

#### INNOSPEC PALM SUPPLY GRIEVANCE PROCEDURE

# 1. Background

Relatively small volumes of palm and palm kernel oil based materials are used in some of Innospec's product ranges. However, as an active participant in the palm oil supply chain and an Ordinary Member of the RSPO (Roundtable on Sustainable Palm Oil), Innospec understands the importance of its role in encouraging the transition to more sustainable practices.

Innospec is committed to the responsible sourcing of palm based raw materials though its Sustainable Sourcing of Palm Oil (PO) and Palm Kernel Oil (PKO) Policy (policy) and specifically the commitment to No Deforestation, No Peat, No Exploitation (NDPE). The implementation of these commitments within Innospec's supply chain is an ongoing activity with our direct and indirect suppliers.

Innospec takes any alleged activity that is not in line with its policy very seriously and will engage with its direct suppliers about direct and indirect grievances raised as detailed in this procedure.

## 2. Purpose

This procedure acts as guidance to provide a clear process for the identification, investigation and resolution of external grievances concerning the implementation of Innospec's policy. As a fully transparent process, all relevant parties will understand the expectations for each stage of the process. Innospec aims to provide a clear, appropriate and prompt response to any applicable grievance raised.

#### 3. Grievance Procedure

## 3.1 Scope

A grievance is defined as a complaint or concern around alleged practices in palm production that does not comply with Innospec's policy, e.g. reports of poor labour practices or consuming supply from high risk areas affected by deforestation. Innospec may be made aware of a grievance from a variety of sources including; NGO's, press, civil society organisations, customers, suppliers and industry sources. This grievance procedure is open to all stakeholders, though is mainly focused on receiving grievances from external sources.



#### 3.2 Process Summary:

### Stage 1 - Receipt of Grievance - within 5 days

- Grievance reported to Innospec.
- Desktop research to collect any additional information.
- Accept or reject the issue as a potential eligible grievance and breach of Innospec policy.
- If deemed not eligible;
  - o notify grievance raiser along with reason.
  - o grievance closed.
- If deemed eligible then acknowledgement of receipt to be provided to the grievance raiser.

## Stage 2 - Preliminary Review - within 8 weeks

- Use existing traceability data to identify which direct suppliers have potential links to the grievance facility / plantation / area.
- Where required seek further confirmation from direct suppliers as to if the material supplied to Innospec has the potential for links to the grievance facility / plantation / area.
- Where no links are identified;
  - o notify the grievance raiser.
  - o grievance closed.

## Stage 3 - Grievance Investigation - within 1 month

- Notify the direct supplier(s) of the specific details of the grievance.
- Request and agree action plans and time bound plan to resolve the grievance.

## Step 4 – Monitor progress – time varies depending on required action(s)

- Request regular updates from supplier(s) on action plans and progress.
- If progress is as agreed;
  - o monitor till action plan completed.
  - o grievance closed.
- If insufficient progress is made:
  - o Innospec will review the relationship with the supplier and take appropriate action which may include temporary or permanent suspension of procurement.

## Step 5 - Notification of outcome

Notify grievance raiser of the outcome of the investigation and action taken.

## 3.3 Methods of Raising a Grievance

Grievances can be received through any of the following methods:

- Email: <u>sustainability@innospecinc.com</u>
- Get in touch webpage: <a href="https://www.innospecinc.com/get-in-touch">https://www.innospecinc.com/get-in-touch</a>
- Telephone: +44 (0)151 355 3611
- Writing: Sustainability Department, Innospec Ltd, Innospec Manufacturing Park, Oil Sites Road, Ellesmere Port, CH65 4EY

Submitted grievances should include the following information:

- Full name
- Name of organisation
- Address
- Email address/telephone number
- Description of grievance in detail including any supporting evidence
- Any requests for confidentiality



Innospec asks for contact details to enable us to seek any further information on the grievance and provide details of the actions taken. If the person submitting a grievance requests confidentiality, Innospec shall respect this request.

#### 4. Contact

For any further information in relation to Innospec palm supply management, please contact: <a href="mailto:sustainability@innospecinc.com">sustainability@innospecinc.com</a>

#### 5. Administration

Innospec's Group Sustainable Development Manager is responsible for the content and periodic review of this policy and for ensuring that grievances raised are processed through to completion in line with section 3 of this procedure.

## 6. Document Control History

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