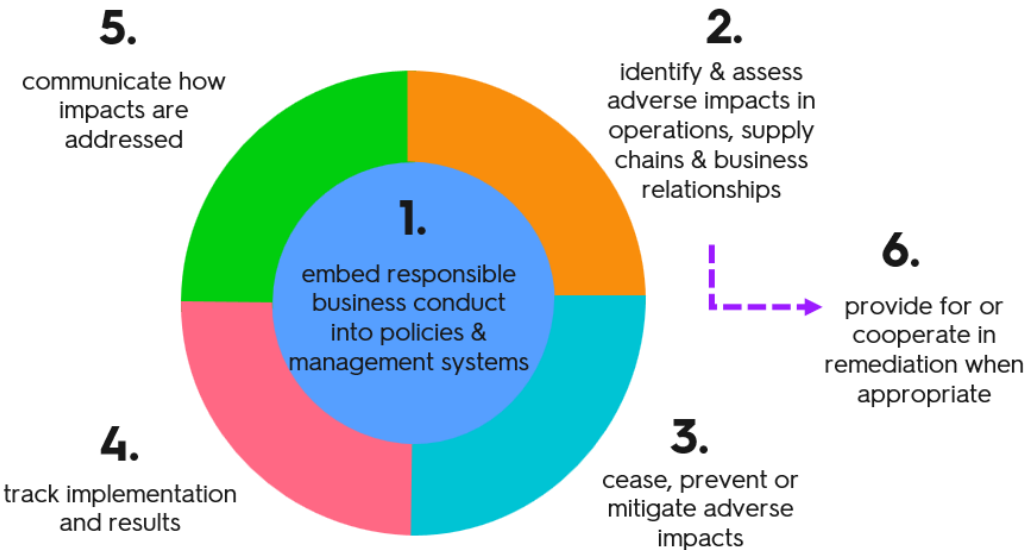


# HEMA notification & grievance policy

## production chain

HEMA products are produced all over the world. HEMA aims to take responsibility in the value chain and identify and address the most salient risks of violating human rights, environment and animal welfare. We follow the [OECD guidelines for Human Rights and Environmental Due Diligence](#) and the [United Nations Guiding Principles on Business and Human Rights to do so](#). We shape our policies and protocols on sustainability around the results of [these steps](#). HEMA is transparent about our production locations and publishes them on the website and [in the Open Supply Hub](#).

As an important part of the due diligence process, HEMA works together with suppliers to establish or enhance complaints- or grievance mechanisms and provide for or cooperate in remediation when appropriate (step 6).



*\*This image is based on the OECD guidelines on Human rights and environmental due diligence and the 6 steps described in the guidelines.*

### 1.1 grievance mechanism

HEMA requires suppliers to ensure a proper functioning grievance mechanism, in accordance with local law or international guidelines and standards.

This grievance policy is part of HEMA’s general grievance mechanism and covers the activities of HEMA’s production chain partners. Any natural, legal person or stakeholder representative who is affected or has reasonable grounds to believe that they might be affected by an adverse impact can submit a complaint, regarding any actual, suspected, or potential violation of regulation or law, such as but not limited to, human rights, environmental misconduct.

Although HEMA encourages complainants to solve grievances with factory management using existing grievance procedures, there are cases where a complainant needs or prefers to submit



grievances externally. For that reason, HEMA participates in multistakeholder initiatives (MSIs) to enhance grievance mechanisms outside of the factory walls.

HEMA has a wide network of stakeholders with local networks. We aim to work closely together on improvement and remedy. HEMA with and through its production chain partners underline the preconditions of complaint procedures. This includes accessibility, animosity, confidentiality, fairness, impartiality and no retaliation.

These are the grievance mechanisms currently available to workers in HEMA's production chain:

- [International Accord](#)
- [Bangladesh agreement](#)
- [Pakistan agreement](#)
- [Amfori Speak4change](#) Programme
- Directly through HEMA's head office or buying offices in Dhaka, Shanghai, Istanbul or Hong Kong

When a complaint is received through MSI's, the existing procedures outlined in the protocols are followed.

When a complaint is received by HEMA, directly or through other stakeholder representatives the following steps are taken:

1. Complaint is shared with HEMA's compliance officer and the sustainability team.
2. HEMA's compliance officer is informed and involved in the remedial process. (Depending on the nature of the complaint, [HEMA Emergency Response Procedure](#) is activated).
3. Complainant receives acknowledgement of receipt within 7 working days (provided that HEMA has been notified as described in this policy).
4. The complaint is filed and discussed with the relevant departments, such as legal, buying desk, product and category managers.
5. Within 7 working days of the filed complaint, HEMA engages with the supplier to verify and, if needed, request the supplier to comply with local law and the HEMA (Supplier) Code of Conduct.
6. Depending on the subject of the complaint, HEMA consults the relevant stakeholders on remediation.
7. HEMA can start an investigation. HEMA reserves the right to not investigate further where the complaint appears not to be a violation of the law or HEMA's policies and if there are no legal obligations to further investigate. In this scenario the complaint is unfounded and will be rejected.
8. The outcome of the investigation will be communicated to the complainant.



9. When the complaint has appeared to be founded, HEMA contributes to access to remedy according to OECD guidelines on human rights and environmental due diligence.

HEMA reports on the outcomes of the external grievance mechanisms annually in our sustainability report.

## 1.2 notification procedure

In addition to submitting a formal complaint, there is the possibility to submit a notification. This procedure offers the possibility to submit a notification in a simplified way and is meant to notify HEMA of potential or actual wrongdoing.

### Who can submit a notification?

- Persons and entities.

### What should the notification be about?

- information or legitimate concerns regarding actual or potential adverse impacts on human rights or the environment (related to the operations of HEMA's production chain partners).

### Where can the notification be submitted?

- Submit the notification to [sustainability@hema.nl](mailto:sustainability@hema.nl).
- Notifications can be submitted anonymously or confidentially.

### Following up

- Upon receiving a notification, HEMA will assess the validity of the notification, and where relevant, investigate and implement corrective actions.