BLACK WOLF

GRIEVANCE MECHANISM

Document Name:	Grievance Mechanism
Document Number:	BW-AD-GRM-26-01
Number of Pages:	3
Version:	V2
Version Release Date:	01/01/2026
Reference:	*HR-G-GP-2501*
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GRIEVANCE MECHANISM

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Abstract

This Document must be read only by all involved parties and implement its Protocols & Procedures accordingly

General Manager

gm@bw-security.com

1. Purpose

Black Wolf provides a safe, accessible and fair process for receiving, investigating and resolving grievances connected to the Company, its personnel or its security operations. The procedure supports early resolution, effective remedy, prevention of recurrence and respect for human rights.

2. Scope

This procedure is available free of charge to current and former personnel, applicants, clients, suppliers, community members, visitors and any other person who may be affected by Black Wolf activities. A representative may submit a grievance on behalf of an affected person with their consent, where practical.

Grievances may concern human rights, use of force, misconduct, harassment, discrimination, employment practices, health and safety, corruption, property damage, community impacts, retaliation or any breach of law, Company policy or the International Code of Conduct for Private Security Service Providers.

3. Core Principles

Accessible: Complaints may be submitted verbally or in writing in Kurdish, Arabic or English. Reasonable support shall be provided for disability, literacy or other access needs.

Fair and impartial: No person shall investigate a grievance in which they are involved or have a conflict of interest.

Confidential: Information shall be shared only with persons who need it to assess, investigate or resolve the matter.

Non-retaliatory: No complainant, witness or representative shall be punished, threatened or disadvantaged for raising a concern in good faith.

Predictable and timely: The complainant shall receive acknowledgement, progress updates, a reasoned outcome and access to an appeal.

Rights-compatible: Remedies shall respect applicable law, human rights and the complainant's right to use external mechanisms.

4. How to Submit a Grievance

A grievance may be submitted through any of the following channels:

Email: grievance@bw-security.com

Telephone: 07502091111

Website: www.bw-security.com

In person: Compliance Department, Human Resources Department, a site manager or Black Wolf headquarters

Written complaint: Sealed and addressed to the Compliance Department

Personnel are not required to report through their direct supervisor. Anonymous complaints shall be accepted where permitted by law and investigated when sufficient information is available.

5. Responsibilities

Compliance Department / ICoCA Focal Point: Receives and registers grievances, completes the initial assessment, appoints an impartial investigator, communicates with the complainant, monitors remedies and maintains records.

Investigator: Collects evidence, interviews relevant persons fairly, protects confidentiality and prepares written findings and recommendations.

GM: Approves significant remedies, disciplinary action and corrective measures. A grievance involving senior management shall be referred to the Company owner or an independent external investigator. A grievance involving the owner shall be referred to an independent external investigator or competent authority.

6. Grievance Handling Process

1. Receipt and registration: The grievance shall be entered in the confidential grievance register and assigned a reference number on the same working day.

2. Acknowledgement: Receipt shall normally be confirmed within two working days, together with an explanation of the process, expected timeframe and available protection.

3. Initial assessment: Within five working days, the Compliance Department shall assess urgency, safety risks, conflicts of interest, required interim measures and whether referral to an authority is required.

4. Investigation: An impartial investigator shall gather relevant documents, records and witness accounts. The complainant and the person complained against shall have a fair opportunity to provide information. The investigation should normally be completed within 30 calendar days.

5. Progress updates: The complainant shall receive an update at least every 10 working days and be informed of any justified delay and revised completion date.

6. Decision and remedy: The complainant shall receive the outcome, reasons and proposed remedy, subject to lawful confidentiality restrictions.

7. Appeal: An appeal may be submitted within 10 working days where there is new evidence, procedural unfairness or disagreement with the outcome. A person not involved in the original decision shall decide the appeal, normally within 15 working days.

8. Closure: A case shall be closed only after the agreed remedy and corrective actions have been completed or formally scheduled and verified.

7. Urgent or Serious Grievances

Allegations involving immediate danger, death, serious injury, unlawful use of force, sexual exploitation or abuse, torture, trafficking, child harm, weapons misuse or suspected criminal conduct shall receive immediate priority. Black Wolf shall take appropriate steps to protect affected persons, preserve evidence, prevent interference, arrange urgent assistance and notify competent authorities where required by law or necessary to protect life and safety.

All personnel shall cooperate with lawful internal, external and public investigations, except where prohibited by applicable law.

8. Outcomes and Remedies

Where a grievance is substantiated, Black Wolf shall provide or facilitate a lawful, proportionate and practical remedy. Depending on the case, this may include:

an explanation, acknowledgement or formal apology;

correction of an employment or administrative decision;

restoration of rights, benefits or property;

medical, psychological or practical support;

repair, replacement or financial compensation where appropriate;

additional training, supervision or operational controls;

changes to policies, procedures or deployment arrangements;

disciplinary action, including dismissal; or

referral to a competent authority.

The complainant should be consulted on the remedy sought where appropriate. No person shall be required to waive access to courts, authorities, ICoCA or another lawful mechanism as a condition of using this procedure.

9. Confidentiality and Protection from Retaliation

Complaint records shall be securely stored and accessed only by authorised persons. Identities shall not be disclosed unnecessarily. Where disclosure is legally required or needed to prevent serious harm, the complainant shall be informed where lawful and practical.

Any allegation of retaliation shall be treated as a separate serious grievance. A complaint that is not substantiated shall not result in action against a complainant who acted in good faith. Deliberately false or malicious complaints may be addressed through the disciplinary process.

10. Records, Monitoring and Reporting

The Compliance Department shall maintain the complaint, communications, evidence, findings, decisions, remedies, appeal records and proof of corrective action. Records shall normally be retained for at least five years, or longer where required by law, contract or an ongoing investigation.

Records shall be made available to competent authorities or ICoCA when lawfully requested, except where disclosure is prohibited by applicable law. Management shall receive anonymised trend reports covering complaint types, response times, outcomes, retaliation concerns and corrective actions.

11. Awareness and Review

This procedure shall be published on the Company website, displayed at offices and operational sites, included in induction and refresher training, and communicated to relevant clients and communities. Managers and supervisors shall immediately refer grievances to the Compliance Department and shall not discourage reporting.

The Compliance Department shall review this procedure and the effectiveness of the mechanism at least annually and after any significant grievance. Lessons learned shall be used to improve policies, training, risk controls and operational practice.

12. References

- International Code of Conduct for Private Security Service Providers, particularly paragraphs 66-68.
- ICoCA guidance on company grievance mechanisms.
- United Nations Guiding Principles on Business and Human Rights, Principles 29-31.
- Applicable laws and regulations of Iraq and the Kurdistan Region.
- Black Wolf Code of Conduct, Human Rights Policy and disciplinary requirements.

13. Approval

This procedure takes effect upon approval by the GM. All Black Wolf personnel are required to support its implementation and cooperate with investigations conducted under it.

Yad Mohammed Rashid
General Manager