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|  | <b>SAFETEC<br/>SECURITY<br/>LIMITED</b>                                 | Doc. No. <b>SS/OP/018</b>      |              |
|   |   | Effective Date:<br>30/01/ 2025 |              |
|   | <b>Procedures for Internal and external<br/>complaint and grievance</b> | Rev: 00                        | Issue No. 01 |

## 1. Purpose

This procedure establishes Safetec Security's framework for handling complaints and grievances from internal and external stakeholders, ensuring compliance with ISO 18788 Clause 8.8.3 and Ugandan laws. It ensures that all grievances are handled expeditiously, fairly, and impartially, while protecting complainants from retaliation.

## 2. Scope

This procedure applies to all Safetec Security personnel, clients, subcontractors, and affected external parties who wish to report complaints, grievances, or non-conformances regarding human rights violations, security misconduct, ethical concerns, or operational deficiencies.

## 3. Receiving and Addressing Complaints and Grievances

- Complaints and grievances shall be submitted in writing, verbally, or anonymously through:
  - Email, verbal or written submissions to Safetec Security's designated Human resource representative for Safetec Employees
  - Email, verbal or written submissions to Safetec Security's designated sales and marketing representative, command centre/ control room for external clients.
  - A physical complaint box is available at Safetec Security offices for receiving external and internal complaints and grievances.
- The grievance mechanism is publicized to all employees during meetings, clients, and affected external parties on the company website.
- All complaints shall be acknowledged within 48 hours, with a commitment to investigate and resolve the issue fairly and promptly.

## 4. Hierarchical Steps for Resolution Process

Step 1: Initial Review and Acknowledgment

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- The complaint is received and logged by the respective Department.
- An initial review is conducted to determine the nature and severity of the grievance.

#### Step 2: Assignment of Investigation Team

- Complaints involving serious violations (e.g., human rights abuse, criminal acts) are immediately escalated to senior management and, where applicable, law enforcement.
- Internal grievances (e.g., workplace conflicts) are assigned to an impartial Grievance Resolution Committee.

#### Step 3: Investigation and Evidence Gathering

- The selected investigation team collects relevant documents, witness statements, and physical evidence.
- Confidentiality shall be maintained, and whistleblower protections shall be enforced.

#### Step 4: Findings and Corrective Actions

- The investigation team presents findings to senior management.
- Appropriate corrective actions, including disciplinary measures, policy updates, or remedial actions, are implemented.

#### Step 5: Communication of Outcome

- The complainant (if not anonymous) shall be informed of the outcome and any remedial measures taken.

### 5. Investigation Procedures

Safetec Security implements clear protocols for investigating grievances, including:

#### 5.1 Cooperation with External Investigation Mechanisms

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- Where necessary, Safetec Security shall cooperate fully with external investigative authorities, such as:
  - Uganda Police Force (UPF) for criminal matters.
  - Regulatory bodies overseeing private security operations.
- Safetec Security shall provide all relevant documentation, witness statements, and evidence to support external investigations, subject to confidentiality and legal constraints.
- The organization shall appoint personnel to handle communications with external agencies whenever there are grievances.

#### 5.2 Prevention of Witness Intimidation and Evidence Tampering

- Witnesses shall not be threatened, coerced, or intimidated in any manner.
- Witness interviews shall be conducted in a safe and secure environment.
- Evidence, including written statements, video footage, and physical documentation, shall be:
  - Securely stored, protected from alteration, destruction, or loss, Handled only by authorized personnel.
- Any attempts to obstruct an investigation shall result in disciplinary and legal consequences.

#### 5.3 Protection Against Retaliation

- Individuals submitting grievances in good faith shall be protected from retaliation, including:
  - Unlawful termination or demotion, Harassment or workplace discrimination, Verbal or physical intimidation.
- Affected individuals shall be provided with confidential reporting channels to raise concerns about retaliation.

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- Any confirmed case of retaliation shall result in disciplinary actions, including termination of employment and possible legal action.

## 6. Handling Grievances Alleging Criminal Acts or Human Rights Violations

- Complaints involving criminal activity, human rights violations, or imminent danger shall be prioritized and reported to law enforcement or relevant human rights bodies immediately.
- Where necessary, emergency protective measures shall be provided for at-risk individuals.
- All actions taken shall comply with Ugandan legal frameworks and international human rights conventions.

## 7. Confidentiality and Protection Against Retaliation

- All complaints shall be handled confidentially to prevent retaliation.
- Whistleblower protections shall be provided to encourage reporting without fear of retribution.
- Retaliation against complainants will result in disciplinary action, including termination or legal consequences.

## 8. Record Retention and Compliance Monitoring

- All complaint records shall be securely stored and maintained as required by the law.
- Management shall conduct periodic reviews of grievances to identify trends and areas for improvement.
- A summary of resolved complaints shall be included in quarterly reports to ensure transparency and accountability.

## 9. References

- Complaint and grievance records
- Quarterly reports
- Meeting minutes