

GRIEVANCE POLICY AND PROCEDURE - EXTERNAL

14 MAY 2025 - VERSION 1.1

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PUBLIC

THIS DOCUMENT ENCOMPASSES INFORMATION THAT CAN BE RELEASED OUTSIDE OF GEMSERV AND THE TALAN GROUP. THIS DOCUMENT DOES NOT INCLUDE ANY CONFIDENTIAL, PERSONAL OR SENSITIVE INFORMATION.







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GRIEVANCE POLICY & PROCEDURE

1 STATEMENT OF INTENT

Gemserv Ltd is committed to conducting business responsibly, ethically, and transparently. As part of our B Corp values and ethical governance, we provide a formal mechanism through which stakeholders—including clients, suppliers, community members, and others—may raise concerns related to legal, ethical, social, or environmental matters.

This Grievance Policy outlines how individuals can submit a concern, how Gemserv will handle the grievance, and our commitment to accountability, transparency, and non-retaliation.

2 SCOPE

This policy applies to any external stakeholder interacting with Gemserv who wishes to raise a grievance concerning:

- Unethical conduct
- Environmental harm or non-compliance
- Legal or regulatory violations
- Human rights, diversity, or workplace concerns linked to Gemserv or our suppliers

3 GRIEVANCE SUBMISSION PROCESS

Grievances can be submitted via:

- Online grievance form: [Insert website link]
- Email: grc@gemserv.com
- Postal mail: FAO Governance Risk & Compliance Team, Gemserv Ltd, 77 Gracechurch Street, London, EC3V 0AS

All submissions will be treated confidentially and reviewed independently by our Governance, Risk & Compliance function.

4 PROCESS STEPS AND TIMELINES

- 1. Acknowledgement of grievance within 3 working days
- 2. Initial review and classification within 7 working days
- 3. Investigation and engagement with relevant parties (if required)
- 4. Resolution target within 30 working days
- 5. Outcome communication to complainant and closure

If the grievance does not meet the accepted grounds, the stakeholder will be informed in writing with a rationale.



5 PROTECTION AND NON-RETALIATION

Gemserv will not tolerate retaliation against any individual who raises a concern in good faith. External stakeholders are equally protected. In cases of suspected retaliation, the complainant may escalate to the Manager, Governance Risk & Compliance at grc@gemserv.com.

6 TYPES OF CONCERNS COVERED

We accept concerns involving:

- Environmental impact or sustainability violations
- Data protection or legal non-compliance
- Ethical issues involving staff, suppliers, or services

The following are not typically covered:

- Customer service feedback (should be sent via general feedback form)
- Anonymous submissions lacking sufficient detail

7 OVERSIGHT AND REVIEW

The **Governance Risk and Compliance (GRC) Manager** is responsible for the implementation and oversight of this procedure. This policy is reviewed annually and updated as needed.



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