

SEAKEY MARINE LIMITED

**GRIEVANCE
MECHANISM
PROCEDURE**

1. INTRODUCTION

1.1. Overview

The purpose of this document is to define the procedure for managing stakeholder concerns and complaints (referred to as “grievances”) in a planned, timely, and respectful manner.

This grievance mechanism helps Seakey Marine fulfill the requirements of:

1. Human Rights Policy.
2. Alignment with international best practices in stakeholder engagement.

A management process to effectively and proactively manage staff/clients/community’s feedback, grievances or concerns is frequently used to allow staff/clients/community a chance to have two-way dialogue with the company about its operations. A grievance mechanism enhances outcome by giving people satisfaction that their voices are being heard and that their issue was subject to formal consideration within the company.

1.2. Stakeholders

1.2.1. Internal Stakeholders

All Seakey Marine Limited (SML) staff members, contractors and sub-contractors that interact with external stakeholders would be made familiar with the grievance mechanism on an annual basis. The management of SML shall ensure satisfactory performance of the process.

1.2.2. External Stakeholders

SML would be ready to coordinate incoming grievances with a variety of external stakeholders including the local government, contractors, sub-contractors or other community members, wherever operations might impact people.

2. OBJECTIVES AND SCOPE

2.1. Objectives

The objectives of this grievance mechanism are to:

- Provide accessible avenues for all external stakeholders to contact SML
- Provide a mechanism for stakeholder concerns to be addressed effectively, in a timely manner and by the most appropriate department
- Identify and monitor stakeholder concerns to support effective stakeholder and risk management
- Enhance SML’s reputation as a maritime security escort company and a leader in Corporate Social Responsibility and
- Meet requirements of international best practice

2.2. Scope

The grievance mechanism will manage grievances from internal stakeholders and it will also manage grievance from external stakeholders, in all SML's "Project Area of Interest", where SML operations might have an impact. It applies to all grievances that arise as a consequence of any SML's activity. This Process is designed to provide a system for managing grievance from the general public, and does not replace Seakey Marine's legal processes, existing employee grievance systems, normal business-to-business dialogue, or other management procedures already in place.

There are no restrictions on the type of issue a stakeholder can raise under this procedure. However, when a complaint is received that would be more appropriately handled under a separate company process established for that purpose (such as employment or business integrity related issues), it will be re-directed so as to prevent parallel processes being followed. All complaints received under this procedure shall be tracked until close out, regardless of the process under which they are handled.

Company reserves the right not to address a complaint which it reasonably considers amounts to no more than general, unspecified, and therefore un-actionable dissatisfaction with the company, is otherwise malicious in nature, or concerns a matter for which the company has no formal responsibility (for example, a matter that the government controls).

2.3. Confidentiality

The personal details of Complainants would only be made available to those involved in the resolution of the grievance in question, and must follow policies related to protecting personal data when handling the grievance.

SML will accept, log, and seek to address grievances contained in anonymous grievance forms, but, due to the anonymous source of the grievance, will not be able to respond directly to the Complainant.

3. GRIEVANCE MECHANISM PROCESS

3.1. Administration

SML will administer the grievance mechanism by providing resources to handle correspondence, coordinate internal resolutions, manage a log, and report (both internally and externally). SML will need to liaise with, support, and work with other work groups within SML in order to be able to formulate a solution and response.

The approval process for external correspondence and reporting will be emphasize to ensure that communication is consistent with SML's culture. The approval process is detailed later in the plan.

3.2. Grievance Mechanism Process

At SML, grievance is defined as any type of problem, concern or complaint related to work or the work environment. A grievance may be about any act, omission, situation or decision which a stake holder thinks is unfair, discriminatory or unjustified. Examples of grievances are but not limited to:

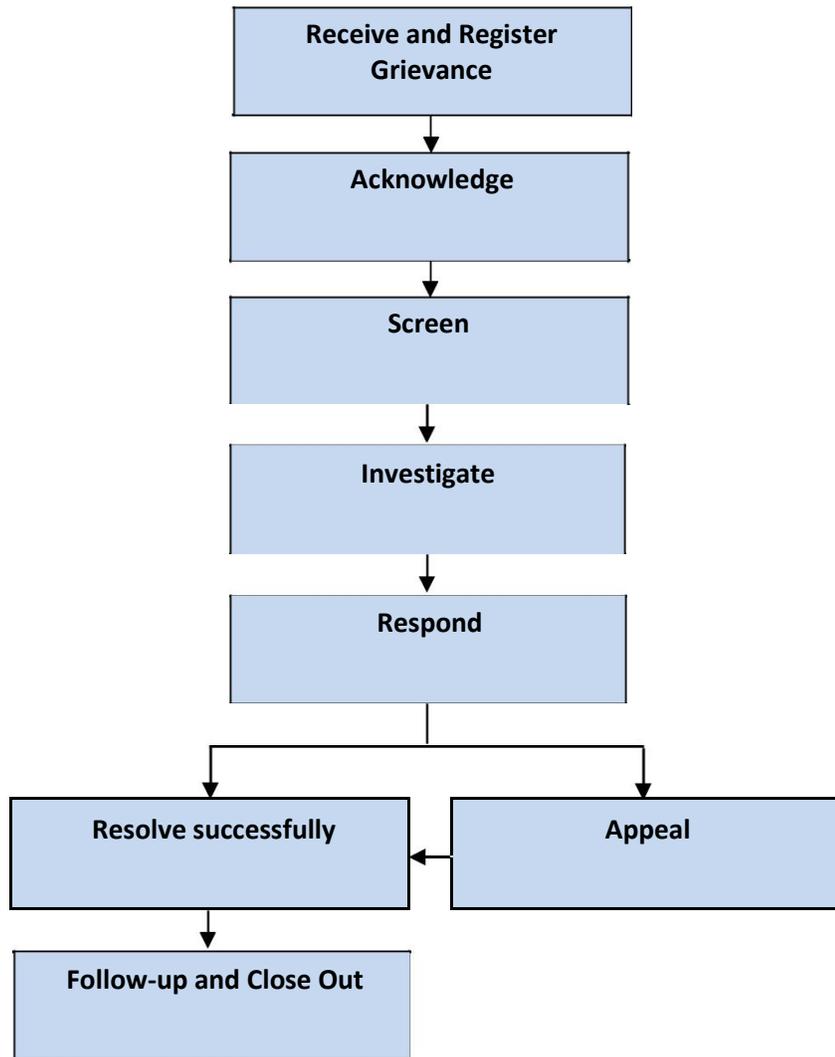
- Workplace violence
- Sexual harassment
- Performance appraisal
- Discrimination
- Violent or threatening behavior
- Insubordinate behavior

Grievances related to:

- The work environment
- Safety in the workplace
- Transfer or promotion
- Staff development or training
- Workload / hours of work
- Wages or salary levels
- Leave allocation
- SML and the environment in which we operate

The key task in implementing the grievance mechanism are summarized in Figure 1 and described below.

Figure 1: Grievance Mechanism Process



3.2.1. Receive and Register Grievance

3.2.1.1 Data protection and privacy

In order to ensure that all whistle blowers are protected against inappropriate behaviors or actions, such as retaliation, all information shall be treated confidentially as far as reasonably practicable. There may be circumstances where by due to the nature of the investigation or disclosure, it will be necessary to disclose the identity of the complainant. In such circumstances every effort will be made to inform such person(s) before such disclosure is made.

If it is necessary for a complainant to be involved in an investigation (for example by providing evidence), the fact that you made the original disclosure will, so far as reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure.

3.2.1.2 Methods for Receiving Grievances

Stakeholders can submit grievances through a number of methods, including:

- In Person:
 - To SML Representative
 - Note: As SML will not always be present in the field to receive grievances, then community members may also submit grievances to SML via: Local Government or Village Administrators. The SML Representative will collect grievances informally through these stakeholders, however, it will be important for the government official to assess whether grievances are being accurately captured, shared and managed in a timely manner.
- Electronic:
 - Through e-mail address: complaint@seakeyarineng.com
- Traditional means of collecting grievance:
 - Dedicated telephone line: +234 803 413 2444
 - Letters: Seakey Marine Limited, 40 Mbonu Street, D/Line, Port Harcourt, Rivers State - Nigeria

SML is responsible to ensure that any personnel and contractors that could potentially receive claims will be knowledgeable about the grievance mechanism process and ready to accept feedback. SML will stress that there will be no costs or retribution associated with lodging grievances.

To facilitate tracking, evaluation and response to grievances, standardized information would be collected and recorded on the Grievance Recording Form (Appendix A). As a best practice, practitioners should always carry the Grievance Recording Form or contact information, if available, when they conduct field visits or community meetings.

3.2.1.1. Publicizing the Procedure

The grievance mechanism procedure will be publicized and communicated in a manner appropriate to the scope and in a manner appropriate to the audience (i.e. method of delivery, language, etc.). In particular, SML will publicize and communicate the process to those most likely to use/administer it: local communities, authorities, and contractors. Notification will include:

- A summary of the procedure and how it can/should be used;
- Details of the process, such as who is responsible for receiving and responding to grievances, and any external parties that can receive grievances from communities;
- When stakeholders can expect a response, and
- Safeguards in place to ensure confidentiality.

SML will communicate this grievance mechanism procedure via brochure, our website (under social responsibility section) and during engagements with Village Administrators, local government and community members.

During the notification process, SML will solicit feedback on how the procedure could be improved. This information will be taken into consideration when revising this procedure.

3.2.1.2. Registering Grievances

Grievances will be logged in the Grievance Register (Appendix B) within two days of receiving the grievance. A grievance owner will be assigned to each grievance when they are logged. The grievance owner may delegate responsibilities to other staff, but is ultimately responsible for:

- Defining and implementing resolution actions.
- Investigating the grievance.
- Consulting relevant departments or persons within the organization.
- Making sure resolution actions are completed.
- Tracking progress of individual grievances.
- Aggregating and forwarding feedback to Complainants.
- Documenting resolution actions.
- Gaining necessary approvals from, and reporting to, management.

While no response is necessary for anonymous grievances, these will be logged and reported with other grievances to facilitate continuous improvement.

3.2.2. Acknowledge Grievance

The Grievance Officer will formally acknowledge grievance within 5 working days of the submission of the grievance, informing the Complainant that SML's objective is to respond within 20 working days. Verbal and then written feedback will be provided so that a record of correspondence is retained and recorded.

Acknowledgement would include a summary of the grievance, SML’s approach to responding to the grievance, and an estimated timeframe in which the final response will be issued. If needed, use the acknowledgement opportunity to clarify issues from the grievance or request further information if required.

If grievance is considered out-of-scope for the grievance mechanism (see section 3.2.3 on screening), the Grievance Officer would draft a response for signature by the **Executive Director, Operations** explaining why it is out-of-scope and providing any guidance of where to go to get the issue addressed (if possible). In cases where another entity (e.g. the government or a contractor) should be responsible for handling the grievance, Grievance Officer will share the grievance with the appropriate government stakeholder (unless the grievance could result in potential reprisal) and inform the Complainant that the grievance has been shared with the appropriate body/person. If appropriate, Grievance Officer may also provide details to the Complainant on any specific follow up that SML has completed with the relevant entity to share information for them to address the issue.

3.2.3. Screen

Each grievance will be screened from Level 1 to 3, per definitions provided in Table 1, in order to determine the appropriate response.

“Routine” issues will be managed through the grievance mechanism. “Potentially Significant” grievances will be flagged and managed via the **Issues Management/Legislative and Regulatory Advocacy Process**.

Table 1: Grievance Screening Categories

Category	Issue Description	Issue Type	Management Approach
Level 1	A grievance for which there is already a Seakey Marine Limited management approved response and an answer can be provided immediately. This level also includes grievances that are out of scope.	Routine	Inform Executive Management and then utilize approved answers to handle response.
Level 2	Grievances characterized by being a one-time situation, local in nature, and that will not impact SML’s reputation.		Define grievance response plan and draft a response for management approval.

Level 3	Repeated, widespread or high-profile grievances that may result in a negative impact on Seakey Marine Limited business activities and/or reputation. Level 3 grievances indicate a gap in a management plan or procedure, or that a serious breach in Seakey Marine Limited policies has occurred.	Potentially significant	Prioritize through Issues Management/Legislative and Regulatory Advocacy Process and define appropriate management strategy
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3.2.4. Investigation

The Grievance Owner will lead grievance investigation, when needed, which could include collecting relevant documents, making site visits, consulting appropriate internal staff, contacting external stakeholders, and other activities. Investigation findings will be used to document decision making process and inform proposed remedy.

3.2.5. Respond

Before responding to the Complainant, the Grievance Owner will complete the following:

- Level 1 Grievances - Grievance Owner informs Executive management and then utilizes recently approved answers to respond to Complainant. Response requires approval of Executive Director, Operations.
- Level 2 Grievances - Grievance Owner defines plan for grievance response and crafts the draft response for Executive management’s approval.
- Level 3 Grievances – Grievance Owner works directly with executive management to define plan for grievance response, then drafts response. For grievances relating to physical or economic displacement and resettlement, or damage claims or negotiations. Sufficient evidence will be collected, captured or verified to support damage or monetary claims. In the case of particularly sensitive grievances – particularly grievances related to physical and/or economic displacement and resettlement – SML may engage an external organization or third party (e.g. a NGO) in a joint investigation, or allow for the participation of a Community Action Council, or other community structure, in order to demonstrate transparency in the process being taken to resolve the issue. Level 3 grievance responses need to be approved by Executive Management.

Once the response has been approved, Grievance Officer will take final, approved language and respond formally using appropriate communication vehicle in the appropriate languages.

The Grievance Owner is responsible for ensuring all information on the grievance is documented and actions tracked in the Grievance Register.

3.2.6 Disciplinary action

If the person sorting out the grievance decides that there has been a breach of one of SML's policies or standards we may discipline the person or people who breached the standard or policy. If the grievance consists of lies, the person who made the grievance can be disciplined. The level of discipline will depend on the following:

- The seriousness of the breach
- Whether the offender knew what He / She was doing and intended to do it
- Whether the offender has been officially warned or disciplined before about this type of breach
- Whether there are any circumstances that protects the offender from been disciplined, or not disciplined so seriously.

Discipline could involve one or more of the following:

- A written apology
- counseling
- An official warning
- loss of promotion rights or wage/salary increases for a specified period
- Transfer or demotion
- Dismissal.

A record of the grievance and the resulting disciplinary action will be placed in the personnel file of the person who is disciplined. The grievance handlers will also send all their notes and a copy of the record of the grievance to Manager Human Resources for filing.

3.2.7 Follow-up and Close Out

If the Complainant accepts the proposed resolution, the agreed actions are implemented.

The Complaint Owner is responsible for assigning action parties, actions, and deadlines to implement the resolution. These are recorded in the Grievance Register with any supporting documentation. If necessary, monitoring arrangements will be put in place to verify implementation.

After resolution, the grievance would be formally closed out. This includes requesting the Complainant sign a completion form to document satisfaction with resolution actions, documenting actions taken, and closing out in the Grievance Register.

3.2.8 Appeal

In cases where a Complainant is unsatisfied with and/or unwilling to accept the resolution actions proposed, the grievance may be escalated to the Appeals Committee for review and final decision.

The Appeals Committee reviews the case and determines if further reasonable action is possible. If options for reasonable, justified corrective actions are exhausted, a written notice should be provided to the Claimant notifying him or her that their grievance is being closed. Supporting documentation of resolution actions and the Grievance Mechanism Procedure may be sent with the notice. Examples include paid invoices, written agreements, photographs, emails, etc. If an address is not available, the Complainant may be notified by telephone or in person.

4 ROLES AND RESPONSIBILITIES

Roles and responsibilities of key staff involved in operation and management of grievance mechanisms are shown in Table 2.

Table 2: Roles and Responsibilities

Title/Role	Responsibilities
Grievance Owner	<ul style="list-style-type: none"> • Investigating the grievance. • Consulting relevant departments or persons within the organization. • Defining and implementing resolution actions. • Gaining necessary approvals from, and reporting to, management. • Making sure resolution actions are completed. • Tracking progress of individual grievances. • Aggregating and forwarding feedback to Complainants. • Documenting resolution actions.
Grievance Officer (Grievance Officer)	<ul style="list-style-type: none"> • Overall responsibility for stewardship of the grievance mechanism process and documentation, from receipt to closeout. • Provide guidance and support to operations. • Collect and receive grievances: (1) in person at community meetings, site visits, etc.; (2) by phone or email from MCP team, contractor, and key stakeholders on site in Area of Interest (e.g. Village Administrators, Fisheries Liaison Officer, etc) • Assign Grievance Officer (if appropriate to assign to an SME or different SML representative) • Manage database of grievances, responses, and stakeholder information • Track, analyze, and report grievance updates to management.

Executive Director, Operations	<ul style="list-style-type: none"> • Review and endorse grievance resolution, as appropriate • Provide oversight of grievance process and monitor consistency of resolutions and responses • Review grievance reports on a regular basis and escalate as appropriate • Ensure Grievance Officer has appropriate level of training to handle role and responsibilities. • Support process in a timely fashion through review, leadership, and approvals. • Ensure external and internal reporting is appropriate. • Support appeal process.
Project Team	<ul style="list-style-type: none"> • Accept grievances in person at community meetings, site visits, etc. • Log grievances gathered in person or at physical locations • Refer received grievances within 24 hours to the Grievance Officer (SML) • Ensure project staff, contractors, and other resources are knowledgeable about the process • Ensure project feedback is integrated into grievance mechanism
Subject Matter Experts (includes Seakey Marine Team / Corporate	<ul style="list-style-type: none"> • Engaged at the discretion of SML, as required by the nature of the grievance • Provide information and assistance in order to plan for response, respond and close the grievance • Provide peer review of grievance process

5 MONITORING AND EVALUATION

As part of the annual process for continuous improvement, SML will review process qualitative and quantitative indicators internally with management and externally with the appropriate community stakeholder groups. Additionally, SML will conduct a quarterly review on quantitative indicators and report to a monthly management team meeting. Quarterly and annual indicators are provided in Table 3.

Table 3: Review Period and Indicators to Review

	Objective	Suggested Indicators
Quarterly review of quantitative indicators	<ul style="list-style-type: none"> • Assess whether grievances are correctly classified • Identify trends in grievances • Ensure grievances are being addressed 	<ul style="list-style-type: none"> • Total number of grievances received by grievance level and type • Number of open grievances by grievance level and type • Timeframes for closure by grievance level and type • Repeat of grievance from the same stakeholder • Repeat grievance from several stakeholders (i.e. trends in grievance)

<p>Annual review of grievance procedure</p>	<ul style="list-style-type: none"> • Assess compliance with the grievance process • Evaluate progress in achieving objectives • Identify improvements and update grievance procedure 	<ul style="list-style-type: none"> • Compliance with process • Completeness of grievance log • Total number of grievances received by grievance level and type • Number of open grievances by grievance level and type • Timeframes for closure by grievance level and type • Repeat of grievance from the same stakeholder • Repeat grievance from several stakeholders (i.e. trends in grievance) • Qualitative assessment of stakeholder awareness of the grievance mechanism through stakeholder engagement process • Qualitative assessment of trust in grievance mechanism through stakeholder engagement
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6 ANNUAL COMMUNICATION AND WORK PLAN

An annual work plan for grievance mechanism related communication and reporting will be developed pending outcomes from the maritime security operations.

Appendix A: Grievance Recording Form

Seakey Marine Grievance Recording Form

Seakey Marine Limited would like to know your concerns related to our work and that of our contractors. You can submit your concern anonymously. However, the more information provided, including contact details, the easier we will be able to follow-up. This process is at no cost to you.

Date/ Time Location	Date (dd-mm-yyyy) Time (24 hr):	Location:
Name	<input type="checkbox"/> You can use my name but do not use it in public <input type="checkbox"/> You can use my name when talking about this concern in public <input type="checkbox"/> I do not want to give my name.	
Alternative contact:	I would like the following trusted individual to talk with Seakey Marine Energy on my behalf.	
Method to Contact You:	<input type="checkbox"/> By mail: Address where you or your trusted contact receive mail: <input type="checkbox"/> By Telephone: <input type="checkbox"/> By E-mail: <input type="checkbox"/> I would like to pick up responses at the Seakey Marine Limited [local town] office. <input type="checkbox"/> I would like to pick up responses at the [Local organization, if applicable] office	
Location of Residence:	If we would like to talk with you in person, describe where can you normally be found?	
Supporting Documents:	<input type="checkbox"/> Written (email, invoice, title, commitment, contract, etc) <input type="checkbox"/> Photograph <input type="checkbox"/> Other <input type="checkbox"/> Voice Recording	
Brief Description: (What happened? Who was involved? Who did it happen to?)	<input type="checkbox"/> Compensation Requested	

Follow-up: (How would you like to see this resolved?)	
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Acknowledgement of Receipt:	By checking this box, I acknowledge that my grievance has been received by Seakey Marine Limited and that I am aware of the grievance resolution process.
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Signature (Claimant)

Date (dd-mm-yyyy)

Signature (Seakey Marine Limited)

Date (dd-mm-yyyy)

For Official Use Only	
Grievance Involves:	
<input type="checkbox"/> Human Rights	<input type="checkbox"/> Property Damage
<input type="checkbox"/> Injury	<input type="checkbox"/> Environmental Concern
<input type="checkbox"/> Impact to Livelihood/Income	<input type="checkbox"/> Other: _____

Appendix B: Grievance Register

A record or register will be maintained by the Service outlining the nature of the complaint, the complainant, date the complaint has been brought to the **Approved Provider's or Nominated Supervisor's** attention and action taken to resolve the complaint.

Name of Person Dealing With Complaint

Date Grievance was received:

Name of Grievant:

Nature of Grievance:

Outcome of Grievance:

Task	Date Started	Date Complete	Completed By	Signature
Send letter of receipt when written grievance received				
Discuss grievance with grievant (within 24 hours of verbal or written complaint)				
Investigate grievance				
Communicate the result of the investigation to the grievant (within 7 working days of receiving verbal or written complaint)				
Document the investigation and outcome (Do not include details in the file of any staff member involved unless a disciplinary action has been undertaken.)				
Offer external review to the grievant				
Send questionnaire to grievant				
Track complaints to rectify recurring issues within our Service				

Appendix C: Definitions

Access Point	A method for submitting grievances to Seakey Marine Limited
Anonymous Grievance	Grievances where the identity of the complainant is not known to the company.
Community	A group of people who share a common sense of identify and interact with one another on a sustained basis.
Complaint	A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as ‘concern’, ‘grievance and ‘issue’.
Complainant	An individual, group or organization who submits a grievance to the company.
Concern	A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as ‘complaint’, ‘grievance’ and ‘issue’.
Grievance	A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as ‘concern’, ‘complaint’ and ‘issue’.
Grievance Mechanism	A grievance mechanism is a process for receiving, investigating, responding to and closing out complaints or grievances from affected communities in a timely, fair and consistent manner.
Grievance Owner	The person responsible for ensuring a grievance is resolved, but may bring in others to support the process.
Issue	A formal expression of discontent concerning company or contractor actions raised by one or more stakeholders. Same as ‘complaint’ and ‘grievance’.
Remedy	Actions taken to resolve a grievance; for example, apologies, restitution, rehabilitation, financial and non- financial compensation and/or punitive sanctions. Same as ‘resolution’.
Resolution	Actions taken to resolve a grievance; for example, apologies, restitution, rehabilitation, financial and non- financial compensation and/or punitive sanctions. Same as ‘remedy’
Stakeholder	Individuals or groups who can affect, or are affected by, or have a legitimate interest in the company’s performance. Stakeholders can include, but are not limited to: government officials, communities, NGOs, media, contractors, business organizations and legislative and regulatory authorities.