



Grievance/Appeals/Dispute Process

IBL Africa SMETA clients rely on consistent and accurate data to support their business sourcing decisions. From time to time, IBL Africa may receive complaints from clients, other Affiliate Audit Companies or other interested parties, relating to the quality or content of data which has been uploaded onto the Sedex Information Exchange platform, or in relation to the worker rights or labour practices of Sedex members. The purpose of this Grievance Process is to provide a fair, independent and reasonably prompt dispute resolution process, in relation to these allegations or complaints, as part of IBL Africa's intent to preserve worker protection and to ensure a high-quality service offering. IBL Africa's role in the Grievance Process is to facilitate communication with the complainant with a view to finding a resolution to the issue raised.

Confidentiality and treatment of data

The primary purpose of the Grievance Process is to ensure IBL Africa has a robust and effective process in place to respond to complaints raised by or about its clients, its activities and the activities of the auditors it contracts in. Where data of a confidential or business sensitive nature is shared with IBL Africa, as part of this process, IBL Africa will endeavour to keep the data confidential and only share such data with a third party with the consent of the relevant party.

Disclaimer

Where IBL Africa receives allegations of a serious nature, including the health and safety of workers, or the integrity of its clients, IBL Africa reserves the right to immediately notify the relevant regulatory authorities and/or relevant Buyer/Audit Requestor that should be alerted. IBL Africa cannot be held liable for any loss or damage, including indirect loss, loss of profit, damage to reputation or goodwill, in relation to the administering of this Grievance Process.

Scope

IBL Africa SMETA clients and other interested parties can raise a complaint to IBL Africa via email (bparker@iblafrica.com), with sufficient detail, about an issue relating to a SMETA audit or a SMETA client. Where appropriate, IBL Africa may invoke this Grievance Process to manage the complaint. For the avoidance of doubt, IBL Africa may also raise a concern in relation to a SMETA audit/client to invoke this Grievance Process.

Valid complaints include issues related to the SMETA process, in relation to:

- IBL Africa's management system
- IBL Africa SMETA Auditor conduct, knowledge and skills
- SMETA methodology or SMETA report
- Integrity/ethics
- Other relevant issues

For example, IBL Africa SMETA clients and other interested parties may raise issues about:

- Planning
- Resourcing
- The type of audit

- The length of audit, document review and workers' interviews
- Reporting, including the Corrective Action Plan Report (CAPR)
- Non-compliance findings
- Unethical behaviour during the audit
- Other relevant issues

IBL Africa may raise issues about:

- Unethical behaviour during and after the audit
- Application process
- Other issues

The IBL Africa Grievance Process will NOT deal with issues relating to:

- Audit cost
- Complaints that are not made in good faith
- Allegations which are unsubstantiated, based solely on media and social media reports or which are politically or commercially motivated.

Process

IBL Africa will ensure that the complaint is handled fairly and in good faith, by an experienced staff member. All complaints, disputes, appeals and allegations related to SMETA audits brought to the attention of IBL Africa by IBL Africa SMETA clients or other interested parties will be reviewed. If a complaint or query is vexatious in nature, invalid (for instance, based on false assumptions), or is outside the scope of the Grievance Process, we will use our best endeavours to inform the complainant within 2 days of receiving the query that IBL Africa will not take this further, and outline the reasons.

The following sets out the process for investigating complaints relating to SMETA audits, or as provided above, under the Grievance Process:

1. IBL Africa receives a complaint and carries out an initial review (as soon as practicable). If the complaint warrants investigation, IBL Africa initiates the Grievance Process. Where appropriate, IBL Africa shall protect the identity of the complainant.
2. IBL Africa acknowledges receipt of the complaint and determines the acceptability of the complaint based on information received, within 2 working days.
3. IBL Africa advises the complainant that the process may include alerting the relevant Buyer/Audit Requestor of the investigation, following this initial internal investigation stage.
4. IBL Africa investigates the complaint, internally, and provides initial feedback to the complainant and/or an initial investigation report in writing to the relevant Buyer/Audit Requestor, where applicable, within 10 working days of the initiation date.
5. IBL Africa may request further details or suggest further actions before the feedback and/or investigation report is finalised. IBL Africa shall collaborate with the complainant and/or relevant Buyer/Audit Requestor to finalise the investigation report within 30 calendar days of initiation date.



6. IBL Africa shall make every effort to provide the final investigation report, in writing and in a format suitable to share with the complainant, which may include verbal feedback, where appropriate.
7. Depending on the outcome, IBL Africa may request updates within 60-90 calendar days of initiation date. All complaints shall be logged by IBL Africa, and records kept of remediation steps taken. Any interested party or affected stakeholder may submit a complaint. Complainants should have some connection to the issues being complained about and must be able to supply information about these issues. The complaint should also state clearly what resolution or remediation is sought. Complaints may be verbal but ideally in writing and should be sent to the email address: bparker@iblafrica.com. By submitting a complaint, the complainant agrees to comply with the requirements of this Grievance Process.
8. Whistleblowing complaints: In the event a complaint is brought to IBL Africa, which is considered whistleblowing against an IBL Africa SMETA client, IBL Africa contracted SMETA auditor or other interested party, IBL Africa may invoke this Grievance Process but shall:
 - (a) Respect any request for anonymity and shall treat any complaint which could result in harm to a worker, if disseminated, as anonymous;
 - (b) May make any necessary and proportionate adjustment to the Grievance Process to ensure that anonymity can be appropriately maintained without adversely affecting the ability of either party to otherwise fully follow the process.
9. Appeal process: Any of the parties to a complaint can request a review of whether IBL Africa has properly complied with the procedure set out in this Grievance Process. The review will not re-examine the substance of an outcome. It is intended to identify procedural errors or a perception that a decision has been made unfairly. A request that IBL Africa review an outcome shall be referred to as an "Appeal". Appeals must be made in writing and sent to the email address: achemaly@iblafrica.com. Appeals must be made at any time up to and within 10 business days of the date of receipt of notice by IBL Africa that a case has been closed. Appeals will be considered by the General Manager of IBL Africa. IBL Africa will make all reasonable endeavours to ensure that Appeals are investigated, and a final recommendation made to all interested parties, in writing, within 20 working days from the date the Appeal was received by IBL Africa.
10. Dispute process: In the case of each SMETA, an auditor aims for agreement and sign-off of the CAPR by the site management; however, if agreement cannot be achieved, the site management signs in the dispute box of the CAPR and states their reasons why agreement was not reached. Once a SMETA has been uploaded to the Sedex platform, there is a further opportunity for the site of employment to dispute a finding. This is done by clicking on the "Dispute NC" button. Activating the dispute process results in the audit firm receiving a notification that a finding has been disputed. The Reviewer accesses the Sedex platform as soon as possible after having received the dispute notification, but within at least 48 hours. The reason for the dispute is reviewed including any additional evidence and explanations uploaded as part of the dispute activation. If further information is required from the auditor who raised the finding, the dispute is communicated with the relevant auditor and their input requested for clarification purposes. Where the evidence at hand favours the dispute, this is immediately resolved online on the Sedex platform and the non-compliance is closed. Where the evidence to support the dispute is inadequate, the dispute is rejected and the finding remains open, together with an explanation as to why the dispute was rejected. Continued dispute of a finding may result in the resolution process being escalated to the IBL Africa General Manager, or the Buyer/Client/Audit Requestor for further input.