

Grievance and Complaints Mechanism Policy

Victoria Security LLC

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This policy establishes a fair, accessible and accountable mechanism for raising and resolving grievances and complaints connected to Victoria Security LLC operations.

Contents

1. Introduction	3
2. Purpose	3
3. Scope of Application	3
4. Guiding Principles	3
5. Access to the Grievance Mechanism	4
6. Matters That May Be Reported.....	4
7. Internal Employee Grievances.....	4
8. External Complaints and Third-Party Concerns	5
9. Submission Channels	5
10. Registration and Acknowledgement	5
11. Assessment, Investigation and Resolution.....	5
12. Remedies and Corrective Action	6
13. Confidentiality, Data Protection and Non-Retaliation	6
14. Records Retention	6
15. Roles and Responsibilities.....	6
16. Communication, Training and Awareness.....	7
17. Monitoring and Continuous Improvement.....	7
18. Final Provisions.....	7
Annex A - Grievance and Complaint Form.....	8
Annex B - Grievance Register Template	9



1. Introduction

Victoria Security LLC provides private security services in environments where professional conduct, accountability and respect for people are essential. A clear grievance and complaints mechanism allows concerns to be raised, assessed and resolved before they create harm, mistrust or operational risk.

This Policy forms part of the Company's governance system for responsible security operations. It is applied together with the Code of Conduct, Human Rights Policy, Incident Management Policy, employment contracts, operational procedures and client-specific instructions.

The mechanism is designed to be fair, accessible and predictable for both personnel and external parties. It supports lawful operations, respect for human dignity, transparency, confidentiality, prevention of retaliation, and effective remedy where appropriate.

2. Purpose

The purpose of this Policy is to establish the procedures for receiving, registering, assessing, investigating, resolving and retaining grievances and complaints connected to Victoria Security LLC operations.

The Policy aims to:

- provide accessible channels for employees and external parties to raise concerns;
- ensure that grievances and complaints are handled fairly, respectfully and without retaliation;
- support early resolution of concerns wherever possible;
- enable objective assessment and investigation of serious or complex matters;
- ensure that corrective action and remedy are considered where harm or misconduct is identified;
- maintain records that allow management review, learning and continuous improvement.

3. Scope of Application

This Policy applies to all employees, managers, supervisors, security personnel, administrative personnel, temporary staff, contracted personnel, consultants and any other person acting under the authority or supervision of Victoria Security LLC.

The mechanism is also available to external parties who may be affected by Company activities, including clients, visitors, contractors, suppliers, community members, members of the public, public authorities and other third parties, whether or not they have a contractual or financial relationship with the Company.

This Policy applies to grievances and complaints arising from Company operations, personnel conduct, workplace relations, site security activities, access control, patrols, incident response, use of force, human rights concerns, discrimination, harassment, corruption, safety concerns, confidentiality concerns or suspected violations of Company policies.

4. Guiding Principles

All grievances and complaints shall be managed according to the following principles:

- Accessibility - the mechanism must be known and available to personnel and relevant external parties;
- Fairness - matters must be assessed impartially and with respect for all parties;
- Predictability - complainants should be informed of the process and expected timeframes where contact details are provided;
- Confidentiality - information must be shared only with persons who need it for proper handling of the matter;



- Non-retaliation - no person may be punished, threatened, intimidated or disadvantaged for raising a concern in good faith;
- Transparency - outcomes and reasons should be communicated as far as appropriate and lawful;
- Effectiveness - the Company must consider appropriate corrective action or remedy where a complaint is substantiated;
- Continuous improvement - complaints and lessons learned must be used to improve procedures, training and supervision.

5. Access to the Grievance Mechanism

Victoria Security LLC maintains grievance and complaint channels that may be used by personnel and external parties. The mechanism is available without charge and does not require the complainant to have a contract, employment relationship or financial relationship with the Company.

The Company shall communicate the availability of the grievance mechanism through appropriate channels, including internal briefings, employee onboarding, supervisor communication, client communication where relevant, and the Company's public contact channels.

Where a person has difficulty submitting a complaint in writing, the Company may provide reasonable assistance to record the concern accurately and respectfully. Anonymous complaints may be submitted and will be assessed to the extent reasonably possible based on the information provided.

6. Matters That May Be Reported

The mechanism may be used to report or complain about any matter connected to Victoria Security LLC operations, including:

- misconduct, improper conduct or suspected illegal conduct;
- potential violations of the Code of Conduct, Human Rights Policy or other internal policies;
- discrimination, harassment, intimidation, retaliation or abuse of authority;
- excessive, unnecessary or inappropriate use of force;
- corruption, bribery, conflict of interest or improper benefits;
- workplace concerns, terms and conditions of employment, supervision or interpersonal conflict;
- health, safety, security or environmental concerns;
- privacy, confidentiality or personal data concerns;
- harm or potential harm to a client, visitor, employee, community member or other third party.

This Policy does not prevent any person from contacting competent public authorities, law enforcement, regulators, courts or other lawful mechanisms available to them.

7. Internal Employee Grievances

Employees may raise work-related grievances through informal or formal channels. The employee may choose the channel that is appropriate to the circumstances.

Informal resolution may be used where the matter can reasonably be addressed through discussion with the immediate supervisor, manager, HR Department or another responsible person. Informal resolution must still be respectful, fair and without retaliation.

Formal grievances are submitted through the Grievance and Complaint Form or another written record. Formal grievances shall be registered, assessed and handled under this Policy. A formal grievance may be submitted without first attempting informal resolution.

Where an employee grievance involves a direct supervisor or manager, the employee may bypass the normal reporting line and submit the grievance directly to HR, senior management or another designated responsible person.

8. External Complaints and Third-Party Concerns

External parties may submit complaints or concerns regarding Victoria Security LLC operations, personnel conduct or the impact of Company activities. External complainants may include clients, visitors, contractors, suppliers, local community members, public authorities, members of the public and any affected third party.

External complaints shall be registered and handled with the same core safeguards as internal grievances, including fairness, confidentiality where possible, non-retaliation and consideration of remedy or corrective action where appropriate.

Where a complaint relates to a client site, the Company may coordinate with the client where necessary and lawful, while ensuring that the complainant's safety, privacy and legitimate interests are considered.

9. Submission Channels

Grievances and complaints may be submitted through any of the following channels:

- directly to an immediate supervisor, manager, HR representative or senior management;
- in writing using the Grievance and Complaint Form;
- by email to the Company's official contact email: info@vss.ge;
- by telephone to the Company contact number: +995 32 250 50 90;
- by delivery or post to the Company's registered address: Georgia, Tbilisi, Saburtalo district, S. Chikovani Street, No. 2;
- through the Company's website or public contact channel where available.

Complaints should include, where possible, the complainant's contact details, date and location of the matter, persons involved, description of the concern, witnesses, supporting documents or evidence, and the remedy or outcome sought. Lack of complete information does not prevent the Company from registering and assessing the complaint.

10. Registration and Acknowledgement

All formal grievances and complaints shall be entered into the Grievance Register. The record shall include a unique reference number, date received, complainant type, summary of the concern, responsible handler, actions taken, outcome, closure date and retention date.

Where the complainant provides contact details, the Company shall acknowledge receipt within five (5) working days where practicable. The acknowledgement should explain that the matter has been received, identify the next step, and provide a point of contact where appropriate.

Immediate risks to life, safety, security, human rights or evidence preservation shall be escalated without delay to management and, where appropriate, competent authorities or emergency services.

11. Assessment, Investigation and Resolution

After registration, the grievance or complaint shall be assessed to determine its seriousness, urgency, responsible handler and appropriate process. Minor concerns may be resolved through early action where this is fair and acceptable. Serious, complex or sensitive matters require formal review or investigation.

An investigation may include collecting documents and evidence, reviewing incident reports, interviewing relevant persons, reviewing CCTV or site records where available, consulting supervisors or clients where appropriate, and assessing compliance with applicable law, contracts and Company policies.

Investigations shall be objective, respectful and conducted by persons with appropriate authority and impartiality. Persons involved in the complaint should not lead the investigation into their own conduct.

The Company shall seek to complete the review and communicate an outcome within thirty (30) calendar days where practicable. Where additional time is required due to complexity, the complainant should be informed of the delay if contact details are available and communication is appropriate.

12. Remedies and Corrective Action

Where a grievance or complaint is substantiated, the Company shall consider appropriate remedy and corrective action. Measures may include:

- explanation, apology or clarification;
- medical assistance or support where appropriate;
- correction of records or communication;
- changes to post orders, procedures, supervision or staffing;
- additional training, counselling or coaching;
- disciplinary action in accordance with internal procedures and applicable employment arrangements;
- referral to competent authorities where required by law or where serious misconduct is identified;
- other reasonable measures proportionate to the circumstances and harm identified.

Where a complaint is not substantiated, the Company shall document the reason and close the matter. Closure shall not prevent future review if new information becomes available.

13. Confidentiality, Data Protection and Non-Retaliation

All grievance and complaint information shall be handled confidentially and shared only with persons who need access for registration, assessment, investigation, decision-making, legal compliance or implementation of corrective action.

Personal data shall be collected and processed for legitimate grievance-handling purposes and protected against unauthorized access, loss, misuse or disclosure. Records shall be stored securely in physical or electronic form.

Retaliation is strictly prohibited. No employee, complainant, witness or other person may be threatened, disadvantaged, dismissed, demoted, harassed, intimidated or otherwise penalized for raising a concern in good faith, participating in an investigation or refusing to participate in improper conduct.

Knowingly false or malicious complaints may be addressed under disciplinary or legal procedures. A complaint made in good faith shall not be penalized merely because it is not substantiated.

14. Records Retention

Grievance and complaint records shall be retained securely for a minimum of seven (7) years from the date of closure.

Records covered by this retention period include grievance forms, complaint correspondence, acknowledgement records, investigation materials, evidence logs, witness notes, decisions, remedies, corrective actions, closure records and register entries.

Access to retained records is limited to authorized personnel with a legitimate need to know. At the end of the retention period, records shall be securely archived or disposed of under Company document-control procedures.

15. Roles and Responsibilities

Senior Management is responsible for approving this Policy, ensuring sufficient resources for its implementation, and reviewing significant grievances, complaints and corrective actions.



The HR Department is responsible for employee grievance administration, personnel-related records, confidentiality, non-retaliation safeguards and coordination of employee corrective actions.

Operations Management is responsible for operational complaints, site-related concerns, client coordination, incident linkage, supervision and implementation of operational corrective actions.

Supervisors and Managers are responsible for receiving concerns respectfully, reporting them promptly, preventing retaliation, supporting fact-finding and implementing actions assigned to them.

All Personnel are responsible for cooperating with this mechanism, raising concerns in good faith, providing accurate information, respecting confidentiality and avoiding retaliation.

16. Communication, Training and Awareness

Personnel shall be informed of this Policy during onboarding and through appropriate briefings or training. Supervisors and managers shall understand how to receive complaints, escalate serious concerns, protect complainants and witnesses, and prevent retaliation.

The Company shall make essential information about the grievance and complaints mechanism available through appropriate internal and public communication channels so that personnel and external parties know how to raise concerns.

17. Monitoring and Continuous Improvement

The Company shall monitor grievances and complaints to identify recurring issues, operational weaknesses, training needs, policy gaps and opportunities for improvement.

Management may review grievance trends, complaint outcomes, corrective actions, employee feedback, anonymous survey results and lessons learned from incidents. Improvements may include changes to procedures, training, supervision, communication or client coordination.

18. Final Provisions

This Policy is binding on all personnel within its scope. Failure to comply with this Policy may result in corrective or disciplinary action, including termination of employment or engagement where appropriate.

This Policy enters into force upon approval by management and remains valid until amended, replaced or withdrawn by Victoria Security LLC.



Annex A - Grievance and Complaint Form

This form may be used by employees or external parties. A complaint may also be submitted by email, telephone, letter or other official contact channel.

Field	Details
Complainant name	
Relationship to Company	Employee / Client / Contractor / Visitor / Community member / Other
Contact details	Email / phone / address
Date received	
Date and location of matter	
Persons involved	
Summary of grievance or complaint	
Policies, procedures or rights potentially affected	
Witnesses or evidence	
Immediate safety concern	Yes / No
Remedy or outcome sought	
Submitted by / received by	

Signature of complainant (where applicable): _____ Date: _____

Signature of recipient: _____ Date: _____

Annex B - Grievance Register Template

The register is maintained by authorized personnel and treated as confidential.

Ref.	Date Received	Complainant Type	Summary	Responsible Person	Status	Closure Date	Retention Date