



IRAQ STAR

Internal Grievances and Whistleblowing Standard Operating Procedure (English Language)

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Internal Grievances and Whistleblowing

1 Purpose

The objective of the Grievance procedure is to promote good staff relations by the prompt resolution of individual grievances. Grievances may relate to any concerns, problems or complaints an employee or contractor may have in relation to any aspect of employment or a decision made about the employment/contracts including terms and conditions, relationships at work, harassment, new working practices, changes within the organization and equal treatment. An effective grievance management process respects the human right to seek **remedy**.

2 Internal Grievances Management Process

All employees and contractors have the right to raise grievances. In the first instance, this will be directly with the individual's line manager. Where this is unsuccessful, or in the event that the individual does not feel that it is appropriate to raise the issue with his line manager, the grievance may be escalated through the chain of command..

Initially, if raising a grievance with the Manager is inappropriate, or if the situation is unclear with whom a grievance should be raised, then informal counselling from the Country Manager or General Fadel should be sought. They will agree on how best to proceed.

Alternatively, all personnel have the right to use the confidential whistle-blower email address to raise their concern with the Ethics Committee.

3 Domestic Grievance Management

Domestic grievance management for Iraqi national personnel is managed by General Fadel in the first instance following accepted national practices. Where the grievance is not resolved, the General Manager will be called to attempt resolution.

General Fadel and the Country Manager will consult to ensure that:

- (a) Any grievance involving a foreign national is resolved.
- (b) Management lessons are identified for continuous improvement purposes.

Appropriate issues will be raised at the next Country Management Team Meeting.

4 Foreign National Grievance Management

Foreign national grievance management are managed by the Country Manager in the first instance. Where the grievance is not resolved, the General Manager will be called to attempt resolution.

The Country Manager will consult with General Fadel to ensure that:

- (c) Any grievance involving an Iraqi national is resolved.
- (d) Management lessons are identified for continuous improvement purposes.

Appropriate issues will be raised at the next Country Management Team Meeting.

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5 Ethics Committee

Iraq Star PSC maintains an ethics committee consisting of Iraq Star PSC's General Manager, General Fadel and the Country Manager. The business owners may be included by invitation if necessary. The Ethics Committee will

6 Whistle-blowing

The Company recognises that employees may not always feel comfortable about discussing their concerns internally especially if they believe the Company itself is responsible for the wrongdoing. The aim of the whistle-blowing system is to ensure that employees are confident that they can raise any matter with the Company that concerns them, in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them unless they are responsible for the wrongdoing (honesty will be considered). Wrongdoing includes any act that:

- (a) Amounts to a criminal offence or breach of civil law;
- (b) Amounts to a breach of any statutory code of practice;
- (c) Amounts to corruption or fraud;
- (d) Amounts to a miscarriage of justice;
- (e) Involves danger to the health and safety of any person;
- (f) Involves damage or potential damage to the environment; or
- (g) Attempts to cover up the occurrence or likely occurrence of any of the above

All concern(s) must be raised in good faith and the whistle-blower must reasonably believe that the information that they wish to disclose relates to one of the above categories of wrongdoing.

If there is a genuine suspicion about actual or planned wrongdoing which may be against the law or which may be a serious breach of regulations, or which may threaten seriously the high standards required of all employees, the concern should initially be raised with a Manager. However, if a question or concern relates to the Manager, the employee may raise a question or report possible misconduct by emailing ethics@iraqstar-psc.com. The report(s) can be made confidentially and/or anonymously. However, they may be discussed in confidence by the Ethics Committee.

7 Investigation

Once a complaint is received, the Company will investigate the allegation(s). The Company will do everything that it can to respect confidentiality and to prevent reprisals. However, to investigate concern(s) properly it may be necessary for the whistle-blower to consent to other employees being informed of their concern(s). The whistle-blower may request anonymity but this may affect the Company's ability to investigate your concern(s).

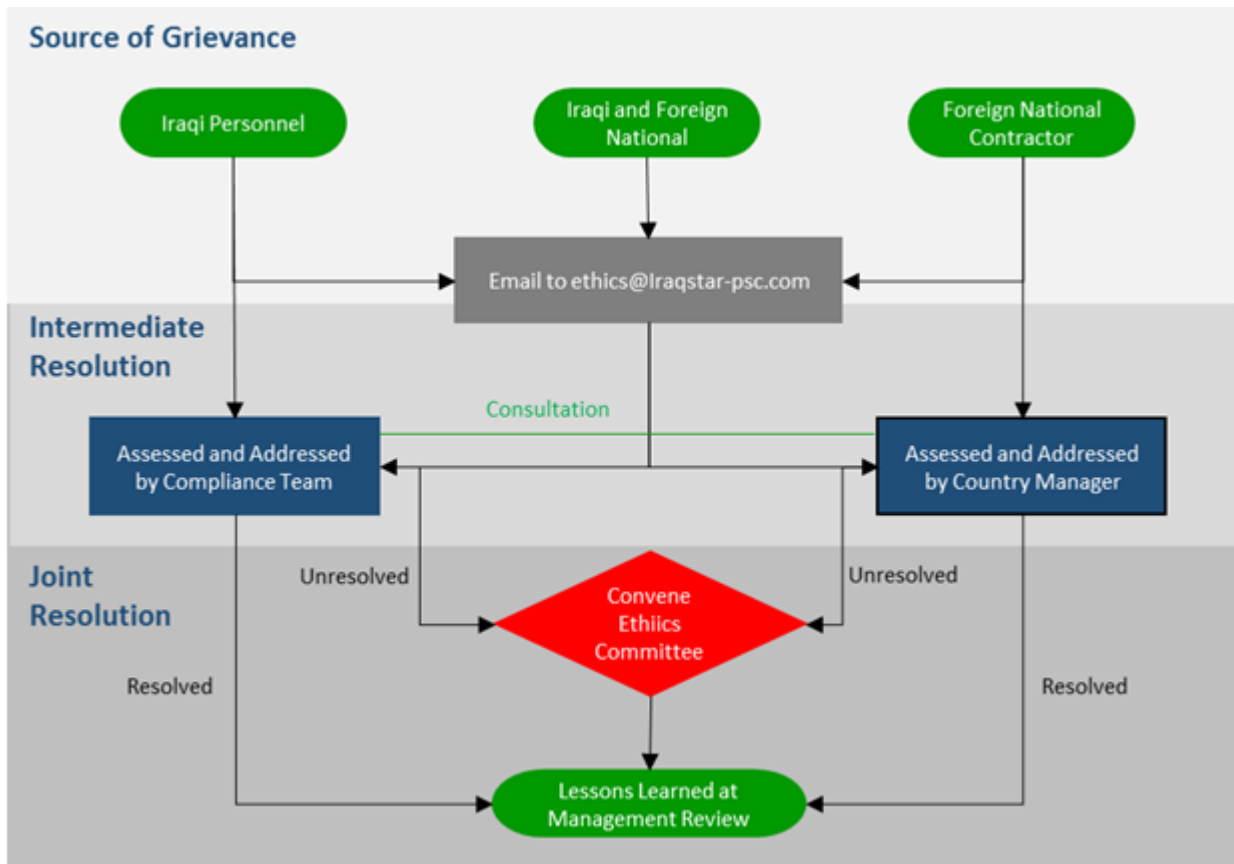
The investigation will be conducted and concluded as quickly as possible. The Company will advise the whistle-blower in a manner and to an extent considered appropriate by the Company, of the outcome of any investigation. This may include disciplinary action being taken against any employee(s) suspected of malpractice. The whistle-blower must treat the investigation, the outcome of the investigation, any report prepared as a result of the

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investigation and any disciplinary arising as confidential. Any breach of confidence may lead to disciplinary action being taken, including summary dismissal.

The grievance and whistle-blowing reporting process is as follows:



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