

LARSA Security Services

Grievance Policy

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Purpose

LARSA Security Services is committed to maintaining the highest standards of professionalism, accountability, and fairness across all aspects of its operations. This policy establishes the formal procedures and guidelines governing how employees may raise grievances and how the company will respond.

The company applies a consistent, transparent, and equitable approach to the handling of grievances. All complaints will be received respectfully, assessed impartially, and addressed promptly in line with both organizational values and applicable legal or regulatory requirements. Decisions will be based solely on facts, evidence, and merit, ensuring that no employee is disadvantaged for raising a concern.

By adhering to these principles, LARSA ensures that its grievance procedures contribute not only to a safe and respectful workplace but also to its long-term commitment to integrity, accountability, and equal opportunity.

Definition

A grievance is defined as any complaint or concern raised by an employee relating to discrimination, harassment, unfair treatment, or any other issue arising in the course of employment, including matters connected with LARSA-endorsed activities.

LARSA Security Services is firmly committed to providing a safe, respectful, and equitable workplace that is free from discrimination, harassment, and retaliation. This commitment extends not only to employees but also to third parties who interact with the company or its personnel.

An essential part of fostering such an environment is ensuring that all personnel feel encouraged and supported to raise grievances. Employees can do so with the assurance that LARSA will respond promptly, fairly, and effectively to address their concerns. No complainant will face persecution, disadvantage, or retaliation for raising a grievance in good faith.

Unresolved grievances can escalate into larger issues that may negatively impact morale, performance, and productivity. Therefore, LARSA emphasizes the importance of addressing complaints at the earliest opportunity. Every employee has the right to present their grievance to their line management, and confidentiality will be maintained throughout the process.

Grievance Procedures

The following procedures outline the steps by which grievances will be managed in order to ensure fairness, transparency, and timely resolution:

Reporting A Grievance

Employees/contractors who wish to raise a grievance should report the matter to their immediate Line Manager in the first instance. If the grievance concerns the Line Manager, the employee may escalate the issue to the Departmental Manager, or further up the chain of command as appropriate.

If an employee/contractor feels unable to report a grievance through LARSA's internal procedures, they retain the right to raise the matter with external authorities. This may include local government authorities, the police complaints department, or a legally recognized representative such as a lawyer.

Any documented evidence related to the grievance will be made available to these external parties upon request. Furthermore, all staff members are expected to cooperate fully with any investigations conducted by authorized external bodies.

Anonymous Complaints

LARSA recognizes that some employees may feel uncomfortable or fearful about raising a grievance in person, particularly if they are concerned about possible retaliation against themselves, their property, or their family. To address this, the company allows grievances to be submitted anonymously.

While anonymous complaints may take longer to investigate due to the need to establish credibility and gather supporting evidence, they will still be treated seriously and handled with fairness. Confidentiality is assured throughout the process, and no employee will face retaliation for raising a concern in good faith.

Disciplinary Measures

Disciplinary action does not always result in formal outcomes such as warnings or dismissal. In some cases, issues may arise that are minor, misinterpreted, or exaggerated, and these can often be resolved through dialogue, mediation, and compromise. When this approach is taken, it is equally important that mechanisms are put in place to prevent the recurrence of such issues in the future.

However, if it is determined that the company has been negligent or that an individual has violated the rights of others, corrective action must be taken. In such circumstances, the responsible person will be subject to appropriate disciplinary measures, as any violation of LARSA's Human Rights Policy is considered a serious breach of company standards.

Line Management Role

Line Managers and Departmental Managers are responsible for receiving and addressing employee grievances with professionalism, empathy, and fairness. While it is important to listen with understanding, managers must also objectively separate fact from perception or emotional influence in order to identify the true root cause of the grievance or complaint.

Minor or trivial issues should be resolved promptly at the line management level, as early intervention can often prevent escalation. In some cases, a constructive discussion or a sincere apology may be sufficient to resolve the matter and restore positive working relationships.

However, if the grievance is more complex, sensitive, or beyond the authority of the Line Manager, it must be formally escalated to the Human Resources (HR) Manager. The HR Manager will then take ownership of the process, ensuring the matter is investigated thoroughly and handled in line with company policy, employment law, and best practice standards.

HR Manager Role

The HR Manager holds a central role in ensuring grievances are managed fairly, consistently, and in alignment with company policy and legal requirements. Upon receiving a grievance, the HR Manager will review the matter in reference to the Company's **Disciplinary Frameworks** and, relevant policies, and applicable standards of conduct.

- **Referral to Line Management:**

If, after review, the HR Manager determines that the matter is minor or appropriate for resolution at Line Management level, the case will be referred back with clear guidance and recommendations on how to resolve it effectively. This ensures that lower-level issues are handled at the most appropriate level while maintaining oversight and consistency.

- **Escalation to Senior Management:**

If the HR Manager concludes that the grievance is serious, sensitive, or requires broader oversight, the matter will be escalated to Senior Management. In such cases, the HR Manager will establish an Ad-Hoc Grievance Panel consisting of impartial and suitably qualified members of management. This panel will be responsible for investigating the grievance, hearing from all relevant parties, and determining an appropriate resolution in line with company policy, disciplinary procedures, and the principles of fairness and accountability.

The HR Manager will also ensure that all outcomes are documented, communicated appropriately, and that follow-up actions are implemented to prevent recurrence.

Grievance Panel

The Grievance Panel members will consist of a member of the LARSA Leadership Team (CSM, DGM, GM) whom will be the (Chair), HR Manager (Member) and a Head of Department (Member) not involved in the issue.

Time Frame

The Grievance Panel will convene to hear the case within **14 working days** of the grievance being escalated. In scheduling the hearing, due consideration will be given to operational requirements such as

staff shift rosters, as well as the availability of panel members, witnesses, and any personal representatives chosen by the employee.

Grievance Hearing

The Grievance Panel has the authority to require any employee of the company to provide evidence relevant to the case. The Complainant will be given the full opportunity to present their case and may call witnesses to support their grievance.

Both the Complainant and the Respondent are entitled to be accompanied or represented by a person of their choice during the hearing. This representative may either provide support throughout the process or speak on behalf of the individual, if required or desired.

Decision Making

Once all evidence, testimony, and supporting documentation have been presented, the Grievance Panel will carefully review the case in its entirety before reaching a decision. The Panel's primary objective is to ensure that the outcome is fair, transparent, and consistent with company policy and legal requirements.

The Panel reserves the right to adjourn the hearing in order to deliberate privately. This adjournment allows members to assess the credibility of evidence, weigh mitigating and aggravating factors, and consider the broader impact of the grievance on individuals, teams, and the organization as a whole. A written decision will then be communicated to all relevant parties within a reasonable timeframe.

In determining the appropriate corrective or disciplinary action, the Grievance Panel will be guided by:

- **The Company's Code of Conduct** – to ensure all decisions uphold the standards of professionalism, respect, and integrity expected of all employees.
- **The Disciplinary Framework** – to determine proportionate outcomes, ranging from informal measures (e.g., mediation, counseling, or warnings) to more formal sanctions where culpability is evident.
- **Principles of Fairness and Consistency** – ensuring that similar cases are treated consistently, while also recognizing the unique circumstances of each grievance.
- **Corrective and Preventive Measures** – identifying not only how the grievance should be resolved, but also what steps the company can take to prevent similar issues from arising in the future.

The final decision of the Grievance Panel will be documented in writing, with clear reasoning provided to support the outcome. Both the Complainant and the Respondent will receive a copy of the decision, along with details of any actions to be taken, timelines for implementation, and the right of appeal.

Appeals Process

The Complainant retains the right to appeal if they are dissatisfied with the outcome of a grievance decision, whether made at Line Management level or by the Grievance Panel. The appeal process ensures fairness, transparency, and accountability, giving employees the opportunity to have their concerns reviewed at the highest level.

▪ **Submission of Appeal**

The Complainant must submit their appeal in writing within a specified timeframe (normally 14 working days) of receiving the grievance decision. The written appeal should clearly state the grounds for appeal, which may include:

- New or previously unavailable evidence
- Concerns about the impartiality of the original hearing
- Procedural errors in handling the grievance
- Disproportionate or unreasonable outcome

▪ **Review by the CEO**

Upon receipt, the case will be referred to the CEO for independent review and deliberation. The CEO may decide to:

- Uphold the original decision
- Amend or overturn the decision
- Request further investigation or clarification before making a final determination

- The CEO's review will be based on the principles of fairness, consistency, and adherence to the company's Code of Conduct, Disciplinary Framework, and grievance procedures.

▪ **Finality of Internal Process**

The decision of the CEO will be considered final within the company's grievance framework. The Complainant will receive a written outcome explaining the decision, any corrective actions, and the rationale behind them.

▪ **External Escalation**

If the Complainant remains unsatisfied after the internal appeals process has been exhausted, they reserve the right to escalate the matter to the appropriate external authorities. This may include local labour authorities, regulatory bodies, the police complaints department, or a legally recognized representative such as a lawyer. LARSA will fully cooperate with any external investigations and provide relevant documentation upon request.

Responsibility & Accountability

Human Resources

The Human Resources (HR) Department has overall responsibility for administering, monitoring, and ensuring the effective operation of this policy. Its key functions include:

- **Advisory and Support Role** – Providing guidance to managers, employees, and complainants on the correct application of the grievance procedures, ensuring clarity, consistency, and fairness throughout the process.
- **Monitoring and Oversight** – Recording, tracking, and monitoring all grievance cases to identify patterns, trends, or recurring issues that may require systemic action or policy review.
- **Evaluation and Reporting** – Regularly reviewing the overall operation of the grievance process and reporting outcomes, lessons learned, and recommendations to senior management for continuous improvement.
- **Ensuring Compliance** – Safeguarding that all grievances are managed in line with company policy, labor laws, human rights obligations, and international standards where applicable.

If a grievance investigation confirms that a complaint is substantiated, the HR Department will implement the company's Disciplinary Policy. Disciplinary measures will be applied proportionately to the severity of the misconduct and may range from informal corrective actions or verbal warnings to written warnings, suspension, or dismissal where warranted.

By fulfilling these responsibilities, the HR Department not only ensures the fair handling of grievances but also strengthens LARSA's commitment to accountability, employee well-being, and an ethical workplace culture.

Managers & Supervisors

Managers and Supervisors carry a heightened responsibility to ensure a safe, respectful, and equitable workplace. As leaders within LARSA Security Services, they are required to take all reasonable and proactive steps to prevent discrimination, harassment, and any other inappropriate conduct arising in the course of employment.

Leaders are expected to act as role models by consistently demonstrating professional, ethical, and inclusive behaviour. Their actions set the tone for workplace culture, and they must exemplify the standards of integrity, respect, and fairness expected of all employees.

In addition to setting an example, Directors, Managers, and Supervisors are responsible for:

- **Early Identification of Issues** – Remaining attentive to signs of workplace tension, misconduct, or inappropriate behavior and addressing concerns before they escalate.
- **Active Intervention** – Taking prompt, fair, and proportionate action when complaints or incidents arise, using established management and grievance procedures.
- **Supportive Leadership** – Ensuring that complainants, witnesses, and respondents are treated with dignity and that no party suffers retaliation or bias as a result of the grievance process.
- **Promoting a Healthy Workplace** – Embedding respect, equality, and accountability within their teams through positive leadership and adherence to company values.

The resolution of discrimination, harassment, or any other grievance-related matters is not separate from management duties but forms an integral part of effective leadership. By fulfilling these responsibilities, Directors, Managers, and Supervisors help safeguard employee well-being, maintain team cohesion, and uphold LARSA’s commitment to a fair and professional working environment.

Complainants

Employees who raise grievances (“complainants”) are expected to approach the process with honesty, integrity, and a genuine intention to resolve the matter. Complainants have a responsibility to:

- Engage constructively and seriously in all efforts to address their grievance.
- Avoid submitting grievances that are vexatious, frivolous, or malicious in nature.
- Recognize and respect that the individual(s) subject to the grievance have the right to a fair opportunity to hear and respond to the allegations made against them.

At the same time, LARSA Security Services is committed to safeguarding complainants from any form of retaliation, intimidation, or obstruction during the grievance process. This protection extends to:

- Ensuring complainants can pursue their grievance without fear of reprisal against themselves, their property, or their families.
- Protecting witnesses and their testimony from interference, pressure, or coercion.
- Guaranteeing that investigations are conducted impartially, free from attempts to influence or obstruct their outcome.

Any employee found to be engaging in retaliation against a complainant or witness or attempting to obstruct the grievance process in any way, will be subject to disciplinary action, up to and including termination of employment.

This balanced approach ensures that grievances are taken seriously, investigated fairly, and resolved with integrity, while also preserving the rights of all parties involved.

Respondents

Employees who are the subject of a grievance (“respondents”) are expected to conduct themselves with professionalism, integrity, and a willingness to resolve the matter fairly. Respondents have a responsibility to:

- Engage seriously and constructively in the grievance process, cooperating fully with all efforts to reach a fair resolution.
- Recognize and respect the complainant’s right to raise concerns without fear of hostility, victimization, or harassment.
- Approach the process with openness, acknowledging that in some cases grievances may be resolved through dialogue, clarification, or a sincere apology, allowing both parties to move forward amicably.
- Refrain from any behavior that could obstruct, intimidate, or influence the complainant, witnesses, or those tasked with investigating and resolving the grievance.

LARSA Security Services strictly prohibits retaliation or harassment against complainants, witnesses, or others involved in the grievance process. Any respondent found to be engaging in such behavior will be subject to disciplinary action, up to and including termination of employment.

By adhering to these principles, respondents help ensure that grievances are addressed fairly, promptly, and in a manner that fosters mutual respect, accountability, and a healthier working environment.

Monitoring & Evaluation

The implementation of this policy will be continuously monitored to ensure its effectiveness and alignment with company standards and legal requirements. A formal review will be conducted at the end of every 12-month period to assess its performance and identify any areas for improvement.

The HR Manager will be responsible for initiating and coordinating this review process. This includes ensuring that all grievances and complaints are properly documented, tracked, and analyzed to identify trends or recurring issues.

All grievance records will be securely maintained in employees’ personal files for a minimum period of **five (5) years**, ensuring accountability, transparency, and compliance with regulatory and audit requirements.

Records

The HR Department is responsible for maintaining accurate and confidential records of any cases where employees have acted in breach of this policy. These records will be securely stored within the individual

employee's personnel file to ensure a complete history of conduct and to support transparency, accountability, and compliance with organizational and legal standards.

All documentation relating to the investigation, deliberation, and outcome of such matters must be retained in accordance with company record-keeping procedures and data protection requirements. This includes written statements, evidence considered, management decisions, and details of corrective or disciplinary actions taken.

Records will be preserved for a minimum of **five (5) years** to provide an auditable trail for internal governance, external inspections, or regulatory reviews. Access to these records will be strictly limited to authorized personnel only, ensuring confidentiality and the protection of employee rights.

External Third-Party Grievance

LARSA Security Services recognizes that grievances may not only arise internally but may also come from external stakeholders such as clients, contractors, community members, or other third parties affected by the company's operations. To ensure accountability and uphold our commitment to transparency, fairness, and respect for human rights, LARSA provides clear channels through which external parties can raise concerns.

Third parties who wish to voice a grievance against the company or its employees may do so by contacting larsa.ethics@larsasecurity.com or by visiting our website www.larsasecurity.com for further details on available reporting mechanisms. Where individuals feel unable to report concerns directly to LARSA, they retain the right to escalate the matter to the relevant local authorities, such as the Police Complaints Department, regulatory agencies, or a legally recognized representative such as a lawyer.

Investigation and Response

All third-party grievances will be reviewed and investigated by the Senior Leadership Team, ensuring that the matter is handled objectively and with the appropriate level of authority. Our goal is to provide a timely, fair, and transparent response. Complainants can expect to receive acknowledgment of their grievance promptly and a formal response within **14 working days** of submission, unless exceptional circumstances require additional time, in which case the complainant will be informed.

Confidentiality and Non-Retaliation

LARSA guarantees that all grievances will be treated with strict confidentiality. Complainants may choose to remain anonymous, and their identity will be protected throughout the process. We also ensure that all grievances are handled without bias or discrimination, and that no complainant will suffer retaliation for raising a concern in good faith.

Commitment to Continuous Improvement

The company views third-party grievances as an important opportunity for organizational learning and improvement. All substantiated grievances will not only result in corrective action where necessary but will also inform policy and operational reviews to prevent recurrence and strengthen trust with stakeholders.