



Third Party Complaints Policy and Procedure

Spartent Global Solutions Ltd recognises its responsibilities to individuals affected by its operations and the actions of its management and staff; it also recognises the importance of providing a channel for third parties to raise concerns.

Aim

This document outlines Spartent's policy and procedures for handling third party complaints or grievances, describes how third parties can raise a complaint or grievance and outlines how they can expect such a complaint or grievance to be handled in confidence.

Definition

The term "third parties" within the context of this policy does not refer to those that have a contractual relationship with, or are employed by Spartent, but more to individuals or communities that live and work in areas where Spartent may be operating. Third parties may be affected by Spartent's actions in the following ways (list not exhaustive):

- verbal abuse, personal injury and death;
- infringement of human rights;
- damage to property and material or financial loss;
- excessive use of force; and
- environmental damage.

Policy

In the event of an issue arising from a third party complaint Spartent will:

- process complaints and grievances in an effective, appropriate, transparent and fair manner, with due consideration for confidentiality and the rule of law;
- conduct an initial assessment and investigate further as needed;
- identify the root causes, remedy the impacts and take disciplinary action where appropriate;
- advise complainants of the outcome of investigations;
- develop remedial training and implement procedures to reduce the likelihood of future similar complaints;

- report complaints to the appropriate external authorities when the nature or severity of the complaint requires such action giving its full support to any external investigating authorities. Where a criminal act may have taken place Spartent's legal advisors will consider taking the matter to the appropriate authorities, providing information, documents or support as necessary; and
- publish the Third Party Complaints/Grievance policy on its website.

Procedure

Registering a Complaint

Those wishing to register a complaint should send an email to grievance@spartentgs.com, giving as much information as possible of the circumstances surrounding Spartent's alleged malpractice. Where third parties believe that their complaint has been handled inappropriately and prefer to seek independent redress, they are advised to refer the matter to an external body.

Investigation

On receipt of a third party complaint Spartent will nominate a member of its management team to act as the point of contact. The point of contact will outline to the complainant the stages in the resolution process, liaise with all relevant parties, provide progress updates and report on the outcome. If there is evidence that a criminal or serious disciplinary offence may have been committed, the matter will be referred immediately to Spartent's legal advisors.

Spartent's Roles and Responsibilities

Spartent employees will advise complainants of the process, assist complainants in submitting complaints or grievances and ensure that complaints or grievances raised through Spartent's management are escalated to an appropriate level. Moreover, they will ensure that investigations are fully supported, notifying senior management and initiate Spartent's confidential complaint's policy where they believe that the above provisions are not being implemented.