



THIRD PARTY COMPLAINTS/GRIEVANCE POLICY

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Description

Control Risks recognises the accountability of the Company, its management and its staff for their actions and the consequences of those actions. It also recognises the importance of providing a channel for third parties to raise their concerns if they are impacted by, or may be impacted by, Control Risks' activities. The Company has accordingly developed a process to receive and address external complaints and grievances from third parties. This document defines Control Risks' policy for handling complaints or grievances; describes how third parties can raise a complaint or grievance; and outlines how they can expect such a complaint or grievance to be handled.

Scope

This policy applies to all companies in the Control Risks Group ("Control Risks" or the "Company"). Control Risks Group shall be defined as Control Risks Group Holdings Limited and its subsidiaries and branches.

Definitions

Third parties All those who are not Control Risks' clients or Control Risks' managers and staff, for whom separate contract conditions, and policies and processes respectively apply.

Third parties may believe they have been adversely affected by the actions of Control Risks as a company, its management or staff in a number of ways (see below).

- Death or injury of a family member
- Personal injury
- Excessive use of force
- Infringement of human rights, including those relating to gender, ethnicity and labour
- Material or financial loss
- Infringement of contract for a service provider (who is not an employee)
- Compromise of reputation
- Environmental damage

1. Policy

Control Risks will:

- Handle complaints and grievances from third parties in accordance with the policy, in an effective, appropriate, transparent and fair manner, and with due consideration for confidentiality and restrictions imposed by local laws.
- Undertake an initial assessment of the complaint or grievance, and investigate further as required.
- Address the complaint or grievance as appropriate, identify the root causes, remedy the impacts and take disciplinary action where appropriate.

- Advise complainants of the outcome of investigations.
- Develop training and implement procedures as appropriate to ensure compliance with the policy.
- Report complaints to the appropriate external authorities when the nature or severity of the complaint requires such action, and give full support to any external investigating authorities. Where a criminal act may have taken place Group General Counsel will consider taking the matter to the appropriate authorities, providing information, documents or support as necessary.
- Publish the Third Party Complaints/Grievance policy on its website.

2. Process

2.1 How to register a complaint or grievance

- To register a complaint or grievance, third parties should send an email to complaints@controlrisks.com, giving as much information as possible of the circumstances and Control Risks' alleged involvement or fault.
- Other mechanisms will be made available where appropriate to ensure that culture, language, education or technology requirements do not prevent a third party from making a complaint (for example, a specific mechanism is in place in Iraq).
- Where third parties believe that their complaint or grievance has been handled inappropriately and prefer to seek redress through an independent body, they are advised to refer to a relevant external body. Control Risks will be able to provide guidance on which body is most relevant.

2.2 Initiation, conduct and reporting of investigations into a third party complaint or grievance

- On receipt of a third party complaint or grievance, Control Risks will nominate a member of its management team to act as the point of contact for the resolution of such complaint or grievance. The point of contact will outline to the complainant the stages in the resolution process and the associated timeframes, liaise with all relevant parties, provide progress updates and report on the outcome.
- Where during the conduct of an investigation, or at its conclusion, there is evidence that a criminal or serious disciplinary offence may have been committed, the matter will be referred immediately to Group General Counsel.

3. Authority and Responsibility

3.1 All Control Risks' employees

- Advise complainants of the process, and assist complainants in submitting complaints or grievances.
- Ensure that complaints or grievances raised through Control Risks' line management system are escalated to an appropriate level. When in doubt, they should refer to their line manager.
- Ensure that investigations are fully supported.
- Notify the Group Risk and Insurance Manager and Group Senior Legal Counsel/Group General Counsel immediately of any complaint or grievance that could give rise to an insurance claim.
- Invoke Control Risks' confidential Whistleblowing policy where they believe that the above provisions are not being implemented.

REVISION HISTORY

Version	Author	Date issued
1.03	J Buckingham	2015-03-09
1.02	J Buckingham	2014-12-10
1.01	C Sanderson	2009-05-17