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1. POLICY STATEMENT

The organisation is committed to upholding internationally recognized human rights and providing all employees, external stakeholders, partners, and community members with a safe, fair, and effective process for raising concerns. This policy establishes the Human Rights Grievance Mechanism (“the Mechanism”), managed by the Human Rights Working Group Committee (HRWG), to ensure timely and appropriate responses to allegations of human rights violations, unethical conduct, discrimination, or any other related issues.

2. PURPOSE

This policy provides a structured and transparent framework for reporting, investigating, and resolving grievances related to human rights. The purpose is to:

- Provide accessible reporting channels for employees and external stakeholders.
- Ensure concerns are addressed in a timely, confidential, and impartial manner.
- Promote accountability and continuous improvement in human rights due diligence.
- Protect complainants from retaliation.

3. SCOPE

This policy applies to:

- All employees, contractors, temporary staff, and interns.
- External stakeholders including suppliers, partners, customers, and community members.
- Any individual or entity affected by the organisation’s operations, products, or services.

4. GUIDING PRINCIPLES

4.1 Accessibility

- Multiple and culturally appropriate reporting channels shall be provided.
- Mechanisms will be available in English language and formats accessible to persons with disabilities.
- Information about the Mechanism will be widely communicated internally and externally.

4.2 Confidentiality and Anonymity

- Personal data will be protected in accordance with applicable laws.
- Anonymous submissions will be accepted and respected.
- Only authorized HRWG personnel may access grievance records.

4.3 Transparency

- All stakeholders will have access to clear information regarding the grievance process and timelines.
- Periodic anonymized reports may be published to promote trust in the Mechanism.

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4.4 Non-Retaliation

- Retaliation against any individual who submits a grievance in good faith is strictly prohibited.
- Any retaliation will result in disciplinary action.

4.5 Fairness and Impartiality

- All grievances will be assessed objectively.
- Investigations will be carried out by trained and impartial personnel.

4.6 Timeliness

- The HRWG shall process grievances promptly, with timely acknowledgment, assessment, and resolution.

5. REPORTING CHANNELS

5.1 Internal (Employees)

- Human Rights Hotline - 067 336 7821
- Dedicated Email Address Employeevoice@Bovuaholdings.co.za.
- In-person Reports to the HRWG or trained HR representatives.
- Manager/Supervisor Escalations, required to forward concerns to HRWG.

5.2 External (Stakeholders)

- Public Online Reporting Form - accessible through the organisation's website.
- Hotline for External Complaints – 067 336 7821.
- Reports through Partner Organisations, such as unions or NGOs.

6. COMMUNICATION OF THE MECHANISM

6.1 Internal Communication

- Orientation for new employees.
- Annual training for all staff.
- Regular reminders via email communications, Toolbox Talks and Awareness Bulletins.

6.2 External Communication

- Public-facing information on the organisation's website.
- Stakeholder engagement meetings.
- Supplier and contractor briefings.

7. GRIEVANCE HANDLING PROCEDURE

7.1 Step 1: Receipt and Acknowledgment

- The HRWG logs the grievance in a secure system.
- Acknowledgment of receipt is sent within 1 to 3 business days.
- A case reference number is assigned.

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7.2 Step 2: Initial Assessment

- The HRWG conducts a preliminary review to determine:
 - nature of the complaint,
 - urgency,
 - potential human rights risks,
 - whether immediate action is required.

7.3 Step 3: Investigation

- The HRWG appoints a trained impartial investigator or investigation team.
- Evidence is collected, including interviews, documentation, and site visits if necessary.
- Confidentiality is maintained throughout the process.

7.4 Step 4: Resolution and Remediation

- Findings are reviewed, and appropriate corrective or remedial actions are determined.
- Possible actions include mediation, disciplinary measures, systemic changes, or compensation (where relevant).
- Stakeholders may be consulted where appropriate.

7.5 Step 5: Communication of Outcome

- The HRWG informs the complainant of the outcome within confidentiality limits.
- If dissatisfied, the complainant may request an appeal or secondary review.

7.6 Step 6: Closure and Documentation

- Case files are securely stored.
- Lessons learned are reviewed to prevent recurrence.

8. MONITORING AND CONTINUOUS IMPROVEMENT

- The HRWG will conduct quarterly reviews of grievance data for trend analysis.
- An annual audit of the Mechanism will evaluate effectiveness, accessibility, and stakeholder satisfaction.
- Improvement actions will be integrated into human rights due diligence planning.
- A summarized report may be included in the organisation's sustainability or human rights report.

9. ROLES AND RESPONSIBILITIES

a) Human Rights Working Group Committee (HRWG)

- Oversees implementation of this policy.
- Maintains grievance records.
- Ensures confidentiality, impartiality, and consistency in handling cases.

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b) Human Resources Department

- Supports internal communication and training.
- Ensures compliance with employment legislation and policies.

c) Investigation Team

- Conducts fair and thorough investigations.
- Documents findings and recommendations.

d) Supervisors and Managers

- Promote awareness of this policy.
- Report grievances promptly to the HRWG.
- Uphold the non-retaliation principle.

e) Executive Leadership

- Allocates resources for effective operation of the Mechanism.
- Demonstrates organisational commitment to human rights.

10. NON-COMPLIANCE

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or termination of contractual relationships for external partners.