

## Policy

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<b>Title: External consultation and complaint resolution policy and procedure</b>		<b>Revision:</b> 1
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<b>Document Owner:</b> Jenna Bowyer	<b>Approver(s):</b> Gillian Smith	
<b>Organization:</b> Nutreco : Aquaculture : Salmon : Australia : Skretting Australia EN_4810	<b>Process:</b> 06. Sustainability; 05. Human Resources	

## Purpose

The External Consultation and Complaint Resolution Policy and Procedure provides a framework for citizens to raise any issues or concerns with Skretting Australia (Skretting) and for Skretting to be able to respond and resolve any issues or concerns raised by any citizens.

It aims to:

- Provide a flexible approach for Consultation and Complaint Resolution which takes into consideration the individual, operational and environmental circumstances. It does not limit Skretting's right to take reasonable action in a reasonable manner.
- Recognise that complaints are best dealt with and resolved at the individual level, as soon as is practicable and without unnecessary formality to prevent unnecessary escalation and to promote fairness all round for all parties.
- Encourage a 'speak up' and accountability relationship between complainants and Skretting (i.e. where complainants speak up with a view to having genuine conversations to create/maintain effective ongoing relationships with Skretting).
- Ensure that individuals who raise concerns in good faith are protected from retaliation, victimisation, or any adverse consequences as a result of speaking up. Retaliation against a complainant, including direct or indirect punitive actions, will not be tolerated.

## Scope

The scope of this procedure is all Skretting Australia operational and administrative sites and is applicable to any submission of a complaint or grievance that cannot be resolved through standard operating procedures (see Community and Neighbours Relationship Management – Operational Procedures and Guidelines). This SOP does not apply to internal employee grievances.

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## Ownership & Responsibilities

Position	Responsibilities
General Manager	Owns this Policy/Procedure and ensures that issues are handled in accordance with it.
HSE Manager	Keep this document updated and relevant and handles issues in accordance with it
Operations Manager	Supports the handling of complaints in relation to Skretting's operation
Supply Chain Manager	Supports the handling of complaints in relation to Skretting's logistics services
Communications & Sustainability Specialist	Reviews the currency of this document in relation to third party certifications (e.g. ASC, BAP)

Terminology	Definition
Complaint	Any process in which a person raises a concern about undesirable impacts associated with Skretting's operation.

## Description

### 1. What should I do if I have a complaint?

*There are different processes which can be followed, depending on the seriousness of the situation and the people involved:*

#### 1.1. Informal approach by citizen

- a) Citizens should first raise their concern via the Skretting Australia complaints portal made available through the website.
- b) The submission of a complaint through the complaints portal will trigger an internal process where common sources of adverse conditions can quickly be assessed and corrective actions can be implemented in a timely manner.
- c) Following the submission of your complaint, a relevant member of the Skretting Australia team will contact you, confirming the details on your complaint and describe the internal action process.
- d) Skretting Australia will again contact you within a three-day period, detailing the immediate actions implemented to address your complaint. Future opportunities for further improvement will also be highlighted at this time.
- e) Self-management will not be suitable for circumstances including:

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- i. serious or contentious complaints; or
- ii. where it is appropriate for the complaint to be dealt with under the Disciplinary Policy & Procedure or other policy or procedure; or
- iii. serious health and safety risks at the Workplace.

#### 1.2. Formal Approach by citizen

- a) Citizens may choose to raise formal complaints with Skretting Australia.
- b) This process requires Skretting to not only resolve the point source of the complaint, but to also initiate a process of future consultation with the complainant.
- c) Upon being made aware of the issue, Skretting will work with the complainant to understand the issue in detail in order to resolve it in the most appropriate manner within a 90-day timeframe.
- d) This approach may be instigated verbally, or by lodging a request through the complaints portal on the Skretting Australia website, and requesting to begin a formal complaints procedure. You will then be contacted by a suitable member of the Skretting Australia team and be sent a copy of the complaints form.

### 2. ACTION BY SKRETTING

- a) If a Complaint Resolution Form has been lodged or Skretting otherwise considers it appropriate, Skretting may adopt a process including any or all of the following:
  - I. conducting initial interviews or requiring initial written responses;
  - II. preserving evidence if it is appropriate to secure the scene, obtain photographs or take any other steps to preserve physical evidence that may otherwise be lost;
  - III. implementing appropriate interim arrangements; and
  - IV. conducting a preliminary enquiry or workplace investigation

### 3. DETERMINATION PROCESS

- a) Skretting may conduct a preliminary enquiry which may consist of obtaining detailed statements and interviews of persons directly relevant to the complaint and a report without making findings where there is disputed evidence. Skretting may do so in circumstances including where it requires further factual circumstances or the complaint is not particularly serious or may be better resolved with a preliminary enquiry.
- b) Skretting may conduct a general investigation under a scope it considers appropriate to potentially resolve the complaint.
- c) Skretting may choose not to conduct a preliminary enquiry or workplace investigation if it is reasonably satisfied that the complaints and findings of fact can be determined and conclusions can be objectively drawn. Examples of this include where there is no dispute as to the material facts or they can be easily determined for the purpose of resolving the complaint.

### 4. VEXATIOUS BEHAVIOURS

Any person who makes a complaint which is:

- a) not made in good faith;

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- b) false;
- c) vexatious;
- d) frivolous; and/or
- e) without any reasonable basis,

may be subject to any or all of the resolution options in section 5 (resolution outcomes).

## 5. RESOLUTION OUTCOMES

As part of any of the processes under this Procedure, Skretting may implement any combination of the following resolutions as it considers appropriate in the circumstances:

- a) commitment to cease the behaviour;
- b) commitment to perform a specific remedial action (e.g. undertaking, apology, action plan, etc.);
- c) communication to individuals, groups or Skretting-wide;
- d) training (e.g. communication skills, diversity awareness, interpersonal skills, etc.) to individuals, groups or Skretting-wide;
- e) review a Policy, Procedure or other document that is the subject of a complaint;
- f) other lawful and reasonable directions considered appropriate for the circumstances

## 6. UNREASONABLE RESPONSES TO COMPLAINT RESOLUTION

Any person who unreasonably responds to a proposed or implemented complaint resolution may be subject to any or all of the resolution outcomes in section 5. Without limiting the generality of the above some typical examples may include:

- a) refusing to accept genuine and meaningful apologies;
- b) refusing to participate in any appropriate remedial action or restorative process where there are no genuine safety or wellbeing concerns;
- c) ostracising or otherwise victimising the perpetrator (or aiding, abetting or encouraging others to do so);
- d) demanding termination/ resignation of employment or other unreasonable disciplinary action;
- e) and/or any other behaviour considered unreasonable for the circumstances.

## 7. GUIDELINES

7.1. Processes and outcomes will be utilised as considered reasonably necessary by Skretting in the individual circumstances. The exact nature of procedural fairness will be applied according to the individual circumstances of each case including confidentiality and privacy considerations and obligations.

7.2. Who conducts a Complaint resolution process?

- b) A Complaint resolution process is commonly conducted by the HSE Manager. However, in circumstances not directly related to our operation, other members of the Skretting Australia team may facilitate this process.

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### 7.3 Natural justice considerations

- a) Treat fairly and seriously - assess all matters on their merits and facts. Any complaint resolution process should be thorough enough and obtain relevant and credible evidence as is reasonably necessary to ensure substantive fairness by:
  - (i) providing particulars of complaints and available evidence (including a copy of any complaints, if available, and not otherwise inappropriate to provide on legitimate privacy, confidentiality, or work health and safety grounds) so participants understand the context of the process in which they are being required to participate;
  - (ii) providing complainants with a reasonable opportunity to respond to =complaints, findings, proposed resolutions, subsequent or additional information (whether in writing and/or in person as appropriate), and other processes;
  - (iii) making factual findings that are reasonably open to be made (e.g. specific behaviours and their context and surrounding circumstances);
  - (iv) making conclusions or characterisations (e.g. breaches of policies which are serious) that can be objectively drawn from those factual findings;
  - (v) notifying complainants of the findings relevant to them and any proposed resolution action (if any);
  - (vi) taking into account the nature and extent of the complaint, any mitigating circumstances, Skretting requirements and any other relevant matters to ensure that any complaint resolution is appropriate in the circumstances; and
  - (vii) notifying complainants of the complaint resolution (if any) which will be imposed and when.
- b) Act promptly – complaint resolution matters should be dealt with courteously, respectfully and within appropriate timeliness on a case by case basis. All relevant parties should be provided reasonable estimates of timeframes and be kept reasonably informed of the progress. Extensions of time may be appropriate in complex matters where justified. If additional time beyond the initial estimate is reasonably required to address the complaint, all relevant parties should be advised of the additional time required and, in a manner appropriate, the reasons for the delay.
- c) Be neutral - impartiality towards everyone involved (i.e. persons seeking to impose a resolution to a complaint, witnesses, affected parties, and responding persons). Participants should also avoid any personal or professional bias (perceived, potential or actual).
- d) If a preliminary enquiry or Workplace investigation is undertaken, the investigator may be internal or external to Skretting provided that person is:
  - (i) objective, neutral and impartial (i.e. avoid actual or perceived bias);
  - (ii) competent having regard to the particular circumstances;
  - (iii) available to conduct a preliminary enquiry or Workplace investigation and report in a timely manner; and
  - (iv) not a potential witness or has had prior dealings with parties that creates an actual or perceived bias.
- e) Communicate process and outcomes - all parties should be reasonably informed of the process, and what they can expect will happen during a complaint resolution process

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and be informed of the potential outcomes. Skretting will provide all parties with reasons for any actions taken or not taken (which may be appropriately summarised or redacted). Details of complaint resolution matters should only be disclosed in a manner to those parties that genuinely and legitimately need to know, provided that such disclosure does not create an unreasonable risk to their health and safety or otherwise unreasonably cause or escalate risks of further or similar occurrence.

- f) Maintain confidentiality - the process should ensure appropriate confidentiality for all parties involved and consider individual requests for confidentiality subject to Skretting's duty to provide a safe workplace.
- g) Keep records as appropriate - some form of record (with as little or as much formality as is required for the circumstances) should be made of the complaint resolution process and matters dealt with under this procedure including details of complaints, responses or submissions from those involved, the process adopted, and any outcomes.
- h) Seeking advice and support - Participants are entitled to obtain advice of their choice and have a support person present during any meetings they are required to attend at their own cost.
- i) Appropriate interim arrangements – It is necessary to preserve the integrity of the complaint resolution process being undertaken, having regard to the seriousness of the allegation(s), or to reasonably ensure the health and safety of people at the workplace. While in the process of resolving any complaint, the parties must reasonably ensure that there is no unreasonable interruption to work and/or no other increase to the risks to health and safety.

## **8. LODGING A COMPLAINT RESOLUTION FORM**

### **8.1 Step 1 – Lodging a Complaint**

Complete either the Complaint Resolution Form.

### **8.2 Step 2 - Initial Response**

- a) A Manager/Supervisor or person appointed by Skretting will meet separately with all parties as soon as practicable and explain the process and their rights and responsibilities.
- b) Skretting may determine to attempt to resolve the complaint by utilising other processes under the Procedure or under another Policy or Procedure in which case persons will be notified as appropriate.

### **8.3 Step 3 - Appropriate interim arrangements**

Skretting will implement appropriate interim arrangements whilst conducting the process.

### **8.4 Step 4 - The determination process**

Skretting may conduct an appropriate process in a reasonable manner to determine the complaint. Depending on the circumstances, this may involve a preliminary enquiry or Workplace investigation.

### **8.5 Step 5 - Findings and report**

The Manager/Supervisor or person appointed by Skretting (e.g. investigator) will provide a report consistent with the required scope including findings and other matters appropriate to resolve the complaint. The findings should be communicated to the parties in writing as considered appropriate for the circumstances.

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### 8.6 Step 6 – Outcome

Skretting will implement an outcome after it has provided the parties with a reasonable opportunity to respond to the findings and any proposed outcome.

### 8.7 Step 7 – Post outcome

Skretting will implement:

- a) appropriate reporting to other persons;
- b) processes to monitor the outcome; and
- c) other appropriate actions.

## Additional Information

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*Attention: The following fields are automatically filled.*

## Topics

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## Standards & Schemes

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ASC Feed Standard v.1.01 2023

## Supporting Documents

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## Related DMS Documents

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Standard Operating Procedure, Grievance, Conflict and Complaint Resolution Form,  
INTERNAL\_DOCUMENT, DMS-133848 [rev.1]

## Other 1QM Links

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## External links

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