Document Reference: SOP-HR-003-EC-V04



#### **Policy Brief & Purpose**

Our grievance procedure ensures that employees and stakeholders can voice their complaints in a constructive, confidential, and supportive environment. Supervisors and senior management should be aware of any issues that hinder employees' well-being or performance, so they can resolve them quickly and fairly. This process also provides stakeholders a way to report activities by Expat Compass that negatively impact human rights or the environment.

By encouraging open communication, Expat Compass aims to foster a positive and respectful workplace and uphold its commitment to human rights.

A grievance refers to any complaint related to employment matters, living conditions, or Expat Compass activities impacting human rights or the environment.

#### **Scope**

This policy applies to everyone at Expat Compass, regardless of position or status, and to external stakeholders who wish to report a grievance.

#### **Definitions**

- Grievance: A formal complaint regarding employment matters, workplace issues, or Expat Compass's activities.
- Grievant: The individual or party filing the grievance.
- Respondent: The person or entity against whom the grievance is filed.

## **Policy Elements**

Employees and stakeholders can file grievances for the following reasons, including but not limited to:

- Workplace harassment.
- Health and safety concerns.
- Supervisor behaviour.
- · Adverse changes in employment conditions.
- Human rights violations.
- Discrimination or unfair treatment based on gender, ethnicity, religion, or disability.

While less critical issues are encouraged to be resolved informally, more serious matters may directly proceed to the formal grievance process.

## **Employee Rights**

Employees who file grievances can:

- · Reach out to their direct supervisor or the HR department.
- Submit a formal grievance form (Annex A) explaining the situation in detail or online via the grievance section located at the bottom of any page.
- Refuse to attend meetings alone, with the option to bring a trusted colleague or representative.

Appeal any formal decision.

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Employees facing allegations have the right to:

- · Receive a copy of the allegations.
- Provide a response and relevant evidence.
- Appeal any formal decision.

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## **Company Obligations**

Expat Compass is committed to:

- Maintaining a formal grievance procedure.
- Communicating this procedure clearly to all employees and stakeholders.
- Investigating grievances promptly and impartially.
- Treating all grievants equally and ensuring confidentiality at all stages.
- Resolving grievances whenever possible within outlined timelines.
- Enforcing a zero-tolerance policy for retaliation.
- Providing an accessible online grievance form available through the grievance section on the company's website.

#### **Grievance Procedures**

#### **Informal Resolution**

Employees are encouraged to address minor issues by communicating informally with their supervisor. If the grievance involves the supervisor or cannot be resolved informally, employees should escalate the matter.

#### Filing a Formal Grievance

- 1. Step 1: Submit a Grievance Form
  - a. Employees should complete the grievance form (Annex A) and submit it to their direct supervisor, HR department, or via email to <a href="mailto:grievance@expat-compass.com">grievance@expat-compass.com</a>
  - b. Alternatively, employees and stakeholders can file a grievance online through the grievance section located at the bottom of any page on the company's website.
  - c. The grievance will be acknowledged within 48-72 hours, and an investigation will be initiated.
  - d. A full response will be provided within 10 working days, unless an extended period is agreed upon.

#### 2. Step 2: Appeal the Decision

- a. If dissatisfied with the decision, employees can submit a grievance appeal form (Annex B) within 10 days of receiving the initial response.
- b. The appeal will be reviewed by the next-level manager, with a final decision issued within 10 working days.
- 3. Step 3: Escalation to Senior Management
  - a. If the grievant is still unsatisfied, they may request an appeal to top management (Country/Regional Manager).

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b. A formal review will be conducted with another senior manager present, and a final decision will be issued within 20 days.

## 4. Step 4: Optional Mediation

a. If both parties agree, the matter may be referred to an impartial third party for advice, conciliation, or arbitration.

# **HR Department Responsibilities**

The HR department will:

- Provide copies of the grievance policy and procedures upon request.
- Organize mediation or formal meetings as needed.
- Investigate grievances thoroughly, seeking external expertise when necessary.
- Keep all parties informed of progress and outcomes.
- Communicate decisions clearly and enforce any agreed actions.
- Maintain accurate and confidential records of all grievances and their resolutions.

## **Third-Party Grievances**

Third parties can report grievances related to Expat Compass activities that negatively impact human rights or the environment. Grievances can be submitted via email to grievance@expat-compass.com or in person at any Expat Compass office.

Additionally, third parties can file grievances anonymously through the grievance section located at the bottom of any page on the company's website.

To ensure anonymity and protection against retaliation, third parties may report grievances under the Whistleblower Protection Policy. All reports will be handled with strict confidentiality.

## **Confidentiality and Non-Retaliation**

Expat Compass ensures that all grievances will be treated with confidentiality, and no employee or stakeholder will face retaliation for filing a complaint in good faith. Retaliatory actions, including harassment or unjust treatment, will be subject to disciplinary action.

# **Policy Review**

This grievance procedure will be reviewed annually to ensure it remains effective, fair, and aligned with best practices.

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