

# GRIEVANCE POLICY & PROCEDURE

# **GRIEVANCES**

Closing the Loop implemented a grievance policy and procedure to deal with difficulties that may arise within the business operations. The policy addresses employees, partners, stakeholders, and other relevant parties. With the procedure we want to provide a mechanism to resolve issues of concern before they result in litigation to maintain good relations.

The policy introduces a procedure that employees and other stakeholders can follow to report suspicions and deviations to the company. A member of the board of Closing the Loop has been mandated to take responsibility for grievances that cannot be resolved within the company itself and acts as the Grievance Officer.

All employees and partners are informed about the grievance mechanism at the time they are hired or a contract was closed. Details about the policy's operation, steps to follow in the event of a submitting a grievance, are available in this document.

Grievances that cannot be solved within the company can be lodged anonymously: you can file your complaint via this open Google form, which will only be sent to the board member in charge of grievances. It should be noted that anonymous grievances can make any investigation less effective or efficient.

All grievances are handled with confidentiality.

# WHAT DO WE CONSIDER A GRIEVANCE?

This policy in particular addresses confidential grievances that should be handled as such. In this process, Closing the Loop defines a grievance as a complaint or issue that cannot be resolved by the direct supervisor or contact person within Closing the Loop, and has to be referred to an outside party.

We therefore set up criteria to qualify a complaint or issue received through the procedure channels as a grievance, as defined in this document. If a complaint sent through the procedure below does not satisfy the mentioned criteria, it will not be answered. Regular complaints that fall outside of this scope should be sent to the Closing the Loop contact person involved or the direct supervisor.

The complaint is considered a grievance in this context if:

- The issue cannot be resolved with the direct supervisor or CTL contact person of the person filing the complaint
- The issue concerns a violation of the General Business Principles or Code of Conduct of Closing the Loop, or it concerns a policy mentioned in these documents that might adversely affect the person filing the complaint
- The person filing the complaint is a stakeholder of Closing the Loop, as defined in the General Business Principles
- The issue concerns a past or on-going process or business relationship of Closing the Loop.

## **HOW CAN I FILE A COMPLAINT?**

If you want to file a grievance you can share this by following the steps below:

### 1. Present your complaint in a grievance letter using this form

The letter must clearly state your complaint and include details of the situation, other parties involved, your suggestions to solve the situation.

### 2. Submit your grievance letter

Our Grievance Officer will handle your complaint with confidence.

### 3. Want to submit anonymously?

If you wish to lodge your grievance anonymously please use this open Google form