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## 1 PURPOSE

The aim of this document is to present SLS's policy and procedures for the handling of any grievance from within or outside our company with a view to facilitating their successful resolution in a timely fashion.

SLS is committed to maintaining a collegial work environment in which all individuals are treated with respect and dignity. Grievances will be treated seriously and sensitively, having due regards to procedural fairness and confidentiality. No employee shall be subjected to discrimination or adverse treatment for participating in a grievance procedure.

SLS will respect all persons alleging improper conduct providing processes for fair and transparent resolution. SLS will 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.

SLS's Grievance Policy intends to meet all aspects of the International Code of Conduct Association (ICoCA) Grievance Procedure and publish this policy and contact information on our website.

## 2 RESPONSIBILITY FOR IMPLEMENTATION

HR Manager  
Training & Compliance Manager  
All staff

This policy and all associated procedures apply to all Company staff (consultants/contractors or employees), sub-contractors and any third party who have a cause, or feel that they have a cause, for complaint against SLS.

## 3 REFERENCES

ISO 9001: 2015 Clause 5.1  
ISO 18788: 2015 Clause 7.4.4 8.8.3

## 4 DEFINITION OF A GRIEVANCE

A "basic grievance" is defined as a claim that SLS has violated a published policy in the manner in which an employee was treated.

Basic grievances do not involve claims of:

- Possible discrimination on the basis of race, colour, sex (including sexual harassment or sexual orientation), religion, creed, age, handicap, national origin, or status as a veteran.
- Employees wishing to pursue claims of such discrimination must contact the SLS HR Manager at SLS Head Quarters in Erbil.
- Disputes over salary grades or salary/rate of pay, or disputes over a supervisor's judgment regarding job performance or professional competence should be brought to the employee's human resources administrator. Although problems of this nature are not covered by the Basic Grievance Policy, an employee with these concerns is encouraged to discuss them with his/her supervisor or the Human Resources Manager at the SLS HQ, or the appropriate contact within the SLS HQ at the Program Management level.
- The Office of Human Resources will determine whether or not a dispute is within the scope of this policy.

## 5 INDIVIDUALS COVERED UNDER THE POLICY

This policy covers all employees. SLS will acknowledge grievances by employees or by non-employees who conduct business with SLS. Any employee who feels they have been subjected to mistreatment should communicate the matter immediately and directly to either the Office of Human Resources, the Program Manager, or Senior Management. SLS will investigate any incident of alleged mistreatment by a person who is not an employee of SLS to the extent practical and will take any action it deems appropriate after evaluating all circumstances. SLS encourages reporting of all incidents of harassment, regardless of whom the offender may be, in accordance with the method set out below.

## 6 REPORTING A COMPLAINT

### 6.1 Informal Procedure

SLS encourages individuals who believe they are being mistreated too clearly and promptly notify the offender that his or her behaviour is unwelcome. If for any reason an individual does not wish to approach the offender directly, or if such discussion does not successfully end the harassment, the individual should notify either the Office of Human Resources, the Program Manager, or SLS Senior Management, who may talk to the alleged harasser or arrange for mediation between the individual and the alleged harasser with a third person acceptable to both parties.

### 6.2 Formal Procedure

In the event that the reporting individual does not wish to pursue the informal procedure, or in the event that the informal procedure does not produce a result satisfactory to the reporting individual, the following aspects are applicable to grievance procedures:

#### 6.2.1 Written complaint

In the case of formal action, the aggrieved party should provide SLS management with a written submission, which provides details of the complaint (Nature, time, place, and those involved).

#### 6.2.2 Record Keeping

Keep 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. Records will be sealed; for more detail with regard to recordkeeping **see Par 7 in this document** "Grievance Recordkeeping".

#### 6.2.3 Time for Reporting a Complaint

Prompt reporting of complaints is strongly encouraged as it allows for rapid response and resolution of objectionable behaviour or conditions for the reporting individual and any other employees. Failure to report an incident may result in the offender not being aware that his or her conduct is offensive, thereby repeating the activity.

#### 6.2.4 Protection Against Retaliation

SLS will not retaliate against an individual who makes a report of mistreatment, nor permit any employee to do so. Retaliation is a very serious violation of this policy and should be reported immediately. Any individual found to have retaliated against an

individual for reporting harassment, or against anyone participating in the investigation of a complaint, may be subject to appropriate disciplinary action, up to and including termination of employment.

#### 6.2.5 Confidentiality

Any allegation of harassment brought to the attention of either the Office of Human Resources, the Program Manager, or Senior Management will be promptly investigated. Confidentiality will be maintained throughout the investigation process to the extent practical and appropriate under the circumstances.

#### 6.2.6 Sanctions for Mistreatment

Individuals found to have engaged in misconduct constituting mistreatment shall be subject to appropriate disciplinary action, up to and including termination of employment. Appropriate sanctions will be determined by either the Chief Operating Officer or the Chief Executive Officer of SLS. In addressing incidents of harassment, SLS' response at a minimum will include reprimanding the offender and preparing a written record of the investigation and outcome.

#### 6.2.7 False Accusations

If an investigation results in a finding that the reporting individual falsely and maliciously accused another of harassment, the reporting individual shall be subject to appropriate disciplinary action, up to and including termination of employment.

## 7 GRIEVANCE RECORDKEEPING

SLS shall maintain a complete written record of each complaint and how it was investigated and resolved. Written records shall be maintained in a confidential manner to the extent practical and appropriate and shall be maintained in the possession of the Chief Operating Officer of SLS. The following comprise SLS' Grievance Policy (all information will be held confidential):

- It is to be transparent and fair by nature and in its application.
- Investigate allegations promptly, impartially and with due consideration to confidentiality.
- In the case of formal action, the aggrieved party should provide SLS management with a written submission, which provides details of the complaint (Nature, time, place and those involved).
- SLS desires to deal with incidents promptly and will take steps to follow up, make decisions, and confirm actions in the most expedient manner possible.
- Keep 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.
- Employees have the right to be accompanied at any meeting concerning a grievance. In cases where group grievances are addressed, a maximum of two observers will be allowed to attend the grievance process in addition to the representatives.
- Aggrieved parties may appeal against the decision made.
- Cooperate with official investigations, and not participate in or tolerate from their Personnel, the impeding of witnesses, testimony, or investigations.
- SLS will take appropriate disciplinary action, which could include termination of employment in case of a finding of such violations or unlawful behaviour.
- 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.

## 8 INTERNAL GRIEVANCE PROCEDURES

An employee who has a grievance over any work-related issue has the right to raise their concerns with SLS management.

### 8.1 Informal Dealing.

Issues of a serious nature should always be dealt with formally; however, when mutually agreed, less serious grievances should be dealt with informally. This should take the form of an informal discussion between the aggrieved party and an appropriate manager. If it becomes clear that the matter cannot be resolved satisfactorily, or that the case is more serious than first assessed, the formal process must be adopted. If both parties agree that the grievance has been resolved satisfactorily no further action needs to be taken but the manager should make an informal note to record the event, its nature and outcome.

### 8.2 Formal Process.

The formal process may involve up to 4 procedures:

#### 8.2.1 Grievance Submission.

The aggrieved party must provide an appropriate SLS manager (i.e.: direct supervisor, senior Supervisor, PM, HQ HR or an executive) with a written submission, which gives details of the grievance; these should include:

- The nature of the grievance.
- Where the incident(s) has occurred.
- Who has been involved.
- When the incident(s) happened or has been happening.
- Any actions that have been taken so far by any of the parties concerned

#### 8.2.2 Grievance Hearing.

SLS' management will arrange for a meeting to take place as quickly as possible to discuss the grievance. In preparing for such a meeting managers should consider the following:

- Having an impartial record keeper, making themselves aware of the full facts of the case, how similar grievances may have been resolved in the past, and 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.
- Once the hearing has finished the SLS manager will take time to consider the case.

#### 8.2.3 Management Decision Process.

In making the decision upon the outcome and SLS' position, the manager should consult the Human Resources manager, SLS Lawyer and or other senior managers within the Company – and is encouraged to do so. Actions upon completion of said hearing will be:

- Regardless the decision, it should be presented in writing within 24hrs of the completion of the hearing.

- Once a decision 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 not satisfied with the decision.

#### 8.2.4 Grievance Appeal.

If the aggrieved party is not satisfied with the outcome of the decision, they can appeal but this must be submitted within 5 days explaining their grounds for appealing in writing to SLS management. An appeal meeting should be arranged within 5 days and will be run by the next more senior manager. The hearing will follow the same format and the aggrieved party may again be accompanied. Grievance Recordkeeping. Records of the following are to be made and kept for seven (5) years:

- Nature and details of the grievance.
- What was decided and the actions taken.
- The reasons for these actions.
- Whether an appeal was made and its outcome.
- Any other subsequent developments.

## 9 EXTERNAL GRIEVANCE PROCESS

The policy set out in paragraph 4 applies to a non-employee who has a grievance to make against the company. The said procedures are very similar, but the complaint is likely to be dealt with at the corporate level in the first instance. In summary:

### 9.1 Informal Approach.

SLS prefers to resolve grievance issues on an informal basis whenever possible; but only when this course is mutually agreeable.

### 9.2 Formal Approach.

The formal approach requires the aggrieved party to submit the details of their complaint in writing to the Human Resource manager or COO at Villa 10, 414Hadyab Street, Ainkawa, Erbil, Iraq or email [hr@SLSirag.com](mailto:hr@SLSirag.com). The following is relevant to this approach:

- Arrangements will be made for a hearing – the composition of attendees will be agreed on a case-by-case basis.
- SLS will inform the aggrieved party of its decision in writing within 24 hours of the hearing being completed.
- The aggrieved party has the right to appeal within 5 days and this process should be started by a submission in writing explaining the grounds for this appeal.
- A further hearing will be convened but managed by a different person with the findings being promulgated within 24 hours of its completion.
- Additional to the above grievances can also be reported anonymously at:
  - [ethics@slsiraq.com](mailto:ethics@slsiraq.com)
  - **Via hotline number:**
    - **+964 (0) 750 445 8639**
    - **+964 (0) 750 445 2109**

## 10 SUMMARY

Grievances are to be handled with sensitivity, respect but without undue delay. The procedures are relatively straightforward; the importance of keeping records is emphasized. Advice should be sought from senior managers; particularly the COO and the SLS Lawyer; from the outset. The over-arching intent is for the fair treatment of all persons within and external to Continuity.

## 11 Mediation

As an alternative for those wishing to resolve disputes between themselves without resorting to the formal complaint procedures, SLS will, if all parties agree, make available a trained outside mediator to help those parties find an amicable, informal solution. If mediation does not solve the problem, the affected parties may still use the procedures in this policy.

## 12 Conclusion

SLS has developed this policy in an effort to ensure that all of its employees and associate personnel can work in an environment free from mistreatment. SLS is committed to eliminating any mistreatment in the workplace.