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|  | GRIEVENCE PROCEDURES | | |
| | Responsible Division: | | ALL CAC STAFF |
| Implementation Date: | 01 March 2023 | Related Documents: | 1. Post Instructions 2. SOP's 3. CAC Code of Conduct |
| Standing Order Number: | CAC-ADM-POL-10 | Pages: | 6 |

DOCUMENT CHANGE RECORD

| Revision No# | Date of Issue | Initiated By | Page No. | Section | Description of Changes | Done By |
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Distribution List:

- a) CEO
- b) General Manager
- c) HR Manager
- d) Department Managers
- e) Head of Legal



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GRIEVANCE PROCEDURES

INTRODUCTION

A grievance is defined as 'A wrong or a hardship suffered, which is grounds for complaint'. Grievances may arise from within the Company or from an external source; CAC Company for Security Services policy on the handling of grievance covers both these circumstances but the procedures vary. This document reflects this situation.

AIM

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

SCOPE

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

POLICY

1.The following comprise CACs grievance policy:

- a. It is to be transparent and fair by nature and in its application.
- b. Informal action will be considered, where appropriate, to resolve problems. Often an informal meeting between the aggrieved party and their manager/CAC Representative is the most effective way of resolving minor complaints, and encourages direct communication between management and staff.
- c. In the case of formal action the aggrieved party must provide CAC management with a written submission, which provides details of the complaint (Nature, time, place and those involved). If, in the case of a "third party" individual feeling they have a grievance against CAC and an in-effective approach to resolve the grievance cannot be made with informal active, the individual is encouraged to contact our local representative at info@congoastral.com and the necessary actions will be made aware to you.
- d. CAC management and aggrieved parties are to raise and deal with issues promptly and not unreasonably delay meetings, decisions or confirmation of such decisions.



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e. CAC management and aggrieved parties are to act consistently.

f. 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.

g. Aggrieved parties may appeal against the decision made.

h. No employee will be victimised for invoking this grievance procedure; where victimisation is suspected, a grievance should be submitted in accordance with the Company's grievance procedure.

INTERNAL PROCEDURES

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

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 need be taken but the manager should make an informal note to record the event, its nature and outcome.

Formal Process

The formal process may involve up to 4 procedures:

Submission

The aggrieved party must provide an appropriate CAC manager with a written submission which gives details of the grievance; these should include:

- (1) The nature of the grievance
- (2) Where the incident(s) has occurred



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(3) Who has been involved?

(4) When the incident(s) happened or has been happening.

(5) Any actions that have been taken so far by any of the parties concerned

Hearing

CACs management will arrange for a meeting to take place within 5 days 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, 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 CAC manager will take time to consider the case.

Decision

In making the decision upon the outcome and CACs position, the manager should consult the Head of Human Resources, Head of Legal or other senior managers within the Company – and is encouraged to do so. Regardless the decision should be presented in writing within 24hrs 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.

Appeal

The aggrieved party has grounds for dissatisfaction they appeal but this must be submitted within 5 days explaining their grounds for appealing in writing to CAC management. An appeal meeting should be arranged within 5 days and should be run by the next more senior manager. The hearing will follow the format described in 4b above and the aggrieved party may be accompanied.

Records

Records of the following are to be made and kept for 7 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.

EXTERNAL PROCESS



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6. The policy set out in paragraph 1 applies to a non-employee who has a grievance to make against the Company. The procedures described in paragraphs 3 and 4 are very similar but the complaint is likely to be dealt with at corporate level in the first instance. In summary:

- a. Informal Approach. CAC prefers to resolve grievance issues on an informal basis whenever possible; but only when this course is mutually agreeable.
- b. Formal Approach. The formal approach requires the aggrieved party to submit the details of their complaint in writing (as per 4a) to the Head of Legal OR HR Manager at the CAC Office. Arrangements will be made for a hearing – the composition of attendees will be agreed on a case-by-case basis. CAC 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.
- c. With the grievance process in place, it shows CAC commitment to the process, the policy and the ICoC, and this will allow CAC staff to:
 - ☉ Will allow all CAC staff to be able to report cases of human rights violations according to the Human Rights SOP that is available to all. The procedures in reporting this violation are contained in the SOP CAC-OPS-SOP-08-Human Rights Policy.
 - ☉ Must respect the confidentiality of information by only sharing the correct and factual information with the correct individuals, that should have access to it.
 - ☉ Allow and open the possibility for victims to file an anonymous complaint – although this may complicate investigations, it is important that this possibility be given to those who may fear negative consequences, especially when the facts reported are of a very serious or even criminal nature;
 - ☉ Will provide for cooperation with external investigations (police, Army, other Contractors) as appropriate, and will share information selectively, as appropriate.
 - ☉ Will provide for disciplinary action against employees found guilty of misconduct according to the Disciplinary Procedures SOP, CAC-OPS-SOP-07-Disciplinary Process Procedures.
 - ☉ Will be accessible to the public, and in particular, clearly published on the company's website.



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SUMMARY

Grievances are to be handled with sensitivity, respect but without undue delay. The procedures are relatively straightforward and must be followed precisely; the importance of keeping records is emphasised. Advice should be sought from senior managers (particularly the Human Resources Manager or the Head of Legal) from the outset. CAC GM will be the main decisionmaker in this process and his commitment to it, will lead by example.

JAN W GEBHARDT
GENERAL MANAGER CAC