Access to Remedy and Grievance Mechanism Policy

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Accountable owner:	Chief People Officer
Responsible owner:	Head of ESG

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1. Policy Statement

This Policy establishes a set of principles and rules adopted by The Very Group Limited in relation to Access to Remedy and Grievance Mechanisms. 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 The Very Group and its suppliers
- Outline our position on access to remedy and grievance mechanism principles
- Define how The Very Group will comply with the above requirements

Scope
This Policy applies to all workers directly or indirectly employed throughout The Very Group's value chain, including agency workers, migrant workers and contract workers, and communities affected by our business activities.

Related Policies:
The Very Group Code of Conduct

Additional Information:
ILO Convention on Examination of Grievances Recommendation, 130
Ethical Trading Initiative (ETI) Guidance on Access to Remedy
United Nations Guiding Principles on Business and Human Rights (UNGPs)
OECD Due Diligence Guidelines for Responsible Business Conduct
ETI Base Code

2. Background

The Very Group is committed to ensuring that all stakeholders in our value chain have access to effective remedies in case of any adverse impacts resulting from our business activities, in accordance with internationally recognised standards, including the UNGPs, OECD Due Diligence Guidelines for RBC and the ETI Guidance on Access to Remedy.

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

The Very Group recognises that Grievance Mechanisms at workplace level may take several forms which can include:

- Workplace mechanisms, where workers lodge grievances and these are addressed through defined procedures internally by management
- Third-party mechanisms, where workers raise grievances through an independent grievance mechanism and these are addressed through defined procedures by a third-party
- State/country-based helplines
- Worker voice applications
- Worker voice surveys
- Worker committees established with equal representation from workers and management where worker representatives are freely elected by the workforce

The Very Group acknowledges that grievances may not always be raised by workers directly but through other means of awareness raising.

The following third-party organisations may also bring issues to our attention:

- Trade unions and other worker representatives such as local representatives
- Civil society organisations
- NGOs
- Industry associations

3. Key requirements

The Very Group is committed to upholding the requirements of this Policy and expects all suppliers to comply with its standards and requirements. The Very Group and its suppliers must comply with all applicable laws and regulations, and where national law differs from international standards, apply the higher standard where legally permissible.

Key requirements of this Policy are:

- Ensure workers and affected communities have access to safe, trusted, accessible, confidential and effective grievance mechanisms
- All grievances must be investigated promptly, fairly and without retaliation
- Workers and/or their representatives must be involved throughout the remedy process
- Remediation must address root causes and provide appropriate remedy

4. What does this mean to The Very Group?

The Very Group is committed to:

- Developing a corporate remedy strategy
- Continuing to monitor and develop our human rights saliency assessment to identify, understand and prioritise actual and potential adverse human rights impacts in our supply chain
- Working with our suppliers on identification, prevention and remediation of negative human rights impacts
- Supporting access to effective grievance mechanisms in our supply chain
- Ensuring that grievances raised within our supply chain will not lead to the relocation of work or cancellation of orders, or other adverse impacts to workers
- Involving workers and/or their representatives throughout the remedy process
- Ensuring that workers who raise grievances are treated fairly and do not experience retaliation, and that anonymity is protected where grievances are raised anonymously
- Supporting effective remedy, including time-bound corrective action plans, meaningful stakeholder engagement, development of sustainable and scalable solutions for long-term improvement and engaging with relevant third-party organisations

- Considering a grievance closed only when the complainant is completely satisfied with the outcome and has been verified by The Very Group or a trusted independent third-party
- Evaluating the effectiveness of grievance and remedy processes, impacts and outcomes with workers and implementing improvements where needed
- Communicating this policy to relevant internal and external stakeholders

5. What does this mean for suppliers?

Suppliers to The Very Group are expected to:

- Ensure workers have access to grievance mechanisms that are accessible, trusted and effective
- Ensure that workers are aware of available grievance mechanisms and understand how to use them
- Provide a clear and well-understood procedure including timeframes for each stage of the remediation process, available resolution options, and mechanisms for monitoring implementation and outcomes
- 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
- Not to retaliate against workers who raise complaints and ensure all complainants are treated fairly, respectfully and without discrimination
- Handle grievances confidentially and respect complainants' privacy where concerns are raised anonymously
- Investigate each grievance thoroughly and fairly, engaging an independent third party where appropriate to support to ensure impartiality
- Keep the complainant and all relevant stakeholders informed of progress and provide sufficient transparency to build confidence in the mechanism's effectiveness
- Actively collaborate with The Very Group to identify, implement and monitor appropriate remedies for grievances within the supply chain, in line with our shared commitments and expectations
- Use grievance outcomes and lessons learned to strengthen management systems, improve effectiveness of the grievance mechanism and prevent future harm

If the Supplier is found in breach of this Policy, then The Very Group reserves the right to suspend the relationship until these issues are rectified. If suitable progress is not made in remediating issues found, then The Very Group may cease our trading relationship with the supplier indefinitely.