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Revision History

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1. Objective and Scope

This is the official procedure for internal and external stakeholders including those working on behalf of Page Protective Services, its clients, members of the public, etc.

Any of these stakeholders who believes that there are potential or actual non conformances with Security Operations Management System (SOMS), or violations of international, national legislation and/or local law, or human rights, can lodge a complaint or file a grievance.

The aim is not to document grievances but delivering a consistent, high-quality and accountable response to all kinds of complaints received by Page Protective Services Limited including identifying root causes, taking corrective and preventive action in a reasonably expeditious manner, evaluating effectiveness criteria and bringing continual improvement.

2. Complaint Handling Process

2.1 Communication

This procedure and associated Forms have been published on the company website as well as communicated through other channels with the clients and other stake holders in order to facilitate customers, complainants and other interested parties in respect of where and how a complaint can be made, what information to be provided by the complainant, the process for handling a complaint, time period associated with various stages in the process, the complainant' options for remedy; including external means, how the complainant can obtain feedback on the status of the complaint.

"Your satisfaction is important to us, please tell us if you are not satisfied — we'd like to put it right".

2.2 Receipt of a Complaint

Any complaint, issue or negative interaction including alleging any actions that threaten human life, rights, or safety, or nonconformance with SOMS in relation to ISO 18788:2015, is received/logged using the related [Form](#) by Management Representative (MR), who assigns unique identifier to it for tracking it all the way till close out.

MR makes sure that the record of the initial complaint has all the necessary information to a reasonable extent, including but not limited to the following

- i. Information of the submitter, including name, designation, company name, telephone # and any other as appropriate and decided by the complainant; however, the complainant has the choice to complain anonymously. For the case of 'complaining about the grievance' non-anonymously, it is the responsibility of all concerned and involved to treat and keep the personal information of the complainant in a strictly confidential manner.
- ii. a description of the complaint and relevant corroborating information;
- iii. the requested remedy;
- iv. related company' practices complained about;
- v. expected timeline for a response;
- vi. information regarding people; concerned department/function, country of operation, project;
- vii. Immediate action taken (if any).

All complaints are dealt with in complete confidentiality and not discussed with other than the complaint owner.



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2.3 Prioritization

Priority 1: Urgent With the Potential of High Business Impact

This includes allegation of

- criminal acts;
- violations of human rights,
- Imminent danger to individuals.

These and similar kinds of complaints shall be dealt with immediately with a response to the complainant no later than 3 working days.

Priority 2: Non-Urgent With Relatively Lower Business Impact

This requires a response to the complainant within 7 working days.

2.4 Tracking a Complaint

The complaint is [tracked](#) from initial receipt through the entire process until the complainant is satisfied or the final decision is made thereof. An up-to-date status is made available to the complainant upon request and at regular intervals, at least at the time of pre-set deadlines.

2.5 Acknowledgement of a Complaint

Receipt of each complaint is acknowledged to the complainant on the same or following working day by MR via phone and subsequently through an email as evidence of acknowledgement. The acknowledgment contains an expectation of when they will receive a response and the person/s dealing with it.

2.6 Initial Assessment of Complaint

After receipt, each complaint is initially forwarded to the concerned departmental Head in terms of regulatory concerns, severity, complexity, impact, and the need & possibility of immediate action.

2.7 Investigation of the Grievances

- a) Cooperation with official external investigation mechanisms
 All those who are involved in the process of complaint management should cooperate with the competent authority in an honest, open and ethical way, other the person can be subject to a disciplinary action.
- b) Intimidation of witnesses or inhibiting the gathering of evidence is strictly prohibited and a disciplinary action can be initiated in this regard.
- c) Individuals submitting a complaint or grievance in good faith shall be protected from retaliation. If there is any such thing, the individual can call CEO or send an email to him to look into the matter directly.
- d) Every reasonable effort that is in commensuration with the seriousness, frequency of occurrence, and severity of the complaint, is made by the Department Manager in liaison with the others concerned from his own department as well as from outside, if required to investigate all the relevant circumstances and information surrounding a complaint to identify the root causes of the complaint.
- e) If required, the concerned Manager may request the CEO and other senior member of the management for their input in cases where for example, the complainant doesn't become satisfied upon initial response to a complaint. In extreme cases, the resolution is sought at CEO level. Finally, the matter can be referred to the relevant competent authority either directly by Page Protective Services Limited or instructing complainant of other possible actions including approaching relevant competent authority.



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- f) Once the investigation is completed, the complainant is advised in writing of the outcome of the investigation and the corrective & preventive action taken or the intended [plan](#) in this regard including disciplinary action commensurate with any infraction. If a violation is detected, MR will issue a [corrective and/or preventive action request](#) to the concerned departmental Manager to take the [corrective and preventive action](#) including immediate corrections.
- g) This should then be reviewed as part of the Management Review Meeting.

2.8 Response to a Complainant

- a) Following an appropriate investigation, the concerned Manager offers a response with a cc to MR and bcc to CEO which may include, but not limited to:
 - refunds,
 - information,
 - referral,
 - compensation,
 - apology,
 - Indication of changes in product, process, policy or procedure arising from a complaint.
- b) If the complaint cannot be immediately resolved, then it is dealt with in a manner intended to lead to its effective resolution, as soon as possible.

2.9 Communicating the Decision

The decision or any action taken regarding the complaint, which is relevant to the complainant or to the personnel involved, is communicated to them as soon as the decision or action is taken and the relevant competent authorities, if required by local law to do so.

2.10 Closing a Complaint

If the complainant accepts the proposed decision or action, then the decision or action is carried out and recorded. If the complainant rejects the proposed decision or action, then the complaint remains open. This is recorded and the complainant informed of alternative forms of internal and external recourses and channels available. Page Protective Services Limited continues to monitor the progress of the complaint until all reasonable internal and external options of recourse are exhausted or till the complainant is satisfied.

3. Complainant’s Rights

This should be noted that Page Protective Services Limited cannot take disciplinary action against the complainant(s) for legitimately exercising their rights under applicable legislation. Page Protective Services’ management and committees are encouraged to make every effort to resolve complaints among themselves. Cooperation in the work place is what contributes to a safer, securer and healthier work environment as intended by its values.

4. References

ISO 18788:2015

- cl. 7.4.4 communicating complaint and grievance procedures including A.7.4.4
- clause 8.8.3, internal and external complaint and grievance procedures including A.7.4.4

5. Related Records

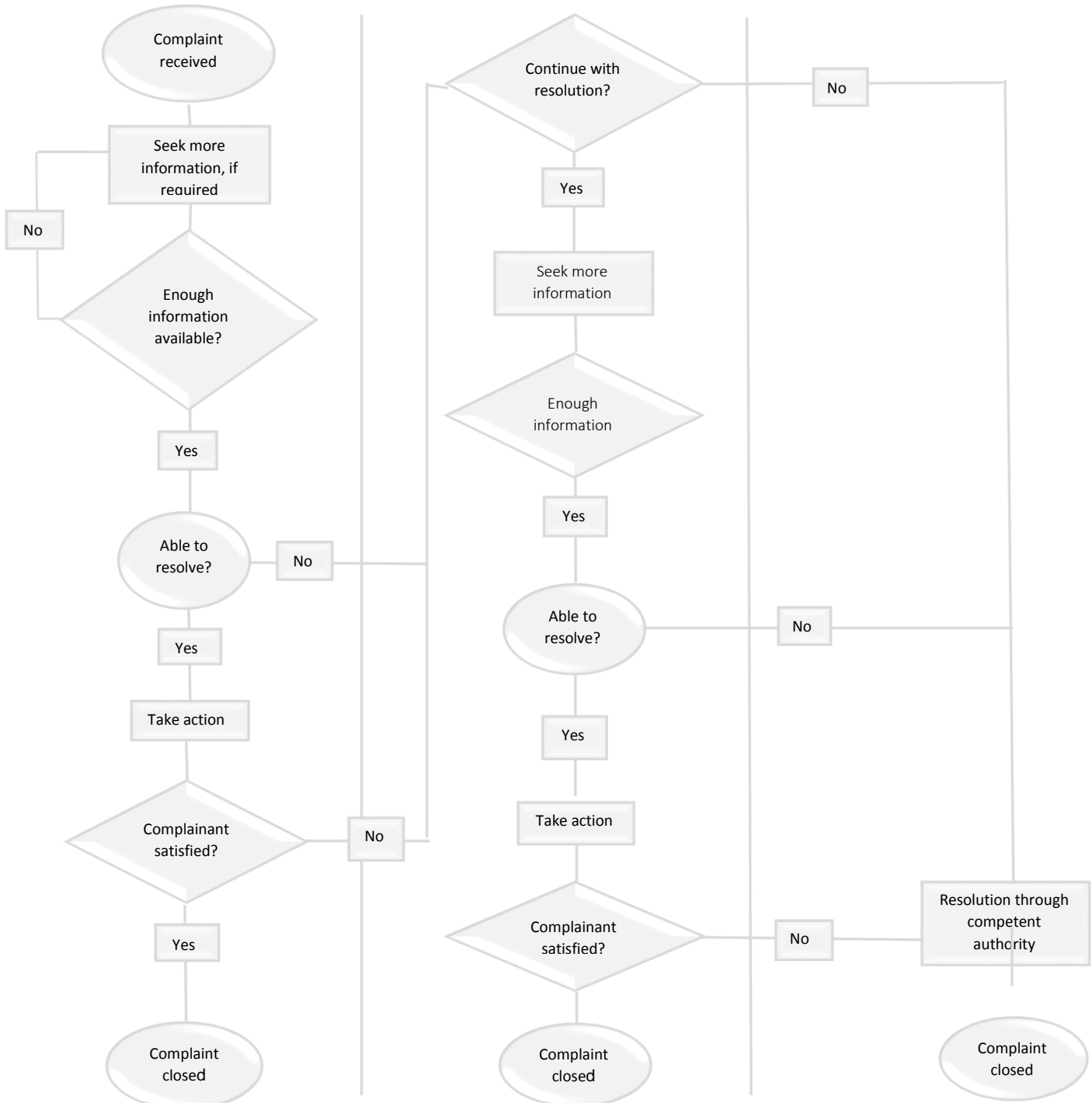
- Written Complaint Form. [PPS – SOMS – L.04 - OCP.02 – F.01](#)
- Verbal Complaint Form. [PPS – SOMS – L.04 - OCP.02 – F.02](#)



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Annexure “A”: Complaint Process Flow Diagram

<u>First Level Resolution by the Department Manager</u>	<u>Top Level Resolution (involving CEO or a Committee constituted by him)</u>	<u>External Resolution (involving relevant Authority)</u>
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