

## COMPLAINTS AND GRIEVANCES POLICY

### ***Receipt of a Complaint or Grievance***

The ways of receiving a complaint or a grievance note are the following:

#### In writing:

- Email to personal account of company's managers.
- Fax/Letter to the company's head offices.

#### Verbally:

- Via telephone to company's head offices.
- Orally to any company staff or subcontractor.

In case of a verbal complaint, the complainant is encouraged by the receiver to submit complaint in writing in order to resolve it more objectively. However, if the complainant insists, the verbal complaint is recorded by the receiver on the "**Complaint Form**".

Anonymous complaints are also considered and are investigated where possible and may be acted upon at the Managing Director's discretion.

### ***Initial Review of the Complaint/Grievance***

In line with the company's Business Ethics and Code of Conduct, no consequences should be for the internal party complaining and expressing grievance.

All complaints are transmitted to the Quality & Security Manager for initial review and planning of resolution. He/She completes the "**Complaint Form**" for all cases attaching if any documents received by the internal or external party.

The Quality & Security Manager makes the first review to investigate if the complaint can be resolved immediately (mainly this is applicable for verbal complaints/grievances). In such a case, if the customer or other involved party declares that they are satisfied, then the date of the complaint's resolution is noted on the "**Complaint Form**".

For cases that cannot be resolved immediately and for allegations of improper and/or illi.e.al conduct, the company will acknowledge receipt of the complaint within ten working days and advise who will be responsible for dealing with the complaint. Quality & Security Manager in consultation with the Managing Director appoint the responsible person to communicate with the complainant party.

As part of the initial review, contact details of the complainant (including postal and e mail address) and availability of the subject of the complaint, information and evidence regarding the alleged breach are verified.

### ***Resolution of Complaint/Grievance***

Ideally the complaint should be resolved immediately and depending on its complexity within a maximum timeframe of 3 months. If the immediate resolution of the problem is not possible, then the Quality & Security Manager requests from the customer/third party a length of time (according to the magnitude of the complaint) to assess the repercussions on the customer and the company. In any case, the Quality & Security Manager is responsible to ensure that the investigation of the complaint/grievance is carried out within 2 months of receipt.

Quality & Security Manager is responsible for the following:

- Copies of documents generated as a result of the complaint are filed and records of any action taken are kept. Except where prohibited or protected by applicable law, the finding of the complaint will be made available to a Competent Authority on request.

- If needed, cooperation with any official investigations.
- Upon decision by the Managing Director appropriate disciplinary action is taken in the case of finding such a violation or unlawful behaviour.
- Ensuring that any personnel working for the company who makes a complaint is protected from any reprisals.

The Quality & Security Manager is responsible to ensure that all complaints are investigated fully and impartially and with due consideration for confidentiality.

For allegations of improper and/or illegal conduct as contained in the International Code of Conduct Association for Private Security Service Providers (ICoCA), upon decision of the Managing Director, after the internal investigation occurs, the evidence of the complainant and the investigation analysis of the company is referred to an independently appointed panel of three lawyers who are registered with the International Association of Arbitrators. The findings of the Arbitrators and their ruling along with actions taken by the Company will be made available to the Complainant. The ruling of the Arbitrators is final.

In respect to complaints that arise frequently, the Quality & Security Manager may set into motion a corrective action according to procedure: “**Corrective and Preventive Actions**”.

All cases of complaints and grievances are reviewed during annual management review meetings.

### ***Whistleblowing Policy***

PREMIUM FOCUS NAUTILUS LTD is committed to maintaining the highest levels of probity and behavior amongst its workforce and contractors, and takes very seriously any form of malpractice that is identified or uncovered.

The PREMIUM FOCUS NAUTILUS LTD Code of Conduct and Business Ethics for Employees and Contractors sets out the standards expected from all the company's Employees and Contractors, providing a comprehensive frame of reference. The company's values are to be fair, helpful and authoritative and it is expected all Employees and Contractors to work in accordance with these values.

Employees and Contractors who have concerns are able to raise disclosures about wrongdoing under this policy, so that problems can be identified and resolved quickly. Where Employees and Contractors raise concerns in good faith and reasonably believe them to be true, they will be protected from possible reprisals or victimization. If Employees and Contractors raise a genuine concern under this policy, they will not be at risk of losing their position or suffering any form of retribution as a result.

The individual who wants to disclose should take care to ensure the accuracy of the information. Employees and Contractors should give this careful consideration and take advice prior to making a complaint if they are in doubt of total accuracy. If it can be shown that the employee or contractor who raises the disclosure has mischievously, maliciously or for personal gain, disciplinary action may be taken.

Employees and Contractors are encouraged to feel confident in raising concerns about wrongdoing.

The Public Interest Disclosure Act 1998 protects Employees and Contractors against detrimental treatment or dismissal as a result of any disclosure by them of normally confidential information in the interests of the public. PREMIUM FOCUS NAUTILUS LTD whistle blowing policy, as set out, is in line with the Act.

A disclosure will qualify for protection if the concern relates to unlawful conduct, financial malpractice, or dangers to the public or the environment. Specific examples could include:

- A criminal offence (i.e., fraud, corruption or theft) has been/ is likely to have been committed.
- The breach of a li.e.al obligation.
- A miscarriage of justice.

- The health or safety of any individual has been/is likely to be endangered.
- Damage to the environment.
- PREMIUM FOCUS NAUTILUS LTD Code of Conduct has not or is not being observed or is being breached by a member of staff or management.
- Any other form of serious improper action or conduct is taking place.
- Information relating to any of the above is being deliberately concealed or attempts are being made to conceal the same.

If requested the identity of an individual shall be protected and not disclosed without that individual's consent. If, due to the nature of the disclosure, PREMIUMFOCUS NAUTILUS LTD is not able to resolve the concern without revealing their identity for li.e.al reasons, this will be fully discussed with the employee/contractor to agree how the matter can proceed. Where practicable PREMIUM FOCUS NAUTILUS LTD will make every effort to protect employee/ contractor confidentiality.

In the event of an employee/contractor raising a concern and then wishes not to proceed with the disclosure, management shall review the nature of the disclosure in order to assess whether the matter should be further investigated.

Where an employee/contractor has been made subject to a Whistle blowing disclosure, and on investigation the disclosure validated the issue is addressed by the PREMIUM FOCUS NAUTILUS LTD top management.

In the event an investigation concludes that there is a case of misconduct by an employee, a formal disciplinary investigation leading to a hearing may take place in accordance with the PREMIUM FOCUS NAUTILUS LTD Disciplinary procedures.

Those potential whistle blowers who have reservations about making such disclosures are free to seek independent advice at any time on the process of raising a concern regarding reporting serious malpractice at work.