



SERMSANG
POWER CORPORATION

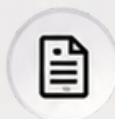
Corporate Grievance Mechanism and Whistleblowing

Sermsang Power Corporation Public Company Limited

A SAFE, FAIR AND TRUSTED CHANNEL
FOR A SUSTAINABLE TOMORROW



SPEAK UP



BE HEARD



INVESTIGATE



TAKE ACTION



PROTECT



PEOPLE | INTEGRITY | PARTNERSHIP
SUSTAINABLE ENERGY

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PROCEDURE

Title : Corporate Grievance Mechanism and Whistleblowing

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1. Objectives

This Procedure is established to define the principles, responsibilities, and procedures for managing grievances and whistleblowing reports in a fair, transparent, confidential, and effective manner. It aims to ensure that all grievances are handled appropriately while protecting complainants, respondents, witnesses, and all parties involved throughout the grievance process.

2. Scope

This Procedure applies to the operations of Sernsang Power Corporation Public Company Limited (SSP) and its group of companies, including subsidiaries, joint ventures, and associated companies.

3. Definitions

To ensure a common understanding, the following definitions shall apply:

- **SSP:** Refers to Sernsang Power Corporation Public Company Limited.
- **Group Companies:** Refers to Sernsang Power Corporation Public Company Limited, including its subsidiaries, joint ventures, and associated companies.
- **Subsidiaries:** Refers to entities controlled by SSP, whether located in Thailand or overseas.
- **Joint Ventures:** Refers to entities jointly controlled by SSP or its subsidiaries based on contractual rights and obligations, with investments accounted for using the equity method in the consolidated financial statements.
- **Associated Companies:** Refers to entities over which SSP or its subsidiaries have significant influence but neither control nor joint control, with investments accounted for using the equity method in the consolidated financial statements.
- **Personnel:** Refers to members of the Board of Directors, the Chief Executive Officer, executives, employees at all levels, and all categories of workers performing duties for SSP Group.

4. Grievance Management Procedure

The SSP grievance management process consists of the following key steps:

4.1 Complaint Registration

Upon receipt of a grievance or whistleblowing report, the designated complaint recipient shall forward the complaint to the Internal Audit Department for registration. A grievance registration number shall be assigned in place of the complainant's identity and case details to ensure confidentiality and protect all parties involved throughout the grievance process.

4.2 Preliminary Assessment

The Internal Audit Department shall conduct a preliminary assessment of every complaint, regardless of whether the complainant's identity is disclosed or anonymous, and determine one of the following actions:

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- Reject the complaint: The complaint may be rejected if it lacks sufficient information or supporting evidence, has no reasonable grounds for investigation, has already been conclusively resolved by the Company or competent authority without new material evidence, or is currently under judicial consideration or has been finally adjudicated by a court. However, the complainant may resubmit the complaint if additional supporting evidence becomes available.
- Proceed with an investigation: Where the respondent is an SSP employee or its subsidiaries, the Internal Audit Department shall submit its recommendation to the Audit Committee for consideration of initiating a formal investigation.
- Refer the complaint to the responsible department: Where the respondent is another stakeholder, such as a supplier, contractor, community member, or other external party associated with SSP's business operations, the complaint shall be referred to the responsible department for further action.

4.3 Investigation

- General Personnel: Where the respondent is a member of SSP's Personnel, the Internal Audit Department shall submit the complaint together with its preliminary assessment to the Chief Executive Officer for consideration of appointing an Investigation Committee. The complainant shall be notified that the complaint has been accepted and informed of the grievance registration number for future reference. The Investigation Committee shall conduct the investigation, determine the facts, recommend corrective and preventive actions, and propose appropriate disciplinary measures where applicable. The investigation should normally be completed within one month unless an extension is justified. Upon completion, the Investigation Committee shall submit the investigation findings and recommendations to the Chief Executive Officer for consideration and notify both the complaint recipient and the Internal Audit Department.
- Directors, CEO or Direct Reports to the CEO: Where the respondent is a Director, the Chief Executive Officer, or a direct subordinate of the Chief Executive Officer, the Internal Audit Department shall submit the complaint to the Chairperson of the Audit Committee or an Independent Director for consideration of appointing an Investigation Committee. The investigation process shall follow the same principles described above.
- Other Stakeholders: Where the respondent is another stakeholder, the responsible department shall conduct a preliminary assessment and determine whether the complaint should proceed. If accepted, the responsible department shall investigate the complaint, recommend corrective and preventive measures, and propose appropriate actions. The investigation should normally be completed within one month unless an extension is justified. The investigation results shall be submitted to the Chief Executive Officer for consideration, with copies provided to the complaint recipient and the Internal Audit Department.

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4.4 Notification of Investigation Results

The Internal Audit Department or the investigating responsible department shall communicate the investigation findings and corrective actions to the complainant as soon as practicable. Where the investigation cannot be completed within the specified timeframe, the complainant shall be informed of the progress and expected timeline.

4.5 Reporting to the Board of Directors

The Company Secretary Department shall compile grievance information and submit it to the Board of Directors for acknowledgement and disclosure, where appropriate, in the Company's Annual Registration Statement (Form 56-1 One Report) or Annual Report.

4.6 Special Procedures for GBVH Complaints

Complaints involving Gender-Based Violence and Harassment (GBVH) shall be handled in accordance with Annex A: GBVH Complaint Procedures, which forms an integral part of this Corporate Grievance Mechanism. GBVH complaints shall be managed using a survivor-centred approach to ensure confidentiality, safety, dignity, non-retaliation, and appropriate support throughout the grievance process.

5 Appointment of the Investigation Committee or Investigating Department

The Chief Executive Officer, the Chairperson of the Audit Committee, or an Independent Director, as applicable, shall have the authority to appoint an Investigation Committee or designate an investigating department to conduct the investigation. The appointed Investigation Committee or investigating department shall be responsible for collecting evidence, interviewing relevant persons, conducting a fair and impartial investigation, determining the facts, recommending corrective and preventive actions, proposing appropriate disciplinary measures or other actions, and performing any other duties necessary to ensure that the grievance is handled thoroughly, objectively, and fairly.

- The Investigation Committee should consist of at least three (3) members, or such number as deemed appropriate by the appointing authority, as follows:
 - Chairperson of the Investigation Committee: Shall be appointed from personnel who are at least two organizational levels higher than the respondent. However, where the respondent is a Deputy Chief Executive Officer, Chief Executive Officer, or Director, the Chairperson may be appointed from personnel who are at least one organizational level higher than the respondent.
 - Human Resources Manager or an authorized representative.
 - Legal Manager or an authorized representative.
 - Other persons considered appropriate by the Chairperson of the Investigation Committee.

Important Note: The respondent's direct supervisor or the manager responsible for the project in which the respondent is involved shall not serve as a member of the Investigation Committee to maintain impartiality.

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However, such persons shall cooperate with the Investigation Committee by providing information or assistance as requested during the investigation.

6 Protection of Complainants, Respondents, and Related Parties

SSP shall provide appropriate and fair protection to complainants, respondents, witnesses, and all persons involved in the grievance process, as follows:

- Confidentiality: All information relating to grievances and investigations shall be treated as strictly confidential and shall only be disclosed to persons who have a legitimate need to know or where disclosure is required by this Procedure or applicable laws. Any Personnel who intentionally disclose confidential information without authorization shall be subject to disciplinary action and/or legal consequences, as applicable.
- Protection Against Retaliation: SSP strictly prohibits any form of retaliation against complainants, witnesses, or any person who participates in or cooperates with an investigation. Retaliation includes, but is not limited to, changes in job duties, transfer of workplace, demotion, suspension, intimidation, harassment, dismissal, or any other unfair treatment. Any Personnel found to have engaged in retaliation shall be subject to disciplinary action.
- Protection of Respondents: Respondents shall be presumed not at fault until the investigation is completed and findings have been established. Investigations shall be conducted fairly and impartially, and respondents shall be given an opportunity to present facts and evidence before any decision is made. Respondents shall also be informed of the investigation results and shall have the right to appeal disciplinary actions in accordance with the Company's Human Resources Regulations.

7 Disciplinary Measures

- Where Personnel of SSP or its Subsidiaries are Found Responsible for Misconduct:
 - The Investigation Committee shall recommend appropriate disciplinary measures against the Personnel found responsible for misconduct, including any person who commits, directs, or assists in such misconduct, in accordance with the Company's Human Resources Regulations.
 - The recommendations shall be submitted to the Chief Executive Officer, the Chairperson of the Audit Committee, or an Independent Director, as applicable, for consideration together with the relevant approving authority in accordance with the Company's Delegation of Authority.
- Where Other Stakeholders Involved in SSP Group's Business Operations are Found Responsible for Misconduct:
 - The investigation department shall recommend appropriate actions or corrective measures against the stakeholder, to the extent permitted within the Company's authority.
 - The recommendations shall be submitted to the Chief Executive Officer for consideration.

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A complainant who intentionally submits false, malicious, or bad-faith allegations without factual basis shall not be entitled to protection under this Procedure and may be subject to disciplinary action and/or legal proceedings, as applicable.

8 Grievance Management Flowchart

The SSP grievance management process begins when a complaint is received by the designated complaint recipient and registered by the Internal Audit Department. The complaint is then categorized and processed based on the outcome of the preliminary assessment conducted by the Internal Audit Department, as follows:

- Where the Respondent is General Personnel:
 - The Internal Audit Department shall submit the complaint together with its recommendations to the Chief Executive Officer.
 - Where the complaint is found to have no sufficient grounds, it should be rejected and the complainant shall be informed accordingly by the Internal Audit Department.
 - Where the complaint is accepted, the Chief Executive Officer shall appoint an Investigation Committee.
 - The Internal Audit Department shall acknowledge receipt of the complaint and provide the complainant with the grievance registration number.
 - The Investigation Committee shall conduct the investigation, determine the facts, recommend corrective and preventive actions, and propose appropriate disciplinary measures.
 - The Investigation Committee shall submit the investigation findings and recommendations to the Chief Executive Officer for consideration and shall also notify the complaint recipient and the Internal Audit Department.
- Where the Respondent is a Director, the Chief Executive Officer, or a Direct Report to the Chief Executive Officer:
 - The Internal Audit Department shall submit the complaint together with its recommendations to the Chairperson of the Audit Committee or an Independent Director.
 - Where the complaint is found to have no sufficient grounds, it should be rejected and the complainant shall be informed accordingly by the Internal Audit Department.
 - Where the complaint is accepted, the Chairperson of the Audit Committee or an Independent Director shall appoint an Investigation Committee.
 - The Internal Audit Department shall acknowledge receipt of the complaint and provide the complainant with the grievance registration number.
 - The Investigation Committee shall conduct the investigation, determine the facts, recommend corrective and preventive actions, and propose appropriate disciplinary measures.

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- The Investigation Committee shall submit the investigation findings and recommendations to the Chairperson of the Audit Committee or the Independent Director for consideration and shall also notify the complaint recipient and the Internal Audit Department.
- Where the Respondent is Another Stakeholder:
 - The Internal Audit Department shall refer to the complaints to the responsible department.
 - The responsible department shall conduct a preliminary assessment and submit its recommendations to the Chief Executive Officer.
 - Where the complaint is found to have no sufficient grounds, it shall be rejected and the complainant shall be informed by the responsible department.
 - Where the complaint is accepted, the Chief Executive Officer shall designate the investigating department.
 - The investigating department shall acknowledge receipt of the complaint and provide the complainant with the grievance registration number.
 - The investigating department shall conduct the investigation, determine the facts, recommend corrective and preventive actions, and propose appropriate measures for addressing the misconduct of the stakeholder.
 - The investigating department shall submit the investigation findings and recommendations to the Chief Executive Officer for consideration and shall also notify the complaint recipient and the Internal Audit Department.

Finally, the Internal Audit Department or the investigating department shall notify the complainant of the investigation results. The Company Secretary Department shall compile the relevant grievance information for disclosure in the Company's Annual Report.

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Annex A

Gender-Based Violence and Harassment Complaint Procedures

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SSP and Subsidiary's Internal Grievance Redress Mechanism

The SSP's internal grievance redress mechanism (GRM) allows employees and contractors (including contract workers) to raise grievance about any aspect of their engagement with the company. All grievances will be addressed in a timely manner, where possible, while maintaining respect for all parties involved.

The mechanism is not intended to impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements, if available. In addition, the GRM will include precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a grievance, as well as an option to submit anonymous grievances. SSP's grievance mechanism is indicated in Appendix 1.

Receiving complaints and protecting complainants

Sermsang Power Corporation PLC. (SSP) has established channels for complaints and whistleblowing to receive reports, comments, or feedback about illegal or unethical actions, including behavior that may imply corruption, from affected stakeholders or those who run the risk of being affected by the Company's business operations or by the duty performance of the Company's directors, executives, and employees. The complainants and whistleblowers have the option to withhold their identity. The Company will maintain the confidentiality of the data received from such reports. The complainants will be protected by the Company.

Coming out with a grievance can pose risks for people, especially if it concerns issues such as corruption, misconduct, monetary compensation, or if it interferes with local social norms, including gender norms. The grievance mechanism will include precautions such as a clear non-retaliation policy, measures to ensure confidentiality and safeguarding of the personal data collected in relation to a grievance, as well as an option to submit anonymous grievances.

Scope for receiving complaints

The procedure for receiving complaints has been established to encourage all employees including those who are engaged on a full time, part time or contract basis with the company including a third party who provide services or workforce at SSP site. The procedure for receiving complaints has been established to encourage employees and all stakeholder groups to disclose information indicating violations of laws, regulations and business ethics of the Company such as:

- Corruption
- Fraud, misappropriation of funds, theft
- Fraudulent action for one's own or others' benefit
- Actions that endanger health and safety or the environment
- Actions with the intention of causing the Company damage or loss of benefit

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- Obvious violation of business ethics
- Support of actions that violate laws, regulations, and business ethics, including concealing or assisting in concealing
- Other actions that cause negative impacts on the complainant or other persons
- Actions that endanger or affect physical and mental safety
- Sexual harassment
- Gender-based violence
- Other issues.

Confidentiality

Complainants can be assured that their complaints will be taken seriously and the complainant will not suffer as a result of reporting the complaint in good faith. The identity of the complainant will always be kept confidential. Complainants should collect information with caution and consider the accuracy of information disclosed.

Protection of the rights of the complainant

The Company will not subject complainants, employees, or anyone else hired to work for the Company to any unfair treatment, including changing their job title, job description, or workplace, suspending their employment, threatening them, interfering with their work, terminating their employment, or acting in any other unfair manner towards such persons for the following reasons:

1. Provide information, cooperate or offer assistance in any way regarding complaints of actions that violate laws, regulations and business ethics of the Company.
2. Give statement, submit evidence or act as a witness for the purpose of consideration or investigation in case of suspected violations or non-compliance with laws, regulations or business ethics of the Company.

Anyone who receives a complaint or information associated with a complaint is required to keep it confidential. By taking into account the safety of and the damage to the whistleblowers, source of information, or relevant parties, the information shall not be disclosed to any other person, unless it is necessary to comply with the Company's regulations or as required by law. If information is intentionally disclosed, the Company will take disciplinary action and/or take legal action against the violators, as appropriate.

False accusation

If a complainant deliberately makes false or malicious accusations against the respondent, the Company will regard the complaint as an act that violates business ethics. The Company will conduct an investigation to determine the punishment according to the Company's regulations.

Special measures for Sexual Harassment and Gender-Based Violence and Harassment (GBVH) complaints

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Given the sensitive and specific risks associated with sexual harassment and Gender-Based Violence and Harassment (GBVH), the Company will update its Human Resource Management Procedures (HRMP) to strengthen measures to manage GBVH-related risks and to respond effectively to related complaints, including provisions to guide a retrenchment plan. These measures include, but are not limited to, the following:

- Survivor-centred approach: complaints of sexual harassment and GBVH will be handled with particular sensitivity, prioritizing the safety, dignity, and wellbeing of the complainant/survivor at every stage of the process, and consent will be sought before taking any action that directly affects them.

All actions taken under this mechanism will be guided by the principles of safety, confidentiality, respect, non-discrimination, survivor autonomy, informed consent, and protection from retaliation.

- Trained focal point(s): the Grievance Redressal Committee (GRC) will include at least one member trained in receiving and handling sexual harassment and GBVH complaints, including at least one female member, to whom complainants can report directly.

- All personnel involved in receiving, assessing, investigating, deciding, or overseeing sexual harassment and GBVH complaints including relevant HR staff, Welfare Committee members, and supervisors who may be a worker's first point of contact – will receive periodic training on survivor-centred approaches, confidentiality, trauma-informed interviewing, retaliation risks, and referral procedures.

- Multiple, accessible and confidential channels: complaints may be submitted by post, email, online form, or in person to a trained focal point, with the option to remain anonymous, as set out under Submitting a Grievance below.

- Immediate protective measures: where appropriate, interim measures such as temporary reassignment, paid leave, adjusted work arrangements, or a no-contact directive between the complainant and the alleged perpetrator may be applied during the investigation, without prejudging the outcome.

- Strict confidentiality and data protection: information relating to a sexual harassment or GBVH complaint will be shared only on a need-to-know basis and with the survivor's consent, except where disclosure is required by law.

- Except where an immediate risk to life exists or disclosure is required by applicable law (including the Personal Data Protection Act B.E. 2562), information relating to a survivor will not be shared, investigated, or referred externally without the survivor's informed consent.

- No mandatory mediation: sexual harassment and GBVH complaints will not be subject to mandatory mediation, conciliation, or direct confrontation between the complainant and the alleged perpetrator. Any participation in mediation shall be voluntary, informed, and assessed for safety and appropriateness, and will not affect the complainant's right to pursue a formal investigation, to report the matter to the police, or to the Department of Labour Protection and Welfare, where the conduct may also constitute a criminal offence or a violation of Section 16 of the Labour Protection Act B.E. 2541.

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- Non-retaliation: the Company's non-retaliation policy applies fully to complainants, witnesses, and any person involved in a sexual harassment or GBVH complaint.
- Referral pathway: the Company will maintain and periodically update a referral list of medical, psychosocial, and legal support services, and will assist complainants/survivors in accessing these services where needed.
- Where available, this referral list will include the nearest government hospital's One-Stop Crisis Center (OSCC) for medical and psychosocial support to survivors of gender-based violence, the Ministry of Social Development and Human Security's 1300 hotline, and the provincial Office of Labour Protection and Welfare.
- Prioritized timelines: given the urgency and sensitivity of these cases, sexual harassment and GBVH complaints will generally be managed as medium or high risk cases under the timelines set out in Appendix 2, unless a different timeline is needed to protect the safety or wellbeing of the survivor.
- Proportionate disciplinary action: substantiated cases will result in disciplinary action in accordance with the Company's Code of Conduct, up to and including termination of employment, and will be reported to the relevant authorities where required by law.
- Retrenchment provisions: the updated HRMP will include provisions to guide a fair, transparent and non-discriminatory retrenchment process, ensuring that an ongoing sexual harassment or GBVH complaint or investigation is not used as grounds for retrenchment, and that workers affected by retrenchment retain access to this grievance mechanism for any related grievance, including GBVH.
- Monitoring and reporting: aggregated and anonymized data on sexual harassment and GBVH complaints will be tracked and periodically reported to management and/or the Welfare Committee to monitor trends and the effectiveness of these measures, while the details of individual cases remain confidential.

Survivor Support Measures

Subject to the survivor's informed consent and where reasonably available, the Company may provide or facilitate access to:

- Emergency medical support, including referral to a government hospital's One-Stop Crisis Center (OSCC);
- Trauma-informed psychological counselling;
- Legal advice and legal referral services, including information on rights under the Labour Protection Act B.E. 2541 and, where relevant, the Criminal Code;
- Paid leave and/or flexible or adjusted work arrangements during the process;
- Workplace accommodation measures, such as temporary reassignment or a no-contact directive;
- Reintegration support following the conclusion of the case; and
- Safety planning support where retaliation or an ongoing risk to the survivor is identified.

These measures are in addition to, and do not replace, any statutory benefits or protections the employee is entitled to under Thai law, including social security benefits and, where applicable, the Company's retrenchment procedures.

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Submitting a Grievance

The grievance mechanism will allow for grievances to be filed, in the following ways:

- By post:
to the Head of Internal Audit of the Company - Sermsang Power Corporations PLC 325/14 Lan Luang Road,
Si Yaek Maha Nak, Dusit, Bangkok 10300
- By email and/or through an online form.
Website: https://www.sermsang.com/home#whistle_blowing

Receiving complaints or whistleblowing reports

After receiving complaints or reports of misconduct, the head of the internal audit department will send a letter of receipt to the complainant or whistleblower (in case the complainant or whistleblower reveals himself/herself). The Complainant/Whistleblower has a right to remain anonymous. After that, Complainant or Whistleblower must send the issue(s) to the Human Resources Department within 3 working days from the date of acknowledgment. And in the event of complaints or whistleblowing involving the Human Resources Representative, the Internal Audit Department will handle the issue themselves.

The Company will not reject a complaint solely because the information available at the time of reporting is limited, incomplete, or difficult to substantiate. No person reporting a concern in good faith will be required to provide evidence at the time of reporting; the purpose of the reporting stage is to allow concerns to be safely raised and initially assessed, with further information gathered, where possible, during the investigation.

Where a complaint or whistleblowing report involves Human Resources personnel, a member of senior management, Internal Audit personnel, a Welfare Committee member, or any other individual otherwise responsible for administering this grievance mechanism, an alternative reporting and investigation pathway will be activated – for example, referral to a different Welfare Committee member, to the Company's Audit Committee, or to an agreed independent party – to avoid any real or perceived conflict of interest.

Gathering information, verifying facts, and punishing violators

The Human Resources Department is responsible for collecting preliminary facts and notifying the supervisor of the complainant or whistleblower as well as initial screening process and proved by HR department. The criteria of company's initial screening process comply with Thai Labor Legal on Labor Protection Act (No.3) B.E.2551 (2008) and International Labor standard (For instance, ILO's standard on working time, forced labor, wages etc.) In addition, this criteria adheres to HR policies, SSP's Code of Conduct, SSP's terms of employment, workplace conditions etc. This initial screening process will take time at least 3 days for completed this step. The supervisor should conduct an investigation as soon as possible. The grievance redressal committee (GRC) will conduct an investigation into the grievance, utilizing information gathered either by the HR Department and/or through its own inquiry. The Company's

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Welfare committee comprising of 5 members (refer to HR-194 Notification for appointment a welfare committee in the company) will function as the GRC. If it is deemed fraudulent, the disciplinary investigation will be conducted in accordance with the rules and procedures, and punishment will be determined accordingly. Employees who invite in the meeting for investigation process will also be met with both employer and employee representatives in the meeting. This is to prevent bias that may occur during investigation.

The following additional practices apply, in particular to sexual harassment and GBVH complaints:

- Sexual harassment and GBVH complaints will not require physical evidence, witnesses, medical reports, or a police report in order to be assessed or investigated by the Company; a report to the police remains the survivor's own choice and is not a precondition for the Company's internal process.
- Survivors will not be required to repeat their account unnecessarily. Interviews will be conducted by trained personnel and scheduled in a manner that minimizes distress, re-traumatization, and exposure.
- Where feasible, complainants may request that interviews be conducted by an interviewer of a preferred gender or by personnel with appropriate training in handling sensitive complaints; the Welfare Committee will accommodate such requests where practicable given the Company's available personnel.

Grievance registrations, log and tracking.

Complainant/ Whistleblower can register their issue via SSP's Online Grievance Registration Form which is available at https://www.sermsang.com/home#whistle_blowing (refer Appendix 3). After that, HR Representative(s) is/are responsible person to monitoring/ verifying as well as retrieve these data by tracking from the web page's back office before initiating the initial screening process by themselves and initial investigation process, respectively.

Summarizing and Reporting Results

The supervisor summarizes the facts, action results, and comments and sends them to the Human Resources Department. Then the Human Resources Department reports the review results to the complainant or whistleblower (In case the complainant or whistleblower reveals himself/herself) and this process will conducted and completed within a period as indicated in Appendix 2.

The complainant or whistleblower will be informed of the outcome of the investigation to the extent appropriate and legally permissible. Information concerning disciplinary measures affecting another individual will be disclosed only in accordance with applicable privacy requirements, including the Personal Data Protection Act B.E. 2562.

Appeals process

Following a grievance hearing, an employee has the right to challenge an employer's decision within 1 week. Employer will write to the employee with decision; employee will be advised of their right to appeal, including the timeframes in

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which they can make their appeal against the grievance outcome. Should the decision be made not to uphold the grievance, the employee has the right to appeal this decision. They may also appeal against any part of the grievance process that they believe was unfair or incorrect. Employee's appeal has to be made in writing. An appeal meeting is held and the employer makes a final decision. Should the employee remain unhappy with the decision, their options may include resigning and claiming constructive dismissal.

Where possible, the appeal will be reviewed by an individual who had no involvement in the original investigation or decision-making – particularly for appeals relating to sexual harassment or GBVH complaints – so as to strengthen the independence, credibility, and fairness of the appeal outcome. In companies where personnel resources are limited and this is not practicable, the reviewing individual will exercise particular objectivity and this limitation will be disclosed to the employee.

Conducting the appeal hearing

The same general principles apply for the appeal hearing as with the initial grievance hearing, with a couple of additional considerations. The appeal hearing should also specifically consider the reasoning behind the appeal and any new evidence that has emerged since the earlier decision.

It is advisable for the appeal hearing to be led by someone different to the initial hearing; preferably a senior figure in the organization who has not been involved in the grievance process, so as to avoid any allegations of bias. However, if the individual hearing the appeal is the same individual who heard the initial hearing, they should exercise objectivity and make sure they thoroughly and objectively scrutinize the initial decision. As soon as possible following the hearing, the employer should write to the employee with the decision and the justification for it.

In the event that the employee does not show up for the rescheduled hearing, the process is over, and the employer can make its decision at that time. The employer must still inform the employee of the decision in writing. In the event that the appeals procedure is delayed, it is crucial to let the employee know as soon as feasible.

Alternative dispute resolution

In some cases, the employer and employee may decide that it would be advantageous to enlist a third party in the dispute resolution process, such as mediation to help the parties arrive to a mutually agreeable solution. The grievance process may be temporarily halted in such cases.

For sexual harassment and GBVH complaints specifically:

- Mediation is not the default or standard pathway and will only be considered where voluntarily requested by the complainant and assessed by the Company as safe and appropriate;
- Participation in mediation will not affect the complainant's right to pursue, or return to, a formal investigation, and the complainant may withdraw from mediation at any time;

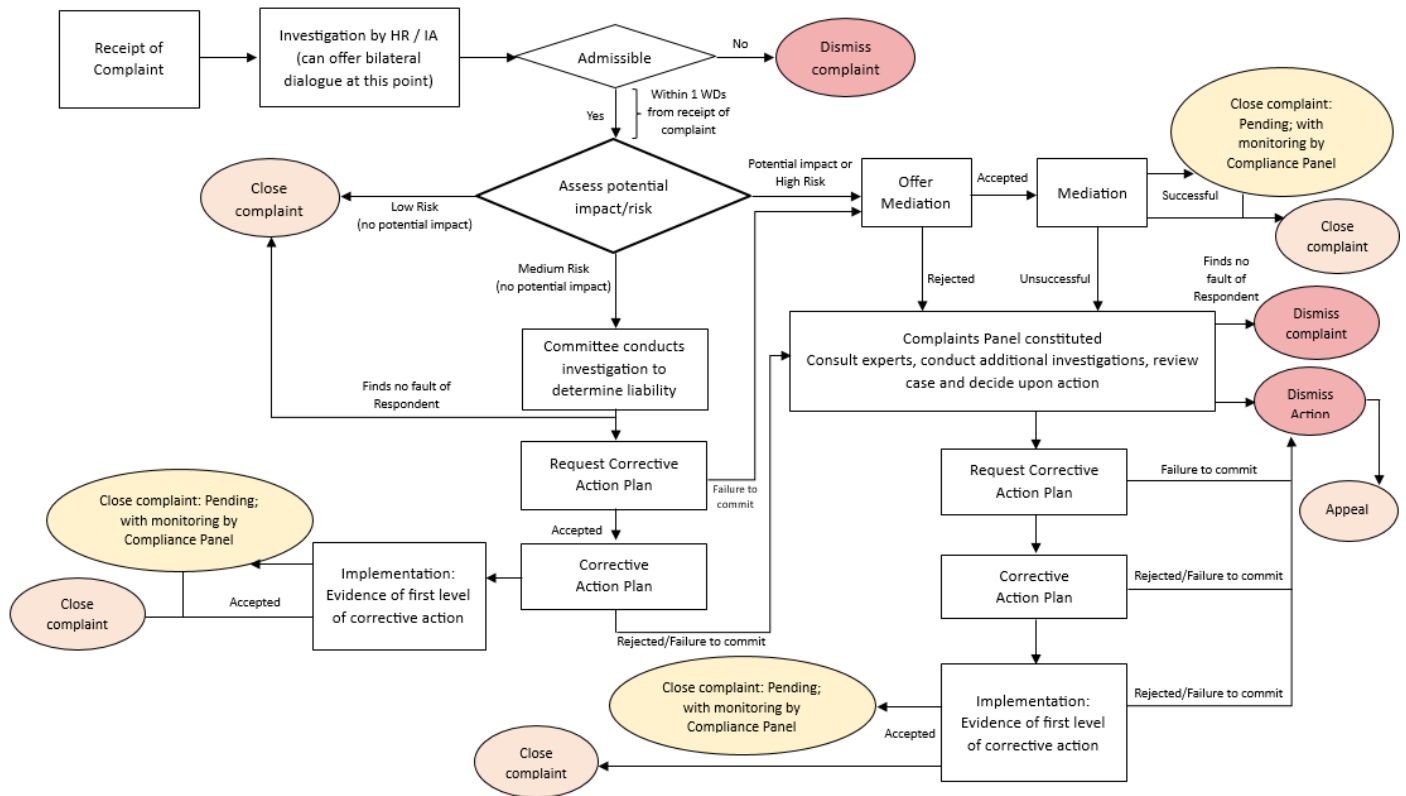
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- Where an internal resolution cannot be reached, either party may also refer a labour-related grievance to the provincial Office of Labour Protection and Welfare for conciliation, or, where the conduct may constitute a criminal offence, report the matter to the police, without prejudice to their right to continue using this internal mechanism.

Note: for sexual harassment and GBVH complaints, the “Mediation” step shown in the flowcharts and timelines below is not a standard or default step. It applies only where voluntarily requested by the complainant and assessed as safe and appropriate, as described above.

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Appendix 1: Grievance Mechanism Flowcharts



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Appendix 2: Grievance Mechanism Timeline Flowcharts

Low Risk (and No Potential Impact)

Stage 1 - Submission and Receipt of Complaint 1 WDs – Acknowledgement of complaint 1 WDs – Determine admissibility	Stage 2 – Evaluation and investigation of Complaint 3 WDs – determine low risk and issue statement	Close Complaint 5 total WDs
2 total Work Days	5 total Work Days	5 total Work Days

Medium Risk (and No Potential Impact)

Stage 1 - Submission and Receipt of Complaint 1 WDs – Acknowledgement of complaint 1 WDs – Determine admissibility	Stage 2 – Evaluation and investigation of Complaint 3 WDs – determine medium risk, liability, and refer to respondent	Stage 2 Cont. – 2 WDs – Respondent will respond with a Corrective Action Plan 1 WDs – Committee approval/non approval	Final Stage – Complaint Closure 5 WDs – evidence of implementation 1 WDs – Compliance Panel approval/non approval of evidence
2 total Work Days	5 total Work Days	8 total Work Days	14 total Work Days

Potential Impact and/ or High Risk

Stage 1 - Submission and Receipt of Complaint 1 WDs – Acknowledgement of complaint 1 WDs – Determine admissibility	Stage 2 – Evaluation and investigation of Complaint 3 WDs – determine potential impact and refer to Respondent and propose mediation 7 WDs – Respondent will respond and both parties will confirm/deny offer of mediation	Stage 2 Cont. – 5 WDs – Mediation 5 WDs – Complaint closed after mediation agreement	Stage 3 – Complaints Panel and Investigation 15 WDs – Investigation and case presented to Complaints Panel, who will make a ruling	Final Stage – Complaint Closure 6 WDs – evidence of implementation 2 WDs – Compliance Panel approval/non-approval of evidence- ongoing
2 total Work Days	12 total Work Days	22 total Work Days	37 total Work Days	45 total Work Days

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Appendix 3: Online Grievance Registration Form

GENERAL
Whistleblowing

Please provide your personal information for our response. Your information will be strictly kept confidential. ([Corruption Policy](#))

* First Name
* Last Name

Company

* Phone Number

* E-Mail Address

* Subject

* Detail

* Attach File(s)

Choose File
No file chosen

SUBMIT

CONTACT