

GRIEVANCE POLICY**EMPLOYEE GROUP POLICY APPLIES TO:**

All Erinys Employees, Contractors, Sub-Contractors, Vendors, Suppliers (Stakeholders), Clients and any member of the public.

OBJECTIVE AND INTENT:

A grievance is defined as 'A wrong or a hardship suffered, which is grounds for complaint'. Grievances may arise from within the Company or from an external source; Erinys' policy on the handling of grievance covers both these circumstances but the procedures vary. This document reflects this situation.

The aim of this document is to present Erinys' policy and procedures for the handling of any grievance from within or outside the Company with a view to facilitating their successful resolution in a timely fashion.

SCOPE:

This policy and procedures apply to all Company staff (consultants/contractors or employees), sub-contractors and any third party who have cause, or feel that they have cause, for complaint against Erinys.

POLICY DIRECTIVES:

1. The following comprise Erinys grievance policy:
 - a. It is to be transparent and fair by nature and in its application.
 - b. Informal action will be considered, where appropriate, to resolve problems. Often an informal meeting between the aggrieved party and their manager/Erinys Representative is the most effective way of resolving minor complaints and encourages direct communication between management and staff.
 - c. In the case of formal action, the aggrieved party must provide Erinys management with a written submission, which provides details of the complaint.
 - d. Erinys management and aggrieved parties are to raise and deal with issues promptly and not unreasonably delay meetings, decisions or confirmation of such decisions.
 - e. Erinys management and aggrieved parties are to act consistently.
 - f. Aggrieved parties have the right to be accompanied at any meeting concerning a grievance. In cases where group grievances are addressed, a maximum of two observers will be allowed to attend the grievance process in addition to the representatives.

- g. Aggrieved parties may appeal against the decision made.
- h. No person shall be victimised for invoking this grievance procedure; where victimisation is suspected, a grievance should be submitted in accordance with the Company's grievance procedure.

INTERNAL PROCEDURES

2. A person who has a grievance over any work-related issue has the right to raise their concerns with Erinys management; Figure 1 illustrates the process that will be undertaken to resolve any grievance case.

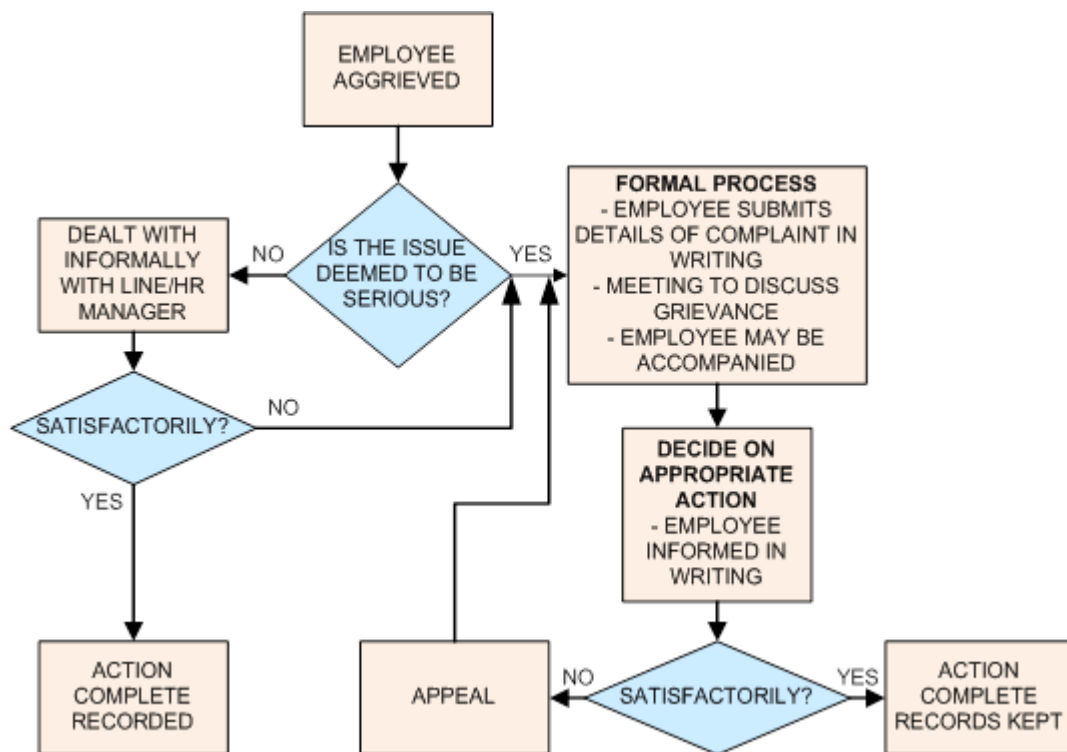


Figure 1: Grievance Process

3. Informal Dealing. Issues of a serious nature should always be dealt with formally; however, when mutually agreed, less serious grievances should be dealt with informally. This should take the form of an informal discussion between the aggrieved party and an appropriate manager. If it becomes clear that the matter cannot be resolved satisfactorily, or that the case is more serious than first assessed, the formal process must be adopted. If both parties agree that the grievance has been resolved satisfactorily no further action need be taken but the manager should make an informal note to record the event, its

nature and outcome.

4. Formal Process. The formal process may involve up to 4 procedures:
 - a. Submission. The aggrieved party must provide an appropriate Erinys manager with a written submission which gives details of the grievance; these should include:
 1. The nature of the grievance
 2. Where the incident(s) has occurred
 3. Who has been involved
 4. When the incident(s) happened or has been happening.
 5. Any actions that have been taken so far by any of the parties concerned
 - b. Hearing. Erinys management will arrange for a meeting to take place within 5 days to discuss the grievance. In preparing for such a meeting, managers should consider the following: having an impartial record keeper, making themselves aware of the full facts of the case, how similar grievances may have been resolved in the past, whether an interpreter may be needed. The aggrieved party has the right to be accompanied by a colleague, who may be allowed to address the meeting on the aggrieved individuals' behalf, sum up the aggrieved individual case, respond to any views expressed at the meeting and confer with the aggrieved individual. Once the hearing has finished the Erinys manager will take time to consider the case.
 - c. Decision. In making the decision upon the outcome and Erinys' position the manager should consult the Head of Human Resources, Managing Director or other senior managers within the Company – and is encouraged to do so. Regardless the decision should be presented in writing within 24hrs of the hearing. Once it has been made the manager is to inform the aggrieved party in writing of the outcome. The latter has the right to appeal if they are dissatisfied.
 - d. Appeal. The aggrieved party has grounds for dissatisfaction they appeal but this must be submitted within 5 days explaining their grounds for appealing in writing to Erinys management. An appeal meeting should be arranged within 5 days and should be run by the next more senior manager. The hearing will follow the format described in 7b above and the aggrieved party may be accompanied.
5. Records. Records of the following are to be made and kept for 7 years:
 - a. Nature and details of the grievance.
 - b. What was decided, and the actions taken.

- c. The reasons for these actions.
- d. Whether an appeal was made and its outcome.
- e. Any other subsequent developments.

EXTERNAL PROCESS

6. The policy set out in paragraph 4 applies to a non-employee who has a grievance to make against the Company. The procedures shown in Figure 1 and described in paragraphs 6 and 7 are very similar but the complaint is likely to be dealt with at corporate level in the first instance. In summary:

- a. Informal Approach. Erinys prefers to resolve grievance issues on an informal basis whenever possible; but only when this course is mutually agreeable.
- b. Formal Approach. The formal approach requires the aggrieved party to either submit the details of their complaint in writing (as per 7a) to whistleblowing@erinyssiraq.com. Arrangements will be made for a hearing – the composition of attendees will be agreed on a case by case basis. Erinys will inform the aggrieved party of its decision in writing or via email within 24 hours of the hearing being completed. The aggrieved party has the right to appeal within 5 days and this process should be started by a submission in writing/email explaining the grounds for this appeal. A further hearing will be convened but managed by a different person with the findings being promulgated within 24 hours of its completion.

7. Grievances are to be handled with sensitivity, respect but without undue delay. The procedures are relatively straightforward and must be followed precisely; the importance of keeping records is emphasised. Advice should be sought from senior managers (particularly the Human Resources Manager and the Managing Director) from the outset.