

		Country Management Office Baghdad Iraq	
Version #:	1.0	Date:	21/09/2025
File No.:	J5-031-POL		
Title	Grievance Policy and Procedures		

Applicable to:	Department:	All
	Business Unit:	Iraq

Document Revision Control

Issue	Change History	Date	Owner	Approver
V.0	Initial Issue Document added to Company website	02/10/2022	Security Director	Chief Executive Officer
V0	Document Review - No Changes.	27/03/2023	Security Director	Chief Executive Officer
V1.0	Para 4.1.3 added.	04/09/2023	Security Director	Chief Executive Officer
V1.0	Review – No change	18/09/2024	Security Director	Chief Executive Officer
V1.0	Review – No change	21/09/2025	Security Director	Chief Executive Officer

Contents

1	Document Control	1
1.1	Purpose	1
1.2	Scope	1
1.3	Review.....	1
2	Responsibilities	1
3	Grievance	2
3.1	Informal Grievance Process.....	2
3.2	Formal Grievance Process.....	2
3.2.1	Submission	3
3.2.2	Hearing	3
3.2.3	Decision.....	3
3.2.4	Appeal	4
3.3	Record of Grievances	4
4	External Process.....	4
4.1.1	Informal Approach.	4
4.1.2	Formal Approach.	4
4.1.3	Alternate Competent Authority	5

1 Document Control

This document is intended to provide information in respect of Palm Security Policy, Procedure and Standards or Guidance. Neither or part of this document shall be reproduced or released for commercial purposes by a recipient without the consent of the stated Palm Security, document owner. The document will be periodically updated to reflect any changes due to the business requirement or organisation changes.

1.1 PURPOSE

This Policy applies to Palm Staff and External Stakeholders (clients, partners, contractors and suppliers). Grievances are limited to matters of interpretation and application of employment, policies, rules and procedures.

For purposes of this policy, a grievance must be based upon a difference arising between Palm Security and Palm Staff or External Stakeholders, as to the interpretation or application of written policy, rules or procedures relating to terms and conditions of the relationship.

The Policy does not include:

- Contractual disputes that are dealt with under contractual Agreements or;
- Subcontract or supplier disputes that are managed through procurement Agreements

1.2 SCOPE

The Policy applies to all Palm Security Business Units.

1.3 REVIEW

This Procedure will be reviewed as necessary for content and effectiveness by the document owner and updated if necessary.

2 Responsibilities

All Managers are responsible for ensuring that the grievance procedure is fulfilled. They are also responsible for communicating this procedure to all Staff and External Stakeholders that they manage.

No employee will be victimised for invoking this grievance procedure; where victimisation is suspected, a grievance should be submitted in accordance with the Company's grievance procedure.

Doc Ref	J5-031-POL- Grievance Policy and Procedures	Control	Uncontrolled if printed or downloaded
Classification	Public	Version	# 1.0 March 2025

3 Grievance

Grievances are concerns, problems or complaints that Staff and External Stakeholders may have and which must be raised with a senior palm representative. This Grievance Procedure is designed to help Palm Security and its Staff and External Stakeholders deal with grievances in a fair and consistent manner.

3.1 INFORMAL GRIEVANCE PROCESS

Palm Security recognises that many issues that arise can be dealt with informally between the individuals concerned. However, if Staff and External Stakeholders have concerns which relate to their manager, or if Staff and External Stakeholders have not been able to resolve any issues informally, the formal grievance process should be followed.

3.2 FORMAL GRIEVANCE PROCESS

Staff and External Stakeholders should request a meeting with a Palm Senior representative, to set out the nature of their grievance, without undue delay. If the grievance concerns their manager, the grievance should be submitted to the Ethics Officer via phone or email. The Ethics Officer can be contacted on +964 (0)783 050 1883 or by email to: ethics@naklagroup.com.

A grievance may also be submitted through the Grievance Link on the company website @; www.nakhlagroup.com

A manager who receives a grievance complaint must comply with the following:

- Acknowledge the grievance complaint;
- Arrange a meeting with the individual concerned as soon as practicable, which is convenient to both parties;
- Allow the individual to be accompanied by a fellow member of Staff

Following the meeting, the manager is to decide on what action, if any, to take. The decision is to be in writing and communicated to the individual concerned. If, at any stage, the manager is unsure of his duties or needs advice, they are to liaise with the Security Director.

If Staff and External Stakeholders wish to report a grievance anonymously, they may do by sending an email to ethics@naklagroup.com. The email is monitored by the Ethics Officer, who will conduct a review into all grievances reported.

The Ethics Officer is responsible for having all messages translated that are received in a foreign language. The Ethics Officer is then responsible for investigating the matter and making any recommendations/findings to the Executive for their action if necessary.

Doc Ref	J5-031-POL- Grievance Policy and Procedures	Control	Uncontrolled if printed or downloaded
Classification	Public	Version	# 1.0 March 2025

3.2.1 Submission

The aggrieved party must provide an appropriate manager with a written submission which gives details of the grievance; these should include:

- a. The nature of the grievance.
- b. Where the incident(s) has occurred.
- c. Who has been involved?
- d. When the incident(s) happened or has been happening.
- e. Any actions that have been taken so far by any of the parties concerned.

3.2.2 Hearing

The management are to arrange for a meeting to take place as soon as practically possible of the submission to discuss the grievance. In preparing for such a meeting, managers should consider the following:

- a. Whether an interpreter may be needed
- b. Having an impartial record keeper,
- c. Making themselves aware of the full facts of the case,
- d. How similar grievances may have been resolved in the past,

The aggrieved party has the right to be accompanied by a colleague, who may be allowed to address the meeting on the employee's behalf, sum up the employee's case, respond to any views expressed at the meeting and confer with the employee. Once the hearing has finished the interviewing manager will consider the case.

3.2.3 Decision

In making the decision upon the outcome and the company's position, the manager should consult the Human Resources Manager and other senior managers within the Company if required. The company Legal Council is to be informed if the complaint is within his responsibilities. Should the complaint be in regard to a specific project, the client may need to be informed of the ongoing process. Apart from impeding reasons, the decision should be presented in writing within 24hrs of the hearing. Once it has been made, the manager is to inform the aggrieved party in writing of the outcome. The complainant has the right to appeal if they are dissatisfied.

Should the decision be in favour of the complainant and the complaint be related to an company employee then company disciplinary procedures are to be opened against the perpetrator.

Doc Ref	J5-031-POL- Grievance Policy and Procedures	Control	Uncontrolled if printed or downloaded
Classification	Public	Version	# 1.0 March 2025

3.2.4 Appeal

Should the complainant have grounds for dissatisfaction, they may appeal. An appeal must be submitted in writing and within five working days to the management explaining their grounds for appealing. An appeal meeting should be arranged within five working days and chaired by the next level of senior management. The hearing will follow the format described in 3.2.2 above and the aggrieved party may be accompanied with a colleague.

3.3 RECORD OF GRIEVANCES

After a grievance has been resolved a record of all the findings is to be placed in the individual's personal file and kept for seven years.

Records of the following are to be made:

- a. Nature and details of the grievance.
- b. What was decided and the actions taken.
- c. The reasons for these actions.
- d. Whether an appeal was made and its outcome.
- e. Any other subsequent developments.

4 External Process

Should the company receive a complaint from a non-employee who has a grievance to make against the Company, the procedures described in paragraphs 3.1 and 3.2 are to be followed however the complaint is likely to be dealt with at corporate level.

4.1.1 Informal Approach.

The company prefers to resolve grievance issues on an informal basis whenever possible; but only when this course is mutually agreeable.

4.1.2 Formal Approach.

The formal approach requires the aggrieved party to submit the details of their complaint in writing as detailed in Para 3.2.1 and addressed to:

Head of Legal Counsel,
House 19
Street 6
CIC 929
Karada
Baghdad
Iraq.

Doc Ref	J5-031-POL- Grievance Policy and Procedures	Control	Uncontrolled if printed or downloaded
Classification	Public	Version	# 1.0 March 2025

Arrangements will be made for a hearing and the composition of attendees will be agreed. Palm Security will inform the aggrieved party of its decision in writing within twenty four hours of the hearing being completed. The aggrieved party has the right to appeal within five days and this process should be started by a submission in writing explaining the grounds for this appeal. A further hearing will be convened but managed by a different manager with the findings being promulgated within twenty four hours of its completion.

4.1.3 Alternate Competent Authority

4.1.3.1 Mediation:

If the Complainant elects mediation, the Legal Counsel shall recommend to the parties that the matter be referred to an independent, external mediator. Within Iraq the following ministry will act as an alternate competent authority:

- Ministry of Labour and Social Affairs (MoLSA)

Should a Complainant wish to report a grievance to an alternate competent authority then they are to email the Ministry of Labour and Social Affairs at the following email address:

<https://www.molsa.gov.iq/?compaint>

4.1.3.2 ICoCA

Although not an Alternate Competent Authority within Iraq, complaints can also be reported to ICoCA via their website at the following address:

secretariat@icoca.ch

4.1.3.3 Resolution/Closure of Complaints

- I. Should a Complainant elect not to pursue any of the procedures identified by the Company, or should the Complainant elect to pursue alternative proceedings without the facilitation of the Company, the CEO shall close its processing of the Complaint and shall report that to the Legal Counsel.
- II. Should a Complainant elect to pursue one of the procedures identified by the company, or should the parties agree to resolve the subject of the complaint through a mutually agreed procedure that is capable of offering an effective remedy, the CEO may determine that the complaint has been addressed and direct the Legal Counsel to close the complaint.

Doc Ref	J5-031-POL- Grievance Policy and Procedures	Control	Uncontrolled if printed or downloaded
Classification	Public	Version	# 1.0 March 2025