



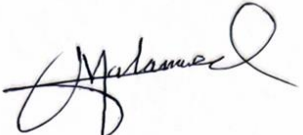
GRIEVANCE AND COMPLAINTS PROCEDURE

P-COR-001



Iraqi Sword Security Services Grievance and Complaints Procedure	Document No:	P-COR-001
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Document Approval

Date	Names	Position	Signature
01/04/2025	Mohammed Ali	CEO	



Grievance and Complaint Procedures

Introduction

The Aim of this document is to give directions on how employees and/or stakeholders process a grievance or complaint that cannot be resolved between two parties. This is aimed at clearing up the complaints in the shortest time possible.

A Grievance is regarding a complaint about a person's employment matters or living conditions and also for any stakeholder or person who has a grievance or complaint about Iraqi Sword Security activities that are having a negative impact on human rights and/ or the environment in which it is operating.

Iraqi Sword Security Employee Procedures

Grievance procedures are initiated when an agreement cannot be made between two parties, either with another employee or the company itself. This is can be initiated at any time and by any employee.

Stage 1

The first stage of an initiation is to the complainants' line manager verbally or in writing. If the concerns against the employee's immediate manager, then the grievance should be taken to their line manager. Access to this line manager should be available to all employees, or the use of the ethics email or portal can be used – ethics@iraqisword.com

If the manager is unable to resolve the matter due to its nature, then a formal written grievance form should be submitted using the form in **Annex A**.

The line manager or company will initially respond to any complainant within 48-72 hours to the grievance letter unless an extended period of time is agreed upon by both parties. This will be followed with an investigation to the matter and a full response sent within 10 working days, unless a longer period of time has been agreed with the complainant.

Stage 2

If the complainant is still aggrieved and not satisfied with the final response, then they may appeal against the manager's decision and this will then be processed by the next manager in line this must be submitted using the form **Annex B** within 10 days of the previous decision with a copy of the completed form from **Annex A**.

This Senior Manager will attempt to settle the grievance and write his decision on the case within ten days. If the complainant is still wishes to appeal this decision, he will be given top



management for review with the complainant using the form in **Annex C**, attaching both complaints previously submitted.

Stage 3

Top management is the Country Manager, he will arrange and listen to the appeal with another senior manager present where they will respond formally and let the complainant know his decision. This will be done within 20 days.

There will be no further right of appeal. However, both parties can agree that there would be some merit in referring the matter to a third party for advice, conciliation or arbitration, arrangements will then be made to find a mutually acceptable third party.

If the grievance is against the COO, then the case will be sent to the CEO.

Complaints

Any Complaints that cannot be dealt with verbally between the two parties and settled should be written onto the complaint for **Annex D** this is to register that a complaint exists and cannot be dealt without the need for another option or solution.

Complaints can arise due to working conditions and pay issues, which will need to be address and settled at in the shortest time period possible, this may require a compromise or a period of time for the solution to be worked out or delivered.

Definition of a Complaint

This is a collective grievance raised by more than one employee or consultant.

Complaint Procedures

The issue should be reported to the Employees/ Consultants next line manager, if the issue cannot be resolved then the country Manager should be informed so that he is aware before the situation becomes unmanageable.

If the complaint is still unresolved then the CEO will be informed who will make a settlement or compromise to resolve the matter.

Status Quo working

The status quo working arrangements, relating to the conditions in place immediately before the complaint was raised, shall operate until the agreed complaints procedures have been exhausted.



Time Limits

It is in the interest of both the Company and its employees that complaints should be resolved quickly. The following timelines will be expected of Iraqi Sword Security to deal with grievance or complaints to ensure they are efficiently and effectively dealt with:

- Initial response to any grievance or complaint within 48-72 hours.
- Final investigation and response within 10 days of initial response.
- Unsatisfied complaint dealt with within 20 days of unsatisfied report received.

Whistle Blowers Policy

Iraqi Sword Security takes matters of grievance and complaints against it very seriously and deals with such matters swiftly and effectively. If you have any grievance or a complaint then you can either fill out the portal form or email us direct at ethics@iragisword.com. All such matters are dealt with by senior management and are protected by our confidentiality and this whistleblowing policy so you can be sure your case will be dealt with in the strictest of confidence. You should receive an automated response immediately and a formal response within 48-72 hours from one of our top management dealing with the issue and then you can expect a full and final response within 10 days of initial formal response. We thank you in advance for bringing any complaint or grievance to our attention.

All employees who choose to report wrongdoing will be treated with the utmost confidentiality and protected against any reprisals. All persons reporting wrongdoing will remain anonymous throughout the process and will receive all representation from Iraqi Sword Security if needed during the process.

Third Party Procedures

This document can be viewed at our HQ locations or provided to any third party at their request should they wish to report wrongdoing. They will also be protected under the Whistle Blowers policy and remain anonymous and protected against any potential reprisals and the report will be treated with the utmost confidentiality. The address for our company for third parties can be seen on our website with all contact information should they wish to request this policy to make a report.



Iraqi Sword Security Grievance Form A

ANNEX A

To: **Inline Manager Name**

From: **Complainant Name**

Callsign/ Department: **Callsign or office**

Date:

Immediate Superior:

Dear **XXXX**

I wish to take a formal grievance out against: **Name** in line with the Company Grievance Procedure. The details of my grievance are shown below:

Yours sincerely,

(Manager should respond to this formal written grievance within 48 – 72 hours unless an extended period for response is mutually agreed)

Where a grievance is raised against the COO then the grievance will be heard by the CEO.

There is no further right of appeal. Where however **both** parties agree that there would be some merit in referring the matter to a third party for advice, conciliation or arbitration, arrangements will then be made to find a mutually acceptable third party.



Iraqi Sword Security Grievance Form B

ANNEX B

To: **Inline Manager Name**

From: **Complainant Name**

Callsign/ Department: **Callsign or office**

Date:

Immediate Superior:

Dear XXXX

On **Date** (within 10 days of the response to the initial formal grievance) my grievance againstwas heard by.....

I am not satisfied with the outcome of this meeting and would like to appeal to you for a further hearing of my grievance, in line with the Company Grievance Procedure.

I enclose a copy of the original letter regarding this matter and any other correspondence and information related to it.

Yours sincerely

(Manager should respond to this formal written grievance within 10 working days unless an extended period for response is mutually agreed)

Yours sincerely,

Where a grievance is raised against the COO then the grievance will be heard by the CEO.



Iraqi Sword Security Grievance Form C

ANNEX C

To: **Inline Manager Name**

From: **Complainant Name**

Callsign/ Department: **Callsign or office**

Date:

Immediate Superior:

Dear **XXXX**

On **Date** (within 10 days of the response to the second stage of the formal grievance) I appealed to against the decision made at my initial grievance against.....

I remain dissatisfied with the outcome of this meeting and would like to appeal to you for a further hearing of my grievance, in line with the Company Grievance Procedure.

I enclose a copy of the original letter regarding this matter and my response to Grievance Form Annex B any other correspondence and information related to it.

Yours sincerely

(Country Manager should respond to this formal written grievance within 20 working days unless an extended period for response is mutually agreed)

Yours sincerely,

Where a grievance is raised against the COO then the grievance will be heard by the CEO.

There is no further right of appeal. Where however **both** parties agree that there would be some merit in referring the matter to a third party for advice, conciliation or arbitration, arrangements will then be made to find a mutually acceptable third party.



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Grievance and Complaints Flow Chart

