

GRIEVANCE AND RESOLUTION POLICY

CENTURION SAFETY PRODUCTS LTD

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Purpose of this policy

We believe that the sooner any concerns or complaints are raised, the better for everyone involved, to prevent the situation escalating. We encourage you to raise any concerns or grievances you have as quickly as possible with your line manager in an informal setting. However, if the matter concerns your line manager, you can raise it with the Executive Assistant, who will try to help resolve the matter.

We recognise that it may not be possible or appropriate to resolve every concern informally. Where this is the case, you should use the formal grievance procedure set out below.

If you have concerns about harassment or bullying, please see our anti-bullying and harassment policy which gives you guidance on what to do.

If you are concerned about possible malpractice in the company, you should draw this to our attention in accordance with our whistleblowing policy. However, where you are directly affected by the matter in question, or where you feel you have been victimised for an act of whistleblowing, you may raise the matter under this grievance procedure.

Formal grievance procedure

The purpose of this grievance procedure is to ensure that you have an opportunity to raise formally with management any grievances relating to your job or complaints regarding the company or any of its employees. Our aim is to ensure that your grievance or complaint is dealt with promptly and fairly by the appropriate level of management.

This procedure only applies whilst you are employed by the company. If you leave our employment and then raise a grievance, we will consider your grievance but would not normally follow the full procedure.

It is essential to the proper working of this procedure that, whenever possible, you continue to work normally whilst the procedure is being followed.

If your grievance relates to a disciplinary decision that has been taken against you, you should use the disciplinary appeals procedure.

If your complaint or grievance relates to your immediate manager, this procedure can be commenced by approaching the Executive Assistant.

If you are part of a group of employees that wishes to raise a grievance, we suggest that you ask an appropriate representative to raise the grievance on behalf of the group.

Each stage of this procedure will be carried out without unreasonable delay.

If you have difficulty at any stage of the grievance procedure because of a disability, or because English is not your first language, you should discuss the situation with your line manager as soon as possible.

Status of this procedure

This procedure applies to employees only, other than in relation to discrimination issues, as set out below. It does not apply to agency workers, consultants, self-employed contractors, volunteers or interns.

Where a grievance relates to discrimination, harassment, or victimisation, this procedure applies to all staff, including employees, agency workers, consultants, self-employed contractors, volunteers and interns. You may use this procedure to raise a complaint where you have experienced discrimination, harassment or victimisation yourself, or where you have witnessed this happening to someone else.

This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although we will notify you in writing of any changes.

Right to be accompanied

In any formal meetings (including formal investigatory meetings) under the procedure about your grievance, you have a statutory right to make a reasonable request to be accompanied by a work colleague or an accredited trade union representative of your choice.

A companion is allowed reasonable time off from their duties without loss of pay, but nobody is obliged to act as a companion if they do not wish to do so. If your chosen companion is unavailable at the time a meeting is scheduled and will not be available for more than five working days afterwards, we may request that you choose an alternative companion.

Your companion may address the meeting to put your case, sum up your case or respond on your behalf to any view expressed at the meeting. They may confer with you during the meeting but do not have the right to answer questions on your behalf or prevent anyone from making their contribution to the meeting.

We may, at our discretion, allow you to bring a companion who is not a colleague or union representative (for example, a member of your family) where this will help overcome a particular difficulty caused by a disability, or where you have difficulty understanding English.

Neither you nor your companion will be allowed to electronically record any meetings held under this grievance policy, except in exceptional circumstances and with the company's prior express agreement. Any breach of this provision will result in disciplinary action.

Location of meetings

We retain the discretion to choose whether to hold any meeting under this procedure (including investigation meetings) in person or remotely, as appropriate, depending on the circumstances.

If a meeting is to be held remotely:

- we will ensure that all participants (including, if applicable, any permitted person that you choose as a companion) can access the necessary technology and materials;
- we ask you to inform us if you have a disability or other accessibility issue that could affect your ability to use video conferencing technology so that we can consider any reasonable adjustments; and
- you must not have anyone else in the room with you during the meeting (other than your permitted chosen companion, if applicable, if they are attending from the same physical location as you).

Stage 1

If you wish to raise a formal grievance you should, in the first instance, raise it in writing with your immediate manager. If the grievance concerns your immediate manager, you should submit it to the

Executive Assistant. Your letter/email should explain the nature of your grievance, including any relevant facts, dates and the names of anyone involved.

You will be invited to a meeting to consider the matter and to discuss any suggestions you have for how it may be resolved.

The meeting will normally be held within five working days of the formal grievance being raised. The manager will then normally respond in writing to the grievance within five working days of the meeting.

We will normally need to carry out some investigation into your complaint before we meet with you. The scope of any investigation required will depend on the nature of your grievance and will vary from case to case. It may involve us interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents and other evidence. The investigation may be carried out by your immediate manager or another party whom we choose to appoint.

In some circumstances the investigation may take longer than five days. We will confirm to you if that is the case and will give you an indication of how long the investigation is likely to take. We will schedule a formal meeting to discuss your grievance once our investigation is complete.

In some cases, we may decide that further investigation is necessary following our meeting with you. In such circumstances, we will hold a further grievance meeting with you after our investigation is complete and before we decide on your grievance.

The manager will inform you in writing of your right to appeal your grievance at Stage 2, if you are dissatisfied with the outcome of Stage 1.

Stage 2 Appeal

If the matter is not resolved at Stage 1, you may appeal in writing within five further working days to the Department Director who may also involve the Executive Assistant. In your letter/email, you should set out the grounds for your complaint and the reasons why you are dissatisfied with the Stage 1 response.

You will be invited to a meeting to consider the matter and to discuss any suggestions you have for how it may be resolved.

The meeting will normally be held within five working days of the appeal being received. The Department Director will normally give a decision in writing within five working days of the meeting. You will then be informed in writing of your right to appeal your grievance at Stage 3, if you are dissatisfied with the outcome of Stage 2.

Stage 3 Appeal

If the matter is not resolved by the meeting at Stage 2, you may appeal it in writing within five further working days to the Chief Executive Officer (CEO) who may also involve the Executive Assistant. In your letter/email, you should set out the grounds for your complaint and the reasons why you are dissatisfied with the Stage 2 response.

You will be invited to a meeting to consider the matter and to discuss any suggestions you have for how it may be resolved. The meeting will normally be held within five working days of the letter being received.

The decision of the Chief Executive Officer (CEO) is the final stage of the procedure and will normally be given in writing within five working days of the meeting.

Confidentiality, data protection and record keeping

We aim to deal with grievances sensitively and with due respect for the privacy of the individuals involved. All employees must treat as confidential any information communicated to them in connection with a grievance.

Conducting grievance investigations and hearings under this procedure involves us processing the personal data of the employees concerned. We use this personal data in order to investigate and deal with grievances. Our legal grounds for doing so are that it is necessary:

- to comply with our legal obligations and for the performance of the employment contract (i.e. to investigate and deal with grievances in accordance with our duty of trust and confidence to our employees); and
- in our legitimate interest to deal effectively with grievances, whether you are the subject of them or are otherwise connected to the issues raised.

Special category data¹ and data relating to criminal convictions or offences may occasionally need to be processed under this grievance procedure – for example, where an employee brings a grievance asserting that they have been treated poorly because of their race or sexual orientation, or where an employee requires a reasonable adjustment to the procedure to accommodate a disability. Our additional legal grounds for using such data are that this is necessary: to exercise legal rights/comply with legal obligations in relation to employment; and to establish, exercise or defend legal claims.

Where we take witness statements from employees with information about the grievance being investigated under this procedure, such statements will be treated confidentially and will only be shared with individuals who need to be involved in the grievance process. This will ordinarily be the Executive Assistant; the person/people conducting investigations; and the managers conducting any formal grievance hearing or appeal. In addition, if in the course of the grievance procedure it becomes apparent that misconduct has taken place which requires investigation under our disciplinary policy, witness statements taken under this grievance procedure may be used in any subsequent disciplinary procedure and may therefore be shared with the person/people conducting investigations and hearings, as well as the employee whose conduct is the subject of disciplinary proceedings, to enable them to prepare for the hearing and respond to the allegations against them.

We will ordinarily keep records of grievances dealt with under this procedure for 6 months from the date of completion of the grievance procedure or 6 years, if the grievance relates to pay. However, there may also be circumstances in which it is appropriate for us to keep particular records under this procedure for a longer or shorter period. In such circumstances, we will decide how long records should be retained in accordance with the criteria set out in our main employee privacy notice.

More general information regarding data protection, including details of who your personal data is shared with, your individual rights under data protection law and who you should contact if you have any concerns, is contained in our main employee privacy notice, which can be accessed via COLIN (also known as Sharepoint) or a copy obtained from the Executive Assistant.

¹ (i.e. personal data about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sex life or sexual orientation, biometrics (if used for identification purposes) or genetics)

Protection against detriment

Centurion forbids retaliation against anyone for raising a grievance in good faith under the Grievance and Resolution Policy, even if their grievance is not upheld.

Where the grievance is made with malicious intent, the employee will be subject to the Company's disciplinary procedure.

Status of this policy

This policy does not confer any contractual rights to employees, either express or implied.

Policy Owner

Executive Assistant

Review

February 2026

Version Control

Warning: Print copies not subjected to version control