

STAKEHOLDER ENGAGEMENT PROCEDURE AND COMMUNITY GRIEVANCE MECHANISM

GUIDANCE NOTE

The company deems it necessary to have formal confidential procedures and mechanisms in place for reporting grievances and concerns.

This policy is to enable employees to register their concerns and dissatisfactions, either real or perceived, without reprisal, to resolve such challenges promptly.

In agreement with the principles of “*audi alteram partem*” (fair hearing) and “*nemo iudex in causa sua*” (one shall not be a judge in their case), the company ensures impartiality, confidentiality, and transparency.

Specific structured measures creating an opportunity for community members and other stakeholders to raise grievances have been put in place without exception to grievances requiring special protection measures, such as reports of gender-based violence, including protection from reprisals.

Staff Complaints, Whistleblowing, and Suggestions

Staff can expect that the Company will give due consideration to their constructive suggestions and provide a considered and objective review of genuine concerns and complaints. Such concerns include fraud, misrepresentation, theft, harassment, discrimination, and non-compliance with regulations, legislation, policies, and procedures.

Concerns must be investigated impartially so that the employee’s rights are protected. Employees who have concerns about potential unethical behaviour should advise their local Unit Head or Human Resources Manager in the first instance. Employees may do this anonymously if they so wish. To ensure that confidentiality is maintained, employees should not discuss such concerns with colleagues or other third parties, unless specifically authorized or unless it is a legal requirement.

If the employee is dissatisfied with the response to the concern that he or she has raised, or if the concern relates to a matter of exceptional gravity or sensitivity, he or she can contact the Union Representative(s), Line Manager, HR Manager, CCO, and/or General Manager under the Whistleblowing policy.

Procedure

- The disclosing employee shall formally and in writing lodge a complaint to the Human Resource Head, Human Resource Manager, Group General Manager, or the Legal Officer of the impropriety.
- The company shall, within 5 days after the complaint, complete a thorough investigation of the matter.
- HR, the Legal Officer, and any other mix of trained staff shall constitute a committee to investigate the complaint.
- The committee shall, after such hearing, present its findings with recommendations to Management for an action to be taken which shall conform with the company’s disciplinary procedure.



In addition to the aforementioned, this clause shall be governed by all the provisions of the Whistle-Blower Act, 2006 (Act 720).

Compliance Monitoring

We monitor compliance with this ethics policy, using information reported via the whistleblowing facility, internal/external audit, and ongoing management reporting.

Grievance Box

Employees will be provided with a box where they can lodge complaints anonymously. It is a method to hear the grievances of the employees.

Complaints must be in writing and addressed to the Grievance Redress Service (GRS).

They can be sent by the following methods:

- Online, access the online form
- By email to grievances@melcomgroup.com or Contact #: +233 596 91 0545
- By letter or by hand delivery to the Melcom Group in #2 Melcom Head Office – print and use the attached form (DOCX)

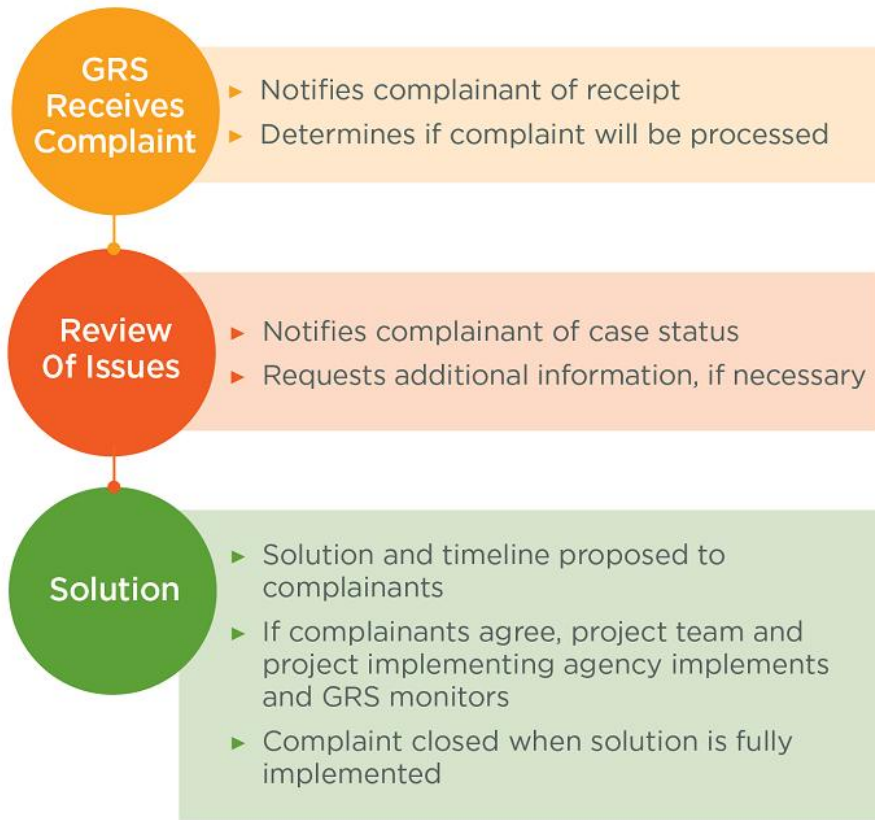
Information to include in a complaint

Complaints must:

- Identify the project subject of the complaint
- Clearly state the project's adverse impact(s)
- Identify the individual(s) submitting the complaint
- Specify if the complaint is submitted by a representative of the person(s) or community affected by the project
- If the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative.

Supporting evidence is not necessary, but it may help review and resolve the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved. All complaints will be treated as confidential. The GRS will not disclose any personal data that may reveal the identity of complainants without their consent.

The GRS complaint process has three main steps.



Expected Acknowledgement Time: 24 ` 48 Hours

Expected Response Time: No later than 10 working days

<i>Prepared By:</i> HR	<i>Reviewed By:</i> Director	<i>Annual Review Date:</i>
Betty A. Padi (GHR Manager)	Francis Sam (General Manager)	November 9 th , 2023

Grievance Redress Service Procedure

A grievance is defined as an act, omission, or occurrence that an employee feels constitutes an injustice and can be established on factual information. It may relate to any condition arising out of the relationship between an employer and an employee, including but not limited to compensation, working hours, working conditions, and welfare in an organization of employees. It does not include position allocation, involuntary transfers, dismissals, demotions, or suspensions.

Instructions for the employee submitting a grievance:

1. While filing a formal grievance, please ensure all the information requested on the grievance form is filled out. While describing the grievance, please include the names of other persons involved in the act or occurrence.
2. The steps in grievance procedures are as follows:

Step 1: File with the Supervisor/Accommodation In-Charge/Other relevant personnel. If not resolved within 3 working days, take the next step.

Step 2: File with [worker welfare officer] - if not resolved within 3 working days, take the next step.

Step 3: File with HR department- If not resolved within 2 working days of receipt of request, the HR/Management shall render a decision.

Step 4: If a grievance is not resolved within 2 working days of submission of the request to the HR department, contact the [Designated Personnel from the company] at the contact number/email provided.

Step 5: If the company management fails to resolve the grievance of the worker after the appropriate procedure is followed, the worker has the right to approach the relevant governmental authority with a copy of the grievance form. [Details of the toll-free authority grievance number].

3. Resolution and Decision by Committee

- Based on findings, determine appropriate corrective or disciplinary actions for execution.
- Ensure restorative options if appropriate (e.g., counselling, mediation, relocation).
- Communicate the outcome to the complainant (within the agreed timeframe) while respecting confidentiality.

4. Appeal Process by Complainant

- Allow the complainant to appeal the decision if unsatisfied within the grievance process.
- Appeals should be reviewed by a different person or panel than the one handling the original complaint.



- Panel or committee will request relevant support as needed.

5. Monitoring and Follow-Up by All Parties

- Monitor the situation to prevent retaliation or further harm.
- Ensure corrective actions are implemented.
- Follow up with the complainant to assess satisfaction, well-being, and general safety assurance.

6. Reporting and Learning by Committee

- Maintain records (securely and confidentially).
- Analyze trends in complaints to identify systemic issues.
- Use lessons learned to improve policies, training, and facility conditions.



Grievance Redress Service Form

Dear Workers,

We understand that there may be times when you have concerns or grievances about your employment. As an employer, we take these concerns seriously and want to provide you with a way to raise these issues in a safe and confidential manner. To this end, we have created a Grievance Form that you can use to raise any concerns or grievances that you may have.

This form is designed to be simple and easy to use, with clear instructions on how to fill it out and what information is required. It can be submitted in multiple ways to ensure that you can submit it in a way that is most convenient for you. We have also included options for anonymity and confidentiality to ensure that you feel comfortable raising your concerns without fear of retaliation.

We recognize that addressing your grievances or concerns in a timely and transparent manner is important to maintaining a healthy and respectful working environment. Therefore, we have included a response time and a follow-up process to ensure that your concerns are addressed and resolved to your satisfaction.

We encourage you to use this Grievance Form to raise any concerns or grievances you may have. We are committed to ensuring that our recruitment practices are fair, ethical, and transparent, and we are dedicated to addressing any issues that may arise.

Sincerely,

Company Representative



GRIEVANCE FORM

The form MUST BE COMPLETELY FILLED OUT

Grievance Case Number: <i>(To be filled by Company)</i>			
Grievant Information: <i>(Not mandatory)</i>			
Full Name:		Mr. [] Mrs. [] Miss [] Other []	
Contact Number:		Gender:-	
Employee No: (If Applicable)		Designation: (If Applicable)	
Immediate Supervisor: (If Applicable)		Department: (If Applicable)	
Incident Information:			
Date of Incident []	Date of Reporting []	Email id []	Channel for submission attached any supported document, if any.
Detailed description of grievances, including names of other persons involved, if any: (Please feel free to attach an extra sheet as needed)			

Date you became aware of the event (if different):

Previous effort taken to resolve the Case (If Applicable)

Does the complainant permit the sharing or disclosure of their name? Yes [☐] No [☐]

(During the investigation period) _____

If no, give us the reason [Optional] _____

Remedy Requested by Grievant (Not mandatory)

Investigation: (To be filled by Company)

Investigation Process and Findings:**Proposed Remediation to the grievance:****Follow Up: (To be filled by Company)****Remediation Assigned
to:****Target Closure Date:****Note: -**

File A copy of this form with either the accommodation in charge or retain a copy for filing at the next step. If you do not receive a response within 7 working days, please report back to the management again for further feedback.

- The expected time frame for acknowledgement is 72 hrs.

Submission Process: Email (grievances@melcomgroup.com), WhatsApp number

(0596910545) Or by hand delivery to the Melcom Group Head Office

To the Legal or HR Department Head.