

GRIEVANCE, COMPLAINTS AND APPEALS POLICY

1. Purpose

Expertise Consultancy (EC) is committed to maintaining an ethical, transparent, and accountable organisational culture. This policy establishes a structured framework to receive, investigate, and resolve grievances, complaints, and appeals related to EC's operations. It ensures that all personnel, including employees, contractors, security and support staff, supply chain members and external stakeholders have access to a fair, confidential, and impartial process to raise concerns or disputes. The policy supports organisational compliance with international standards and frameworks to promote trust, accountability and continuous improvement.

2. Scope

This policy applies to all individuals engaged with EC, encompassing full-time, part-time, temporary employees, contractors, consultants, security personnel, support staff, supply chain associates, and all external stakeholders who have legitimate grievances or complaints concerning any aspect of EC operations, conduct and/or service delivery in Libya.

3. Definitions

- Grievance:** An expression of dissatisfaction raised primarily by internal personnel concerning workplace conditions, treatment, or practices deemed unfair, discriminatory, or in breach of company policy.
- Complaint:** A broader expression of dissatisfaction from either internal or external parties relating to EC's service delivery, conduct, decisions, or operational processes.
- Appeal:** A formal request seeking reconsideration or review of a decision previously made by EC in relation to grievances, complaints, disciplinary actions, or other operational outcomes.

4. Guiding Principles

The policy is underpinned by the following principles, which are essential for compliance and for fostering organisational integrity:

- Confidentiality:** All information related to grievances, complaints, and appeals shall be handled with the highest degree of discretion to protect the privacy of all parties involved.
- Impartiality:** Investigations and decisions will be conducted objectively, ensuring no bias or conflict of interest influences the outcome.
- Protection from Retaliation:** EC strictly prohibits any form of reprisal or retaliation against individuals who raise concerns in good faith.

4. **Accessibility:** The grievance mechanism is designed to be accessible and clear for all eligible parties, including those outside the company.
5. **Timeliness:** Defined timeframes are established for each stage of the process to ensure prompt and effective resolution.
6. **Transparency:** Complainants and appellants will receive clear communication regarding process stages, outcomes, and rights.

5. Procedure for Grievances and Complaints

Step 1 – Informal Resolution (Applicable to Internal Personnel Only)

EC encourages internal personnel to initially seek to resolve issues informally by engaging directly with the individual(s) involved. This approach aims to address misunderstandings or disputes expediently and maintain collegial relationships. Should the issue remain unresolved or if the complainant is uncomfortable with informal resolution, the process proceeds to formal submission.

Step 2 – Formal Complaint Submission

Formal complaints must be submitted in writing and contain the following details:

1. A comprehensive description of the issue, including dates, times, and locations.
2. Identification of involved parties.
3. Supporting evidence or documentation.
4. A clear statement of the desired resolution or outcome.

Complaints from internal personnel should be addressed to either the Country Operations Manager or the Human Resources Manager. External stakeholders may submit complaints through official EC communication channels.

Step 3 – Acknowledgement of Receipt

Upon receipt of a formal complaint, EC will acknowledge the submission within three (3) calendar days. This acknowledgment will confirm receipt and outline the next steps, including expected timeframes for investigation.

Step 4 – Investigation

An impartial investigator, free from any involvement in the complaint, will conduct a thorough investigation. This process may include interviews, document analysis, and consultation with relevant personnel. The investigation aims to establish facts objectively and identify any breaches or issues requiring remedial action.

Step 5 – Response and Outcome

Following the investigation, a written response will be issued within thirty (30) calendar days of the investigation's commencement. This communication will detail findings, conclusions, and any corrective actions to be implemented.

Step 6 – Implementation of Actions

Any remedial or corrective actions recommended must be initiated within sixty (60) calendar days from the conclusion of the investigation. Failure to implement actions within this timeframe may result in dismissal of the complaint unless exceptional circumstances exist.

5. Appeals Procedure

Step 1 – Submission of Appeal

If the complainant or grievant is dissatisfied with the outcome, they may submit a formal appeal in writing within ten (10) calendar days of receiving the original decision. The appeal should include:

1. The original decision being contested.
2. Grounds for the appeal.
3. Any new evidence or information relevant to the case.

Appeals must be directed to the Country Operations Manager or Human Resources Manager, ensuring that the appeal is reviewed by a senior manager who was not involved in the initial investigation or decision.

Step 2 – Acknowledgement of Appeal

The appeal will be acknowledged within three (3) calendar days, with confirmation of the process and anticipated review timeline.

Step 3 – Appeal Review

The designated senior manager will conduct an independent review, which may include re-examination of evidence and consultation with involved parties. Additional information or clarification may be requested during this stage.

Step 4 – Final Decision

A final decision on the appeal will be communicated within thirty (30) calendar days from the start of the appeal review process. The decision will be final and binding.

7. Confidentiality

All stages of grievance, complaint, and appeal processes are subject to strict confidentiality. Information is shared only on a need-to-know basis among those directly responsible for handling the case. Breaches of confidentiality may be subject to disciplinary action.

7. Summary of Timeframes

PROCESS STAGE	TIMEFRAME
Acknowledgement of grievance/complaint	Within 3 calendar days of receipt
Investigation and response	Within 30 calendar days of investigation start
Implementation of corrective action	Within 60 calendar days of investigation conclusion
Submission of appeal	Within 10 calendar days of initial decision
Acknowledgement of appeal	Within 3 calendar days of receipt
Appeal review and final decision	Within 30 calendar days of appeal review start

8. Record Keeping

EC will maintain secure and comprehensive records of all grievances, complaints, investigations, appeals, and outcomes for a minimum of two (2) years. These records will be retained in compliance with data protection laws and will be accessible only to authorised personnel for audit and review purposes.

10. Review and Continuous Improvement

This policy will be reviewed at least annually or following significant incidents or audits. Feedback from users of the grievance and complaints process, along with identified trends, will inform ongoing improvements to strengthen EC's operational resilience, compliance with international and commitment to ethical standards.

EC Libya Managing Director - Tamim Rashed

