

Grievance Mechanism and Complaint Handling Procedure

Purpose

We are committed to conducting our business responsibly and respectfully. We encourage employees, contractors, service providers, suppliers, local communities, and other stakeholders to raise concerns about actual or potential impacts related to our operations. This grievance mechanism enables concerns to be reported, investigated, and addressed in a fair, timely, and confidential manner.

Grievances may be submitted by:

- Employees
- Contractors, service providers and suppliers
- Members of local communities
- Other stakeholders affected by our activities

Concerns may relate to:

- Workplace and employee concerns
- Health, safety and welfare
- Environment and community concerns
- Ethics, compliance, fraud and human rights
- Other concerns related to our operations

How to Submit a Grievance

Concerns may be submitted through the grievance reporting form available on our website. The form is available in Faroese and English.

Reports may be submitted anonymously or confidentially. Providing contact information may help us investigate and respond more effectively, but it is not required.

Confidentiality and Non-Retaliation

All grievances will be handled confidentially. Information will only be shared with those who need it to review, investigate, or address the concern.

We do not tolerate retaliation against any person who raises a concern in good faith or participates in an investigation.

Review and Investigation

The Managing Director and HR department are responsible for receiving grievances, assigning investigations, and ensuring that appropriate actions are taken.

Approved by: Managing Director

Effective date: 01.07.2026

Review frequency: Annually

All grievances will be reviewed fairly, objectively, and in a timely manner. We aim to acknowledge receipt within five working days where contact information is available and to complete investigations within 30 working days, although more complex cases may require additional time.

The reporting party will be kept informed of the progress and outcome wherever contact details have been provided. All grievances are recorded and tracked in the company's internal grievance register.

Corrective Actions and Appeals

Where a grievance is substantiated, appropriate corrective actions will be implemented to address the issue and help prevent recurrence.

If a complainant is dissatisfied with the outcome, they may request a review by the Managing Director within 15 working days. Where appropriate, an independent external mediator or advisor may be engaged.

Data Protection and Contact

Personal data submitted through this process will be handled in accordance with applicable data protection and privacy requirements.

Questions regarding this grievance mechanism may be directed to:

HR

Email: barbara.gregersen@luna.fo

Tlf: +298284002

Approved by: Managing Director

Effective date: 01.07.2026

Review frequency: Annually