

GRIEVANCE PROCEDURES

Excel Security Solutions is a Switzerland based company dedicated to uphold the integrity in all its mandates in all the territories it operates in. Excel Security Solutions affirms it has a responsibility to respect the human rights of and fulfil humanitarian responsibilities towards all persons affected by Excel Security Solutions' business activities. These persons include employees, contracted personnel, clients, suppliers, shareholders and the population of the area in which services are provided.

Excel Security Solutions strives to achieve the highest possible standards of service, and the highest possible ethical standards in all of its practices. For this reason, we take all grievances seriously. All personnel and third parties are to report any possible violations of the principles contained in the Code.

Allegations can be reported by email to info@excelsecuritysolutions.ch or by registered mail to: Excel Security Solutions AG, PO Box 166, 3780 Gstaad, Switzerland.

Excel Security Solutions will establish grievance procedures to address claims alleging failure by the company to respect the principles contained in the Code brought by personnel or by third parties.

Excel Security Solutions will:

- a) establish procedures for their personnel and for third parties to report allegations of improper and/or illegal conduct to designated personnel, including such acts or omissions that would violate the principles contained in the Code. Procedures must be fair, accessible and offer effective remedies, including recommendations for the prevention of recurrence. They shall also facilitate reporting by persons with reason to believe that improper or illegal conduct, or a violation of the Code, has occurred or is about to occur, of such conduct, to designated individuals within a company and, where appropriate, to competent authorities;
- b) publish details of their grievance mechanism on a publically accessible website;
- c) investigate allegations promptly, impartially and with due consideration to confidentiality;
- d) keep records about any such allegations, findings or disciplinary measures. Except where prohibited or protected by applicable law, such records should be made available to a competent authority on request;
- e) cooperate with official investigations, and not participate in or tolerate from their personnel, the impeding of witnesses, testimony or investigations;

- f) take appropriate disciplinary action, which could include termination of employment in case of a finding of such violations or unlawful behaviour; and
- g) ensure that their personnel who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.
- h) not subject the person/s reporting alleged violations to discrimination or adverse treatment.