



Access to Remedy and Grievance Mechanism Policy

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'Accountable' owner: Chief Risk and Legal Officer
'Responsible' owner: Head of ESG



TRUSTED



AMBITIOUS



PROUD



INNOVATIVE



TOGETHER

Version Control

Version	Author name	Version changes	Date	Next review date
V1.1	Carly Bilsbrough		January 2021	January 2022
V1.2	Anna Kasperska	Inclusion of grievance mechanism. Incorporated UNGPs and ETI standards on access to remedy, Refined processes.	20 March 2024	20 March 2025

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1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited ('TVG') in relation to Access to Remedy and Grievance Mechanism Policy. This Policy is designed to influence all decisions, actions and other activities that relate to its subject matter.

The primary objectives of this Policy are to:

- Identify key roles and responsibilities for both TVG and its Suppliers,
- Outline our position on access to remedy and grievance mechanism principles.
- Define how TVG will comply with the above requirements-

TVG is committed to act, together with our Suppliers, to support overall wellbeing of the workers in our supply chain. This policy clearly stipulates our position on access to remedy and grievances, and it is our responsibility to ensure that it is communicated and understood by our Suppliers.

Related Policies:

The Very Group Code of Conduct

2. Background

TVG is committed to upholding Human Rights and ensuring that all stakeholders involved in our supply chain have access to effective remedies in case of any adverse impacts resulting from our business activities.

The purpose of this policy is to ensure that workers in our supply chain have access to adequate and effective remedies in accordance with internationally recognised standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Ethical Trading Initiative (ETI) Guidance on Access to Remedy².

Ethical audits are our first-hand tool for understanding and assessing if workers are able to raise a grievance when suffering human rights issues or our Code of Conduct is not being adhered to.

TVG recognises that Grievance Mechanisms at workplace level may take several forms which can include:

- Workplace mechanisms, where workers lodge grievances and these are dealt with through defined procedures by management,
- Complaint boxes,
- State/country-based hotlines,
- Worker voice applications,
- Worker voice surveys,
- Work committees constituted between workers and management with equal representation from management and workers. Member of the committee to be elected and not selected.

TVG acknowledges that grievances may not always be raised by workers directly suffering human rights issues but through other means of awareness raising. As well as workers which are negatively affected by the activities of a Supplier raising grievances, the following third-party organisations may also bring issues to our attention:

- Trade unions and other worker representatives such as worker committees,
- Civil society organisations of workers that are negatively affected by the activities of a Supplier,
- NGOs,
- Industry associations.

3. Key requirements

TVG is committed to upholding the highest standards of corporate responsibility and ethical conduct. In line with this commitment, TVG adheres to the OECD Due Diligence Guidelines³, the United Nations Guiding Principles on Business and Human Rights (UNGP) for access to remedy and grievance mechanisms, and all relevant laws and regulations, ensuring compliance with whichever requirement is the most stringent in safeguarding human rights. Our Access to Remedy and Grievance Policy outlines our commitment to providing accessible, transparent, and fair mechanisms for identifying grievance and remedying any harm caused.

4. What does this mean to the Very Group?

This policy applies to all workers in TVG's supply chain, and communities affected by our activities.

Once a grievance is received it is essential for TVG that the complaint is dealt with and an access to remedy is given to support and rectify the issue. We use our ESG teams in Regional Offices to identify where access to remedy is required and then complete a human rights due diligence process.

Our Commitments:

- To develop a corporate remedy strategy and support effective grievance mechanisms.
- To identify and understand the nature of human rights risks in our supply chain.
- To establish and commit to evaluating processes, impacts and outcomes with workers; implementing improvements as needed.
- To support remedy including but not limited to timebound corrective action plans, engagement in meaningful dialogue, exploring sustainable and scalable solutions for long term improvement and engaging with relevant third-party organisations,
- To work with our Suppliers on identification and prevention of negative human rights impacts.
- To ensure receiving grievances from our supply chain will not lead to the relocation of work or cancellation of orders.
- To involve workers and / or their representatives in the remedy process.
- To consider the complaint closed only when the complainant is completely satisfied of the outcome and has been verified by TVG or a trusted third party.

Suppliers' commitment:

- Actively collaborate with TVG to identify and agree upon appropriate remedies for grievances within our supply chain, ensuring alignment with our values and commitments.
- Ensure that workers are aware of the existing grievance mechanism and how to use them.
- Encourage and train workers to use the grievance mechanism.
- Investigate each inquiry fairly.
- Not to retaliate against workers who raised complaints and treat the complainant fairly.

- Provide a clear and known procedure with a timeframe for each stage of the grievance redressal process, clarity on the types of process, outcome available and means of monitoring implementation.
- Ensure aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on fair, informed and respectful terms.
- Keeping all interested parties informed about the grievance progress and providing sufficient information about the mechanism's performance to build confidence in its effectiveness.
- Drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms.

5. Footnotes

¹ United Nations Guiding Principles on Business and Human Rights (UNGPs)

² <https://www.ethicaltrade.org/insights/resources/access-to-remedy-practical-guidance-companies>

³ <https://www.oecd.org/investment/ue-diligence-guidance-for-responsible-business-conduct.htm>

⁴ Based on [Guiding Principle 31 | National Action Plans on Business and Human Rights \(globalnaps.org\)](#)