



Grievance Procedure

Domaine de Graux

Domaine de Graux is committed to operating with integrity, transparency, and respect for all stakeholders; including suppliers, workers, guests, and community members. This procedure provides a clear, accessible, and safe way to raise any concern relating to our operations, conduct, or compliance with our Supplier Code of Conduct.

1. How to Raise a Grievance

Any person (including suppliers, employees, contractors, hospitality guests, or community members) may submit a grievance at any time. Our official channel is the contact form on our website. For employees, grievances may also be raised in writing or in person to the General Manager.

- **Internal stakeholders (employees):** the contact details of the person of trust within the company, as well as the contact details of the psychologists of the psychosocial unit of Cohezio (our external prevention and protection service), are available in the internal and official document called “Règlement de travail” (Work Rules document). This document is available and accessible to everyone in a binder kept at the office. The content of the Grievance Procedure is explained to all employees as part of their onboarding, to ensure they are aware from the outset of how to raise a concern and of the protections available to them.
- **External stakeholders (suppliers, guests, community members, contractors, etc.)** may raise any concern directly with the General Manager or via our online contact form. Suppliers can also refer to our Supplier Code of Conduct (§4.5 – Raising a Concern).

In addition to this reactive grievance procedure, Domaine de Graux will introduce satisfaction surveys for hospitality clients. These surveys are designed to identify and address concerns proactively, before they develop into formal grievances. Feedback received through satisfaction surveys will be reviewed regularly and used to improve our services and practices on an ongoing basis.

2. Grounds for Accepting a Grievance

A grievance will be accepted when it relates to:

- Breaches of our Supplier Code of Conduct (labor rights, health & safety, environment, ethics)
- Concerns about human rights, fair treatment, or discrimination
- Environmental or food safety violations in our operations
- Concerns about Domaine de Graux’s lobbying or advocacy practices, in line with our Responsible Lobbying Policy
- Any other conduct inconsistent with our values as a regenerative agriculture farm

Concerns submitted without sufficient detail may limit our ability to investigate but will still be reviewed. We will notify the complainant if a submission does not meet the threshold for formal grievance and explain why.

3. Grievance Process & Deadlines

Steps:

1. **Receipt & Acknowledgement:** We acknowledge receipt of the grievance within 5 business days of submission.
2. **Initial Assessment:** We assess whether the submission qualifies as a grievance and inform the complainant of our decision within 15 business days.
3. **Investigation:** We investigate the concern thoroughly. The complainant is kept informed of progress. This step takes between 30 to 60 business days (complex cases may take longer, with notice given).



4. **Resolution:** We communicate the outcome and any corrective action taken. Where possible, we discuss the resolution with the complainant to ensure it is satisfactory.
5. **Closure:** The grievance is formally closed once the complainant has been informed of the outcome. All cases are logged for internal review and continuous improvement.

4. Confidentiality

Any person raising a grievance may request that their identity and the details of their case be kept confidential, to the extent possible given the need to investigate and resolve the matter fairly.

- At the time a grievance is received, the person handling it will inform the complainant, upon request, of who will be involved in reviewing and resolving their case.
- Where confidentiality has been requested, information about the grievance will not be shared with any party beyond those directly involved in handling it, without the complainant's consent, except where required by law or necessary to protect the safety of any person.
- Where a complainant has requested confidentiality, individuals responsible for handling that grievance are expected to treat all case details as confidential. A breach of confidentiality by a grievance handler will be treated as a disciplinary matter.

5. Protection Against Retaliation & Whistleblower Protection

Anyone who raises a genuine concern in good faith is fully protected from any form of retaliation, whether by Domaine de Graux or by any supplier or partner acting on our behalf. This applies regardless of the outcome of the investigation.

Retaliation includes (but is not limited to) dismissal, demotion, intimidation, threats, changes in working conditions, or any other adverse treatment linked to the act of reporting a concern. Such behavior is strictly prohibited.

Suppliers operating in the EU must comply with the EU Whistleblower Protection Directive (2019/1937/EU), including maintaining a safe and confidential reporting channel and guaranteeing non-retaliation for workers reporting violations related to environmental law, human rights breaches, or food safety.

This Grievance Procedure constitutes Domaine de Graux's whistleblower protection mechanism: it provides a safe and confidential channel through which any worker, supplier, or stakeholder can report a concern (including concerns relating to environmental law, human rights breaches, or food safety) and guarantees non-retaliation for anyone reporting in good faith, in line with the EU Whistleblower Protection Directive (2019/1937/EU).

Any allegation of retaliation will itself be treated as a serious grievance, investigated promptly, and may lead to corrective action.

6. Record-Keeping & Review

All grievances received, investigated, and resolved will be recorded confidentially as shown in appendix A. An annual summary of grievances will be prepared each year.

To date, Domaine de Graux has received no grievances. This procedure will be reviewed periodically and updated as our operations grow.