



# Company Grievance Policy

Reviewed: 13/03/2025

## 1. Purpose

The aim of this document is to present Lateral Solutions policy and procedures for the handling of any grievance from within or outside our company with a view to facilitating their successful resolution in a timely fashion.

Lateral Solutions is committed to maintaining a collegial work environment in which all individuals are treated with respect and dignity. Grievances will be treated seriously and sensitively, having due regards to procedural fairness and confidentiality. No employee shall be subjected to discrimination or adverse treatment for participating in a grievance procedure.

Lateral Solutions will respect all persons alleging improper conduct providing processes for fair and transparent resolution. Lateral Solutions will ensure that personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

Lateral Solutions' Grievance Policy intends to meet all aspects of the International Code of Conduct (ICoC) Grievance Procedure, and to publish this policy and contact information on our website.

## 2. Responsibility for Implementation

HR Manager

Training & Compliance Manager

All staff

This policy and all associated procedures apply to all Company staff (consultants/contractors or employees), sub-contractors and any third party who have cause, or feel that they have cause, for complaint against Lateral Solutions.



## References

ISO 9001: 2015 Clause 5.1

ISO 18788: 2015 Clause 7.4.4, 8.8.3

## 3. Definition

A grievance is defined as **‘A wrong or a hardship suffered, which is grounds for complaint’**. Grievances may arise from within the Company or from an external source; Lateral Solutions policy on the handling of grievance covers both these circumstances but the procedures vary. This document reflects this situation.

## 4. Grievance Policy

**The following comprise Lateral Solutions grievance policy (all information will be held confidential):**

- It is to be transparent and fair by nature and in its application.
- Investigate allegations promptly, impartially and with due consideration to confidentiality.
- In the case of formal action, the aggrieved party should provide Lateral Solutions management with a written submission, which provides details of the complaint (Nature, time, place, and those involved).
- Lateral Solutions desires to deal with incidents promptly and will take steps to follow up, make decisions, and confirm actions in the most expedient manner possible.
- Keep records of any such allegations, findings, or disciplinary measures. Except where prohibited or protected by applicable law, such records should be made available to a Competent Authority on request. Records will be sealed; see Par 7 in this document “Grievance Recordkeeping”.
- Employees have the right to be accompanied at any meeting concerning a grievance. In cases where group grievances are addressed, a maximum of two observers will be allowed to attend the grievance process in addition to the representatives.
- Aggrieved parties may appeal against the decision made.



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- Cooperate with official investigations, and not participate in or tolerate from their Personnel, the impeding of witnesses, testimony, or investigations.
- Lateral Solutions will take appropriate disciplinary action, which could include termination of employment in case of a finding of such violations or unlawful behaviour.
- Ensure that Personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

### 5. Internal Grievance Procedures

An employee who has a grievance over any work-related issue has the right to raise their concerns with Lateral Solutions management.

#### **Informal Process**

Issues of a serious nature should always be dealt with formally; however, when mutually agreed, less serious grievances should be dealt with informally. This should take the form of an informal discussion between the aggrieved party and an appropriate manager. If it becomes clear that the matter cannot be resolved satisfactorily, or that the case is more serious than first assessed, the formal process must be adopted. If both parties agree that the grievance has been resolved satisfactorily no further action need be taken but the manager should make an informal note to record the event, its nature, and its outcome.

#### **Formal Process:**

The formal process may involve up to 4 procedures.

##### 1. Grievance Submission

The aggrieved party must provide an appropriate Lateral Solutions manager (i.e.: Direct Supervisor, Senior Supervisor, HR Manager) with a written submission, which gives details of the grievance; these should include:

- The nature of the grievance
- Where the incident(s) has occurred



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- Who has been involved?
- When the incident(s) happened or has been happening
- Any actions that have been taken so far by any of the parties concerned.

### 2. Grievance Hearing.

Lateral Solutions senior management will arrange for a meeting to take place as quickly as possible to discuss the grievance.

In preparing for such a meeting, management should consider the following:

- having an impartial record keeper (HR Manager),
- making themselves aware of the full facts of the case,
- how similar grievances may have been resolved in the past,
- whether an interpreter may be needed.

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 concluded the Lateral Solutions manager will take time to consider the case.

### 3. Management Decision Process

Within the decision-making process, the consulting manager should consult the Human Resources manager or other senior managers within the Company – and is encouraged to do so. Regardless 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 latter has the right to appeal if they are dissatisfied.

### 4. Grievance Appeal

If the aggrieved party is dissatisfied with the outcome of the decision, they can appeal but this must be submitted within 5 days explaining their grounds for appealing in writing to Lateral Solutions management. An appeal meeting should be arranged within 5 days and will be run by the next more senior manager. The hearing will follow the format described in item 7 above and the aggrieved party may be accompanied.



### 6. Grievance Recordkeeping:

Although it is important for Lateral Solutions to keep a record of grievances, specific care will be taken to ensure confidentiality, whereby records will be kept sealed and access to these records will be restricted to the HR manager only.

Records of the following are to be made and kept for seven (7) years:

- Nature and details of the grievance
- What was decided and the actions were taken?
- The reasons for these actions
- Whether an appeal was made and its outcome
- Any other subsequent developments

### 7. External Grievance Process

Lateral Solutions CEO and/or MD will be responsible for managing any instances of external complaints and third-party grievances.

Lateral Solutions Compliance Manager will be the designated point of contact for the Grievant and will be responsible for managing the process, and bringing the case to a satisfactory conclusion for the reporting party.

All grievances should be reported to:

Mr Rodney Askham

[rodney@latsols.com](mailto:rodney@latsols.com)

[Whistleblower@latsols.com](mailto:Whistleblower@latsols.com)

At a minimum the following detail should be provided in writing:

- Nature of the infraction
- Date and Time of the infraction
- Place of the infraction
- Any personnel involved



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Once the grievance has been reported the following steps will be taken:

**STAGE 1** – Informal discussions and meetings to attempt to resolve the matter (Third Party that has a grievance, Lateral Solutions CEO, and/or MD and Compliance manager. The parties will meet informally to attempt to negotiate and informally resolve the issue (“meet” can be face to face, video teleconference, telephone, or any other feasible mode of communication). If after informal discussions, the matter is not resolved to the satisfaction of the aggrieved, within 7 days, Lateral Solutions compliance manager will request in writing, that the matter be escalated to STAGE -2.

**STAGE 2** – Formal discussions and meetings to attempt to resolve the matter (Third Party that has a grievance, Lateral Solutions compliance manager, and Lateral Solutions Managing Director). The parties will meet formally within 10 calendar days of the receipt of the written request for escalation, to attempt to negotiate and resolve the issue (“meet” can be via face-to-face, video teleconference, telephone, or any other feasible mode of communication). If after formal discussions, the matter is not resolved to the satisfaction of the employee/third party with the grievance, within 7 days, the MD will request in writing that the matter be escalated to STAGE -3

**STAGE 3** – Hearing (Third Party that has a grievance, Lateral Solutions compliance manager, Lateral Solutions Managing Director, Lateral Solutions HR manager, Lateral Solutions Legal Counsel). Within 10 calendar days of the receipt of the written request for escalation, the parties will conduct an official hearing under the direction of Lateral Solutions legal counsel to attempt to resolve the complaint to the satisfaction of the aggrieved.

### 8. Non – Retaliation

All personnel affected in any way by Lateral Solutions operations, have a right to file what they believe to be a legitimate grievance without fear of retaliation of any kind. Lateral Solutions will not tolerate any retaliation, intimidation, or any form of attempted persuasion against the Grievant or any other party that has any influence in the grievance process, in any way shape or form. Any person who attempts to do so, will be subject to disciplinary action, up to and including termination.



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### 9. Confidentiality

The identity of the complainant will always be kept strictly confidential. It must be noted that for the purpose of confidentiality of the grievance hearing, attendance will be restricted to senior management only, the HR manager being the record keeper.

It must be mentioned that the complainant can request a colleague to attend. All records of the grievance hearing will be confidential, it will be sealed in the personnel file of the complainant.

Approved and Endorsed by:

*Mark Stravino*

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