

Empower Technical Services External Stakeholder Grievance Procedure

1. Purpose and Scope

1. This grievance procedure enables Empower Technical Services & all subsidiaries and related entities (hereinafter the Company) to ensure that problems, complaints or concerns raised by external stakeholders are addressed in a fair, timely and consistent manner.
2. This procedure is available to customers, suppliers, subcontractors, business partners, community members and other people or organisations that may be affected by the Company's activities or business relationships.
3. A grievance may be raised regarding:
 - social or human rights impacts connected with the Company's activities or business relationships;
 - environmental impacts, pollution, waste, resource use or other environmental concerns;
 - health and safety impacts affecting an external stakeholder;
 - ethical conduct, bribery, corruption, conflicts of interest or other governance concerns;
 - discrimination, harassment, intimidation or inappropriate conduct involving the Company or someone acting on its behalf;
 - the conduct of a supplier or subcontractor where the matter relates to work carried out for the Company; or
 - any other material issue connected with the Company's operations, decisions or business relationships.
4. Purely commercial or contractual disputes may be handled through the applicable contractual or customer complaints process where that provides the more appropriate route. This does not prevent a stakeholder from raising a related social, environmental, ethical or governance concern under this procedure.

2. Informal Procedure

1. External stakeholders should, where possible, raise a grievance or complaint with their usual Company contact or the relevant manager on an informal basis first. The Company will discuss the concern with the

stakeholder and attempt to resolve the matter within a reasonable timescale. Where this is not appropriate, or the concern relates to that person, the stakeholder may proceed directly to the formal grievance procedure.

2. Where the informal procedure is used, an appropriate written record should be maintained of the issue discussed and any proposed actions.
3. If the grievance is unresolved or cannot be settled informally, the formal grievance procedure should be followed.

3. Formal Grievance Procedure

1. Written Statement

- 1.1. The stakeholder should submit a written statement describing the nature of the grievance without unreasonable delay. The External Stakeholder Grievance Form included at the end of this procedure may be used, or the same information may be provided by email.
- 1.2. Grievances should be sent to hr@empowertechnicalservices.com.
- 1.3. The stakeholder should provide sufficient information to allow the Company to understand the grievance, including what happened, when and where it occurred, who was involved, any supporting information available and, where possible, how they believe the grievance could be resolved.
- 1.4. A stakeholder may request that their identity remains confidential. Anonymous grievances may also be submitted, although anonymity may limit the Company's ability to investigate the matter or provide updates.

2. Grievance Meeting and Investigation

- 2.1. Upon receiving a formal grievance, the Company will form a grievance panel consisting of two members of the Board and, where appropriate, arrange a formal meeting to discuss the grievance. The meeting will be held without unreasonable delay and usually no longer than 10 working days after the grievance is received.
- 2.2. Before the meeting, the grievance panel will appoint an Investigator to investigate the grievance as soon as possible, preferably within five days of receiving the grievance. No person with direct involvement in the matter shall be appointed to investigate it and, where necessary, an external person may undertake the investigation to

ensure fairness and impartiality. Any requests for anonymity and confidentiality shall be taken seriously.

- 2.3. The appointed Investigator will investigate the matter, which may include reviewing documents, speaking with the stakeholder and relevant parties, checking site or supplier information and gathering other relevant evidence. The Investigator should, where possible, complete the investigation within five working days and produce a report outlining the grievance and the findings of the investigation.
- 2.4. The stakeholder should, where possible, explain how they believe the grievance could be resolved. If further investigation is required, the meeting may be adjourned to a later date before a decision is taken.

3. Outcome of the Meeting

- 3.1. Following the meeting and investigation, and without unreasonable delay, the Company will set out in writing the outcome of the grievance and any action it intends to take in order to resolve the matter, where appropriate.
- 3.2. The stakeholder will also be informed of their right to appeal if they are not satisfied with the action taken.
- 3.3. Any action taken will be monitored and reviewed, as appropriate, to ensure it effectively deals with the issue.

4. Appeal

- 4.1. Stakeholders have the right to appeal where they feel their grievance has not been satisfactorily resolved.
- 4.2. The request for an appeal must state the grounds for the appeal and should be submitted in writing within 5 working days of receiving written confirmation of the outcome.
- 4.3. The Company will arrange a further meeting to discuss the appeal within a reasonable time of receiving the request. The stakeholder will be informed of the arrangements in advance.
- 4.4. The appeal will be dealt with impartially and, wherever possible, will be considered by a senior manager or Board member who has not previously been involved in the case. The appeal will consider the specific areas of dissatisfaction in relation to the original grievance.
- 4.5. The outcome of the appeal will be communicated to the stakeholder in writing within 5 working days of the appeal meeting. Decisions made at this point are final and the grievance procedure is concluded.

4. Protection from Retaliation

1. The Company is committed to ensuring that stakeholders who raise grievances in good faith are protected from retaliation, intimidation, threats, disadvantage or other adverse treatment as a result of raising a concern or participating in the grievance process.
2. Where a stakeholder requests confidentiality because they are concerned about retaliation, the Company will consider the potential risks before information is shared. Information will be limited to those who need it to assess, investigate or resolve the grievance, and the stakeholder will be informed, where practicable, where additional disclosure may be necessary.
3. Any retaliation by an employee may be addressed under the Company's disciplinary arrangements. Appropriate action may also be taken where retaliation involves a supplier, subcontractor or other business partner.
4. Following resolution, agreed actions may be monitored and the stakeholder may provide feedback on the effectiveness of the resolution or raise any continuing concerns.

5. Confidentiality

1. Grievances will be handled with as high a degree of confidentiality as is practicable.
2. Confidential records of the grievance will be maintained in accordance with applicable data protection requirements. The Company may withhold certain information where necessary, for example to protect a witness, another stakeholder or confidential business information.

6. Communication During the Process

1. The Company will keep the stakeholder informed as reasonably required throughout the grievance process. This may include information about the scope of the grievance accepted, the review and decision-making process, expected timescales, any material changes to those timescales, the approach to resolution and confirmation when the grievance has been closed.

7. Monitoring and Review

1. The Company will maintain an appropriate record of grievances received, actions taken and outcomes, subject to confidentiality and data protection requirements.
2. Grievance information may be reviewed to identify recurring concerns, opportunities for improvement and any need for corrective or preventative action.

3. This procedure will be reviewed annually to ensure that it continues to meet the Company's objectives and applicable requirements. Any changes to the procedure will be approved by the Board of Directors.

8. Public Access and Policy Queries

1. This procedure and the External Stakeholder Grievance Form will be made publicly accessible so that external stakeholders have an ongoing means of raising concerns with the Company.
2. Any queries relating to this procedure should be directed to the Management via email at hr@empowertechnicalsolutions.com.

9. Policy Approval and Endorsement

1. This procedure has been approved and endorsed by the Board of Directors and Management.

Formalised and approved by the board of directors on

Director

Version control

Date issued	Version number	Date reviewed	Approved
	1.0		