

Galaxy Surfactants Limited -Palm Grievance Procedure

Version-II 10th August 2025

Galaxy Surfactants Palm Grievance Procedure of Galaxy Surfactants Limited applies to the company's entire palm-based sourcing supply chain, encompassing both direct and third-party suppliers of palm-derived raw materials (such as oleochemical derivatives including fatty alcohols, fatty acids, stearic acid, etc.).

This procedure specifically addresses alleged violations or non-compliances related to Galaxy Surfactants' commitments on responsible palm oil sourcing. It supports the company's Sourcing Policy, Sustainability Policy, Supplier Code of Conduct, and Group Position on Human Rights within the palm supply chain.

The Galaxy Surfactants Palm Grievance Procedure:

- Aligns with all relevant RSPO policies and mirrors the RSPO Complaints Procedure, honouring its outcomes while allowing for parallel investigations and the imposition of additional requirements or sanctions where necessary.
- Upholds the RSPO principle of zero tolerance for retaliation against individuals who raise grievances or act as whistle-blowers.
- Complements existing Galaxy Surfactants Group policies, such as the Group's Position on Human Rights.

Submitting a Grievance

Grievances related to Galaxy Surfactants' palm supply chain can be submitted through the following channel:

Email: Teamsustainability@galaxysurfactants.com

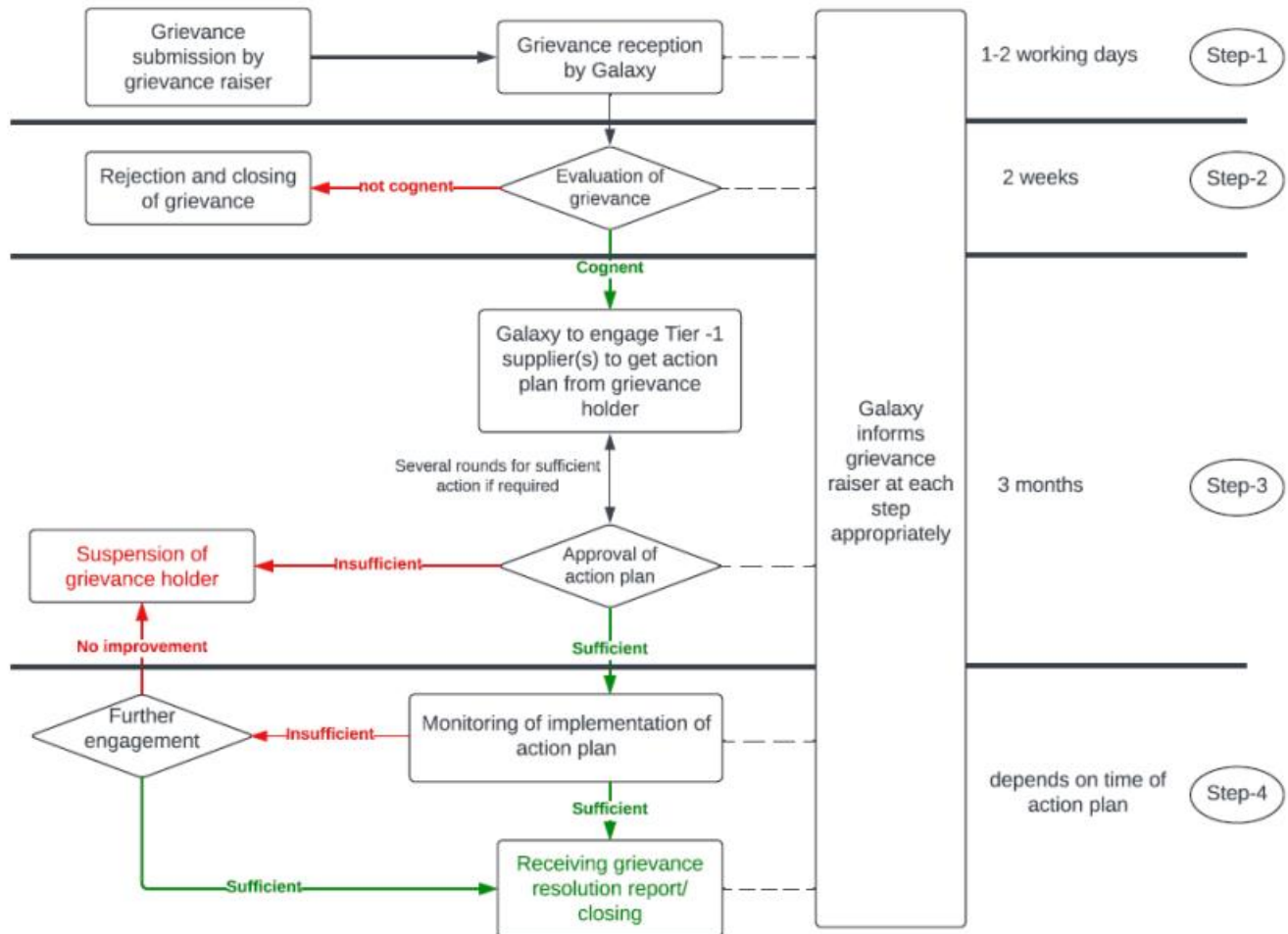
To process a grievance, the following information must be provided:

1. Full Name
2. Organization Name (if applicable)
3. Job Title
4. Address
5. Contact Information (Phone/Fax/Email – at least one is required)
6. Detailed description of the grievance
7. Any supporting evidence
8. Indication of confidentiality requests (if any)

Contact details are essential to facilitate any follow-up or clarification. If the complainant (Grievance Raiser) wishes to remain anonymous, Galaxy Surfactants will honour such confidentiality requests.

Grievances may also be submitted by a third party on behalf of an individual or organization, provided the established procedure is followed.

All palm-related grievances will be addressed according to the grievance handling process outlined in the flowchart below.



Re-entry Procedure for Suppliers

Suppliers who have been suspended or sanctioned as a result of a grievance investigation may be considered for re-entry into Galaxy Surfactants Limited's palm supply chain, subject to the following conditions:

1. Corrective Action Plan (CAP):

The supplier must submit a comprehensive Corrective Action Plan that addresses the non-compliances or violations identified during the grievance investigation. This plan must include specific actions, timelines, and responsible personnel.

2. Independent Verification:

Implementation of the CAP must be verified by an independent third party.

3. Demonstrated Compliance:

The supplier must demonstrate sustained compliance with Galaxy Surfactants' Palm Oil Commitment, Sustainability Policy, Sourcing Policy, Supplier Code of Conduct, and Human Rights Position.

4. Internal Review and Approval:

Galaxy Surfactants will conduct an internal review of the verification findings and determine if the supplier has satisfactorily addressed the issues. Approval for re-entry will be granted only after a thorough evaluation.

5. Probation Period:

Upon re-entry, the supplier may be placed under a probationary period during which Galaxy Surfactants will closely monitor compliance and performance. Any recurrence of non-compliance may result in permanent removal.

6. Public Disclosure:

The re-entry of the supplier, along with a summary of corrective actions taken, may be publicly disclosed in the interest of transparency.