

AFRICA RISK COMPLIANCE LIMITED (ARC), GRIEVANCE PROCEDURE**1. Introduction**

ARC recognises it is important that if you feel dissatisfied, then there is an effective means by which such a grievance can be raised and processed. This grievance procedure provides guidance to any person and/or third party who wishes to make a complaint, and also outlines the steps that will be taken to resolve the issue.

2. Grievance Procedure – Employees and Internal Stakeholders**2.1 Informal Grievance**

This procedure is not intended to prevent you from informally raising any matter you may wish to mention. Informal discussion can frequently solve problems without the need for a written record and is encouraged. When a grievance is raised the line manager (in the case of an employee) or senior manager (in the case of an internal or external stakeholder) will first determine if the grievance can be resolved informally. This decision will be based on:

- a. Whether there is a valid grievance that must be addressed (i.e., no spurious claims).
- b. What steps will need to be taken to address the grievance.

If the grievance is unable to be resolved informally, the complainant will provide the company with a formal written letter outlining the nature of the complaint, and this will be dealt with as a formal grievance.

2.2 Formal Grievance

Where the informal approach fails, if you wish to raise a formal grievance you should normally do so in writing from the outset and you have the right to be accompanied, at any stage of the procedure, by a fellow employee who may act as witness or speak on your behalf to explain the situation more clearly.

If you feel aggrieved at any matter relating to your work (except personal harassment, for which there is a separate procedure), you should first raise the matter with the person specified in your Statement of Main Terms of Employment, explaining fully the nature and extent of your grievance. You will then be invited to a meeting at a reasonable time and location at which your grievance will be investigated fully. You must take all reasonable steps to attend this meeting.

At the meeting with the complainant, ARC will:

- a. Explain the process of the grievance procedure and how the meeting will be conducted with the complainant, including the structure.
- b. Provide the opportunity for the complainant to describe the nature of their complaint.

- c. Ensure that all the facts are known about the complaint, including any witness statements.
- d. Enquire if the complainant has any suggestions themselves on how to resolve the complaint (only if appropriate).
- e. Provide a summary of the meeting and provide the same in writing to the complainant on the same day as the meeting.

At the meeting with the complainant, ARC will:

- a. Explain the nature of the complaint against the person.
- b. Find out this person's view of the situation when the complaint was made.
- c. Ask if they have any suggestions on how to resolve the situation.
- d. Explain the next steps in the grievance process.

After this meeting and if needed, further meetings will be arranged. Once this process is finished you will be notified of the decision, in writing, normally within ten (10) working days of the final meeting. At this point you will have the right to appeal

2.3 Appeal Procedure

If you wish to appeal, you must inform a senior manager within five (5) working days. You will then be invited to a further meeting, which you must take all reasonable steps to attend. As far as reasonably practicable, the company will be represented by a more senior manager than attended the first meeting (unless the most senior manager attended that meeting).

Following the appeal meeting you will be informed of the final decision, normally within ten (10) working days, which will be confirmed in writing. If this is unsatisfactory the case may be referred to another competent authority (legal or otherwise).

3. Grievance Procedure – External Stakeholders

If an external stakeholder wishes to raise a formal grievance they should normally do so in writing from the outset via email to either the email address on the ARC Africa website (<https://www.arcafica.com>), or direct to the Compliance officer (compliance@arcafica.com).

The Compliance officer will respond to the aggrieved external stakeholder in writing, either directly or via email, within forty-eight (48) hours to arrange for an investigation and resolution.

3.1 Appeal Procedure

If the aggrieved external stakeholder wishes to appeal, they are to submit this in writing within five (5) working days detailing the grounds for the appeal to the CEO of the company (info@arcafica.com). A further review and investigation will then take place with a resolution proposed in a timely manner.

4. Records

For any grievance procedure that is carried out whether for internal or external stakeholders, full records of the procedure including review, investigation, resolution and appeal, will be kept.