



TAPROBANE SEAFOODS GROUP

GRIEVANCE MECHANISM & EXTERNAL COMMUNICATIONS POLICY

Issue Number:01
Effective Date: 26/04/2022
Revision Number:01
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GRIEVANCE MECHANISM

01. PURPOSE

The purpose of this grievance mechanism is to provide external stakeholders, including affected communities and individuals, a structured and accessible process to voice concerns related to Taprobane Seafoods' operations.

02. PRINCIPLES

2.1. Accessibility

- Ensure that the grievance mechanism is accessible to all stakeholders, including vulnerable and marginalised groups.
- Provide information in local languages and use multiple communication channels to reach a wider audience.

2.2. Transparency

- Clearly communicate the grievance process, including how grievances can be submitted, the expected timeframe for resolution, and the steps involved.
- Regularly update stakeholders on the status and outcomes of their grievances.

2.3. Fairness

- Establish an impartial and fair process for investigating and resolving grievances.
- Avoid conflicts of interest, and ensure that those involved in the grievance process are unbiased.

2.4. Timeliness

- Commit to resolving grievances in a timely manner.
- Establish clear timeframes for each stage of the grievance process and communicate them to stakeholders.

2.5. Accountability

- Assign responsibilities for handling grievances to specific individuals or teams within the organization.
- Ensure accountability for addressing and resolving grievances in accordance with company policies.

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GRIEVANCE HANDLING PROCESS

01. Grievance Handling Resources (Informal Process): Grievances which are not successfully and satisfactorily resolved at the source may benefit from resources available for informal discussion between the parties. The value of using the following resources to informally resolve the complaint is that the parties work in partnership to arrive at and agree upon a mutually acceptable resolution.

- **Peer Counselors:** Peer counsellors are trained individuals available to meet with someone involved in a conflict to assist him or her to clarify issues and identify options.
- **Facilitators:** Facilitators are trained persons available to meet with both parties involved in a conflict. The role of the facilitator is to aid communication and help parties discover areas of commonality. The facilitator does not suggest solutions to conflict. Solutions come from and are agreed upon by the parties in conflict.
- **Mediators:** Mediators are designated individuals trained to hear both parties in a conflict and to work with them to arrive at a mutually acceptable resolution of the dispute. Mediators have the ability to propose solutions but no authority to implement them.

02. Grievance Handling Process (Formal Process): At this point, it is re-emphasized that the goal of this policy is for conflict to be resolved by mutual agreement at the level requiring the least amount of outside intervention. When individual and informal efforts have been unsuccessful in resolving conflict, one or both of the parties may request the formal review process which relies on third parties to determine solutions:

- **Grievance Officer Review:** The individual/s from the local community should first seek formal problem resolution with the grievance officer Appointed by the company (Note: This does not preclude a grievance officer from functioning informally as a counselor, facilitator or mediator if trained and requested to do so.) The individual/s from the local community should submit the request in writing, documenting the dispute, identifying which policies or practices, principles or values were believed to have been violated, any attempts to resolve the conflict and the results, and setting forth a proposed remedy. If the dispute specifically involves the grievance officer, the individual/s from the local community should address the problem with the next higher level of management. The grievance officer or higher-level manager will document the issue, investigate the dispute and steps taken to attempt to resolve the problem and make a decision on the outcome. A written response will be presented to the individual/s from the local community within 14 calendar days of the grievance officer's receipt of the written request.
- **Top Management Review:** When either of the parties believes the problem has not been resolved through the grievance officer Review, either may present the dispute to the appropriate top management

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representative. The representative will notify the other party that a dispute has been filed. The appropriate Top Management representative will review the written response from the prior step and facilitate further communication about the dispute between the involved parties. The Top Management representative will investigate the problem and attempt to resolve the complaint. A written response to the dispute will be given to both parties by the Top Management representative within 14 calendar days of the date the dispute was filed, unless additional time is needed in which case both parties will be informed of the expected date of response.

Decisions at the Top Management Review level are final.

No Retaliation: No adverse action may be taken against the individual bringing the complaint in good faith, or against any persons who furnish him or her with any assistance solely because of their involvement in the complaint.

NEUTRAL ARBITRATION

If a grievance still exists beyond the Top Management Review level, the individual/s from the local community and the company may choose to participate in neutral arbitration. The individual/s and the company will choose an arbitrator by mutual agreement. The individual/s and the Company will execute a written stipulation designating the selected arbitrator to hear the dispute under the terms of this Policy. The arbitrator shall conduct hearings and issue a final and binding written decision, a copy of which will be delivered to the individual/s and the company. The arbitrator will be authorized to award appropriate remedies under law as to the specific issues submitted; however, the arbitrator shall have no power to add to, subtract from, change, alter, or ignore the provisions of the Policy. The company shall be responsible for the professional fees of the arbitrator, unless the individual/s objects, in which case the company and the individual/s shall each be responsible for 50% of the professional fees of the arbitrator.

RESPONSIBILITY

The stakeholder/s and the company are responsible for maintaining appropriate confidentiality and for participating in the conflict resolution process outlined in this Policy. It is the responsibility of the Human Resources/ Grievance officer to employ the means of resolution detailed in this Policy. Any dispute concerning procedures or standards under this Policy is to be resolved by the Grievance Officer.

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EXTERNAL COMMUNICATIONS POLICY

01. PURPOSE

The purpose of the External Communications Policy is to guide Taprobane Seafoods in its interactions with external stakeholders, ensuring transparency, consistency, and alignment with the principles of IFC PS1.

02. PRINCIPLES

2.1. Transparency:

- Communicate information about Taprobane Seafoods' activities, performance, and impacts in a clear and transparent manner.
- Provide stakeholders with timely and accurate information to foster trust.

2.2. Consistency:

- Maintain consistency in messaging across all external communications platforms.
- Ensure alignment with the company's values, mission, and sustainability commitments.

2.3. Timeliness:

- Respond promptly to requests for information from external stakeholders.
- Proactively communicate relevant updates and developments to stakeholders.

2.4. Engagement:

- Engage with stakeholders through various channels, such as community meetings, surveys, and online platforms.
- Seek feedback from stakeholders to improve communication strategies.

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03. STANDARD OPERATING PROCEDURE (SOP) FOR EXTERNAL COMMUNICATIONS

3.1. Identification of Key Stakeholders:

In order to effectively communicate with external parties, Taprobane Seafoods follows a systematic process for identifying and prioritizing key stakeholders. This involves conducting a comprehensive stakeholder analysis, categorizing groups such as local communities, NGOs, investors, and regulatory bodies. The company evaluates the impact, influence, and legitimacy of each group, creating a prioritization matrix for focused engagement. A stakeholder register is developed, documenting their interests and concerns. The communication strategy is then tailored based on this analysis, ensuring that different stakeholder groups receive relevant information through suitable channels. Regular reviews and adaptations are incorporated to stay responsive to changing dynamics, contributing to a strategic and sustainable approach to external communications.

3.2. Communication Channels:

In addressing external communications, Taprobane Seafoods emphasizes a strategic approach in Section 3.2 - Communication Channels. The goal is to carefully determine suitable channels by taking into account the diverse preferences of various stakeholder groups. This involves understanding how different stakeholders prefer to receive information. To ensure broad accessibility, the company adopts a balanced approach by utilizing both traditional and digital platforms. The choice of communication channels is aligned with the specific characteristics and preferences of each stakeholder group. Traditional platforms such as community meetings and printed materials provide a personal touch, while digital platforms like social media, webinars, and the company website enable real-time communication and global reach. This combination aims to cater to a wide audience, ensuring effective and inclusive communication practices for Taprobane Seafoods.

3.3. Message Development:

Taprobane Seafoods prioritizes the creation of communication that is not only clear and consistent but also deeply aligned with the company's overarching sustainability commitments, core values, and strategic objectives. The messaging strategy is crafted to resonate with the company's identity and mission. Furthermore, a key emphasis is placed on customization – ensuring that messages are not generic but are instead finely tuned to address the unique concerns, interests, and expectations of different stakeholder groups. This tailored approach enhances the relevance and impact of communication, fostering stronger connections and understanding between Taprobane Seafoods and its diverse range of stakeholders.

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3.4. Response to Inquiries:

In this step, addressing Response to Inquiries, Taprobane Seafoods outlines a proactive approach to handling external queries. The company commits to developing a structured protocol that guides the response process, ensuring consistency and efficiency. A key emphasis is placed on the accuracy and timeliness of information provided in all responses, aligning with the company's commitment to transparency. To streamline this process, specific personnel or designated teams are assigned the responsibility of handling external inquiries. This allocation of roles ensures that inquiries are addressed by individuals or teams with the requisite knowledge, expertise, and understanding of the company's operations, thereby enhancing the effectiveness and reliability of the response mechanism.

3.5. Crisis Communication Plan:

Under this, Taprobane Seafoods emphasizes the importance of being prepared for unexpected events or controversies through the development of a Crisis Communication Plan. The plan is designed to be comprehensive, outlining detailed procedures to be followed during crises. Special attention is given to the identification and designation of spokespersons who will represent the company in times of crisis. These spokespersons are chosen for their ability to communicate effectively and represent the company's values and objectives. Additionally, specific communication channels are established to ensure swift and accurate dissemination of information during crisis situations. This proactive and strategic approach aims to enhance the company's ability to manage and communicate effectively in challenging circumstances, thereby mitigating potential reputational risks and maintaining stakeholder trust.

3.6. Monitoring and Evaluation:

Under this step of Monitoring and Evaluation, Taprobane Seafoods underscores the importance of ongoing assessment in the realm of external communications. The company commits to actively monitoring a variety of communication channels, including but not limited to social media, official websites, and community forums, to gather feedback, identify concerns, and stay abreast of emerging issues. Furthermore, the company aims to conduct systematic evaluations to gauge the effectiveness of its communication strategies. This involves analyzing the impact of messages, the reach of campaigns, and the overall responsiveness to external communications. The commitment to making adjustments as needed based on the findings from these monitoring and evaluations reflects Taprobane Seafoods' dedication to continuous improvement and responsiveness to the evolving needs and expectations of its stakeholders.

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3.7. Training and Capacity Building:

In this step, Taprobane Seafoods places a significant emphasis on enhancing the capabilities of its workforce through Training and Capacity Building initiatives. The company commits to organizing training sessions for relevant staff members, aiming to equip them with the skills and knowledge necessary for effective external communication. Special attention is given to ensuring that all employees are well-informed about the company's External Communications Policy, fostering a shared understanding of the principles and guidelines governing external interactions. This concerted effort to instil awareness and adherence among employees reflects Taprobane Seafoods' dedication to maintaining consistency and coherence in its external communication strategies, ultimately contributing to the overall effectiveness of the company's communication efforts.

3.8. Reporting to Stakeholders:

Under this step, Taprobane Seafoods underlines its commitment to transparent communication by focusing on Reporting to Stakeholders. The company aims to develop a structured schedule for periodic reporting, ensuring stakeholders receive regular updates on significant events, performance metrics, and ongoing sustainability initiatives. A notable element of these reports is the inclusion of progress updates on grievance resolution, showcasing Taprobane Seafoods' dedication to addressing concerns raised by stakeholders. By incorporating these key elements into the reporting framework, the company aims to foster transparency, accountability, and stakeholder engagement, ultimately contributing to a comprehensive understanding of its operations and commitments among its diverse stakeholder groups.

By implementing a comprehensive grievance mechanism and external communications policy and SOP in alignment with IFC PS1, Taprobane Seafoods can enhance transparency, accountability, and stakeholder engagement while addressing concerns raised by external stakeholders in a responsible and sustainable manner.

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