



Business Management System

Operations Support Team

Standard Operating Instruction

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Title: EXTERNAL STAKEHOLDER GRIEVANCE PROCESS

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PURPOSE

1. This Standard Operating Instruction describes the procedures which GardaWorld International Protective Services uses to respond quickly and effectively to resolve **non-judicial** grievances raised by external stakeholders and minimise any resulting adverse impacts.

SCOPE

2. This SOI covers the response to grievances resulting from the conduct of security operations in complex environments.

3. The SOI does not cover:

- a. Grievances that are resolved through judicial process.
- b. Commercial/contractual grievances which are dealt with under contractual arrangements with each individual client and are managed by the Commercial Support Team.
- c. Internal grievances which are managed internally following HR procedures (See GW-COR-HR-MAN-098-HR Manual).
- d. Supply chain/vendor grievances which are managed through the Vendor Management System (Procurement).

OVERVIEW

COMPLIANCE OBLIGATIONS

4. The External Stakeholder Grievance Management Process plays a key role in realising GardaWorld's commitment to best practice and in meeting its international, national and local obligations. The international protocols to which GardaWorld subscribes and which this process seeks to serve are:

- a. UN Guiding Principles for Business and Human Rights - Principle 31.
- b. The International Code of Conduct for Private Security Service Providers – Commitment 67.

5. This guidance is jointly articulated in ANSI-ASIS PSC1-2012 Clause 9.5.7, the external certification process for which validates the effectiveness of GardaWorld's procedures.

INCIDENT TYPES

6. The External Stakeholder Grievance Process focusses on corporate, country/regional and local responses applicable to alleged or actual incidents which are:

- a. Caused by or directly involve GardaWorld which adversely impact upon local authorities, communities and NGOs in areas where security operations are being conducted by the Company.
- b. Caused by clients while under the protection of GardaWorld personnel or sub-contractors.

7. The majority of grievances are likely to result from mobile operations, where GardaWorld and its clients come into contact with the majority of external stakeholders. While some aspects of static operations may cause friction which could result in the submission of grievances, they are most likely to be the point at which grievances will be received by GardaWorld from the general public
8. Seconded/Embedded Security Managers may also be responsible for managing grievances on behalf of their clients. This system may be adapted, in consultation with the Director, Operations Support, to ensure that it meets the corporate commitment to the Client while ensuring that GardaWorld is able to monitor and respond to relevant emerging risks and incidents.
9. This in accordance with the requirements of the ICoC (Section 67) and extract (at **Annex A**) is published on the GardaWorld website's Compliance Page.

EXTERNAL STAKEHOLDERS

10. The following entities, people and their property are considered to be external stakeholders:
 - a. Clients. Clients may submit a grievance about GardaWorld's operational or general conduct that is not dealt with through the contractual process. This will be especially true for issues which can be resolved locally, at the tactical level. However, clients may also be considered internal stakeholders as their own decisions and actions may be the root cause for the grievance being raised through GardaWorld.
 - b. Host Nation Civil Authorities. Host Nation civil authorities include; local, regional and national governments, their ministries, departments, agencies, law enforcement bodies and other emergency services.
 - c. Host Nation Military Authorities. Host Nation military authorities include standing elements of the armed forces and also any legitimate paramilitary or militia organisations that perform duties on behalf of the recognised government or governing faction (eg. *Peshmerga* in Kurdistan).
 - d. Communities. Communities include all of the leaders and people that are resident or transient, who live or conduct business in areas where GardaWorld and its clients operate.
 - e. Non-Governmental Organisations (NGOs). The term 'NGO' is applied to a broad range of organisations including, but not restricted to; aid agencies, charities and foundations and other businesses of all types present in the Company's areas of operations.
 - f. Third Country Civil and Military Authorities. These authorities include all military and civil organisations who do not represent the Host Nation Government but who are legitimately present in GardaWorld's area of operations. Examples include; UN Protection Forces (as in the Congo), NATO Forces (as in Afghanistan), Third Country Armed Forces (eg. French in Mali or the British in Sierra Leone).
 - g. Local Supply Chain. A key part of the local community, local suppliers have intimate commercial relationships with GardaWorld and its Clients, and as such may have specific grievances which may need to be managed. The impact of incidents involving GardaWorld and its local supply chain will invariably have an impact (e.g. Financial and reputational) on the communities in the area of the operations.
11. External Stakeholders relevant to each GardaWorld project, site or entity are identified in the local Business Impact and Continuity Requirements Analysis at each site and level of operations. For more detail on this process, please see GW-COR-ERR-SOI-002-BICRA.

RISK MANAGEMENT – ROOT CAUSES OF POTENTIAL GRIEVANCES

12. Risks which could result in external stakeholder grievances arising are managed principally through the GardaWorld Risk Management Process (GW-COR-RSK-SOI-158) and appropriate registers. Examples of risks identified include GardaWorld (or clients when operating under GardaWorld Protection) actions which:

- a. Involve unsafe or uncontrolled use of force.
- b. Cause harm, injury or death to people.
- c. Result in damage to the property of external stakeholders (could include; all types of infrastructure, residences, crops, business premises, vehicles, personal possessions etc).
- d. Cause adverse impacts on culture, faith or cultural heritage of communities.
- e. Could result in GardaWorld directly or indirectly promoting or funding crime, violence or other activities which adversely impact on human rights in the area of operations.
- f. Cause damage to the built or natural environment as a result of accidental or deliberate actions by GardaWorld, causing collateral adverse impacts for communities.

13. Note that the risk of environmental incidents occurring and the immediate response are covered within the HSE Management System (and see Emergency Response Plans for local actions). This process is used to respond and manage any grievances which may arise.

PRINCIPLES

14. GardaWorld's approach to grievance management will generally be **reactive**. The proactive engagement of external stakeholders – planning and design - will be managed in accordance with the considerations raised in the next section. To the greatest feasible and practicable extent, GardaWorld's grievance processes will seek to be:

- a. Legitimate - enabling trust from the stakeholder groups listed above, that the grievance response will be conducted fairly and accountably.
- b. Accessible - All stakeholders being aware, or being reasonably capable of identifying a route through which a grievance can be communicated to GardaWorld. Provisions must be made for those who may face barriers to access.
- c. Predictable – The process will provide a clear, comprehensible procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation for all parties.
- d. Equitable - seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms. This is especially important where the plaintiff does not have access to resources which enable them to be fully informed or to fully understand all aspects of the process.
- e. Transparent - keeping parties to a grievance informed about the progress made in managing it and providing sufficient information about the process to interested parties.
- f. Rights-compatible - Ensuring that outcomes and remedies accord with internationally recognised human rights

PROCESS DEVELOPMENT- INVOLVING STAKEHOLDERS

15. At the local level, the process may need to be designed to meet specific local needs. In the majority of cases, The Company's external stakeholder grievance process will be entirely subordinate to the Client's process. This is because, other than some administrative moves, the majority of GardaWorld's tasks will be in direct support of the Client. Therefore either the client or GardaWorld (or both) may be responsible for the root causes of the incident. The responsibility for managing impacts will always be shared between the two.

16. Wherever possible, external stakeholders may be involved or consulted in the development of local processes. This transparent process promotes trust that the process is equitable. However, in many complex environments, the level of engagement with local external stakeholders must be measured against:

- a. The risk of death or harm to the Company's personnel in carrying out the planning and engagement process.
- b. The risk of death or harm to external stakeholders by being seen to be interacting with GardaWorld and/or its clients.
- c. The risk that external stakeholder engagement with GardaWorld, especially with different communities, or factions could be misconstrued as collusion by other hostile forces or communities, resulting in adverse impacts on the Communities in question, GardaWorld and its clients.
- d. The risk that the Client's safety and that of GardaWorld's personnel could be compromised through disclosure of information.
- e. The risk that interaction with GardaWorld could make communities vulnerable to reprisal or that, by being subject to duress, GardaWorld's operational safety could be compromised.
- f. The risk that, in areas where weakened governance and institutional corruption, engagement of all but the most essential key stakeholders could result in wider attempts to extort goods, funds or services from GardaWorld and its clients. GardaWorld's refusal to submit to these demands will invariably result in adverse impacts on its ability to deliver security services.

LINES OF COMMUNICATION

DESIGN

17. GardaWorld will use a variety of methods to encourage the community, client and other stakeholders to be involved in the design and communication of the grievance process. The Company will:

- a. Work with Clients to ensure that the grievance process is integrated with Client Processes as much as possible – Clients usually have far greater interaction, established grievance mechanisms and well-developed lines of communication with Governments, NGOs and communities than GardaWorld as security providers.
- b. Liaise and provide points of contact/information about the process with the Government Ministries and departments with whom GardaWorld must interact for licensing and operating permissions. Experience has shown that other Government departments and

local authorities that are not directly involved in PSC licensing tend to have no interest in the companies’ activities. They are therefore unlikely to engage with the process in any way.

- c. Use GardaWorld LN/HCN Personnel as advisers and routes of communication to local communities (including tribal leaders, elders and faith leaders) in the design phase.
- d. Engage with NGOs in areas where they have reason to inter-operate – for example, where Corporate Social Responsibility Projects are being planned and implemented.

AWARENESS – BUSINESS-AS-USUAL

18. GardaWorld shall ensure that external stakeholders in its areas of operations are aware of the grievance mechanism, primarily through its Client’s Community Liaison mechanism.

19. Those external stakeholders who are not included within the client scope of operations, e.g. Local vendors, will be sent the message below, adapted to meet local requirements, including translation into appropriate languages:

[Insert Greeting]

GardaWorld is a commercial company providing security for *[Insert Client]*, based in *[Insert Project Location]*. We take every possible step to ensure that we behave responsibly while carrying our operations. However, there may be an occasion when you are dissatisfied with some aspect of our behaviour while carrying out our operations. In the unlikely event that this occurs, you should report your complaint or raise your concerns to *[Insert appropriate contact details for the recipient of the message]*.

We shall ensure that we respond to your grievance rapidly, fairly and transparently with the appropriate level of management. All relevant parties will be consulted to ensure that the issue is being addressed effectively and proportionately.

We request that you acknowledge receipt of this communication.

20. Depending on the communications means available, the message can be sent by email or as a printed letter sent by post or delivered by hand according to local arrangements (e.g. LN/HCN delivery).

21. A record of all stakeholders that have been sent this message and all of those who have acknowledged receipt will be maintained in the **Project/Site Security Plan**.

22. An extract of the External Grievance Procedure will be available on the Compliance Page of the GardaWorld Website. This will include an email address to be used by any plaintiff wishing to raise a grievance.

POST-INCIDENT ACTIONS

23. Responses to grievances arising from the conduct of static or mobile security operations will be managed in accordance with the processes which follow in this SOI.

EXTERNAL STRAKEHOLDER GRIEVANCE PROCEDURE

PROCESS FLOWCHART

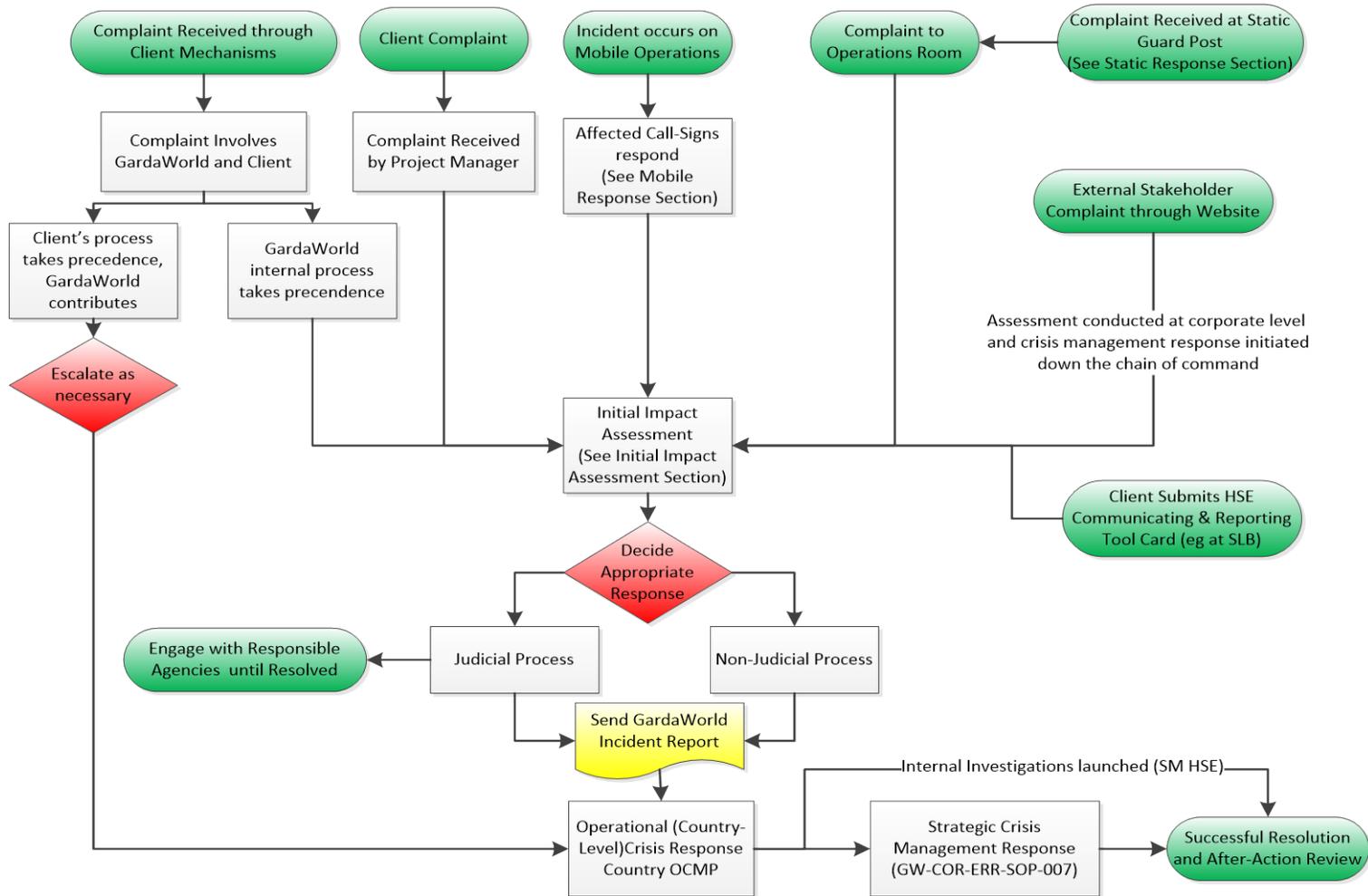


Figure 1 - External Stakeholder Grievance Process Flowchart

INITIAL IMPACT ASSESSMENT

24. This Initial Impact Assessment (See **Figure 1** for the point at which this is employed) is designed to assist managers at every level to understand the scope, scale and severity of a received grievance, or of an incident involving external stakeholders.

25. The template is included in the Operations Room Tactical Aide Memoire and in Operations SOPs. It can be attached to the GardaWorld Incident Report Template to assist in communicating rapidly and accurately up or down the Chain of Command.

| CONFIDENTIAL WHEN COMPLETE | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| EXTERNAL STAKEHOLDER GRIEVANCE PROCESS - INTIAL IMPACT ASSESSMENT | |
| <p>Use - For use by GardaWorld Projects, Field and Management Operations Teams to assist them in:</p> <ul style="list-style-type: none"> • Understanding and assessing the scale, complexity and validity of the grievance or potential grievance. • Brief the chain of command on the evolving situation • Decide on the requirement to escalate the management of the incident up the chain of command. • This form is used as an assessment tool which enables the Ops Room/PM to submit a formal incident report using the GardaWorld Incident Report template. It may be attached to the incident report as additional information. <p>Recording. Whether completed by hand or on IT, this form should be retained as evidence of the Responding Operation’s Team’s comprehension of the situation, based on the <i>information available</i> at the time.</p> | |
| DTG of the Alleged/Actual Incident to Which the Grievance Refers | |
| DTG Grievance Received | |
| <p>Who is the Plaintiff? Include all known details about the person, group or organisation lodging the complaint</p> | |
| <p>How was the Grievance Received Examples include: Incident Report from APT, verbal report to a guard post, Client meeting, email to GardaWorld Head Office through Website etc.</p> | |
| Location of Alleged/Actual Incident | |
| <p>Has GardaWorld been accused of any breach of laws and regulations? Yes/No – is this assessed or have charges been raised?</p> | <p style="color: red;">If the answer is 'YES', do not continue this assessment. Raise and send a Serious Incident Report – Management of the Judicial Response will be managed strategically.</p> |
| <p>Custody Summary List any personnel who are in custody, who has apprehended them, their locations and any charges raised.</p> | |

Grievance Summary
 Insert a detailed summary of the grievance as it has been received and as it has been expressed by the Plaintiff i.e. Without a GardaWorld assessment, opinion or commentary.

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Situation Summary

| | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>Plaintiff's Description Description of the Incident to which the Grievance Refers from the Plaintiff's point of view and allegations.</p> | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

| | |
|---------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>GardaWorld's Description A summary of GardaWorld's Understanding of the Incident referred to in the Grievance.</p> | |
|---------------------------------------------------------------------------------------------------------------------------------------------------|--|

Impact Summary - Known Factors

| | | | |
|-----------------------------------------------------------------------------------------------------------------|--|-------------------------------------|--|
| <p>GardaWorld Casualties Annotate Minor, Moderate, VSI and where being treated.</p> | | <p>GardaWorld Fatalities</p> | |
|-----------------------------------------------------------------------------------------------------------------|--|-------------------------------------|--|

| | | | |
|-------------------------------------------------------------------------------------------------------------|--|---------------------------------|--|
| <p>Client Casualties Annotate Minor, Moderate, VSI and where being treated.</p> | | <p>Client Fatalities</p> | |
|-------------------------------------------------------------------------------------------------------------|--|---------------------------------|--|

| | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------|--|
| <p>External Stakeholders Casualties Annotate Minor, Moderate, VSI and individual/organisational identity and where being treated</p> | | <p>External Stakeholder Fatalities</p> | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------|--|

Damage to Property
 Describe any alleged damage to buildings, crops, vehicles & other items/structures. Provide details of who is alleged to have caused the damage, GardaWorld's view as to who caused the damage and an early assessment of the cost/effort of remediating the damage.

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|
| <p>Local Community and Societal Dimension & Severity of Impact? Describe how and who the local community has been affected (in addition to - or due to any of the information provided above)</p> | |
| <p>Clients affected & how impacted and severity?</p> | |
| <p>Key Societal Sensitivities List all faith, cultural and political sensitivities which should be observed and considered</p> | |
| <p>External Political Dimension? Include all external government/faction stakeholders involved or impacted by the crisis and any sensitivities</p> | |
| <p>Current Media Interest? Mainstream International TV, Online, Social & Print</p> | <p>Insert Hyperlinks if available.</p> |
| <p>Any denial of GardaWorld Services & Duration?</p> | |
| <p>Management Options List options for remediating the grievance and any related issues.</p> | |
| <ul style="list-style-type: none"> • Proposed Meetings • Security Considerations and Risks • Options for Mediation (including Assistance and Arbitration) • Initial Liability Assessment • Settlement Options available | |
| | |

Recommended Course of Action

Use GardaWorld Incident Report Form (GW-COR-HSE-FOR-018) for compiling and sending of all reports. Attach this Assessment if appropriate.

Retain for Records
CONFIDENTIAL WHEN COMPLETE

MOBILE OPERATIONS IMMEDIATE RESPONSE

GENERAL

26. This section deals with the tactical response to causing or becoming involved in an incident which could result in a grievance being raised against GardaWorld.

27. This response process is applicable to incidents resulting from **non-hostile** actions occurring during the execution of mobile security tasks by APTs including, but not restricted to:

- a. Road Traffic Collisions.
- b. Incident causing accidental harm to people.
- c. Incidents causing accidental or unintended damage to property.
- d. Incidents causing accidental or unintended damage to the natural environment.
- e. Incidents causing excessive or other disturbance to the *status quo* of the local community.

28. It is not applicable in events where life-threatening civil unrest/unarmed attack, direct fire, indirect fire and IED incidents occur. These are managed under 'Actions On' provisions in Security SOPs. Any grievance resulting from these actions will be addressed through this SOI, as and when a grievance is received by GardaWorld by any of the means listed in **Figure 1**.

PROCEDURE

29. Mobile APTs will follow this generic procedure:

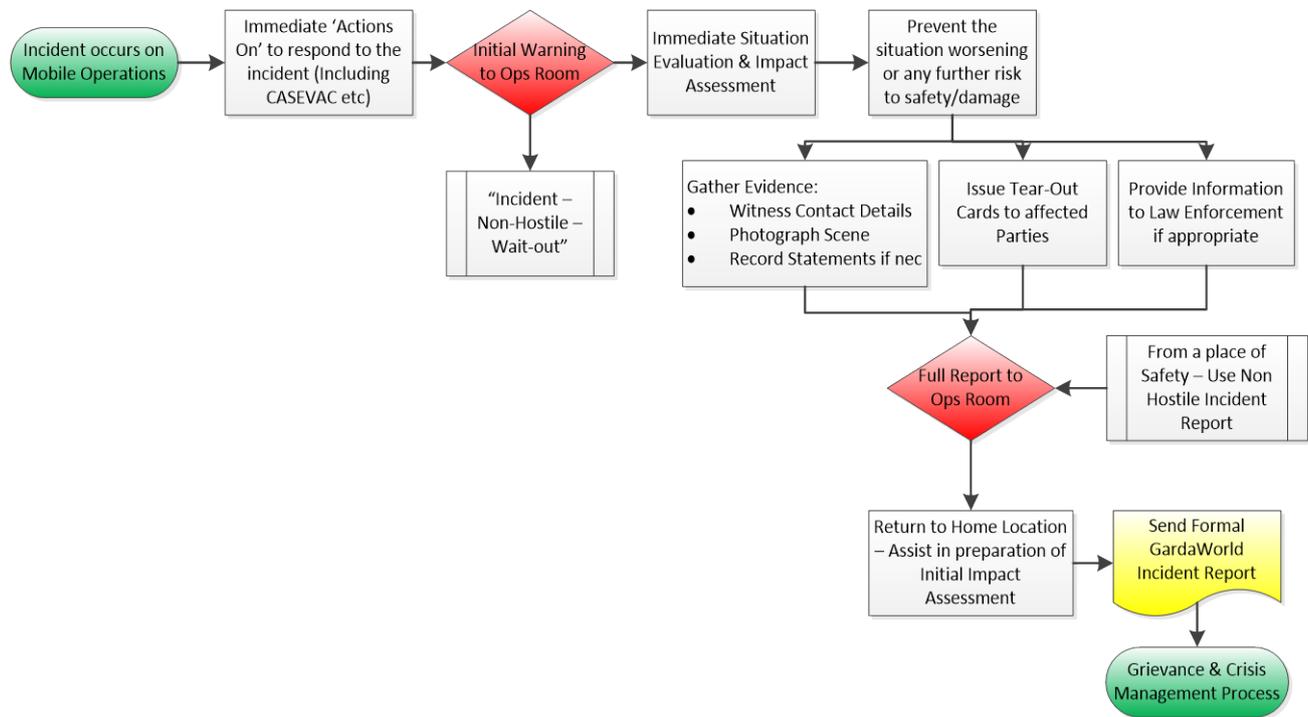


Figure 2 - Mobile Response Procedure

TEAR-OUT CARDS

30. The Tear-Out Card concept aims to provide:

- a. Affected parties at the incident site with a clear means of contacting GardaWorld if, at some future time, they wish to raise a grievance.
- b. Help to de-escalate tension by demonstrating to all affected parties that ‘something can be done’ in the future.
- c. Enabling the affected team (and clients) to extract rapidly from the situation without any admission of guilt but while satisfying all affected parties that corrective actions will be taken if necessary.

31. The final section of the Mobile Security Operations TAMs contains pages of tear-out cards (approximately 50 x cards should suffice). The Tear-Out cards in the TAM are to be maintained in English and in any other local language used in the area of operations. They must contain the contact information for the Regional Operations Room that will coordinate any response to potential grievance response. Each Card will contain the following information, in this format overleaf:

GARDAWORLD

An incident has occurred involving personnel from the Security Company called GardaWorld. We wish for any issues resulting from this incident to be resolved peacefully and fairly between all affected parties.

If you wish to communicate further with GardaWorld's representatives about this incident, please contact us at:

- Telephone Number: [*Insert Telephone Number*]
- Office Address:[*Insert appropriate Office Address*]

REPORTING

32. The following report (the format is contained in the Mobile & Ops Room TAMs) is submitted by voice to the Ops Room from a place of safety, as soon as possible after the incident occurs. A full report is completed immediately on return to the HQ/Project location as part of the post-task debrief:

33. Training in reporting **MUST** cover this information;

- a. This Report is to be used for all incidents which DO NOT result from hostile action but which affect other parties outside of GardaWorld and its Clients' operations. This can include Road Traffic Collisions (RTCs), damage to property and civilian casualties resulting from the incident. **Send this report soonest – verbally to the Operations Room.** Note:
- b. TL or 2IC is to act as the Incident Coordinator
- c. The affected locality/incident site is to be made safe in order to prevent any worsening of the situation
- d. All are to take all necessary steps not to aggravate any sensitivities resulting from the incident, regardless of likely fault.
- e. Do not admit liability. Issue affected parties with a copy of the tear-out 'Grievance Reporting Sheet' and/or pass on the contact details of the Regional Operations Room.

34. The Report Format is overleaf:

| Action | Information |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| (a) | (b) |
| <p>MIKE</p> <p>My Call Sign (Who you are)</p> | |
| <p>ECHO</p> <p>Exact Location (GPS grid, nearest map spot or local Knowledge of incident position).</p> | |
| <p>TANGO</p> <p>Type of Incident. (Civilian Casualty, RTC, Damage to Property, Cultural etc).</p> | |
| <p>SIERRA</p> <p>Situation - Description of what is happening.</p> | |
| <p>ALPHA</p> <p>Affected Parties - List all affected parties including communities, NGOs, Clients, own Call Signs etc)</p> | |
| <p>NOVEMBER</p> <p>Number of casualties, whose casualties and medical status. (Walking, unconscious, conscious, priority of CASEVAC).</p> | |
| <p>HOTEL</p> <p>Help and Support Needed - Emergency services needed (Extra call signs/QRF, Law enforcement, medical, Fire service</p> | |
| <p>WHISKY</p> <p>What we are doing about it? (A description of the actions being taken by the Call-Sign at the Scene Including – Issue of Tear-Out Cards, Extracting/Providing Assistance etc).</p> | |

STATIC GUARD POST RESPONSE

GENERAL

35. Static Security Posts/Personnel may be involved in incidents which could result in a grievance being raised. This could occur::
- a. When searches are being carried out on individuals or vehicles.
 - b. When persons are accessing or leaving sites under guard eg. grievance about the behaviour of the guard personnel.
 - c. When persons are refused entry to sites under guard, for whatever reason.
 - d. In the aftermath of any response to direct fire, indirect fire or VBIED.
 - e. In the aftermath of the response to the discovery of a suspicious package or device.
36. Static Security Sites are also likely to be viewed by community stakeholders as a reporting point for communicating grievances to GardaWorld.

RESPONSE

37. Other than those minor incidents which can be resolved by the Guard Commander on-site, the following process is follows:

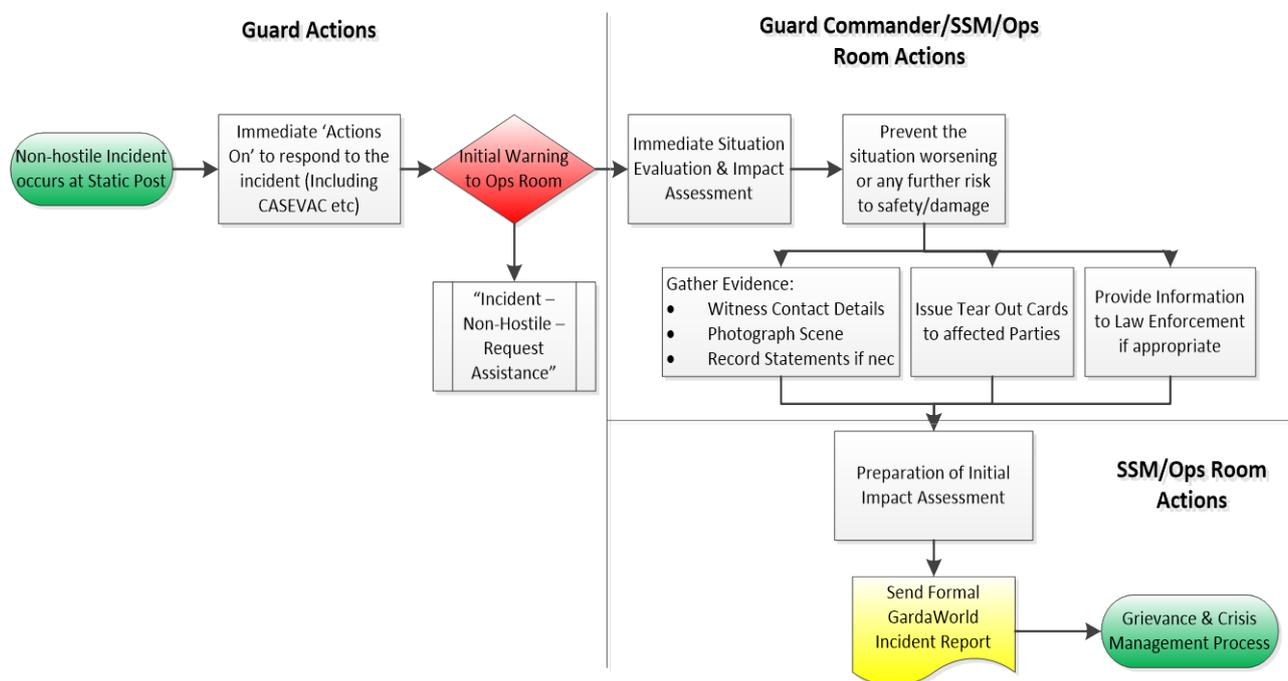


Figure 3 - Static Site Response Procedure

STRATEGIC AND OPERATIONAL RESPONSE

38. There can be no effective standardised method for resolving non-judicial external stakeholder grievances. Each and every grievance will be managed as its own case, on its own merits and resolved accordingly. Once escalated, the grievance will be managed in accordance with Regional (Operational) Crisis Management Plan arrangements and will invariably involve strategic-level input (GW-COR-ERR-SOP-007). This will ensure that all key internal stakeholders are involved in the decision-making process. The escalation and management process is outlined as follows:

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| | <p>Sudden-onset Crisis identified by:</p> <ul style="list-style-type: none"> • Receipt of Incident Report through the chain of command • Open source media reporting • Reporting of a major disruption by management of a business function (eg. IT, Finance) <p>Reported to Ops by default, CC'd to Strategy Committee and Head Office Function Leaders.</p> <p>Director Operations Support or SVP takes decision to escalate to crisis or to appoint a responsible business function to lead management through business-as-usual processes, supported by appropriate business units.</p> <p>On declaring a crisis the Director Operations Support or Senior VP becomes SCG Leader, :</p> <ul style="list-style-type: none"> • Consults Weekly Travel Planner to ID location of potential Team Members. • Informs President and/or Senior VP <p>Decision on level of response taken.</p> <p>SCG Leader:</p> <ul style="list-style-type: none"> • ID crisis centre as hub for virtual operations management • ID plans to be activated and therefore team membership required • Review Strategic BICRA to determine RTO. • Issues Warning Order (SMS & Email) to selected team members including time (and loc) of first physical/virtual CM Meeting • Appoints secretariat <p>Secretariat:</p> <ul style="list-style-type: none"> • Opens Crisis File for recording • Prepares briefing materials (Ppt – on direction of SCG Leader) • Prepares meeting room and arranges conference call. <p>CM Meeting 1 convened and follows CM 1 Agenda. Decisions taken and actions recorded on 3IA board. At conclusion of meeting, planning direction and actions issued to SCG. Time of next meeting directed</p> <p>SCG members depart meeting - carry out actions and issue communications – prepare to update Meeting 2 on progress.</p> <p>Secretariat prepares CRIP. When agreed by SCG Leader, CRIP issued by email to SCG and additional addresses according to crisis management requirements & action plans invoked. CRIP copy filed under DTG of issue.</p> <p>Meeting 2 convened, virtually and/or physically, following agenda & CRIP Rhythm of decisions and actions continues until SCG stand-down.</p> |
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INVESTIGATION AND ARBITRATION

EXTERNAL INVESTIGATIONS

39. Investigations by external agencies will usually be associated with judicial responses to grievances and are therefore not covered in this SOI.

INTERNAL INVESTIGATIONS

40. Internal Investigations will be carried out in accordance with GW-COR-HSE-SOI-019-Incident Investigation and After-Action Review.

ARBITRATION

41. Impartial arbitration of disputes may be impossible to achieve in areas of weakened governance. The Regional Management Team will be responsible for identifying appropriate organisations to arbitrate in the grievance process according to the specific needs of individual cases. Potential arbiters must be agreed as acceptable by all parties to the dispute and may include:

- a. Non-Governmental Organisations trusted by all parties.
- b. Faith or tribal leaders.
- c. Government ministries, local authorities or law enforcement agencies.

42. Before committing to acceptance of any external arbiter, a full risk assessment should be conducted to ensure that impartiality and equity can be assured to a satisfactory level throughout the process.

CONTINUAL IMPROVEMENT

43. GardaWorld will take every possible step to prevent the recurrence of incidents and grievances. The grievance management process is itself a source of continuous learning. GardaWorld shall therefore ensure that the lessons identified during post-incident investigations, after-action and management reviews are learned.