
GRIEVANCE POLICY

Grievance Policy

1. Purpose

This Grievance Policy establishes a fair, transparent, and confidential mechanism through which employees, contractors, stakeholders, and affected parties may raise concerns.

The organization is committed to ensuring that all grievances are:

- Reviewed objectively and impartially
- Addressed in a timely manner
- Resolved without retaliation
- Managed in accordance with applicable laws and human rights standards

This policy operates alongside the Whistleblower Policy and aligns with the Voluntary Principles on Human Rights.

2. Scope

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This policy applies to:

- Employees and contractors
- Community stakeholders
- Business partners
- Any individual directly impacted by company operations

Grievances may relate to workplace conduct, policy violations, human rights concerns, misuse of force, security conduct, discrimination, harassment, unethical behaviour, unethical security practices, or other operational matters.

3. Guiding Principles

3.1 Fairness and Impartiality

All grievances will be assessed objectively, free from bias or conflict of interest.

3.2 Confidentiality

Information will be handled discreetly and disclosed only to individuals with a legitimate need to know.

3.3 Protection from Retaliation

Retaliation against any individual who raises a concern in good faith, or participates in an investigation, is strictly prohibited and may result in disciplinary action.

3.4 Respect for Human Rights and Rules on Use of Force

Where grievances involve security operations or use of force, actions will comply with:

- Force used only when lawful, necessary, reasonable, and proportionate

- Graduated force principles (applied at the lowest effective level and adjusted according to the threat)
- The Voluntary Principles on Human Rights
- Applicable national and international legal standards

4. Contact Information and Reporting Channels

The organization provides multiple secure channels for submitting grievances. Individuals may choose the method most appropriate to them.

4.1 Email Submission

Grievances may be submitted directly to Human Resources:

HR Email: info@bluehacklelimited.com

Submissions should include:

- A clear description of the concern
- Relevant dates, locations, and individuals involved
- Any supporting documentation (if available)

All emails will be handled confidentially by authorized personnel.

4.2 Secure Drop Box Submission

A secure grievance drop box is available for written submissions.

- Located at: Baghdad HQ
- Accessible during normal operating hours
- Checked regularly by designated HR or compliance personnel

Written submissions may be anonymous. All grievances will be formally logged and reviewed.

4.3 Anonymous Reporting

Anonymous reporting is permitted where allowed by law. While anonymity may limit the ability to seek clarification, all concerns will be reviewed in good faith.

5. Grievance Handling Procedure and Timeline

The organization is committed to resolving grievances promptly and fairly.

Step 1: Submission

Day 0

The grievance is received through an approved reporting channel.

Step 2: Acknowledgment

Within 2 working days

The complainant (where identified) will receive confirmation of receipt and an outline of next steps.

Step 3: Preliminary Assessment

Within 5 working days of submission

An initial review will determine:

- Whether the grievance falls within the scope of this policy
- Whether immediate protective measures are necessary
- Whether a formal investigation is required

Step 4: Formal Investigation (if required)

Completed within 15 working days

The investigation may include:

- Interviews with relevant parties
- Review of documentation and evidence
- Assessment of policy, contractual, and legal compliance

If the matter is complex, the investigation period may be extended. The complainant will be notified of any extension and provided with updates at least every 10 working days.

Step 5: Determination and Outcome

Within 5 working days after the conclusion of the investigation

Findings will be documented and appropriate corrective or disciplinary measures implemented where warranted.

Relevant parties will be informed of the outcome, subject to confidentiality and privacy requirements.

Step 6: Appeal

- Appeals must be submitted within **5 working days** of receiving the decision.
- An impartial reviewer not previously involved will assess the appeal.
- A final determination will be issued within **10 working days** of receipt of the appeal.

6. Standard Resolution Timeframe

Under normal circumstances, grievances will be resolved within **20–30 working days** from the date of submission.

More complex matters may require additional time; however, regular updates will be provided to ensure transparency and accountability.

7. Recordkeeping and Monitoring

All grievances will be:

- Documented securely
- Maintained in confidential records
- Reviewed periodically to identify trends and systemic issues

Aggregated and anonymized data may be used to improve policies, procedures, training, and governance oversight.

8. Policy Review and Governance

This policy will be reviewed periodically to ensure alignment with:

- Applicable laws and regulatory requirements

- International human rights standards
- Corporate governance best practices
- Organizational compliance frameworks

Approved by Security Director
James Bond 14/01/2026

