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Complaints and Grievance Policy



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APPROVAL

The signatures below certify that this document has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

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AMENDMENT RECORD

This document is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

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COMPANY PROPRIETARY INFORMATION

The electronic version of this document is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled, except when provided with a document reference number and revision in the field below:

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1 Purpose

The purpose of this procedure is to establish the processes involved in the notification and handling of any grievances and complaints from within or outside of Somalia Risk Management (SRM) (the “Company”) to facilitate their successful resolution in a timely manner.

Any queries arising from this procedure or its implementation can be taken up directly with the HR Department at hrrservices@ska-arabia.com or whistleblower@ska-arabia.com

SRM is the owner of this document and has approved management responsibility for its development, review and evaluation.

This procedure is intended to be read by all employees, contractors and third parties for general information and awareness.

2 Scope

This procedure applies to all processes involved in grievance and complaint handling and must be strictly adhered to by all employees, contractors and any third party of the Company.

3 References

The International Code of Conduct Association (ICoCA).

4 Definition

A grievance is defined as a wrong or hardship suffered, which is grounds for complaint that is brought to the attention of a superior and is not settled to the satisfaction of the complainant. Grievances may arise from within the Company or from an external source.

5 Introduction

Policy and procedure are intended to meet all aspects and principles in the International Code of Conduct Grievance Procedures <http://icoca.ch/en/icoc-association>. The Company has a responsibility to respect the human rights of and fulfil humanitarian responsibilities towards, all those affected by their business activities, including its personnel, clients, contractors, suppliers and the population of the area in which services are provided.

The Company fully recognises the importance of respecting the various cultures encountered at the workplace and the individuals that they meet because of those activities.

A clear and open channel of reporting is fundamental of any grievance and complaint handling procedure. Therefore, personnel, clients, contractors and the population of the area in which the Company provides services are encouraged to raise any grievance or complaint about any aspect of their employment, their working environment, working relationships or concerning any disciplinary action taken against them.

6 Policy

The following comprise the Company's grievance policy (all information will be held confidential):

- a) It is to be transparent and fair by nature and in its application.
- b) The Company will thoroughly investigate allegations promptly, impartially and with due consideration to confidentiality.
- c) In the case of formal action, the aggrieved party should provide the Company's management with a written submission, which provides details of the complaint (Nature, time, place and those involved).
- d) The Company desires to deal with incidents promptly and will take steps to follow up, make decisions, and confirm actions in the most expedient manner possible.
- e) The Company will retain records about any such allegations, findings or disciplinary measures. Except where prohibited or protected by applicable law, such records should be made available to a Competent Authority on request.
- f) Employees have the right to be accompanied at any meeting concerning a grievance.
- g) Aggrieved parties may appeal against the decision made.
- h) The Company will cooperate fully with official investigations, and not participate in or tolerate from their Personnel, the impeding of witnesses, testimony or investigations.
- i) The Company will take appropriate disciplinary action, in accordance with the Company disciplinary procedures, which could include termination of employment in case of a finding of such violations or unlawful behaviour.
- j) Ensure that Personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or



otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

7 Internal Procedure

Personnel are encouraged to discuss any problems, complaints or suggestions with their immediate local superior or direct to the HR Department, explaining the nature of the problem and the relief sought.

The Company would like complaints to be resolved informally, but where this is not possible, the following procedure must be adhered to:

Step 1 – Grievance Submission

Personnel can submit their grievance or complaint in writing to their superior/Country Manager and copy to the HR Department at hrrservices@ska-arabia.com. Details of the grievance should include; the nature, time, place and those involved.

Step 2 – Grievance Hearing

Management will arrange for a meeting to take place as quickly as possible but within three working days to discuss the grievance. In preparing for such a meeting, management is to consider the following: having an HR representative in attendance to record the meeting, making themselves aware of the full facts of the case, how similar grievances may have been resolved in the past, whether an interpreter may be needed. The aggrieved party has the right to be accompanied by a colleague, who may be allowed to address the meeting on the employee's behalf, sum up the employee's case, respond to any views expressed at the meeting and confer with the employee.

Step 3 - Management Decision Process

Once the hearing has finished, management will consult with the Senior Vice President/Director of Human Resources to consider the case. A decision will be presented in writing within three working days of the hearing. Once it has been made the manager is to inform the aggrieved party in writing of the outcome. The latter has the right to appeal if they are dissatisfied.

Step 4 - Grievance Appeal

If the aggrieved party is dissatisfied with the outcome of the decision, they can appeal, but this must be submitted within three working days explaining their grounds for appealing in writing to President & CEO. The appeal hearing should be arranged within five days and will be chaired by the President & CEO or nominated representative. The hearing will follow the format described in Step 2 above and the aggrieved party may be accompanied.

The aggrieved party will be informed in writing of the final decision made by the President & CEO within five working days of the appeal hearing.



8 External Procedure

When a non-employee has a grievance against the Company the same procedure as described in the paragraph 7 will take place but the Senior Vice President/Director of Human Resources will deal with the complaint in the first instance. All such complaints are to be sent directly to whistleblower@ska-arabia.com and hrservices@ska-arabia.com

9 Record Management

- a) The complainant will retain a copy of the original grievance correspondence for his/her records.
- b) During each step of the process, a record of the progress will be minuted and a copy sent to the HR Department for retention.
- c) Upon closure of the matter, the original claim with the accompanying minutes will be filed in the complainant's personnel file as a record of the action steps and resolution.

10 Matters to be aware of when handling Grievances

When dealing with a grievance, management should be aware of and practice the following:

- a) Hold any grievance interview in private without interruptions.
- b) Where a grievance relates to the person's Line manager, ensure that the employee can raise the grievance with someone else.
- c) Listen carefully to the person's explanation of the problem and consider whether there is a deeper issue, which might be the root cause of the grievance.
- d) Listen to any conflicting points of view.
- e) Weigh up all evidence to see whether there is really an issue that needs to be addressed.
- f) Decide what action to take, trying to balance fairness to the person without compromising the business or other employees.
- g) Inform all concerned parties of the decision.
- h) Keep the process as confidential as possible.

11 Non-retaliation

The Company will protect any employee, contractor or third party that raises a compliant or grievance. Any form of retaliation, victimisation or threats will not be tolerated and will be treated as a very serious disciplinary matter that could result in termination.



12 Confidentiality

All the reporting is confidential. This means that the information will only be shared with a limited number of people on a strictly need to know basis. The Company will carry out the investigation and take the necessary action.

13 Publication

This policy and procedure will be disseminated to all employees as part of the induction process, displayed on company notice boards and the Company website for all non-employees.