

ART-Biopharma's Grievance Procedure Policy

Effective Date: June 12, 2024

Approved By: Dr. David Shahbazian, CEO

1. Purpose

Art-Biopharma LLC is committed to maintaining a professional, respectful, and ethical working environment for all employees. This policy establishes a structured, fair, and transparent procedure for employees to raise grievances related to their employment or working conditions.

This Grievance Procedure is designed to:

- Provide employees with a clear process for reporting workplace concerns.
- Ensure grievances are handled fairly, promptly, and confidentially.
- Align Art-Biopharma with **international labour standards** and best practices in grievance handling.

2. Applicability

This policy applies to **all employees** of ART-Biopharma, regardless of their location or employment contract type.

Grievances may include, but are not limited to:

- Working conditions or terms of employment.
- Alleged discrimination, harassment, or bullying; health and safety concerns in the course of work duties.
- Concerns about ethical breaches, misconduct, or inappropriate behaviour by colleagues, management, or contractors.

3. Reporting a Grievance

Employees may submit grievances using the following dedicated email address:

CEO: Dr. David Shahbazian: David.Shahbazian@art-biopharma.com or through a scheduled meeting.

Grievances should include:

- Name of the employee (anonymous reports are not yet supported).
- A description of the grievance.
- Relevant dates, persons involved, and any supporting evidence (if available).

4. Procedure for Handling Grievances

1. Acknowledgment of Receipt

- ART-Biopharma will confirm receipt of the grievance within 24 hours via email.

2. Initial Review

- The grievance will be reviewed by the CEO of ART-Biopharma: Dr. David Shahbazian). If necessary, an impartial person may be appointed for the investigation.

3. Investigation

- A thorough, fair, and confidential investigation will be conducted. This may involve interviewing the employee who submitted the grievance and any other relevant persons, as appropriate.

5. Confidentiality and Protection from Retaliation

- All grievances will be handled **confidentially** to the extent possible, consistent with conducting a fair investigation.
- **Retaliation or victimisation** against any employee raising a grievance in good faith is strictly prohibited.
- Any retaliatory behaviour will be treated as a serious disciplinary offence.

6. Record Keeping

- Grievances and related documentation will be securely maintained by ART-Biopharma management for record-keeping and internal review purposes, in compliance with relevant privacy laws in future.

7. Continuous Improvement

As ART-Biopharma grows, this procedure will be reviewed and updated to reflect:

- International labour and ethical standards.
- Development of anonymous reporting mechanisms.
- Enhanced resources for grievance handling, including outsourced HR resources if required

Feedback on this policy is welcomed and can be sent to **David.Shahbazian@art-biopharma.com**.