Internal and External Grievance & Complaints Policy

SECURE A SHIP LIMITED

Document reference	**SAS-HR-002**
Version / issue date	1.2 / 14 October 2026
Policy owner	Managing Director / designated HR representative
Approval / review	Approval pending / annual review or earlier if required

1. Purpose and commitment

SECURE A SHIP LIMITED is committed to a fair, respectful and safe working environment. This policy provides a confidential, impartial and accessible route for employees to raise workplace concerns, have them considered promptly and appeal outcomes. Raising a grievance in good faith will not result in retaliation or disadvantage.

2. Scope

This policy applies to employees directly employed by SECURE A SHIP LIMITED, including UK office staff and personnel assigned to vessels, ports or overseas operations. It may be used as guidance for other workers where appropriate, subject to their contractual status and applicable law. Personnel employed by a Navy, vessel operator, local agent or third-party provider should normally use their own employer's grievance procedure; SECURE A SHIP will nevertheless receive and escalate safeguarding, safety and ethical concerns involving its operations.

3. Matters covered

- Pay, benefits, working arrangements, leave, contractual concerns or unfair treatment.
- Bullying, harassment, discrimination, victimisation, interpersonal disputes and management decisions.
- Deployment arrangements, accommodation, travel, welfare, fatigue, supervision and other employment-related concerns.
- Concerns about how a previous grievance was handled.

Immediate danger, violence, weapons-security incidents, piracy threats or medical emergencies must be reported at once through the vessel Master, designated security lead and/or emergency channels. The grievance route does not replace emergency reporting, incident reporting, safeguarding, disciplinary, whistleblowing or external regulatory reporting.

4. Principles

- Fairness: an unbiased manager will review the grievance, with conflicts of interest disclosed and managed.
- Timeliness: all stages will proceed without unreasonable delay, taking account of offshore connectivity and operational safety.
- Confidentiality: information is shared only with people who need it to investigate or decide the matter; absolute secrecy cannot be promised.
- Non-retaliation: no employee should be penalised for a grievance made honestly, even if it is not upheld.
- Accessibility: reasonable adjustments, remote meetings and practical assistance will be considered.
- Recordkeeping: evidence, findings, decisions and actions are recorded securely.

5. Informal resolution

Where appropriate and safe, an employee may first raise a concern with their line manager or another manager and request a discussion or facilitated resolution. Informal resolution is optional, especially for serious allegations, alleged harassment, safety issues or where the manager is implicated. An employee may proceed directly to a formal grievance.

6. How to submit a formal grievance

Submit a written grievance to the Managing Director or designated HR representative at info@secureaship.com, marked “Private & Confidential – Employee Grievance”, or by sealed correspondence to SECURE A SHIP LIMITED, South Court, Hardwick Business Park, Noral Way, Banbury, OX16 2AF, United Kingdom. The employee should describe the issue, dates, persons involved, available evidence, previous steps and preferred resolution. Assistance will be provided where writing is difficult.

If the grievance concerns the Managing Director, or the usual recipient has a conflict of interest, the employee may request an alternative independent senior manager or external HR adviser through the company office. Where no impartial internal decision-maker is available, the company will seek appropriate independent support.

7. Acknowledgement and initial assessment

The company aims to acknowledge a formal grievance within 5 working days. The recipient will assess urgency, conflicts of interest, any need for interim protection, welfare support and whether another procedure or external authority must also be engaged. This 5-day period is an internal service target, not a statutory deadline.

8. Investigation and grievance meeting

A manager who is reasonably impartial will gather relevant records and witness accounts and invite the employee to a formal meeting without unreasonable delay. The employee may explain the grievance, provide evidence, identify witnesses and suggest a resolution. A written note of the meeting will be kept and shared subject to appropriate redactions. The investigation may be paused for necessary additional fact-finding, with updates to the employee.

At a qualifying formal grievance meeting and appeal hearing, employees have the statutory right to be accompanied by a fellow worker or an eligible trade union representative or official. The company will consider reasonable requests for other support, including interpreters and disability-related adjustments. Where the chosen statutory companion is unavailable, rearrangement will follow applicable legal requirements.

9. Decision and outcome

The company aims to provide a reasoned written outcome within 15 working days of receiving the grievance where practicable; complex cases or overseas deployments may take longer. Any delay will be explained and an updated timeframe provided. Outcomes may include upheld, partly upheld or not upheld, with proportionate steps such as clarification, mediation, training, changed reporting lines, welfare support, process improvements or a separate disciplinary referral. Confidential disciplinary details about other individuals may not be disclosed.

10. Appeal

An employee who disagrees with the outcome may appeal in writing within 10 working days of receiving the decision, explaining the grounds and any new evidence. Appeals should be sent to the Managing Director or the alternative person identified in the outcome letter. Where practicable, the appeal will be considered by someone not previously involved, with an appeal meeting held without unreasonable delay and the right to be accompanied. A final written decision will be issued promptly. The 10-day appeal period is a company procedural target; reasonable extensions will be considered.

11. Overseas and vessel-based personnel

- Grievances may be raised by secure email, telephone followed by written confirmation, or via an authorised shore contact where communications are limited.
- Operational safety and the vessel Master's lawful authority remain paramount; a grievance does not authorise refusal of lawful safety-critical instructions.
- Where immediate on-board separation, medical support, evacuation or safeguarding measures are necessary, these will be considered independently of the final grievance outcome.
- The company will coordinate with shipowners, local partners and flag/coastal-state authorities where necessary and lawful, protecting employee information as far as reasonably possible.
- Employees must not be required to disclose a sensitive grievance to the individual complained about as a precondition of escalation.

12. Related processes and external rights

Where a grievance overlaps a disciplinary process, the company will consider whether to pause one process or handle them concurrently, depending on fairness and the facts. Protected whistleblowing disclosures, discrimination complaints, criminal conduct and regulatory reports may require separate procedures. This policy does not restrict any statutory right to contact Acas, a regulator, law enforcement, a tribunal or another competent authority. Internal grievance steps do not automatically extend legal claim deadlines.

13. Privacy, records and learning

The designated policy owner will maintain a restricted-access grievance register recording receipt date, category, risk level, investigator, milestones, outcome, appeal and corrective actions. Personal data will be handled in accordance with UK data protection law and the company retention schedule; no fixed retention period is asserted by this policy. Records will be retained only as long as necessary for legitimate purposes and legal obligations. Anonymised themes and corrective actions may inform training and management reviews.

14. Responsibilities

- Employees: raise concerns honestly, provide relevant information and cooperate reasonably.
- Managers: take concerns seriously, protect against retaliation and refer matters involving themselves to another decision-maker.
- Designated HR representative / policy owner: oversee fairness, timelines, recordkeeping and corrective-action tracking.
- Senior management: provide independent oversight for serious, sensitive or unresolved cases.

15. Review and document control

This policy will be reviewed at least annually, and sooner following a significant grievance, relevant legal change, operational incident or audit finding. It is a non-contractual policy unless expressly incorporated into an employment contract. Any change will be communicated to affected personnel.

Appendix A — Employee Grievance Submission

Employee name / job title: _____

Preferred confidential contact: _____

Date(s) and location(s) of concern: _____

People involved / witnesses: _____

Description and supporting evidence (attach pages as needed):

_____

_____

Previous steps taken / preferred outcome: _____

Employee signature / date: _____

Appendix B — Management Handling Checklist

☐ Log securely and acknowledge receipt

☐ Assess immediate safety / welfare and conflicts

☐ Appoint impartial investigator and notify employee

☐ Arrange hearing and explain accompaniment rights

☐ Investigate, document findings and communicate outcome

☐ Explain appeal route and monitor corrective actions

☐ Close case securely and review lessons learned

Policy approval: _____ Date: _____

ICoCA Accessibility & External Investigation Provisions

Version 2.0 | Draft for management approval | 14 October 2026

The employee-specific procedures in sections 1–15 remain in force for staff grievances. Sections 16–23 extend the mechanism to external stakeholders and competent-authority cooperation. If there is a conflict, mandatory law takes precedence.

16. External complaints — access for all parties

In addition to the employee grievance process above, SECURE A SHIP LIMITED provides a complaints channel open to any individual or organisation affected by, or concerned about, its activities. This includes employees, former employees, contractors, subcontractors, vessel crews, shipowners, clients, suppliers, port workers, local communities, NGOs, witnesses and members of the public. No employment, contractual or financial relationship with the company is required. Complaints may be made on behalf of another person with appropriate authority or where safeguarding considerations justify accepting the report. Anonymous complaints will be assessed where sufficient information is available.

17. How external parties can submit a complaint

Complaints may be submitted by email to info@secureaship.com with the subject “Confidential — Grievance or Complaint”; by telephone to +44 (0)1295 254252; or by post to SECURE A SHIP LIMITED, South Court, Hardwick Business Park, Noral Way, Banbury, Oxfordshire OX16 2AF, United Kingdom, marked “Confidential — Grievance or Complaint”. Complainants may describe the concern in their own words and need not use a prescribed form. Reasonable support for language, literacy, disability, communication barriers and remote/offshore access should be provided where practicable. A person should not be required to complain to an alleged wrongdoer.

18. Complaints assessment, escalation and referral to authorities

The designated Complaints and Grievance Officer (or an impartial alternative where conflicted) must assess every complaint for urgency, immediate safety risks, potential criminal conduct, serious human rights abuse, unlawful use of force, injury or death, trafficking, corruption, threats, retaliation, child safeguarding concerns, regulatory breaches and any mandatory reporting duties. Immediate threats must be referred promptly to emergency services or other competent authorities as appropriate. For other serious matters, the Officer must document a referral decision, identifying the relevant law, reporting duty, jurisdiction, competent authority, evidence-preservation steps, and the rationale for reporting or not reporting. Legal advice should be obtained where jurisdiction or disclosure obligations are uncertain. No internal grievance process shall prevent a complainant from reporting directly to lawful authorities.

19. Cooperation with external investigations

SECURE A SHIP LIMITED shall cooperate in good faith with lawful investigations by competent authorities, including law enforcement, courts, relevant maritime administrations, flag/coastal/port-state regulators and other authorised bodies. Subject to applicable law, confidentiality, privilege, data protection and lawful restrictions, the company shall preserve and make relevant records available upon lawful request, including complaint files, witness statements, incident reports, operational logs, communications and partner records within its possession or control. Employees and relevant partners must not obstruct inquiries, intimidate witnesses, falsify information, or conceal, alter or destroy evidence. The Officer shall record requests, the authority and legal basis, materials disclosed or withheld, disclosure dates, and any restrictions. Where records are held by a partner or naval/security unit, the company will seek lawful cooperation without misrepresenting its power to compel disclosure.

20. Investigation, remedy and appeal for external complainants

External complaints will normally be acknowledged within five working days where contact details are available. An impartial investigator shall be appointed according to severity and conflicts of interest; urgent safety issues take priority. The company aims to issue an initial substantive response within 15 working days where practicable and provide progress updates if more time is needed. Findings, supporting evidence, corrective actions and any referral decisions shall be documented. Where appropriate and lawful, complainants will receive an outcome summary and information on requesting independent senior-management review within 10 working days. No contractual relationship is required for an appeal. These are target times, not guarantees; any extension and reason shall be recorded.

21. Confidentiality, non-retaliation and records

The company prohibits retaliation, threats, intimidation or disadvantage against any person who raises a concern in good faith, assists a complainant or participates in an investigation. Complaints are handled discreetly and information shared only on a need-to-know or lawful basis; anonymity or absolute confidentiality cannot be guaranteed. A restricted-access register shall record receipt, source category (including local community), nature, risk assessment, assigned officer, referral decision, investigation steps, authority requests, outcome, appeal, corrective action and closure. Personal data shall be retained only for a documented lawful period under the company retention schedule and applicable law; evidence relevant to proceedings or investigations must be preserved under a legal hold.

22. Public website accessibility and operational roll-out

A public-facing summary of this mechanism shall be published on www.secureaship.com, clearly identifying the channel as suitable for complaints from anyone, including members of local communities without a financial relationship with SECURE A SHIP LIMITED. The website must state submission methods, confidentiality and anti-retaliation principles, how matters are assessed and referred, and the availability of review. The company shall confirm the page is live, accessible without login, and tested periodically. Personnel and local operational partners shall receive information on how to refer complaints. The policy owner shall maintain evidence of publication, training, testing and annual review. This document does not itself establish that publication or training has occurred.

23. Governance, responsibility and approvals

The Managing Director shall appoint a named Complaints and Grievance Officer, an independent alternate and an appeal decision-maker, and record their contact details internally. Conflicted individuals must not investigate or decide their own cases. Serious matters shall be escalated to senior management without delay, subject to conflict management. The policy owner shall review case trends and corrective actions at least annually and report material issues to senior management. The company must verify local legal, regulatory, contractual and reporting requirements for each jurisdiction of operation.

Appendix C — External complaint intake and authority referral record

Complaint reference: _____ Date/time received: _____

Complainant / anonymous / third-party representative: _____

Contact and preferred language/accessibility needs: _____

Incident date/location/vessel/partner: _____

Allegations and immediate safety measures: _____

Conflict-of-interest check / investigator: _____

Criminal / human rights / regulatory / safeguarding risk screening: _____

Authority referral required or appropriate? Yes / No / Pending legal advice

Competent authority and jurisdiction: _____

Decision and reasons (including why not referred): _____

Evidence preserved / legal hold initiated: _____

External request for records, legal basis and response: _____

Outcome, remedy, complainant update and appeal: _____

Closure approval and date: _____

Appendix D — Public website notice (publish on secureaship.com)

GRIEVANCES, COMPLAINTS AND HUMAN RIGHTS CONCERNS

SECURE A SHIP LIMITED welcomes complaints from employees, contractors, clients, vessel crews, suppliers, local communities, NGOs and members of the public. You do not need to be a customer or have any financial or contractual relationship with us. Concerns may relate to misconduct, safety, human rights, discrimination, harassment, security operations or breaches of law or company standards.

Email: info@secureaship.com (subject: Confidential — Grievance or Complaint)

Telephone: +44 (0)1295 254252

Post: SECURE A SHIP LIMITED, South Court, Hardwick Business Park, Noral Way, Banbury, Oxfordshire OX16 2AF, United Kingdom.

We assess concerns impartially, aim to acknowledge identifiable complaints within five working days, protect information as far as reasonably and lawfully possible, prohibit retaliation for good-faith complaints, and refer serious matters to competent authorities when required or appropriate. You may also report directly to relevant authorities. If you need help making a complaint, please tell us your accessibility or language needs.

Implementation and approval checklist — complete before asserting compliance

☐ Appoint named Complaints and Grievance Officer and independent alternate

☐ Approve policy and document effective date/version owner

☐ Confirm complaints inbox and phone/post routing, including after-hours escalation

☐ Publish Appendix D on a public secureaship.com page; save URL and dated screenshot

☐ Test public submission without login, including from overseas

☐ Create restricted complaint/referral register and evidence-preservation procedure

☐ Brief UK employees, deployed personnel and local partners

☐ Verify legal reporting duties and data-retention schedule by jurisdiction

☐ Establish annual review and management reporting

Approval signature: _____ Effective date: _____