的责任。天茂要求供应商核实他们向天茂供应的棕榈油是否符合本政策的标准。

TIANMAO commits to addressing allegations of supplier non-compliance with our Policy. Our approach is always to engage with our suppliers if a grievance has been raised against them, and where we can, to help them address any weaknesses in their policy or practices. Where a supplier refuses to remediate non-compliance, TIANMAO will take appropriate steps to address this in a manner that upholds commitment to our Policy. Suppliers failing to reasonably meet our requirements will be subject to sanction up to and including non-renewal or termination of contracts.

天茂承诺处理不遵守政策的供应商的指控，天茂将采用推动改善的方式来改变那些不遵守政策的供应商，并且在可能的情况下，帮助供应商解决他们在实施政策时遇到的问题。如果供应商拒绝改变他们不遵守政策的情况，天茂将坚守政策的实施并采取措施来解决这一问题。未能合理满足天茂可持续棕榈油采购政策的供应商将受到处罚，包括不续签或终止合同。

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