ESG PRO LIMITED
Shrawley House, Shrawley,
Worcester, WR6 6TG, UK
www.esgpro.co.uk

ESG Pro Limited
Grievance Policy and Procedure

1. Statement and scope

The grievance procedure enables ESG Pro Limited (the Company) to ensure that any problems, complaints or concerns raised by employees are addressed in a fair, timely and consistent manner. We are committed to maintaining an accessible and confidential grievance mechanism through which employees and other persons affected by our activities or business relationships can raise concerns without fear of retaliation.

This policy covers concerns about work, working conditions, pay and benefits, working hours, discrimination, bullying, harassment (including sexual harassment), victimisation, human rights, modern slavery, occupational health and safety, environmental impacts, and other matters relating to our operations or business relationships.

The procedure is available to current and former employees, job applicants, temporary and agency workers, consultants, contractors, suppliers and their workers, clients, visitors, and other external stakeholders who may be affected by ESG Pro Limited. It applies to our predominantly remote consultancy activities, digital communications, business travel, and visits to client or third-party premises.

Complaints concerning disciplinary action taken by the Company should normally be dealt with as an appeal under the disciplinary procedure. This policy does not prevent anyone from seeking independent advice, contacting an appropriate regulator or authority, or using another lawful reporting route. It does not form part of an employee's contract of employment and may be amended at any time.

2. Principles and reporting arrangements

ESG Pro Limited is committed to ensuring that grievances are handled promptly, impartially, respectfully, and in confidence as far as practicable. We will take concerns seriously, consider the needs of those involved, and identify appropriate action to resolve grievances and prevent similar issues from recurring.

Grievances may be raised in writing, by email, verbally, or through an agreed accessible arrangement. The forms in Annexes 1 and 2 can be used for

convenience but are not compulsory. Reasonable assistance or alternative formats will be provided where needed, including for people working remotely, those with disabilities or language barriers, or persons who may otherwise find the process difficult to access.

We prohibit retaliation, intimidation, threats, victimisation, or other detrimental treatment against anyone who raises a genuine concern in good faith, requests advice, supports a complainant, or takes part in an investigation. The rights and wellbeing of the person raising a grievance, witnesses, and anyone responding to an allegation will be respected throughout the process. Concerns about retaliation may be raised separately and will be assessed promptly.

Anonymous grievances will be recorded and considered where sufficient information is available. We will respect requests for confidentiality, although absolute confidentiality or anonymity cannot be guaranteed where disclosure is necessary for a fair investigation, safeguarding, or compliance with the law.

3. Responsibility for the policy

The Board of Directors has overall responsibility for approving this policy and ensuring that appropriate grievance arrangements are maintained. The Managing Director and senior management have day-to-day responsibility for implementing the procedure, allocating appropriate impartial reviewers, and monitoring its effectiveness.

Managers are responsible for listening to concerns, treating those involved fairly, maintaining confidentiality, and referring grievances without unreasonable delay. Investigators and grievance panel members must declare any conflict of interest, consider relevant evidence objectively, document their findings, and recommend appropriate corrective or remedial action.

All persons working for or on behalf of ESG Pro Limited are expected to cooperate with grievance investigations, respect confidentiality, and refrain from retaliation. Employees are invited to comment on this procedure and suggest improvements through the Managing Director or another appropriate member of senior management.

4. Informal procedure

Employees should, where appropriate and where they feel comfortable doing so, discuss their grievance or complaint with their immediate manager on an informal basis first. The manager will discuss the concern and attempt to resolve the matter within a reasonable timescale. Where it is not possible to approach the

immediate manager, or if the grievance concerns that person, the employee should instead approach an uninvolved senior manager or Director.

Where an informal discussion takes place, the parties should maintain a short written record of the matters discussed and any agreed actions. If the grievance is unresolved, cannot reasonably be addressed informally, or the employee prefers to make a formal complaint, the formal procedure should be followed.

Informal resolution is not required for allegations of discrimination, harassment, sexual harassment, retaliation, modern slavery, serious health and safety risks, or other serious concerns. Such matters may be reported formally or through our Whistleblowing Policy without first attempting informal resolution.

5. Formal grievance procedure

5.1 Written statement and receipt

An employee may submit a formal grievance without unreasonable delay to their line manager, another uninvolved senior manager, or a Director. The statement should describe the nature of the grievance and, where possible, relevant dates, people involved, supporting information, and any outcome sought. If an employee has difficulty preparing a written statement, the Company will provide reasonable assistance or record a verbal grievance and confirm its content with the employee.

If the line manager is the subject of the grievance, the employee may contact another appropriate member of senior management directly. A designated contact should record the matter under a unique case reference in the restricted grievance register in Annex 3. We aim to acknowledge receipt within five working days where safe contact details are available.

5.2 Assessment and appointment of an investigator

On receipt, management will assess whether any immediate protective action is required, including where there are concerns about health and safety, harassment, possible modern slavery, retaliation, or ongoing harm. Potential conflicts of interest will be considered before an investigator or grievance panel is appointed.

For formal employee grievances, a panel of two members of the Board will normally be appointed where practicable. Where a Director or manager is involved in the grievance, or the size of the Company makes this impracticable, another suitably independent person or an external investigator may be appointed to ensure fairness and impartiality. The Company aims to appoint an investigator within five working days, wherever practicable.

5.3 Investigation and grievance meeting

The appointed investigator will review the grievance promptly and gather proportionate evidence, which may include relevant documents, discussions with those involved, and accounts from witnesses. Where possible, initial enquiries will be completed within five working days of appointment, although complex cases may require more time. Those affected will be informed of significant delays where appropriate.

A formal grievance meeting will normally be arranged within ten working days of receiving the grievance, where practicable, and without unreasonable delay. The employee will be given sufficient notice and a reasonable opportunity to explain the grievance and how they consider it could be resolved. Meetings may be conducted remotely where suitable, with reasonable adjustments as needed.

An employee has the right to be accompanied at a formal grievance meeting by a work colleague or an eligible trade union representative in accordance with applicable law. The companion may address the meeting, sum up the employee's case, and confer with them, but may not answer questions on the employee's behalf. All those involved should make reasonable efforts to attend. If more investigation is necessary, the meeting may be adjourned and reconvened before a decision is made.

5.4 Outcome of the grievance

Following the investigation and meeting, the decision-maker will set out the outcome in writing without unreasonable delay. The communication will explain the findings and, where appropriate, the action intended to resolve the grievance, while respecting the confidentiality of other individuals. Possible actions include adjustments to working arrangements, support, training, improvement of procedures, or other corrective and remedial measures.

Any agreed actions will be assigned to a responsible person, with an appropriate completion date. Their effectiveness will be monitored and reviewed as necessary. The employee will be informed of their right to appeal if they are dissatisfied with the outcome.

5.5 Appeal

Employees have the right to appeal where they believe their grievance has not been satisfactorily resolved. The appeal should be submitted in writing, stating the grounds, within five working days of receiving the written grievance outcome. Reasonable adjustments will be considered where needed.

An appeal meeting will be arranged within a reasonable time and, wherever practicable, chaired by a senior person who has not previously been involved in the grievance. The employee has the right to be accompanied at the appeal meeting in accordance with applicable law. The appeal decision will normally be communicated in writing within five working days of the meeting, with reasons for any delay. The appeal decision concludes the internal grievance procedure.

6. External stakeholder grievances

Clients, suppliers, contractors and their workers, applicants, visitors, community members, and other affected external stakeholders may raise concerns about ESG Pro Limited's activities or business relationships, including potential human rights, environmental, occupational health and safety, or ethical impacts. External stakeholders may use the form in Annex 2, submit a written or emailed account, or request an accessible alternative reporting method.

Concerns may be directed to the Managing Director through the Company's established contact arrangements, or to the designated grievance contact once confirmed. If the recipient is involved in the concern, the complainant may approach an uninvolved Director or an alternative contact. Reports should include sufficient information to assess the matter but do not need to include unnecessary personal information.

External grievances will be logged, assessed for urgency and potential conflicts of interest, and reviewed by an appropriate person. Relevant information will be gathered proportionately and the complainant will receive an acknowledgement, progress updates where possible, and an explanation of the outcome consistent with confidentiality requirements. We aim to acknowledge contactable reports within five working days.

Where an external complainant is dissatisfied with the handling or outcome, they may request a review by an uninvolved senior person, normally within ten working days of notification. The Company will consider appropriate corrective or remedial measures within its control or influence and follow up where necessary to confirm that agreed actions have been carried out.

7. Confidentiality, protection and recordkeeping

All grievances will be handled with as high a degree of confidentiality as is reasonably practicable. Information will be shared only with those who need it for assessment, investigation, safeguarding, a fair decision, or a legal obligation. Where disclosure is necessary, it will be limited and explained to the affected person where appropriate.

A confidential case register will be maintained using reference numbers rather than names or sensitive personal details in the main log. Annex 3 provides the register template. Supporting statements, contact details, meeting notes, evidence, outcomes, and any appeal records will be maintained separately in secure, access-controlled case files, in accordance with applicable data protection requirements and the Company's document retention arrangements.

Where a grievance concerns discrimination, bullying, harassment, modern slavery, or another human rights impact, the Company will consider suitable measures to protect and support affected persons. These may include changes to working arrangements, an alternative reporting contact, reasonable adjustments, referral to available support, or corrective action with an external provider. No complainant will be required to confront the person who is the subject of their grievance as a condition of reporting.

Management will consider any further harm or retaliation following the outcome and will document relevant follow-up. Findings and lessons learned may be reported to senior management in anonymised or aggregated form so that the grievance procedure can be reviewed without unnecessarily disclosing personal information.

8. Special cases and management system concerns

Where a grievance is raised during a disciplinary process, the Company may suspend or adjust that process where appropriate to deal with the grievance fairly. Collective grievances will be addressed through a suitable separate consultation or management arrangement rather than the individual employee grievance procedure.

Where concerns involve suspected modern slavery, forced labour, exploitation, or other serious human rights risks, the Company may expedite its response, take immediate protective measures, and involve relevant support organisations or authorities where necessary. Such matters may also be raised under the Anti-slavery Policy & Statement or Whistleblowing Policy.

Where a concern identifies an occupational health and safety hazard, incident, near miss, or unsafe working condition, it will be referred promptly through the relevant occupational health and safety arrangements, with worker consultation, assessment of risks, and preventive or corrective action as appropriate. Employees may raise such concerns without fear of reprisals. In urgent situations, immediate safety and emergency procedures take priority over grievance timescales.

Environmental incidents or concerns, such as pollution, inappropriate waste handling, excessive resource use, or impacts involving external providers, will be considered under the Company's environmental management arrangements. Relevant environmental aspects, compliance obligations, risks and opportunities, and appropriate corrective action will be assessed in addition to the grievance process. The Company will monitor actions taken and consider lessons learned in the continual improvement of its management system.

9. Targets and Key Performance Indicators (KPIs)

ESG Pro Limited has established the following targets to be achieved by 31 March 2027 to support implementation of this policy and monitor its effectiveness:

- Communicate this grievance procedure and the available reporting routes to 100% of employees, including new employees during induction, with communication documented.
- Provide information on the external grievance reporting route to 100% of newly engaged material suppliers and contractors as part of relevant onboarding or contracting communications.
- Record and categorise 100% of grievances received, including concerns involving discrimination, harassment, human rights, occupational health and safety, or environmental matters, in the confidential grievance register.
- Acknowledge at least 95% of grievances with available safe contact details within five working days, with reasons recorded where this timescale cannot be met.
- Document an impartiality and immediate-risk assessment for 100% of formal grievance cases, including consideration of conflicts of interest and protection needs.
- Assign a responsible person and completion date to 100% of agreed corrective or remedial actions, and record follow-up of those actions.
- Complete at least one documented review of anonymised grievance trends, access to the procedure, response times, corrective actions, and opportunities for improvement.

Progress against these targets will be monitored and reviewed annually. Where a target is not achieved, the Company will record the reasons and determine proportionate corrective or improvement actions. Cases with no safe contact method, or where no relevant cases arise, will be recorded as not applicable for the relevant calculation rather than treated as failures.

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10. Communication and awareness of this policy

All new employees will be informed of this procedure and its reporting routes during induction, and existing employees will have access through established internal communications. Relevant suppliers, contractors, and external stakeholders will be informed in a manner appropriate to the business relationship.

Personnel handling grievances will receive appropriate information or training on confidentiality, impartiality, non-retaliation, and reporting safety or environmental concerns. Feedback on the mechanism is encouraged.

11. Policy review

This policy will be reviewed annually, and earlier following significant legal, operational, or management system changes. The review will consider KPI performance, corrective actions, the accessibility of reporting routes, and lessons learned. Changes require approval by the Board of Directors.

12. Policy queries

Questions about this policy should be directed to Management via email at **hj@esgpro.co.uk**.

13. Policy approval and endorsement

This policy is subject to approval and endorsement by the Board of Directors and Management. Following approval, it supersedes earlier ESG Pro Limited grievance policies and procedures.

Formalised and approved by the Board of Directors on **11 November 2026**



Humperdinck Jackman
CEO



Natashia Lee
Managing Director

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Version control

Date issued	Version number	Date reviewed	Summary of Changes	Approved by
20 July 2024	V1.0	1 August 2024	Initial policy issued.	H. Jackman
20 July 2025	V1.0	1 August 2025	No changes required; policy remains current and unchanged.	H. Jackman
20 July 2026	V2.0	11 November 2026	Integrated policy with KPIs updated; Alignment with ISO standards.	H. Jackman

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Annex 1. Internal Stakeholder Grievance Form

For employees, former employees, applicants, temporary and agency workers, and others working for ESG Pro Limited. This form is optional. You may instead report verbally, by email, or through an accessible arrangement. Please provide only information relevant to your concern. Concerns may be reported without giving your name, although this can limit the Company's ability to respond.

Case reference (office use): _____

Name (optional): _____

Role / employment relationship (optional): _____

Safe contact details / preferred contact method (optional): _____

Language or accessibility needs (optional): _____

Concern type: ☐ Working conditions / pay ☐ Discrimination ☐ Harassment / bullying

☐ Sexual harassment ☐ Retaliation ☐ Health and safety ☐ Environment

☐ Human rights / modern slavery ☐ Other

Date(s) and location(s) of concern (if known): _____

Describe the concern and how it has affected you:

_____

_____

_____

People involved or witnesses (optional): _____

Relevant evidence or documents (optional): _____

Immediate safety, confidentiality, or accessibility needs: _____

Outcome or support requested (optional): _____

Signature (optional) / Date: _____

Submit to your line manager, an uninvolved senior manager, or a Director. If the concern involves the person who would normally receive it, use another appropriate senior contact. We prohibit retaliation for raising a genuine concern in good faith and will keep information confidential as far as reasonably practicable.

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Annex 2. External Stakeholder Grievance Form

For clients, suppliers, contractors and their workers, applicants, visitors, community members, and other external persons affected by ESG Pro Limited's activities or business relationships. Use of this form is optional. A report may also be made verbally, in writing, by email, or through another accessible arrangement.

Case reference (office use): _____

Name / organisation (optional): _____

Stakeholder type: ☐ Client ☐ Supplier ☐ Contractor / worker ☐ Community member

☐ Applicant ☐ Visitor ☐ Other stakeholder

Safe contact details / preferred method (optional): _____

Business activity / service / relationship involved: _____

Concern type: ☐ Discrimination / harassment ☐ Retaliation ☐ Human rights

☐ Occupational health and safety ☐ Environment ☐ Ethical conduct ☐ Other

When and where did the concern occur? _____

Describe the concern or impact:

_____

_____

_____

Supporting information or witnesses (optional): _____

Immediate protection or accessibility needs: _____

Requested remedy or outcome (optional): _____

Signature (optional) / Date: _____

Send to the Managing Director or the designated grievance reporting contact through the Company's communicated contact arrangements. If the concern involves that person, contact another uninvolved Director or the alternative confidential reporting contact. We prohibit retaliation for concerns raised in good faith.