

GRIEVANCE AND COMPLAINTS POLICY

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GRIEVANCE AND COMPLAINTS POLICY

SECTION A - EXTERNAL GRIEVANCES

Purpose

This Grievance and Complaints Policy describes the procedures and process which Peregrine RM will use to respond to resolve non-judicial grievances raised by 3rd Party/External Stakeholders and complaints received from clients and members of the public. This policy will assist in the quick resolution of any adverse incidents or actions that could impact Peregrine RM's business activities.

Scope

This policy covers the following scope:

'the response to grievances as a result of security operations and business activities in benign, complex and high-risk environments'.

This policy does not cover the following:

- Grievances that need to be resolved via a Judicial Process.
- Contractual or commercial grievances.
- Internal grievances, see Section B.
- Supply chain grievances.

Compliance and Business Obligations

The following international guidelines and protocols are followed;

- a. UN Guiding Principles for Business and Human Rights – (principle. 31)
- b. Developing and operating fair and accessible company grievance mechanisms that offer effective remedies (Manual ICoCA)
- c. The International Code of Conduct for Private Security Service Providers – (commitment. 67)
- d. ANSI-ASIS PSC.1-2022 – (clause. 9.5.7)

Incident Types

This policy refers to the follow operational and business activities delivered by Peregrine RM:

- a. Incidents that have been caused by and/or directly involve Peregrine RM which negatively impacts communities, localised authorities, NGOs in locations where security operations are being delivered by Peregrine RM.
- b. Incidents caused by our clients whilst under our protection or sub-contracted services.

External Stakeholders

The following actors and their organisational assets are considered to be external stakeholders within this policy:

- a. Clients
- b. Communities
- c. Civil Authorities (Host Nation)
- d. Military Authorities (Host Nation)
- e. NGO's
- f. Local supply chain
- g. Third Country Civil/Military Authorities

Risk Management

- h. The following risks have been identified as potential route causes for grievances:
 - i. Uncontrolled/unsafe use of force.
 - j. Causation of death, injury or harm.
 - k. Damage to property.
 - l. Adverse impact towards culture, faith/religious beliefs or heritage.
 - m. Damage to the natural environment

Principles

The following principles will be adopted in-line with ICoCA Guidance Manual:

- a. Fairness
- b. Accessibility
- c. Impartiality
- d. Effective Remedial Action
- e. Record Keeping
- f. Relationships with Competent Authorities
- g. Protection of Complaints

Stakeholder Engagement - Process

During the delivery phase of security services Peregrine RM will be supporting a client in its business activities therefore Peregrine RM may fall beneath our clients existing process. Therefore, both Peregrine RM and our clients may be responsible for the root cause. Where this occurs, Peregrine RM will ensure that our process is followed to ensure it remains equitable. When considering high risk and complex environments Peregrine RM will ensure the level of engagement with external stakeholders will be measured against the following:

- a. Risk of death (Peregrine)
- b. Risk of death (external stakeholders)
- c. Risk to engagement with different communities and cultures
- d. Risk from disclosure of information
- e. Risk from integration with Peregrine RM operational activities from local workforce
- f. Risk from extortion, elicitation or bribery
- g. Risk from Human Rights violations

Developing and operating fair and accessible company grievance mechanisms that offer effective remedies (Manual ICoCA)

<https://irpcdn.multiscreensite.com/df2a2505/files/uploaded/HR%20PO027%2020%20Anti-Bribery%20%26%20Corruption%20Policy.pdf><https://irp.cdnwebsite.com/df2a2505/files/uploaded/HR%20PO020%2020%20Human%20Rights%20Policy.pdf>

Lines of Communication

When working with local communities, external stakeholders, clients and other third parties, Peregrine RM will:

- a. Work with external clients to align the grievance process as much as is reasonably practicable.
- b. Provide and liaise with specific points of contact to ensure compliance with external stakeholders regarding permissioning around licenses and operations.
- c. Utilise communication strategies to engage with local communities and actors.
- d. Engage and align with CSR strategies and projects.

Business as Usual

Peregrine RM will ensure external stakeholders are aware of our grievance process, this will be achieved when creating the project scope and will be adapted dependent on the specific

variations experience at a local level. Where language type may cause confusion, translated reference material will be provided.

This will be sent via email to ensure audit trails are maintained and recorded. A template grievance template can be found at Annex A.

Assessing a Grievance

Where applicable, Peregrine Risk Management will follow a detailed assessment process to understand the level of impact relating to the reported grievance. See Annex B.

Post Incident

All incidents will align with our current ISO 9001:2015 (Quality Management), ISO 18788:2015 and ANSI-ASIS PSC.1-2022 process to ensure effective resolution.

SECTION B - INTERNAL GRIEVANCES

Purpose and Scope

The purpose of a grievance procedure is to enable all employees and contractors to raise a work-related problem, concern, or complaint and to have the matter dealt with as quickly and as fairly as possible.

This procedure applies to all employees. It does not form part of your terms and conditions of employment and the Company may depart from it depending on the circumstances of the case.

Informally raising a grievance

Many work-place issues can be resolved quickly and easily by taking informal action. If it is not appropriate to raise your grievance informally, or your grievance has not been resolved to your satisfaction through informal action, you should use the formal grievance procedure.

Formally raising a grievance

Stage 1

You should put your grievance in writing, without unreasonable delay, and send it to the Head of Compliance at mHUDSON@peregrine-rm.com. If your grievance involves the Head of Compliance, then you should send your grievance to the Director of Operations or Director of Commercial at jlAWRENCE@peregrine-rm.com or wBRITTON@peregrine-rm.com

The appropriate Manager will arrange a meeting with you to discuss your grievance, normally within [5] working days of receiving your complaint. You will be given the opportunity to explain your grievance and how you think it should be resolved. The Manager/Director hearing your complaint will listen carefully to what you have to say and will discuss the matter thoroughly with you. Your complaint may need to be investigated further and you will be advised if this is the case. After your grievance has been fully investigated, you will be notified in writing of the outcome and of any action to be taken to resolve your grievance. This response will normally be given to you in writing, within [5] working days of the meeting. If it is anticipated that the response will take longer you will be informed of this and of the expected

timescale. You will also be informed of your right to appeal if you are dissatisfied with the outcome.

Stage 2

If you are dissatisfied with the handling of your grievance at Stage 1, you can appeal in writing to a Manager or Director not involved in the initial grievance, sending a copy of your appeal letter to that individual.

Where possible, a manager with no previous involvement in the case will be appointed to consider your appeal and, normally within [5] working days of receiving your appeal, will arrange a meeting with you to discuss your appeal. The manager/director (appeal officer) will listen carefully to what you have to say and will discuss the matter thoroughly with you. The Manager/Director may want to investigate your complaint further and you will be advised if this is the case. After your appeal has been investigated, you will be advised, in writing of the outcome. This response will normally be given to you in writing, within [5] working days of the appeal meeting. If it is anticipated that the response will take longer you will be informed of this and of the expected timescale. You will have no further right of appeal. During all stages of the formal grievance procedure you will be provided with copies of notes as soon as they become available.

Right to be accompanied

You have a statutory right to be accompanied by a work colleague or a trade union representative at formal grievance meetings, which concern a complaint about a duty that we owe to you. If you wish to be accompanied, please confirm your request to [HR] who will confirm if it is reasonable and appropriate for your chosen companion to attend in the circumstances.

Ex-employee

If you wish to raise a grievance after you have left the Company, please forward it in writing to the Company. The Company is not obliged to investigate or respond to your complaint, but we may decide to do so if it is deemed appropriate.

Resolving complaints through the employment tribunal

The Company hopes that effective use of this procedure will negate the need for employees to seek external resolution for complaints by way of an employment tribunal claim.

However, the Company also respects that employees may wish to exercise this right and, accordingly, employees are advised that a failure to follow this procedure beforehand could result in a reduction in any compensation awarded of up to 25%.

If an employee believes that they have been unfairly treated they may decide to take their case to an employment tribunal. The process for this would involve attempted resolution through the Advisory, Conciliation and Arbitration Service (Acas) early conciliation service.

Information can be found at: www.acas.org.uk/conciliation and the Acas helpline can provide further advice.

The ACAS helpline details are:

Telephone: 0300 123 1100

Textphone: 18001 030 0123 1100

Monday to Friday, 8am to 8pm Saturday, 9am to 1pm

SECTION C – COMPLAINTS

Key Principles behind the Complaints Policy and Procedure

The principle which lies at the heart of the Company's Policy is that complaints should be resolved swiftly and readily as close to the problem as possible. Staff in contact with customers and the public will need encouragement, training and support to see that this happens. When complaints cannot be easily resolved, further procedures are described which should be followed. Furthermore, the lessons learned from the investigation of complaints should be used to improve the Company services for those who use them. Rather than feeling threatened by complaints, all staff are expected to listen carefully to them, to examine whether there is an opportunity to raise the standard of service that we provide.

The Complaints Procedure specifies response times for all complaints together with template responses that provide a framework to work with. It also provides a common format for the recording of complaints. This will enable complaints to be monitored on a company-wide basis.

Types of Approaches from Customers and the Public: Defining Complaints, Reports and Comments

All staff need to be clear about what sort of situation they are dealing with when they receive a communication from either a customer or a member of the public. It is important, in particular, that consistent judgements are made across the Company about what is a "complaint". Broader approaches can be categorised in two ways:

- **Complaints**

A complaint is determined as occurring when an individual or group of people feel the Company has failed to do something it should have done or done something badly, or if they feel that they have been unfairly treated by any of the Company staff.

- **Comments**

Comments are statements by customers or members of the public or service users about the service provided (or not provided) by the Company. They may be compliments or suggestions as to how services could be improved. They may be views or representations, perhaps adverse, about the Company's stated policy and provision. In each case the member of staff receiving the comment will need to thank the customer for taking the trouble to express their views, describe how it will be dealt with if further action is required and then refer the comment on if appropriate. As with reports, comments should not be regarded as complaints. It is important, however, that comments are fed back to the relevant Manager or other person responsible as positive feedback is both useful and encouraging.

Complaints Procedure

The procedure to be adopted can be broadly divided into three key stages:

STAGE ONE

Where appropriate the best way to deal with complaints is to try to sort them out on the spot. This can often prevent a minor complaint from becoming a major issue. The complainant may only be seeking an explanation of a decision or action but if this explanation is not forthcoming this could easily become a formal complaint.

In the event that someone makes a complaint and is satisfied with the outcome or is not satisfied but does not wish to take the matter further, that will be the end of the matter. As a matter of good practice, the department should record these complaints as a means of analysing and perhaps improving aspects of service delivery.

If the outcome does not prove satisfactory and the person concerned remains aggrieved and wishes to take the complaint further, see stage two for further instructions.

STAGE TWO

Where a complainant remains dissatisfied after a complaint has been dealt with or if it was not appropriate to deal with in person he or she can refer it in writing to Peregrine Risk Management.

Stage two complaints or initial written complaints should either be directed to the relevant management channel with Peregrine Risk Management, this could be directly to the Operations Team at operations@peregrine-rm.com or hr@peregrine-rm.com. The complaint will be sent logged onto the system and followed up via the manager responsible.

Written complaints or complaints requiring a written response should be investigated and responded to in the following manner:

- Registered as a Complaint
- First response sent within 24 hours outlining the matter has been noted and a full report will follow
- Second response sent within five working days unless too complex. This should be a detailed report on what has been done and any plans for the future
- In addition, a non-conformance report MUST be completed at the initial stage if identified.

Complaints received via email will be dealt with in the same way as written correspondence.

Callers who wish to make a complaint in person should be encouraged to contact the relevant manager and these should be recorded and dealt with in the same way as written complaints.

If the complaint is made on behalf of someone, by a relative, friend or someone representing the complainant, they should be dealt with in the same way as complaints directly from the complainant.

The detailed written response should take the form of either:

A letter containing the findings of the investigation with, if required, a suitable apology and details of the course of action to be undertaken in order to rectify the situation.

OR

If a response cannot be made within the target time due to the complexity of the complaint, the letter must contain the reasons for the delay and a revised timetable for the response to be made.

When the investigation has been completed, the outcome will be recorded on the system and all correspondence, reports and relevant documentation relating to the complaint must be filed and kept for future reference.

All complaints should be resolved at this stage, if, in the rare event the complainant is not satisfied with the outcome of the investigation, they may refer the complaint to the Company Directors who will undertake a review of the complaint on behalf of the Company.

STAGE THREE

The Compliance Team will be responsible for ensuring the complaint is dealt with in accordance with the procedures.

All correspondence will be retained in accordance with Company procedures.

In the event that an anonymous complaint is received or the complainant is unwilling to provide their name and address, the matter must still be investigated. The procedure will need to be modified to suit the particular circumstance.

Complaints of a Very Serious Nature

If the complaint is of a very serious nature such as an allegation of criminal activity, financial impropriety or senior officer misconduct, the complaint should be referred in the first instance to the Company Directors for investigation.

Complaints about Staff

Any complaint about a particular member of staff should be referred to the relevant manager. This type of complaint must be handled sensitively to try and ensure that the complainant is satisfied with the approach taken while the member of staff is treated fairly in line with other relevant Company procedures (e.g. discipline, etc.).

Review

This policy is to be reviewed annually or if there is a significant event that affects the integrity and adherence to this policy.



Director: **James Lawrence** SIGNED: _____

This Grievance Policy is available to all personnel including visitors and contractors. All employees are encouraged to read it and communicate any query to the Directors. A copy of the Grievance Policy can also be obtained on request (to any interested parties) from our Head Office.

Annex A – Grievance Email Template.

Title: Insert Reference

To whom it may concern;

Peregrine Risk Management is fully committed to responding to and reacting to any grievance in-line with ICoCA requirements. Peregrine Risk Management will take every step to ensure that our conduct is responsible when delivering security services. However, on occasion there may be times when our behaviour and conduct is unsatisfactory, in the unlikely event this occurs you should report your concerns/complaint to mhudson@peregrine-rm.com

Peregrine Risk Management will ensure that we respond to your grievance in a timely manner with fairness. The appropriate level of management will be defined and allocated to the report to ensure that the grievance is being addressed effectively and proportionately.

We acknowledge your grievance and will aim to resolve this as quickly as possible.

Annex B – Impact Assessment | External Grievance

IMPACT ASSESSMENT – EXTERNAL GRIEVANCE PROCESS	
<p>This IA is to be used to:</p> <ul style="list-style-type: none"> • Understand the type, complexity, scale and validity of a grievance (confirmed & potential). • Compile information to assess and brief internal stakeholders so that an action plan can be developed. • Understand the level at which to respond. <p><i>*This is a recorded document and is confidential when complete</i></p>	
Reference	
When did the alleged/actual grievance occur (DTG)	
Grievance received (DTG)	
Who reported the grievance?	
How was the grievance received?	
Location/Project	
Are there any breach of laws/regs	
Custodial Summary (List personnel implicated, where	

they are apprehended etc.)	
Grievance Details and Summary	
Situation Summary	
Plaintiffs Description/allegation	
Peregrine RM description and understanding	

Impact Summary	
PRM Casualties/Fatalities	
Client Casualties/Fatalities	
External Stakeholder Casualties/Fatalities	
Damage to Assets/Property	
Local Society and Community Impact	
Who is affected (Clients)	

Key Risks and Societal Sensitivities	
Are there any political issues (external)?	
Is there media interest? (localised, national, international)	
Is PRM services impacted?	
Management Considerations	
(Consider: risk exposure, mediation, meetings, communication strategy, settlement/liability, mitigation)	
Recommendations for Resolution	

Completed By		Sent To	
Date		Date	