Castor Vali
Complaints and Escalation Policy

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1 Policy Statement

Castor Vali is committed to receiving and addressing complaints fairly, promptly, impartially and respectfully. Complaints provide an important means of identifying service failures, misconduct, nonconformities, human-rights concerns and opportunities to improve the company's operations and management systems.

Complaints may be raised by employees, contractors, clients, suppliers, subcontractors, affected communities or any other person or organisation affected by Castor Vali's activities. A complainant does not need to submit their concern through a client or other intermediary.

Castor Vali will protect the confidentiality and privacy of complainants, witnesses and other involved parties and will not tolerate retaliation against anyone who raises a complaint in good faith.

1.1 Purpose

The purpose of this Policy is to:

- provide accessible arrangements for receiving and addressing internal and external complaints;
- define the stages through which complaints are assessed, investigated, resolved and escalated;
- ensure that serious complaints receive immediate attention;
- protect complainants and witnesses from intimidation or retaliation;
- identify root causes and implement appropriate corrective, preventive, disciplinary or remedial action;
- communicate with clients, authorities and other relevant parties where required; and
- monitor the effectiveness of the complaints-management process.

1.2 Scope

This Policy applies throughout the Castor Vali Group and covers complaints relating to:

- Castor Vali's services, operations, policies and procedures;
- employees, individual contractors and embedded personnel;
- suppliers, subcontractors and outsourced partners;
- subcontracted PCASP providers;
- host-nation security forces supporting Castor Vali-managed operations;
- compliance with legal, regulatory, contractual and human-rights requirements;
- compliance with ISO 18788 and the Security Operations Management System;
- the handling of a previous complaint; and
- any other activity or business relationship for which Castor Vali has responsibility or influence.

The Policy may be used by:

- employees and contractors;
- clients and protected persons;
- suppliers and subcontractors;
- members of local or affected communities;
- representatives acting with the complainant's consent;
- regulators and public authorities; and
- any other person or organisation affected by Castor Vali's activities.

All employees and contractors must comply with this Policy when receiving, managing, investigating or escalating complaints.

1.3 Compliance with Local Legislation

This Policy provides a standardised approach to complaint management across Castor Vali. It shall be interpreted and applied in conjunction with applicable legislation and regulatory requirements in the relevant country of operation.

Where local legislation provides additional or greater rights or protections, those requirements shall apply. Where there is a direct conflict between this Policy and applicable law, local law shall take precedence.

Nothing in this Policy prevents a complainant from reporting suspected criminal conduct, human-rights violations or other matters to a regulator, law-enforcement agency or other competent authority.

1.4 Definitions

Complaint: An expression of dissatisfaction made to or about Castor Vali, its services, personnel, contractors, subcontractors or complaint handling, where a response or resolution is expressly or implicitly expected. A complaint may include an alleged actual or potential nonconformity with ISO standards, violation of international, national or local law, human-rights concern or failure to comply with Castor Vali's legal, ethical or voluntary commitments.
Complainant: A person or organisation making a complaint, or a representative acting with that person's consent.
Dispute: A complaint that remains unresolved after completion of the applicable internal resolution stage.
Employment grievance: A formal concern raised by an employee or contractor about their own employment, treatment or working arrangements. Employment grievances are normally managed under the applicable HR grievance procedure unless they also involve wider misconduct, illegality, human-rights concerns or risks to others.
Feedback: A comment, opinion or suggestion about Castor Vali or its services where a formal response or resolution is not expected.
Service request: A routine request for information, approval, assistance, action or provision of services that does not involve an expression of dissatisfaction.
Whistleblowing: The reporting by a person working on Castor Vali's behalf of suspected wrongdoing, danger, unethical conduct or nonconformity. Whistleblowing reports are managed in accordance with CVMP014 Whistleblowing Policy.
Retaliation: Any threat, intimidation, discrimination, harassment, dismissal, disciplinary action or other detrimental treatment connected with making or supporting a complaint in good faith.

2 Roles and Responsibilities

Role	Responsibilities
CEO and C-Suite	Provide oversight of the complaints framework; review significant complaints; approve appropriate corrective, disciplinary or remedial action; and ensure adequate resources are available.
Chief Operating Officer	Own this Policy; oversee significant complaints and escalations; appoint an impartial investigator where required; determine external-notification requirements; and monitor the effectiveness of the complaints process.
Country, Department and Operations Managers	Receive and address complaints within their authority; ensure complaints are recorded and escalated; preserve confidentiality and evidence; and implement assigned actions.
Appointed Investigator	Conduct a prompt and impartial investigation; protect evidence, complainants and witnesses; identify findings and root causes; and recommend appropriate action.
All employees and contractors	Assist people who wish to complain; report complaints promptly; maintain confidentiality; cooperate with investigations; and refrain from retaliation or interference.

3 Procedures and Guidelines

3.1 Making a Complaint

Complaints may be made verbally or in writing through any of the following routes:

- a Castor Vali employee or manager;
- the relevant Country Manager, Department Head or Project Manager;
- the Chief Operating Officer;
- the contact details published on the Castor Vali website; or
- another appropriate company communication channel.

A complainant is not required to raise the matter with the individual concerned before using another reporting route.

External affected parties may submit complaints directly to Castor Vali and are not required to submit them through a client, local authority or community representative.

Any employee or contractor receiving a verbal complaint that requires further action shall document it and submit it to the responsible manager.

A complaint should provide as much relevant information as is reasonably available, including:

- the nature of the concern;
- when and where it occurred;
- the people or organisations involved;
- any immediate risks;
- any witnesses or supporting information; and
- the outcome or remedy sought.

A complaint will not be rejected solely because information is incomplete.

3.2 Anonymous Complaints

Castor Vali accepts anonymous complaints and will assess and investigate them as far as reasonably practicable based on the information provided.

Anonymous complaints may be made by telephone using the company contact number published on the Castor Vali website. A complainant is encouraged, but not required, to provide contact details. Providing contact information may assist Castor Vali in obtaining clarification, giving progress updates and communicating the outcome.

3.3 Accessibility

This Policy and information explaining how to submit a complaint shall be publicly available on the Castor Vali website and communicated through appropriate internal and external channels.

Castor Vali will take reasonable steps to minimise barriers caused by:

- language or literacy;
- educational level;
- disability;
- lack of internet access;
- fear of retaliation;
- cultural or social considerations; and
- concerns about confidentiality or privacy.

Complaints may be submitted verbally or in writing. Reasonable assistance will be provided to record a complaint where required.

A complainant may be supported or represented by another person or organisation with their consent, including a family member, legal adviser, community representative or other advocate.

3.4 Confidentiality and Privacy

Castor Vali will protect the identity and personal information of complainants, witnesses and other involved parties as far as reasonably and legally possible.

Information will be disclosed only to persons who require it to assess, investigate or resolve the complaint, meet a legal obligation or address an immediate risk.

Where disclosure of a complainant's identity becomes necessary, Castor Vali will, where legally and practically possible, discuss this with the complainant before disclosure.

Complaint information shall be handled in accordance with applicable data-protection, confidentiality and records-management requirements.

3.5 Protection from Retaliation

Castor Vali will take reasonable steps to ensure that no complainant, witness or other participant is subjected to retaliation for making or supporting a complaint in good faith.

Retaliation, intimidation, threats, interference with an investigation or attempts to inhibit the gathering of evidence are prohibited and may result in disciplinary or contractual action.

Anyone who believes they have experienced retaliation should report the matter immediately to the COO, CEO or another appropriate C-Suite member.

3.6 Receipt and Recording

Unless resolved immediately to the complainant's satisfaction, complaints shall be recorded together with relevant supporting information and assigned a unique reference.

The record shall include, where available:

- the date the complaint was received;
- complainant contact details, unless anonymous;
- the issues raised;
- the outcome or remedy sought;
- any immediate risks;
- relevant supporting information;
- any assistance required by the complainant;
- the assigned complaint owner; and
- subsequent actions, decisions and communications.

Complaints and resulting actions shall be recorded in the appropriate controlled register or restricted file.

3.7 Acknowledgement

Receipt of a complaint shall be acknowledged promptly, preferably within one working day where contact details are available, and in all cases within any applicable statutory timeframe, including the 30-day requirement for UK data protection complaints. The acknowledgement should explain:

- the complaint-management process;
- the person or function responsible for handling the matter;
- the expected timeframe;
- the complainant's likely involvement; and
- how progress and outcomes will be communicated.

3.8 Initial Assessment and Prioritisation

The person responsible for the complaint shall determine:

- whether the matter is within Castor Vali's responsibility or control;
- whether it should be managed under this Policy or another procedure;
- the seriousness, urgency and complexity of the complaint;
- the effect on the complainant or other affected parties;
- whether there is an immediate risk to life, safety, security or human rights;
- whether criminal conduct may have occurred;
- whether the complaint concerns personal data or data protection rights and requires referral to the Senior Information Risk Owner (SIRO) or relevant Data Protection Officer (DPO);
- whether independent investigation is required;
- whether another organisation is involved;
- whether a conflict of interest exists; and
- whether a client, authority, insurer or other party must be notified.

Where more than one issue is raised, each issue shall be considered and addressed as appropriate.

3.9 Immediate Escalation

Complaints alleging criminal conduct, a violation of human rights or imminent danger to any person shall be escalated and addressed immediately.

The COO or another appropriate C-Suite member shall determine the immediate protective, investigative and notification actions required. Appropriate action may include:

- protecting affected persons;
- suspending an activity;
- removing or suspending a person from a task;
- preserving evidence;
- obtaining medical or other specialist assistance;
- notifying a client; and
- notifying a regulator, law-enforcement agency or other competent authority.

3.10 Escalation and Resolution Stages

Complaints shall be managed through the following stages:

1. **Initial resolution**
   The receiving employee or responsible manager should seek prompt resolution where the matter is straightforward and within their authority.
2. **Formal assessment or investigation**
   Unresolved, serious, repeated or complex complaints shall be referred to the responsible complaint-handling manager for documented assessment and, where required, investigation.
3. **Senior-management escalation**
   Complaints involving significant legal, human-rights, safety, security, contractual or reputational implications, or which cannot be resolved at the previous stage, shall be escalated to the COO or another appropriate C-Suite member.
4. **Internal review**
   A complainant dissatisfied with the outcome may request review by a manager or C-Suite member who was not responsible for the original decision.
5. **External referral**
   Where appropriate or legally required, the matter shall be referred to the relevant regulator, law-enforcement agency or other competent authority. Nothing in this Policy prevents a complainant from contacting a competent authority directly.

3.11 Investigation

Complaints shall be investigated promptly, impartially and proportionately, with appropriate consideration given to confidentiality, privacy and restrictions imposed by applicable law. The investigator shall be independent of the matter complained about and free from actual or perceived conflicts of interest.

The investigation shall, where applicable:

- define the issues and scope of the investigation;
- obtain and preserve relevant evidence;
- interview the complainant, witnesses and other relevant persons;
- cooperate with any official external investigation;
- prevent intimidation or retaliation;
- protect witnesses and the integrity of evidence;
- establish the relevant facts;
- identify the root cause and any wider or systemic control failure;
- determine whether the complaint is substantiated;
- identify corrective, preventive, disciplinary, contractual or remedial action; and
- document the findings and recommendations.

The complainant shall be kept informed of material progress and any significant delay where contact details are available.

3.12 Complaints Involving Other Organisations

Where a complaint involves a client, supplier, subcontractor, host-nation security force or another organisation, Castor Vali will coordinate with the relevant organisation where appropriate.

Communication and information sharing shall be managed consistently with legal, confidentiality, privacy and investigation requirements.

Castor Vali retains responsibility for addressing those aspects of the complaint that fall within its own activities, decisions, influence or contractual relationships.

3.13 Corrective, Preventive and Disciplinary Action

Where a complaint is substantiated or identifies a control failure, Castor Vali shall determine and implement action proportionate to the nature and seriousness of the matter. Actions may include:

- correction of the immediate issue;
- changes to policies, procedures, risk assessments or operational controls;
- additional training, supervision or monitoring;
- disciplinary or contractual action;
- suspension, reassignment or removal from a task;
- supplier or subcontractor corrective action;
- notification of a client or competent authority;
- remedy, redress or compensation where appropriate; and
- wider preventive action where similar issues could occur elsewhere.

Actions shall be assigned to an appropriate owner and monitored through completion. Effectiveness shall be reviewed where necessary before closure.

3.14 Communications with Authorities and Other Parties

The COO or another appropriate C-Suite member shall determine whether a complaint must be communicated to:

- the relevant client;
- police or another law-enforcement body;

- a regulator or licensing authority;
- another competent public authority;
- an insurer; or
- another organisation involved in the matter.

Notification shall be made where required by law or where appropriate to the nature and seriousness of the complaint, while maintaining necessary confidentiality and preserving the integrity of any investigation.

3.15 Communicating the Outcome

Following assessment or investigation, Castor Vali shall inform the complainant, where contact details are available, of:

- the outcome of the complaint;
- the reasons for the decision;
- any remedy or resolution that can appropriately be disclosed; and
- any available option for review or appeal.

Personal, disciplinary, contractual, legally privileged or otherwise confidential information may be withheld where disclosure would be inappropriate or unlawful.

3.16 Review and Appeal

A complainant who is dissatisfied with the handling or outcome of a complaint may request an internal review. The review shall be conducted by a person who:

- was not responsible for the original decision;
- has sufficient authority and competence;
- has no actual or perceived conflict of interest; and
- can consider whether the complaint was managed fairly and in accordance with this Policy.

The complainant will be informed of the review outcome and any further options available.

3.17 Managing Unreasonable Conduct

Castor Vali remains committed to accessible and responsive complaint handling. However, threatening, abusive, discriminatory or persistently unreasonable conduct may be managed to protect personnel, preserve the integrity of the process and ensure company resources remain available to other complainants.

Any restriction placed on communication with a complainant shall be proportionate, documented and approved by an appropriate manager. The complaint itself shall continue to be considered on its merits.

3.18 Record Keeping

Complaint records shall include, as applicable:

- the complaint or allegation;
- the initial assessment and priority;
- investigation activity and evidence;
- findings and whether the complaint was substantiated;
- identified root causes;
- communications with the complainant and other parties;
- corrective, preventive, disciplinary or remedial actions;
- external notifications;
- closure evidence; and
- review or appeal outcomes.

Records shall be retained securely in accordance with Castor Vali’s document-control, data-protection and retention requirements and applicable law.

Confidential personal, disciplinary or investigation information shall be held in a restricted case file and shall not be placed in registers with wider access.

4 Monitoring and Enforcement

The effectiveness of the complaints-management process shall be evaluated periodically using, where applicable:

- the number and nature of complaints received;
- the proportion acknowledged within one working day;
- response and closure times against the timeframe communicated to the complainant;
- the number and age of overdue cases and actions;
- recurring complaints and identified trends;
- complaint outcomes, remedies and corrective actions;
- evidence that urgent complaints were escalated immediately;
- the effectiveness of corrective, preventive, disciplinary or remedial action;
- any reported retaliation, confidentiality or privacy failures; and
- complainant feedback, where practicable.

The COO shall ensure that complaint information is reviewed periodically to identify:

- recurring issues;
- complaints involving serious legal or human-rights concerns;
- overdue investigations or actions;
- ineffective corrective actions;
- potential systemic control failures; and
- opportunities to improve services or the management system.

Relevant trends and significant matters shall be reported to the C-Suite and considered through management review, subject to confidentiality and privacy requirements.

Failure to comply with this Policy, retaliation against a complainant or witness, interference with an investigation, or destruction or concealment of evidence may result in disciplinary or contractual action.

5 Policy Review and Updates

The COO is responsible for ensuring that this Policy is reviewed in accordance with the company's Management Review Schedule and whenever there is:

- a material change in applicable law or ISO requirements;
- a significant change to Castor Vali's services or operating context;
- evidence that the complaints process is ineffective;
- a significant complaint or investigation finding; or
- an identified need to improve accessibility, confidentiality or complainant protection.

Updates shall be approved, controlled and communicated in accordance with the IMS document-control process.

Policy approved by: **Steve Grant**
CEO
Castor Vali Group