

Employee Grievance Policy

1. Overview and Purpose

EFD Group is aware that there may be times when employees need to file an official complaint about unjust treatment, harassment, and/or health and safety concerns in the workplace. This grievance policy was created to explain how our employees can voice their complaints in a constructive way, and to ensure that these feedbacks are heard and treated equally. The company encourages employees to communicate their grievances. That way we can foster a supportive and pleasant workplace for everyone.

2. Scope

This policy applies to all EFD employees (permanent, contract and temporary), contractors, consultants and all other workers in the company and its subsidiaries, including all personnel affiliated with third parties.

3. Policy

3.1 Definition.

Grievance can be defined as any complaint, problem or concern of an employee regarding their workplace, job or co-worker relationships, eg workplace harassment, supervisor behavior, adverse changes in their employment conditions etc.

3.2 Procedures.

3.2.1 Before filing an official grievance complaint, employees shall first review the policy that directly impacts their complaint. Employees are encouraged to talk to each other to resolve their problems. When this isn't possible, employees should:

- a. Communicate informally with their direct supervisor. The supervisor will try to resolve the problem.
- b. If employees want to complain about their supervisor, they should first try to discuss the matter and resolve it between them. In this case, they're advised to request an informal meeting. Supervisors should try to resolve any grievance as quickly as possible. When they're unable to do so, they should refer the matter to the HR Department and cooperate with all the procedures.
- c. If the grievance relates to a supervisor behaviour that can bring disciplinary action (e.g. harassment or violence), employees should refer the matter directly to the HR Department or the next level supervisor.

- 3.2.2 Upon notification, the HR department shall initial the following:
- a. Ask employee to fill out a grievance form
 - b. Talk with employee to better understand the matter
 - c. Investigate the matter, if necessary
 - d. Organize mediation procedures (e.g. arranging a formal meeting)
 - e. Communicate the formal decision
 - f. Take actions to ensure the formal decision is adhered to
 - g. Deal with appeals by gathering more information and investigating further, if required
 - h. Keep accurate records

4. Policy Compliance

4.1 Compliance Measurement

The Group will verify compliance to this policy through various methods, including but not limited to business tool reports, internal and external audits, and feedback to the policy owner.

4.2 Exceptions

Any exception to the policy must be approved by the policy owner in advance.

4.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. We may take legal action in cases of any unlawful behavior.