



Co-op's Grievance & Remedy Policy

1. Policy statement

Co-op recognises the responsibility that we share with our suppliers to identify grievances and provide remedy for human rights abuses in our operations and our supply chains. We recognise that grievances are likely, if not inevitable, in any organisation and that successful remediation is not easy to achieve and requires a victim-led, consultative and multi-stakeholder approach. The policy below is drawn from best practice guidance on remediation and builds on the requirements of international conventions and protocols¹.

2. Scope and responsibility

The policy applies to Co-op's suppliers and supply chains. Our own operations are covered by our HR people policies. Overall responsibility for human rights lies with our Board and day-to-day management is led by the Goods Not For Resale (GNFR) and Ethical Trade & Human Rights Teams.

3. Definitions and principles

A **grievance** is a report by a worker or other third party of a violation of national or international laws, the ETI Base Code or Co-op's Sound Sourcing Code of Conduct that has occurred in Co-op's supply chain and has a direct adverse human rights impact. The individual or organisation raising the grievance should be able to produce sufficient information to demonstrate the seriousness of the grievance and how it relates to Co-op's supply chain. Grievances can be raised, and **remedy**² is required, for all workers, regardless of their employment status³ or length of service.

Co-op has grievance procedures in place for all workers in its own operations. We expect our suppliers, and in turn their suppliers, to have grievance procedures in place for all their workers. A grievance procedure or mechanism is one or more channels for individuals or groups to raise concerns about adverse human rights impacts, whether to the factory or farm involved, to the state or to another third party, in order to seek remedy. Grievance procedures have the potential to limit dispute escalation, facilitate dispute resolution and contribute to an improved working environment and relations between management and workers. The procedure must be serious and effective and follow best practice (for example, [Oxfam's grievance mechanism toolkit guidance](#), [Stronger Together's Tackling Modern Slavery in Global Supply Chains Toolkit](#) and [ACAS's Grievance Procedure guidance](#)). It must

¹ Including the requirements of ILO Conventions, Protocols, Recommendations and Instruments such as the Declaration on Fundamental Principles and Rights at Work and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, and the UN Guiding Principles on Business and Human Rights.

² Access to effective remedy is a core component of the UN Guiding Principles on the Business and Human Rights (UNGPs) whereby businesses take "appropriate steps to prevent, investigate, punish and redress" business-related human rights abuses within their supply chains.

³ This includes permanent, temporary or casual labour whether directly or indirectly employed.



be available to all workers in appropriate languages and take into account accessibility by marginalised groups. Any grievances raised must be well-managed⁴ and remediated. The procedure is not to be used to undermine the role of legitimate trade unions or equivalent worker bodies, to impede access to state-based mechanisms or access by competent authorities investigating and adjudicating credible allegations of human rights impacts.

Grievance channels available to workers must meet the criteria laid out in Principle 31 of the UN Guiding Principles on Business and Human Rights⁵: These channels may include:

- Raising issues with line managers or supervisors
- Trade unions
- Worker management committees
- Access to human resource staff
- Worker surveys (online or paper-based)
- Suggestion boxes (anonymous or other)
- Worker hotlines (anonymous or other)
- Third-party audit company confidential phone number cards
- OECD National Contact points
- State-based judicial and non-judicial grievance procedures where available.

We expect our suppliers to convey the same expectations on access to grievance mechanism(s) to their own suppliers.

4. Co-op's role in grievances in the supply chain

It is our role to support our suppliers to put in place suitable local and site-based mechanisms (own, third-party or shared) and ensure they have qualified staff to manage those mechanisms and any grievances raised. We believe we should become involved in grievances only when all local and site-based grievance mechanisms have been exhausted by an individual or representative organisation.

Any individual or organisation who has exhausted local and site-based grievance mechanisms and been unable to find resolution OR that believes they have been the subject of retaliation as a result of registering a complaint should contact Co-op immediately via our whistleblowing line, Speak Up, 0800 915 1571.

5. Co-op's role in remedy in the supply chain

We will identify and establish a team of representative stakeholders to tackle severe human rights abuses in the supply chain which we have *caused or contributed to* including forced labour, child labour or any violation which puts workers at risk of life and limb. The complainant should be able to produce sufficient information to demonstrate the relevance and seriousness of the complaint.

⁴ Steps to manage grievances include information facilitation, negotiation, mediation and conciliation, arbitration, investigation, adjudication and monitoring

⁵ http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf



The team of representative stakeholders will be able to access independent expertise to investigate and provide timely remediation of human rights violations. The team will identify how redress can be provided in different scenarios, before they occur. If there is an existing government or civil-society backed organisation, process or project providing remedy for victims of modern slavery these should be identified and involved in the development of the remediation procedure for forced labour and child labour issues.

Investigations and the implementation of remedy will:

- Include an initial assessment of the allegations to ensure there is sufficient information to investigate the exploitation discovered and to establish where Co-op has caused or contributed to the harm
- Make the protection of individuals the first priority
- Take a victim-led approach to provide remedy including restitution (restoring victim to original situation before abuses occurred), compensation (financial or otherwise), rehabilitation (medical, physiological or psychological) and satisfaction and guarantee of non-repetition
- Include changes to systems, processes and practices to prevent similar adverse impacts in the future
- Include relevant government and/ or civil society-backed support
- Be monitored, for example by third parties, and include feedback from victims.

Where Co-op has not caused or contributed to severe human rights abuses, we will play a role in convening responsible stakeholders to provide remedy to victims.

6. Monitoring and evaluating

We encourage suppliers to monitor the key indicators used to measure the effectiveness of its own process, specifically:

- Trends and types of grievances raised
- Remedy provided and outcomes of the remedy
- Awareness and perception of grievance mechanisms.