



GRIEVANCE POLICY

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. Risk Consultancy Global's policy on handling grievances covers both of these circumstances but the procedures vary. This document reflects this situation. A reference to 'Risk Consultancy Global' and/or the 'Company' in this policy means Risk Consultancy Global in all its elements and operational locations.

2. AIM

The aim of this document is to present Risk Consultancy Global's policy and procedures for handling 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), subcontractors, and any third parties who have cause, or feel that they have cause, for a complaint against Risk Consultancy Global.

4. POLICY

The following comprise Risk Consultancy Global'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 or Risk Consultancy Global 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 Risk Consultancy Global management with a written submission, which provides details of the complaint.
- d) Risk Consultancy Global management and aggrieved parties are to raise and deal with issues promptly and not unreasonably delay meetings, decisions or confirmation of such decisions.
- e) Risk Consultancy Global management and aggrieved parties are to act consistently.
- f) Risk Consultancy Global management will carry out any necessary investigations to establish the facts of the case.
- g) 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.
- h) Nature, time, place and those involved.
- i) Aggrieved parties may appeal against the decision made.
- j) 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.
- k) Whenever crimes have been committed or reasonably suspected of being committed, these must be reported to the competent authorities. Careful consideration will be given to such reporting within the complex environments in which Risk Consultancy Global is operating due to the fragile

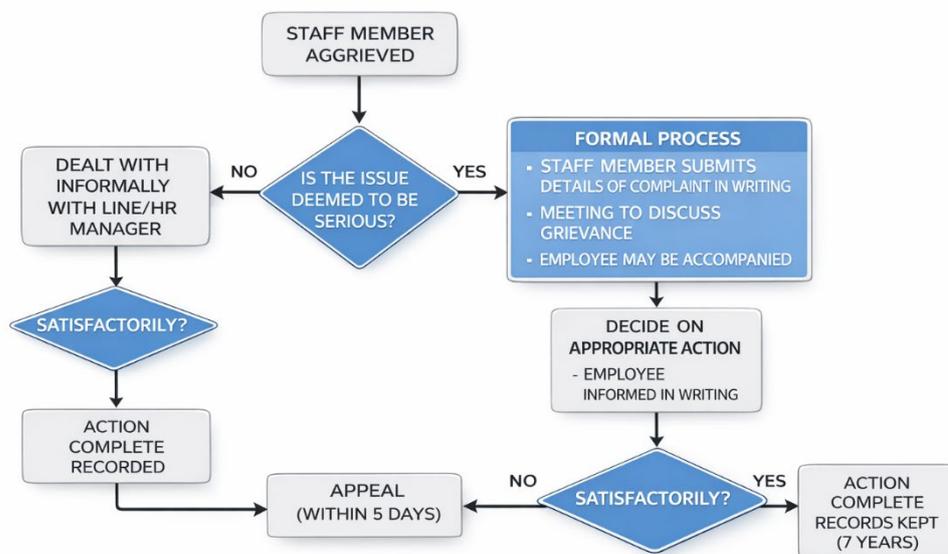
nature of governance and human rights risks involved. Advice is to be sought from ICoCa and SCEG.

5. INTERNAL PROCEDURES

An employee who has a grievance over any work-related issue has the right to raise their concerns with Risk Consultancy Global management. Figure 1 illustrates the process that will be undertaken to resolve any grievance case.

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

Figure 1



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 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.

7. FORMAL PROCESS

The formal process may involve up to four procedures:

a. Submission

The aggrieved party should provide an appropriate Risk Consultancy Global manager with a written submission which gives details of the grievance including:

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

Risk Consultancy Global management will arrange for a meeting to take place within five days to discuss the grievance. In preparing for such a meeting, a manager should consider having an impartial record keeper, reviewing the full facts of the case, assessing how similar grievances may have been resolved in the past, determining whether an interpreter may be needed, and considering any reasonable adjustments required. The aggrieved party has the right to be accompanied by a colleague or representative.

c. Decision

In making the decision upon the outcome and Risk Consultancy Global's position, the manager should consult the Managing Director Craig Poynton, or other senior managers within the Company. The decision should be presented in writing within 24 hours of the hearing where possible. If further information is required, the aggrieved party will be informed of the expected timeframe. The outcome will include any actions intended to resolve the grievance. The individual has the right to appeal if dissatisfied.

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

d. Appeal

If the aggrieved party has grounds for dissatisfaction, they may appeal within five days explaining their grounds in writing to Risk Consultancy Global management. An appeal meeting should be arranged within five days and should be run by a more senior manager who has not previously been involved in the case where possible. The decision following appeal is final.

8. RECORDS

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

- a. Nature and details of the grievance
- b. What was decided and actions taken
- c. Reasons for decisions
- d. Discussions during informal meetings

- e. Appeal outcomes
- f. Any subsequent developments

9. EXTERNAL PROCESS

The policy set out in paragraph 4 also applies to non-employees who have a grievance against Risk Consultancy Global. The procedures are similar but complaints are likely to be managed at corporate level in the first instance.

a. Informal Approach

Risk Consultancy Global prefers to resolve grievance issues on an informal basis whenever possible, but only where mutually agreed.

b. Formal Approach

The formal approach requires the aggrieved party to submit details of their complaint in writing and send electronically to HR@riskconsultancyglobal.com; receipt will be acknowledged immediately. Arrangements will then be made for a hearing, likely conducted via telephone or video conference. Risk Consultancy Global will inform the aggrieved party of its decision in writing within 24 hours of the hearing where possible. The aggrieved party has the right to appeal within five days, after which a further hearing will be conducted by a different manager.

SUMMARY

Grievances are to be handled with sensitivity, respect, and without undue delay. Procedures must be followed precisely and accurate record keeping is essential. Advice should be sought from senior management from the outset where appropriate such as the Managing Director.

CONTACT DETAILS

For any grievance related purposes please email HR@riskconsultancyglobal.com or should you wish to stay anonymous you are to engage through our website www.riskconsultancyglobal.com. Or the international code of conduct association for PSC companies <https://icoca.ch/en/complaints> or the secretariat@icoca.ch