



FO Standard

Policy Statement and Procedure

Forests - Third Party Complaints

Policy Statement

In the event of an issue arising from a third party complaint JNL will:

- process complaints and grievances in an effective, appropriate, transparent and fair manner, with due consideration for confidentiality and rule of law;
- conduct an initial assessment and further investigation as required;
- identify the root cause, remedy the impacts and take disciplinary action where appropriate and deemed necessary with due consideration to other company policies and procedures e.g. JNL Code of Conduct policy;
- consult with the affected party throughout the process and further investigation;
- advise complainants of the outcome of any investigation;
- Where complaints are upheld, develop remedial training and revise or implement policies and procedures to reduce the likelihood of future similar complaints.
- Report complaints to the appropriate external authorities when the nature or severity of the complaint requires such action giving its full support to any external investigating authorities. Where an act, may compromise the legal position of JNL, JNLs legal advisors will consider taking the matter to the appropriate authorities, providing information, documents or support as necessary.

Date: 08/11/2024	Doc No: JNL-90-010-FO-POL-0004	Version: 004	Review by Date: 31/03/2027	Authorised by: Sean McBride
Printed Date: 8/11/2024	Printed Document is Uncontrolled, next day after Printing or after Review by Date			Page 1 of 4

HEAD OFFICE | Floor 6, Tower 1, 205 Queen Street | Auckland 1010 | PO Box 1450 | Auckland 1140 | New Zealand



Procedure

Juken New Zealand (JNL) recognises its responsibilities to individuals and organisations affected by its operations and actions in its management of operations and staff; it also recognises the importance of providing a process or channel for third parties to raise concerns.

1. Aim

This document outlines JNL's policy and procedures for dealing with third party complaints or grievances, and describes how third parties can raise a complaint or grievance and outlines how and at what level they can expect such a complaint or grievance to be handled in confidence.

2. Definitions

Dispute: this is an expression of dissatisfaction by any person or organization presented as a complaint to JNL, relating to its forest management activities and/or its conformity with the FSC Principles and Criteria, where a response is expected.

Dispute of substantial duration: Dispute that continues for more than twice as long as the predefined timelines in the FSC System (this is, for more than 6 months after receiving the complaint)

Dispute of substantial magnitude: is a dispute that involves one or more of the following:

- Affects the legal or customary rights of Indigenous Peoples and local communities;
- Where the negative impact of management activities is of such a scale that it cannot be reversed or mitigated;
- Physical violence;
- Destruction of property;
- Presence of military bodies;
- Acts of intimidation against forest workers and stakeholders.

Third parties, within the context of this policy does not refer to those that have a contractual relationship with, or are employed by JNL. The term 'third parties' is in the context of individuals, communities and interested parties that live, work and utilise areas which JNL may be operating in or areas under JNLs direct control. Third parties may be affected by the following ways (list is not exhaustive):

- verbal abuse
- infringement of human rights
- damage to property and material or financial loss
- environmental damage

3. Process and Investigation

3.1 Registering a Complaint

Those wishing to register a complaint should either:

Phone: Wairarapa Forest Office (06) 3706400

East Coast Forest Office (06) 8691180

Email: info@jnl.co.nz

or go to the Enquire page at <https://www.jnl.co.nz/our-forests/>

Giving as much information as possible, this information will be recorded in the “Interested Parties’ Communication” module within Integrum and forwarded to the district Risk Manager, who will then assign it to the most appropriate member of staff for action. The appropriate member of staff will be determined by the level of exposure or risk JNL could face as a result of the complaint or concern.

Reference the JNL Risk Matrix, *Risk Matrix*. - JNL-90-010-CS-STD-0002, and the below table to determine the appropriate staff member.

Risk Ranking	Appropriate Staff
Extreme	Chief Forest Officer
High	General Manager – Wairarapa or East Coast Forest
Medium	Appropriate Forest Operations Manager
Low	Appropriate Forest Operations Manager

The HSEMS will also monitor and assist with any Preventative or Corrective actions resulting from complaints or letters of concern.

3.2 JNL Roles and Responsibilities

JNL employees will advise complainants of the process, assist complainants in submitting complaints or grievances and ensure that complaints or grievances raised through JNLs management are escalated to the appropriate level.

Moreover, they will ensure that investigations are fully supported.

3.3 Records

Up-to-date records of disputes related to issues of applicable laws or customary law, are held including:

- 1) Nature of the complaint or grievance
- 2) Steps were taken to resolve disputes;
- 3) Outcomes of all Dispute resolution processes*; and
- 4) Unresolved disputes and the reasons why they are not resolved and how they will be resolved.

FO Standard – Third Parties Complaints Policy & Procedure

3.4 Disputes

If your complaint is not resolved to your satisfaction, you may wish to escalate the complaint. If so, JNL may:

- Gather more information about the issue/s and talk to you again
- Involve a more senior person to investigate
- Operations will cease while dispute exists, if issue is determined to be of substantial magnitude and/or duration, or involving a significant number of interests.
- Instigate or participate in any dispute resolution process that has been agreed or as required by law.
- If no process has been agreed or is required by law, then JNL may do one of more of the following:
 - Consider and discuss with you a suitable alternative dispute resolution process, for example, restorative or settlement conferences, mediation, arbitration or expert determination
 - Instigate or participate in an alternative dispute resolution process
 - Instigate or participate in litigation.

3.5 Resolution

Depending on the process followed, resolution of the dispute will be either by agreement or as determined by an external decision-maker.

The resolution will be recorded in writing and shared with you. Any actions for JNL will be implemented as agreed.

3.6 Timeframes

Timeframes for resolution will depend on:

- the process chosen for resolution
- the complexity of the dispute
- the volume and availability of information
- 3rd party investigations and determinations (Insurers, joint potential accountability)

any external factors (for example, availability of a mediator, tribunal timetabling). JNL will endeavour to resolve a dispute in a timely manner, communicating periodically with affected stakeholders.

3.7 Feedback

We welcome feedback about this complaints policy. Please use the contact details on our website.