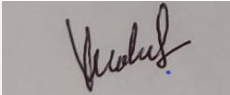


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APPROVAL

The signatures below certify that this management system procedure has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	Name	Signature	Position	Date
Prepared by	Yogesh Chandra Mahat		MR	10/04/2025
Reviewed by	Abhishek Karki		HOA	13/04/2025
Approved by	Sabal Shaha		MD	15/04/2025

AMENDMENT RECORD

This procedure is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

Page No.	Context	Revision	Date
6	Receipt of complain	Mechanism added	10/04/2024

COMPANY PROPRIETARY INFORMATION

The electronic version of this procedure is the latest revision. It is the responsibility of the individual to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled, except when provided with a document reference number and revision in the field below:

Document Ref.			Rev	
Uncontrolled Copy	☒	Controlled Copy	☐	Date 15/04/2024

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1. Introduction

The procedure shall be used by the company to identify:

- Enable employees and other stakeholders to inform and address their grievances
- To clarify the nature of the grievance and investigate the reasons for dissatisfaction
- To obtain, where possible, a speedy resolution to the problem and take appropriate actions

2. Scope

This procedure is used to identify, investigate and resolve grievances of Garud Securities' stakeholders. All the grievances of interested parties are identified, investigated and resolved using this procedure.

2.1 Definitions

The following provides definitions of the terms Complaint and Grievance;

a. Complaint. A Complaint includes any complaint made by an individual or company which arises as a result of the alleged acts or omissions of Garud Securities or any personnel (including contractors or employees engaged by it at the time the alleged acts or omissions took place) or any of its subcontractors.

b. Grievance. A Grievance is the cause of or grounds for a complaint

3. Responsibilities

It's the responsibilities of Operational department, Administration Department, Finance department and each director to identify the grievances around the organization. All the grievances will be identified by each departmental head.

4. Grievances handling of the organization

Garud securities function throughout the country and thus its grievances handling procedure is also decentralized. Regional head and functional head form a grievances handling unit who functions effectively to address the grievances.

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Team Composition	Functions
Regional head	Committee form a operative and functions group with clear and accountable responsibilities
Union representatives	Units implement mechanism for recording and reporting of grievances
Expert from industry	Unit investigate the issues and prepare the report
Government agent (If required)	Units will prepare the final recommendations and make a follow up
Management personnel	Unit also seeks advice and report management when required.

Team composition will be based on nature of grievances and involve only required personal. Following sets of action plan should be performed by the Team and organization.

S.N	Activities	Time
1	Grievances handling unit formation	Within 1 week of grievances recording
2	Investigation of grievances	1 week
3	Grievances resolve with the involvement of UNIT	3-4 weeks
4	If unit cannot resolve the issues, involve concerned stakeholders, experts and other required personnel	2-3 weeks
5	Reports and recommendation generation	10 days
6	Follow up	Until recommendations are implemented
7	Communication	Communicate the all progress and updates to concerned stakeholders via e-mail or circular.

Departmental head, regional head should maintain the grievance register within the reach of stakeholders and report all the records to Administration head at the end of fiscal year.

4.1 Overview

This is a guidance document for all managers in understanding the mechanisms and handling of complaints and grievances throughout Garud Securities security. All managers must also have read and understood this procedure.

This SOP provides the procedures for engaging with External Stakeholders (e.g. customers or members of the public) to enable the timely, efficient and effective management of grievances or

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a complaint when/if they are raised regarding any aspects of Garud Security's operations or service delivery. Grievances may be raised if Garud Securities is alleged to have acted in a way that:

Involves unsafe or uncontrolled use of force.

Causes a vehicle/road traffic accident.

Causes harm, injury or death to people.

Results in damage to the property of external stakeholders (could include; all types of infrastructure, residences, crops, business premises, vehicles, personal possessions etc.).

Causes adverse impacts on culture, faith or cultural heritage of communities.

Could result in Garud Securities directly or indirectly promoting or funding crime, violence or other activities which adversely impact on human rights in the area of operations.

Causes damage to the built or natural environment as a result of accidental or deliberate actions by Garud Securities, causing collateral adverse impacts for communities.

A complaint may be raised if a customer is unhappy with a matter relating to the delivery of services as outlined in their contract. Examples include (list not exhaustive):

Incorrect invoicing

Billing issues

Service quality

Timekeeping of personnel

4.2 Cascading Complaints and/or Grievances

An initial complaint or grievance may be raised directly to a member of Garud Securities Security and this may be direct to a Security Officer or to the Field Supervisor when visiting a working location. The first initial contact with a customer or a member of the public will go a long way to setting the initial impression of how professional Garud Securities security come across as a business and for providing initial reassurance that the complaint or grievance will be initially handled.

Initial receipt or awareness of a concern

On receipt or on being made aware of the initial complaint or grievance it will be important to ensure a clear understanding of what exactly the concern is. Security Officers are to contact their

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Field Supervisors who will be required to deal with the complaint or grievance when in attendance at the location.

On the initial receipt or on being made aware of the concern then an open dialogue by the supervisor or member of management should take place to identify what the concern relates to.

Handling the concern

The first step will be to try to deal with the concern and to ensure that the complainant is made to feel comfortable and that Garud Securities is receptive to dealing with the concern. If the supervisor or member of management can deal with the initial concern in line with standard company procedures then the necessary action is to be undertaken and recorded. The person handling the concern is to ensure that the person raising the concern is satisfied with the action and where applicable, necessary action to prevent recurrence is to be identified and actioned.

Escalating the concern

If the concern cannot be handled by the supervisor or member of management, or if the person raising the concern is unhappy with the proposed response, they should be made aware of the complaint and grievance procedure.

The supervisor or member of management is to hand the tear off slip shown below to the person making the concern that will inform them how to formally raise the concern or grievance. This complaint or grievance will be handled in line with GARUD SECURITIES -COR-OPS-SOI-011.

4.3 Communicating Grievance Mechanisms relating to Incidents

In the event of an incident taking place e.g. road traffic accidents or an individual being refused access to a location, the individual(s) involved may feel aggrieved by the actions of Garud Securities Security. In the event of such an occurrence the tear out card concept below is to be utilized to prevent further escalation of the situation.

ROLES AND RESPONSIBILITIES

Quality Management Department

The Quality Management Department will provide impartial advice and where necessary direction in relation to the Complaints Procedure. Where required it will:

- a. Appoint Investigating officers.
- b. Make referrals to an Ethics Committee.
- c. Monitor and oversee the Complaints Database.

Complaints Handling Officer

The deputy branch manager will serve as the overall Complaints Handling Officer (CHO) and will ensure:

Complaints are appropriately categorized.

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- a. Complaints received have been referenced.
- b. E-mail is sent to the complainant acknowledging receipt of the Complaint and providing the complainant with the reference number for the Complaint, as above.

Branch Managers

Branch Managers will serve as CHOs for their regions/branches and ensure that this Complaints Policy is widely circulate and understood by those within their area of responsibility. They will also ensure that Complaints/suggestions Boxes are in-place as outlined in this document.

REQUIREMENTS

The following outlines the process and requirements that relate to the receipt of complaints and how external grievances feed in to this process.

RECEIPT OF COMPLAINT

A communication of a Complaint may be received in a number of ways:

- a. **First Method** Via chain of command through Ops, ABM, BM and upwards.
- b. **Second Method** Unanimous report Via email to the address: speakup@garud.com.np
- c. **Third Method** Via dedicated phone number: 970511100 Whatsapp and Viber Messaging or regular call to HR Manager 9801173009.

13. Upon receipt of the Complaint, The Complaint Handling Officer will ensure the following have been performed either by himself/herself or an appropriate designate:

- a. Determine in the first instance how the Complaint should be categorized (see below);
- b. Assign a reference number to the Complaint in the database for the recording of Complaints.
- c. Send an email to the complainant, acknowledging receipt of the Complaint and providing the complainant with the reference number for the Complaint.

ADVICE

14. The Complaints Handling Officer shall consult the Garud Securities Quality Department where he/she needs to make a decision as to how a Complaint will be handled.

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CLASSIFICATION OF COMPLAINT	
Customer Complaints.	Customer Complaints relate to issues associated with operational service quality. The CHO will ensure that all customer complaints are recorded in a <i>Complaints Database</i> are escalated appropriately and resolved within agreed timelines.
Whistleblowing.	Whistleblowing is the disclosure of information by an employee or contractor which relates to some danger, fraud or other illegal or unethical conduct in the workplace. If a Complaint relates to his/her personal circumstances in the workplace then the complainant should use this Complaints Procedure and not the Whistleblowing Policy. If the Complaint falls within the remit of the Whistleblowing Policy, the Complaints Handling Officer (“CHO”) shall refer the Complaint to GS’s designated Whistleblowing Officer (DWO) and close the Complaint in the <i>Complaints Database</i> . The DWO will then take responsibility for the handling of the Complaint until resolution. The DWO will inform the individual that they have taken responsibility; this step should be completed within five working days.
Internal Grievance.	If the Complaint is made by personnel and does not fall within the remit of the Whistleblowing Policy, the CHO shall refer the Complaint to the Human Resources department (“HR”), and shall explain to the complainant, where possible within five working days, how the Complaint is to be handled. The CHO shall then ensure that the Complaint has been closed in the Complaints Database. HR shall ensure that the Complaint is properly addressed in a timely manner in accordance with all relevant KK policies, until resolution.



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Comment/Observation	If the Complaint is determined by the CHO (following the recommendation of the Quality Department) (i) not to fall within a, b or c above and (ii) is not otherwise actionable as an External Complaint (see below), and where the complainant makes no specific allegation or produces no substantive evidence against either GS as a company or an individual working for GS: the CHO shall refer the Complaint to an appropriate internal recipient and the complainant should be advised what (if any) action is being taken. This step should be completed where possible within ten working days. The CHO shall then ensure that the Complaint has been closed in the Complaints Database.
External Grievance	If the CHO determines that a Complaint does not fall within a, b, c or d above, he/she shall classify the Complaint as an External Complaint. An External Complaint is one made by a person who is neither a Client nor a person working for the company in any capacity but which concerns a specific allegation made with substantive evidence in support against Garud Securities itself or a current contractor or employee (in connection with their performance of services for GS Security).

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CONTINUAL IMPROVEMENT

24. Garud Securities will take reasonable possible step to monitor the source of complaints, analyze associated trends and take steps to prevent the recurrence of the sources of complaints. The Complaints Process is itself a source of continuous learning. GS Security shall therefore ensure that the lessons identified during the investigation of complaints, after-action reviews and management reviews are recorded and learned.

DOCUMENTS

REFERENCES

25. ISO 18788:2015 Management System for private security operations
26. ANSI/ASIS PSC.1-2012 Management System for Quality of Private Security Company Operations – Requirements with Guidance
27. ISO 9001:2015 Quality management systems