G2S GROUP
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# GRIEVANCE & COMPLAINTS POLICY

## POLICY STATEMENT

G2S-SOMS-POL-008

Version 2.0 | Effective 23 July 2026

*Security Operations Management System (SOMS) / Integrated Management System*

*Conforms to ISO 18788:2015, ANSI/ASIS PSC.1-2022 and ISO 9001:2015*

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# DOCUMENT CONTROL

| | |
|---|---|
| Document Title | Grievance & Complaints Policy |
| Document Number | G2S-SOMS-POL-008 |
| Version | 2.0 |
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| Approving Authority | Chief Executive Officer and Security Manager, G2S Group |
| Classification | Public |
| Applicable Management Systems | ISO 18788:2015 (SOMS) · ANSI/ASIS PSC.1-2022 · ISO 9001:2015 (QMS) |

## AMENDMENT HISTORY

| Version | Date | Summary of Change | Author | Approved By |
|---|---|---|---|---|
| 1.0 | 10-03-2026 | Initial issue. | Compliance Officer | CEO / Security Manager |
| 2.0 | 23-07-2026 | Full revision for conformance with ISO 18788:2015, ANSI/ASIS PSC.1-2022 and ISO 9001:2015: added explicit ISO 45001 alignment statement, RACI table, measurable KPIs (LTIFR and related indicators), and document-control framework. | Compliance Officer | CEO / Security Manager |

## DISTRIBUTION

| Distribution | Method |
|---|---|
| All employees, contractors, subcontractors and agency personnel | Induction pack; intranet; site notice boards; annual refresher training |
| Clients and prospective clients | Available on request; published on the G2S public website where indicated |
| Board of Directors and Senior Management | Management review pack; governance portal |
| Regulators and auditors | Provided on request for compliance verification |

## 1. PURPOSE

G2S is committed to providing accessible, transparent, and effective grievance and complaint mechanisms for all personnel, clients, subcontractors, local communities, and other stakeholders who may be affected by G2S operations. This Policy ensures that all grievances and complaints are received, recorded, investigated, and resolved in a fair, timely, impartial, and transparent manner. It supports ISO 18788:2015 Clause 8.5 (Respect for human rights) and the G2S Human Rights Policy by providing accessible remedy mechanisms and preventing retaliation.

This Policy is designed to align with the grievance and complaints provisions of ISO 18788:2015 (Clause 8.5.1 and 8.8.3), ANSI/ASIS PSC.1-2022 (Clause 9.5.8), and ISO 9001:2015 (Clause 9.1.2 and 10.2), in addition to the principles of the International Code of Conduct for Private Security Service Providers (ICoCA) and the UN Guiding Principles on Business and Human Rights.

## 2. SCOPE

This Policy applies to all G2S operations in Somaliland, including all personnel, clients, subcontractors, local communities, and other stakeholders who may have a grievance or complaint related to G2S security operations. It covers the receipt, recording, investigation, resolution, and closure of all grievances and complaints, including:

- Complaints about security personnel conduct (e.g., excessive force, disrespectful treatment, discrimination);
- Grievances related to human rights impacts;
- Service quality or contract performance issues;
- Ethical concerns (fraud, corruption, conflict of interest);
- Community concerns near operational sites.

This Policy excludes criminal allegations (which are immediately referred to Somaliland authorities) and contractual disputes handled under separate commercial arbitration clauses.

# 3. OUR COMMITMENTS

G2S is committed to upholding the following principles in the handling of all grievances and complaints:

## 3.1 ACCESSIBILITY

Grievance mechanisms are accessible to all stakeholders through multiple channels, free of charge, and available in Somali and English (or through interpreter support where needed).

## 3.2 CONFIDENTIALITY AND PRIVACY

All grievances and complaints are handled with strict confidentiality to protect the identity and privacy of complainants, witnesses, and subjects of complaints.

## 3.3 NON-RETALIATION

G2S strictly prohibits retaliation against any person who makes a good-faith report or participates in an investigation. Any act of retaliation is treated as a serious disciplinary offense.

## 3.4 IMPARTIALITY AND INDEPENDENCE

All investigations are conducted impartially and independently, ensuring no conflict of interest between investigators and the subject of the complaint.

## 3.5 TIMELINES

All grievances and complaints are acknowledged within 48 hours, with a resolution target of 30 days (or as per the nature and severity of the complaint). Critical cases are escalated immediately.

## 3.7 RIGHT TO APPEAL

Complainants have the right to appeal decisions through a defined escalation process.

## 3.8 DOCUMENTATION AND LEARNING

All grievances and complaints are documented, tracked, and analyzed to identify trends and opportunities for continual improvement.

## 4. GRIEVANCE AND COMPLAINT CHANNELS

G2S provides the following accessible channels for raising grievances and complaints:

| Channel | Description | Availability |
|---|---|---|
| **Confidential Hotline** | +252-634-000290 | 24/7, confidential |
| **Secure Email** | grievances@g2sgroups.com | 24/7 |
| **Physical Complaint Boxes** | Locked boxes at all site entrances and community gathering points | 24/7, cleared weekly |
| **Direct Reporting** | Report to Site Supervisor, Security Director, or Human Rights Focal Point | During working hours |
| **Anonymous Reporting** | Via Whistleblowing Policy channels (POL-006) | 24/7 |
| **Community Focal Points** | Designated representatives near major sites | During working hours |

All channels are publicized via posters at sites, induction training, client contracts, community engagement forums, and the G2S public website.

## 5. GRIEVANCE AND COMPLAINT PROCEDURE

### 5.1 RECEIPT AND ACKNOWLEDGEMENT

| Step | Action | Responsible | Timeline |
|---|---|---|---|
| 1 | Receive grievance/complaint through any available channel. | All Personnel | Immediate |
| 2 | Log the grievance/complaint in the Grievance & Complaints Resolution Log (G2S-SOMS-REC-001). | Security Director / HR Focal Point | Within 24 hours |
| 3 | Acknowledge receipt to the complainant (unless anonymous). | Security Director / HR Focal Point | Within 48 hours |
| 4 | Assign a unique reference number for tracking. | Security Director / HR Focal Point | Within 48 hours |

## 5.2 INITIAL ASSESSMENT AND CLASSIFICATION

| Step | Action | Responsible | Timeline |
|---|---|---|---|
| 1 | Assess the nature and severity of the grievance/ complaint. | Security Director / HR Focal Point | Within 5 working days |
| 2 | Classify severity: Low / Medium / High / Critical. | Security Director / HR Focal Point | Within 5 working days |
| 3 | Determine if the matter requires immediate escalation. | Security Director / HR Focal Point | Within 5 working days |
| 4 | Assign an independent investigator (if required). | Security Director | Within 5 working days |

## SEVERITY CLASSIFICATION

| Level | Description | Examples |
|---|---|---|
| **Low** | Isolated minor concern | Perceived rude language, minor service issue |
| **Medium** | Moderate impact | Unnecessary prolonged detention at gate, verbal harassment |
| **High** | Serious impact | Allegation of physical assault, discrimination, excessive force |
| **Critical** | Life-threatening, sexual violence, torture-like treatment, or widespread community impact | Sexual exploitation, serious injury, community unrest |

## 5.3 INVESTIGATION

| Step | Action | Responsible | Timeline |
|---|---|---|---|
| 1 | Appoint an independent investigator (not involved in the matter). | Security Director | Within 48 hours (High/Critical) |
| 2 | Conduct impartial and confidential investigation including interviews, evidence review, and witness statements. | Investigator | Within 15-25 working days |
| 3 | Document findings, root cause, and conclusions. | Investigator | Within 15-25 working days |
| 4 | Determine if force was necessary and proportionate (if applicable). | Investigator | Within 15-25 working days |
| 5 | Assess human rights impact (if applicable). | Human Rights Focal Point | Within 15-25 working days |

## 5.4 RESOLUTION AND REMEDY

| Step | Action | Responsible | Timeline |
|---|---|---|---|
| 1 | Develop proposed resolution or corrective actions. | Investigator / Security Director | Within 5 working days of investigation |
| 2 | Review and approve resolution (CEO for High/Critical cases). | Security Director / CEO | Within 5 working days |
| 3 | Communicate outcome to complainant (unless anonymous). | Security Director | Within 5 working days |
| 4 | Implement agreed actions (apology, disciplinary action, compensation, policy change, training). | Assigned Owner | As agreed |
| 5 | Confirm complainant satisfaction (where possible). | Security Director | Within 7 days of resolution |

## 5.5 ESCALATION

| Step | Action | Responsible | Timeline |
|---|---|---|---|
| 1 | If complainant is dissatisfied, they may request escalation. | Complainant | Within 10 days of outcome |
| 2 | CEO review and final decision. | CEO | Within 10 days of request |
| 3 | If criminal in nature, refer to Somaliland authorities. | Security Director | Immediately |

## 5.6 CLOSURE AND FOLLOW-UP

| Step | Action | Responsible | Timeline |
|---|---|---|---|
| 1 | Only close after resolution implemented and effectiveness verified. | Security Director | Within 30 days of outcome |
| 2 | Record lessons learned and update Improvement Plan (PLN-003). | Security Director | Within 30 days |
| 3 | Update Grievance & Complaints Resolution Log (G2S-SOMS-REC-001). | Security Director | Upon closure |

## 6. ROLES AND RESPONSIBILITIES

| Role | Responsibility under this Policy |
|---|---|
| **Chief Executive Officer** | Holds ultimate accountability for grievance and complaint handling; reviews and approves resolutions for High/Critical cases; ensures adequate resources for implementation. |
| **Security Director** | Overall ownership of the grievance and complaints system; oversees investigations; approves resolutions; reviews trends; reports to management. |
| **Human Rights Focal Point** | Provides guidance on human rights-related grievances; ensures rights-respecting procedures; reviews human rights impacts. |
| **Site Supervisors** | Accept and record grievances at site level; escalate issues appropriately; support investigations. |
| **Investigators** | Conduct impartial and confidential investigations; document findings and recommendations. |
| **All Personnel** | Report grievances and complaints; cooperate with investigations; maintain confidentiality; do not retaliate. |

## 7. MEASURABLE OBJECTIVES AND MONITORING

| Objective | Measurable Target / KPI | Review Frequency |
|---|---|---|
| Timely Acknowledgement | 100% of complaints acknowledged within 48 hours | Monthly |
| Timely Resolution | 100% of grievances resolved within 30 days | Monthly |
| Complainant Satisfaction | ≥ 90% satisfaction with resolution process | Quarterly |
| Substantiated Human Rights Violations | Zero (0) | Quarterly |
| Grievance Resolution Rate | ≥ 90% of grievances resolved | Monthly |
| Investigation Completion | 100% of investigations completed within timeline | Monthly |
| Trend Analysis and Reporting | Quarterly report to management review | Quarterly |

# 8. CONFIDENTIALITY AND NON-RETALIATION

## 8.1 CONFIDENTIALITY

All grievances and complaints shall be treated with strict confidentiality. Information shall only be shared with personnel who have a legitimate “need to know” for investigation and resolution purposes. Complainants may request anonymity, and their identity shall be protected to the extent possible.

## 8.2 NON-RETALIATION

G2S strictly prohibits retaliation against any person who makes a good-faith report or participates in an investigation. Retaliation includes threats, harassment, intimidation, demotion, termination, or any adverse action. Any act of retaliation is treated as a serious disciplinary offense and may result in termination and legal referral.

## 9. TRAINING AND AWARENESS

G2S provides regular awareness training on this Policy and grievance procedures to all personnel, including:

- Induction training on grievance and complaint mechanisms;
- Annual refresher training on rights and responsibilities;
- Specialized training for investigators on impartial investigation techniques;
- Community awareness sessions on grievance channels near major sites.

## 10. MONITORING AND CONTINUAL IMPROVEMENT

G2S monitors grievance and complaints performance through:

- Regular tracking and analysis of grievance trends;
- Quarterly management review of grievance statistics and performance indicators;
- Identification of systemic issues and implementation of corrective actions;
- Feedback from complainants on satisfaction with the process;
- Annual review of this Policy and procedures for effectiveness.

## 11. POLICY COMMUNICATION AND REVIEW

### 11.1 COMMUNICATION

This Policy shall be communicated to all personnel during induction and through annual refresher training. It shall be posted at all operational sites and made available to all personnel, clients, and stakeholders on request.

### 11.2 PUBLIC AVAILABILITY

This Policy shall be published on the G2S public website to demonstrate transparency and commitment to our stakeholders.

### 11.3 REVIEW

This Policy shall be reviewed annually or following significant changes to our operations, regulatory environment, or client requirements, ensuring its ongoing relevance and effectiveness.

## 12. RELATED DOCUMENTS

| Document | Reference |
|---|---|
| SOMS Manual | G2S-SOMS-MAN-002 |
| Human Rights Policy | G2S-SOMS-POL-002 |
| Code of Ethics | G2S-SOMS-POL-003 |
| Whistleblowing Policy | G2S-SOMS-POL-006 |
| SOP: Complaints Resolution & Grievance Mechanism | G2S-SOMS-SOP-015 |
| SOP: Incident Management & Investigation | G2S-SOMS-SOP-005 |
| Grievance & Complaints Resolution Log | G2S-SOMS-REC-001 |
| Lessons Learned Register | |

## APPROVAL AND ENDORSEMENT

This document has been reviewed and approved by G2S Group leadership and is effective from the date shown below. It forms part of the G2S Security Operations Management System (SOMS) / Integrated Management System and is maintained in conformance with ISO 18788:2015, ANSI/ASIS PSC.1-2022, and ISO 9001:2015.

| Approved By | Date |
|---|---|
| Abdishakur Hassan Kayd<br>Security Manager, G2S Group | 23-07-2026 |

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| Approved By | Date |
|---|---|
| Kader Abdi Daher<br>Chief Executive Officer, G2S Group | 23-07-2026 |

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