

<b>AMALGAMATED SECURITY SERVICES LIMITED</b>			
<b>Doc. No.</b> ASSL-OPS-013	<b>Issue Date:</b> 2002-11-09	<b>Rev. No.</b> 005	<b>Date:</b> 2021-01-28
<b>Issued By:</b> Information Systems Coordinator		<b>Authorized By:</b> Executive Chairman/Chief Executive Officer	<b>Page</b> 1 of 7
<b>HANDLING GRIEVANCES BY MEMBERS OF THE PUBLIC OR CUSTOMERS</b>			

Approved: _____ Officer Title	<i>Signature</i>	Executive Chairman/Chief Executive
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### Change Record

Revision	Date	Responsible Person	Description Of Change
001	2002-11-09	Information Systems Coordinator	Initial Release
002	2008-08-13	MIS Analyst	Update Related Documents
003	2011-03-25	Information Systems Coordinator	Revise documentation to include guidelines for handling customer's grievances.
004	2016-02-29	Chief Information and Research Officer	Review update
005	2021-01-28	Chief Information and Research Officer	5 year standard document review and update

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**1. Purpose**

The purpose of this procedure is to identify and establish processes for handling of Grievances brought by customers or third parties against Amalgamated Security Services Limited (ASSL) or alleging that improper or illegal conduct by employees of ASSL has occurred or is about to occur.

**2. Scope**

This procedure applies to all activities surrounding the handling of such grievances or allegations and its associated responsibilities.

**3. References**

**Incidents OPS-P030**

**4. Definitions**

**Improper Conduct** - will include encouraging, or seeking to benefit from any national or international crimes including but not limited to war crimes, crimes against humanity, genocide, torture, enforced disappearance, forced or compulsory labour, hostage-taking, sexual or gender-based violence, human trafficking, and the trafficking of weapons or drugs, child labour or extrajudicial, summary or arbitrary executions.

**Torture and other cruel, inhuman or degrading treatment or punishment**, - as referred to here, includes conduct by a private entity which would constitute torture or other cruel, inhuman or degrading treatment or punishment if committed by a public official.

**Human trafficking** - is the recruitment, harbouring, transportation, provision, or obtaining of a person for (1) a commercial sex act induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age; or (2) labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage, or slavery.

**Child Labour** -- shall be the employment of anyone under the age of 18.

**5. Persons Responsible**

**Executive Chairman /Chief Executive Officer**

- Reviews the investigation file to determine if the investigation is complete

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- Decides on the appropriate course of action to be taken at the completion of the investigation

**Chief Security Officer**

- Advises the Chairman of the incident and its status.
- Follows up with the Divisional Manager to ensure that the investigation has started
- Reviews the investigation report and determines if complete
- Recommends the appropriate action to be taken.
- Ensures that the person who made the allegation is written, at the conclusion.

**Divisional Manager**

- Reports the incident to the Chief Security Officer.
- Assigns a Regional Supervisor to conduct investigations.
- Reviews the progress of the investigation
- Makes recommendations based on the investigation
- Updates the web site with the incident information.

**Regional Supervisor**

- Conducts investigations into the incident.
- Prepares and submits reports to the Divisional Manager.

All other persons assigned responsibilities from time to time within the Company.

*[All questions regarding the interpretation, implementation and administration of this procedure should be submitted to the Executive Chairman/Chief Executive Officer.]* All responsibilities, designations and authorities shall be in accordance with the Matrix of Authority

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## 6. Procedure

### 6.01 Reporting

6.02.01 Anyone who has a grievance against ASSL or who believes that improper or illegal conduct has occurred or is about to occur may report that grievance or allegation of improper or illegal conduct to any Divisional Manager/designate.

6.02.02 A Divisional Manager/designate receiving such a report will in turn report the allegation to the Chief Security Officer/designate who will decide on the appropriate Divisional Manager or designate/Director to be in charge of the investigation.

### 6.02 Investigations

6.02.01 The assigned Divisional Manager or designate/Director will assign a Regional Supervisor to conduct investigations into the incident.

6.02.02 The Divisional Manager or designate/Director will guide the Regional Supervisor in the conduct of the investigations and ensure that all possible avenues are explored.

6.02.03 The Divisional Manager must ensure that the investigations are concluded within three days of the first knowledge of the incident.

6.02.04 Where the investigations cannot be concluded within three days, the manager must advise the Chief Security Officer/designate and the Security Administrator, stating the reasons for the delay.

6.02.05 In conducting the investigation both the Divisional Manager/designate and the Regional Supervisor must give due consideration to the confidentiality of the information unearthed during the investigation.

6.02.06 All staff shall ensure that any individual who reports wrongdoings in good faith is provided protection against any retaliation for making such reports

### 6.03 Reports

6.03.01 All reports must be completed and submitted within the stipulated time. Persons

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must be guided by the Incident Reporting and Investigating Procedure [ASSL-HSE-022]

- 6.03.02 The investigator's report must include the following:
- a) time and location of the incident;
  - b) identity and nationality of any persons involved including their addresses and other contact details;
  - c) injuries/damage sustained;
  - d) circumstances leading up to the incident;
  - e) an assessment of whether the allegation is considered true.
  - f) any recommended measures to be taken by the Company in response to the allegation including measures to be taken to prevent a recurrence,
- 6.03.03 Upon receipt of the Investigator's report the Divisional Manager or designate/Director will review the report and determine whether the investigation is considered complete or whether there are areas that require further examination. If there are areas that require further examination he/she shall so direct the investigator.
- 6.03.04 Upon completion of the investigation the Divisional Manager or designate/Director will forward the report along with their comments to the Chief Security Officer, who will review and determine if the investigation is indeed complete. Where the Chief Security Officer/designate is satisfied that the investigation is complete, he/she shall forward the complete file on the incident to the Executive Chairman/Chief Executive Officer or designate along with his/her recommendations.
- 6.03.05 The Executive Chairman/Chief Executive Officer or designate upon receipt of the file will review the documents and determine the appropriate course of action.
- 6.04 Actions from the Investigation**
- 6.04.01 Where the investigation reveals that disciplinary action should be taken, the

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appropriate disciplinary action will be taken which could include termination of employment in case of a finding of such violations or unlawful behaviour;

- 6.04.02 Where the investigation reveals that unlawful behavior has taken place, such unlawful actions will be reported to the Police.
- 6.04.03 Where an unlawful action has been reported to the Police all staff shall cooperate with the official investigations, and not participate in or tolerate from their Personnel, the impeding of witnesses, testimony or investigations
- 6.04.04 At the conclusion of the investigation the individual who made the allegation shall be advised in writing of the outcome of the investigation.
- 6.04.05 Electronic and hard copy archives will be maintained for future reference.

**7.0 Related Documents**

HSE Incident Report Form  
Handling Incidents

ASSL-HSE-F001  
ASSL-OPS-FL013

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