Grievance Mechanism Policy

1. Introduction

a) Shabeel Group, recognizing the importance of fostering a culture of transparency, accountability, and ethical conduct, establishes this detailed Grievance Mechanism Policy.

b) The policy aims to provide a robust framework for addressing grievances related to improper or illegal conduct, violations of company policies, or breaches of ethical standards within the organization.

2. Purpose

a) The primary purpose of this policy is to ensure that all grievances are addressed promptly, impartially, and effectively, with due consideration for the rights and well-being of all parties involved.

b) Additionally, the policy seeks to promote a supportive environment where personnel feel empowered to raise concerns without fear of retaliation.

3. Scope

a) This policy applies to all individuals associated with Shabeel Group, including but not limited to employees, contractors, suppliers, vendors, clients, customers, and community members.

b) It encompasses grievances related to all aspects of the company's operations, including workplace issues, ethical concerns, human rights violations, environmental issues, and community impacts.

4. Reporting Mechanisms

a) Shabeel Group will establish a range of accessible and confidential reporting mechanisms, including:

i. Direct reporting to designated personnel or supervisors.

ii. An anonymous hotline or web-based reporting platform.

iii. Written submissions via email, physical mail, or dedicated grievance forms.

b) The company will ensure that reporting channels are widely communicated, prominently displayed, and easily accessible to all stakeholders through various means, including employee handbooks, posters, and intranet portals.

5. Investigation Process

a) Upon receipt of a grievance, Shabeel Group will appoint a dedicated grievance committee or investigator(s) to conduct a thorough and impartial investigation.

b) The investigation will commence promptly, with the aim of gathering relevant evidence, conducting interviews, and assessing the credibility of the allegations.

c) The process will be conducted with due respect for confidentiality, ensuring the privacy and safety of all parties involved.

d) Investigators will document all steps taken during the investigation, including findings, evidence collected, and conclusions reached.

6. Record-Keeping

7. a) Shabeel Group will maintain comprehensive records of all grievances received, including details of the complaint, steps taken during the investigation, findings, and any remedial actions or disciplinary measures implemented.

   b) Records will be securely stored in a centralized database or electronic system, accessible only to authorized personnel responsible for handling grievances.

   c) Access to grievance records will be restricted to ensure compliance with data protection laws and regulations.

8. **Remedial Actions**

a) Upon completion of the investigation, Shabeel Group will take appropriate remedial actions based on the findings and severity of the grievance.

b) Remedial actions may include but are not limited to:

i. Disciplinary measures against individuals found responsible for misconduct.

ii. Implementation of corrective measures to address systemic issues identified during the investigation.

iii. Provision of support services or compensation to affected parties, where appropriate.

c) The company will communicate the outcomes of the investigation and any remedial actions taken to the relevant stakeholders in a timely and transparent manner.

9. **Protection Against Retaliation**

a) Shabeel Group prohibits any form of retaliation against individuals who report grievances in good faith or participate in the grievance resolution process.

b) Measures will be implemented to safeguard whistleblowers from adverse actions, including but not limited to:

i. Confidentiality protections for complainants and witnesses.

ii. Non-retaliation clauses in employment contracts and policies.

iii. Access to support services and legal assistance for whistleblowers, where necessary.

c) Any instances of retaliation will be promptly investigated and may result in disciplinary action against the responsible parties.

10. **Continuous Improvement**

a) Shabeel Group is committed to regularly reviewing and updating its grievance mechanism policy and procedures to enhance effectiveness, efficiency, and compliance with best practices.

b) Feedback mechanisms will be established to solicit input from stakeholders on the grievance resolution process, with a view to identifying areas for improvement and addressing emerging issues promptly.

11. **Communication and Training**

a) The company will provide comprehensive training and awareness programs to all personnel on the grievance mechanism policy, procedures, and reporting channels.

b) Training will cover topics such as recognizing grievable issues, reporting procedures, confidentiality obligations, and non-retaliation policies.

c) Regular communication will be maintained to ensure that employees are informed about updates, changes, or improvements to the grievance mechanism.

12. **Compliance**

a) Shabeel Group is committed to complying with all relevant laws, regulations, and international standards pertaining to grievance mechanisms, whistleblower protection, and data privacy.

b) Any deviations from this policy must be authorized by senior management and documented in accordance with established procedures.

13. **Review and Approval**

a) This Grievance Mechanism Policy will be subject to periodic review by senior management to ensure its continued relevance, effectiveness, and alignment with the company's values and objectives.

b) Updates or revisions to the policy will be communicated to all stakeholders and documented accordingly.

This Grievance Mechanism Policy reflects Shabeel Group's commitment to promoting a culture of transparency, accountability, and respect for human rights within the organization, and outlines the procedures for addressing grievances in a fair, objective, and timely manner.