



HART

WHEN YOU FACE RISK. YOU NEED HART

GRIEVANCE POLICY

Document No:	POL/HR/GK/100218	Date:	05 December 2024
Revised:	VH	Controlled Copy	1

Prior to use, ensure this document is the most recent revision by downloading it from SharePoint, which will always hold the latest version. To request a change, submit a Document Change Request via email to your Management Representative.

Approvals

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

	Name	Position	Date
Prepared By	Graham Kerr	MR	25 August 2020
Reviewed By	Vicky Holford	HHR	05 December 2024
Approved By	James Houghton	CEO	25 August 2020

Amendment Record

This procedure 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:

Page No.	Context	Revision	Date
3.	To include all Hart companies	2	12 Oct 23
	Decision with COO and CM	2	
all	COO updated to CEO	3	05 Dec 24
7	telephone/video conference call changed to MS Teams	3	

Note:

The latest Version of this document will be held on SharePoint and shared with managers as appropriate. These managers are to:

- a) Acquaint themselves with the amendments.
- b) Amend derivations of this document that are held within their auspices.
- c) Brief their staff upon the changes.
- d) Ensure that any other documents that may need amending because of these amendments are updated accordingly.

Contents

1. INTRODUCTION.....	4
2. Aim.....	4
3. Scope.....	4
4. POLICY.....	4
5. INTERNAL PROCEDURES	5
6. Informal Dealing	5
7. Formal Process.....	6
a. Submission	6
b. Hearing	6
c. Decision	6
d. Appeal	6
8. Records.....	6
9. EXTERNAL PROCESS.....	7
a. Informal Approach	7
b. Formal Approach	7
10. SUMMARY	7

1. 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; Hart's policy on handling of grievance covers both circumstances but the procedures vary. This document reflects this situation.

A reference to 'Hart' and/or the 'Company' in this policy means Hart Security Limited (Cyprus), Hart Nationwide DMCC (Somalia), Hart Security UK (Afghanistan), Hart Security DMCC (Dubai).

2. Aim

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

3. Scope

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

4. POLICY

The following comprise Hart's grievance policy:

- a. It is to be transparent and fair by nature and in its application.
- b. Informal action will be conducted, where appropriate, to resolve problems. Often an informal meeting between the aggrieved party and their manager/Hart 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 Hart management with a written submission, which provides details of the complaint¹.
- d. Hart management and aggrieved parties are to raise and deal with issues promptly and not unreasonably delay meetings, decisions or confirmation of such decisions.
- e. Hart management and aggrieved parties are to act consistently.
- f. Hart management will carry out any necessary investigations, to establish the facts of the case.
- g. Personnel 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.
- h. Aggrieved parties may appeal against the decision made.
- i. 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.
- j. Whenever crimes have been committed – or reasonably suspected of being committed – these must be reported to the competent authorities². Careful consideration will be given to such reporting within the complex environments in which Hart is operating due to the fragile nature of governance and human rights risks involved. Advice is to be sought from ICoCA and/or SCEG.

¹ Nature, time, place and those involved.

² Defined within the ICoC as 'any state or intergovernmental organisation which has jurisdiction over the activities and/or persons in question.'

5. INTERNAL PROCEDURES

A staff member who has a grievance over any work-related issue has the right to raise their concerns with Hart management; Figure 1 illustrates the process that will be undertaken to resolve any grievance case.

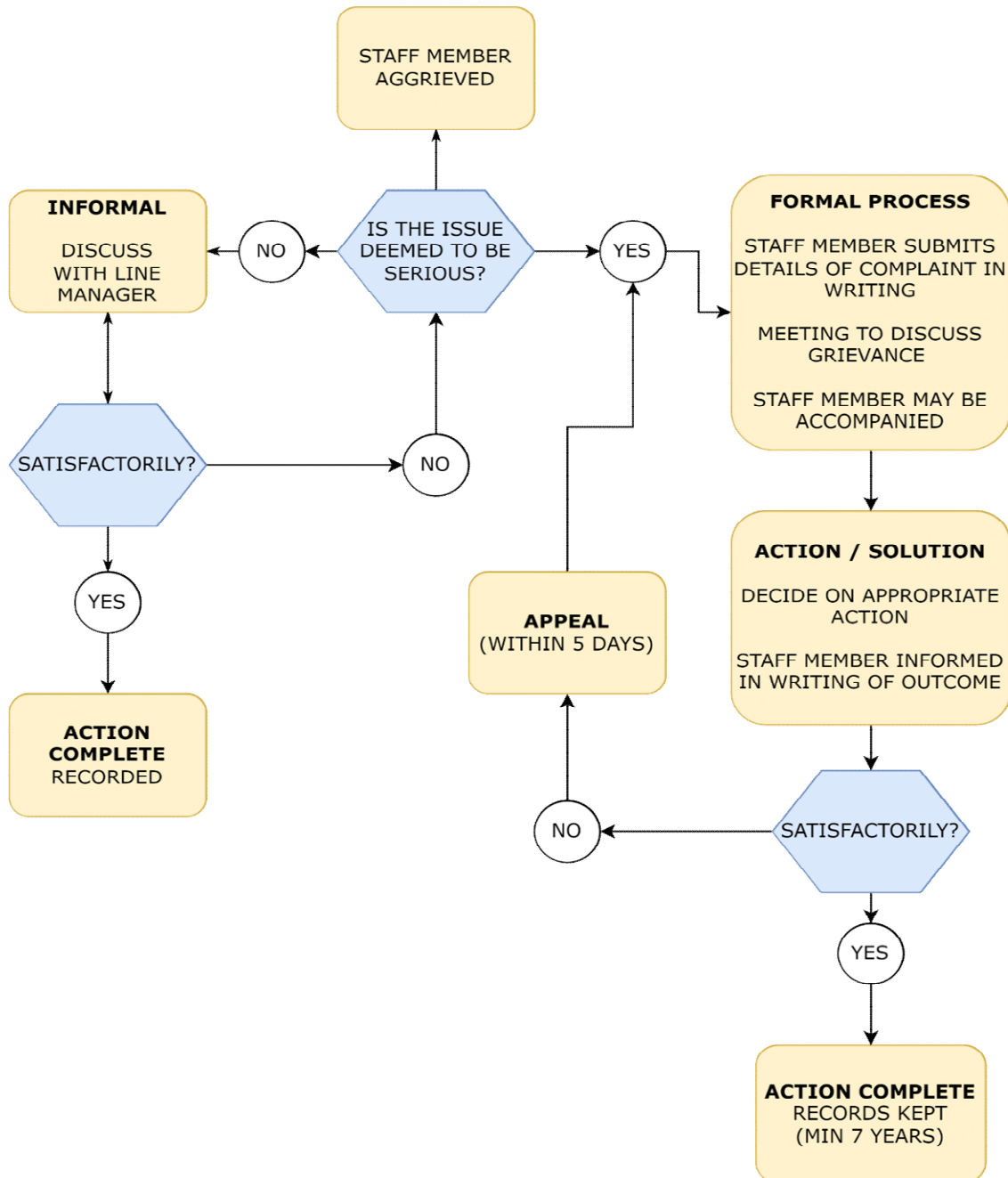


Figure 1: Grievance Process

6. 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 manager³. If it becomes clear that the

³ A manager who is suitably qualified technically, managerially and aware of the situation but is not subject of the complaint.

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.

7. **Formal Process**

The formal process may involve up to 4 procedures:

a. **Submission**

The aggrieved party should provide an appropriate Hart manager of the grievance 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.
- (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.

b. **Hearing**

Hart's management will arrange for a meeting to take place within 5 days to discuss the grievance. In preparing for such a meeting a manager 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, and consider if any reasonable adjustments are necessary for a person who is disabled. The aggrieved party has the right to be accompanied by a colleague, who should be allowed to address the meeting on the aggrieved party's behalf, put and sum up the aggrieved party's case, respond to any views expressed at the meeting and confer with the aggrieved party. Once the hearing has finished, the appropriate Hart manager will take time to consider the case.

c. **Decision**

In making the decision upon the outcome and Hart's position, the manager should consult the Country Manager and Chief Executive Officer (**CEO**), or other senior managers within the Company – and is encouraged to do so. The decision should be presented in writing within 24 hours of the hearing. If it is necessary to gather further information before deciding, the manager will inform the aggrieved party of this, and the likely timescale involved. Once it has been made, the manager is to inform the aggrieved party in writing of the outcome, and where appropriate, it should be set out what action is intended to resolve the grievance. The latter has the right to appeal if they are dissatisfied.

d. **Appeal**

If the aggrieved party has grounds for dissatisfaction, they may appeal but this should be submitted within 5 days explaining their grounds for appealing in writing to Hart management. An appeal meeting should be arranged within 5 days and should be run by the next more senior manager and wherever possible by a manager who has not previously been involved in the case. The hearing will follow the format described in 7b above and the aggrieved party may be accompanied. After the meeting, the manager will give the aggrieved party a decision, normally within 24 hours. The manager's decision is final.

8. **Records**

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

- a. Nature and details of the grievance.
- b. What was decided and the actions taken.
- c. The reasons for these actions.
- d. What was discussed in any informal chat or meeting.
- e. Whether an appeal was made and its outcome.

- f. Any other subsequent developments.

9. EXTERNAL PROCESS

The policy set out in paragraph 4 also applies to a non-staff who has a grievance to make against the Company. The procedures shown in Figure 1 and described in paragraphs 6 and 7 are very similar but the complaint is likely to be dealt with at corporate level in the first instance. In summary:

a. Informal Approach

Hart 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 7a) and send it electronically to info@hartinternational.com; receipt will be acknowledged immediately. Then arrangements will be made for a hearing – the composition of attendees will be agreed on a case-by-case basis.

The hearing is likely to be conducted by Microsoft Teams and recorded. Hart 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.

10. 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 CEO and the Head of Human Resources from the outset.