GRIEVANCE PROCEDURE
EXTERNAL STAKEHOLDER

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CONTENTS

1. PURPOSE: 3
2. SCOPE 3
3. PRINCIPLES 3
4. REPORTING CHANNEL 3
5. HANDLING PROCEDURE: 3
6. PROTECTION AGAINST RETALIATION: 4
7. ANNEXURE 1 5

Signed on : 5th August, 2024

Signed by : Boaz Lev, Managing director

1. PURPOSE:

This document aims to provide a fair and transparent process for external stakeholders (such as customers, suppliers, partners, and community members) to address and resolve grievances about HB's products, services, or business relationships.

2. SCOPE

The Grievance procedure covers all external stakeholders, such as customers, suppliers, business partners, service providers, industry associations, and community members (**hereinafter referred to as 'Stakeholders'**). It addresses legitimate grievances related to abuses, risks, and behaviors, including but not limited to human rights violations, environmental damage, corruption, fraud, and labor practices (hereafter referred to as '**Grievance**').

3. PRINCIPLES

Fairness: All grievances will be handled impartially and concerning the rights and perspectives of all parties involved.

Transparency: The grievance process will be clear and accessible, with stakeholders informed of each step and the expected timelines for resolution.

Confidentiality: Confidentiality will be maintained to the greatest extent, respecting the privacy of all parties involved unless disclosure is required by law or necessary for the resolution process.

Accountability: HB is committed to addressing grievances promptly and effectively with accountability for ensuring that corrective actions are taken where necessary.

4. REPORTING CHANNEL

HB provides several channels for external stakeholders to express their concerns or grievances:

- Via Email: Concerns can be submitted to compliance@hbantwerp.com ,
- Via Telephone: Stakeholders can call us at +32 03 2 83 07 07.
- Anonymous complaint – Stakeholder may send a letter of complaint marked "Confidential" addressed to HB Antwerp by post to Hoveniersstraat 51, 2018 Antwerpen

While grievances can be expressed verbally, we encourage our external stakeholders to use the grievance form provided in **Annexure 1**. This form is necessary for proper documentation and should include details such as the description of the complaint, the person or organization involved, any potential witnesses, and the event's date, time, and location.

5. HANDLING PROCEDURE:

Stage 1: Submission of Grievance:
Stakeholders should submit their grievances in writing to the provided reporting channel.

Stage 2: Acknowledgement:
Once the grievance is received, the responder will send an acknowledgment within 3 business days. The grievance is treated strictly confidential, and this acknowledgment will detail the following steps and provide an estimated timeline for resolving the issue.

Stage 3: Investigation and Resolution:
The grievance will be assessed for its relevance to HB's operations. This may involve gathering additional information, consulting relevant parties, and conducting interviews if necessary.

Based on the findings of the investigation, a resolution will be proposed. If the grievance falls outside HB's scope, it will be closed, and the relevant Stakeholder will be informed accordingly.

Stage4: Results:
The responder will communicate the decision to the stakeholder in writing. The communication will include a clear explanation of the decision and any actions to be taken as a result.

Stage 5: Appeal (if applicable):
If the stakeholder is unsatisfied with the decision, they may appeal within 10 business days. Appeal should be made in writing, stating the grounds for the appeal and any additional evidence or information to be considered.

Stage 6: Review of Appeal:
An independent review panel or senior management designated for appeals will review the grievance and the initial decision. If necessary, they may conduct further investigation.

Stage 7: Final Decision:
The final decision of the appeal will be communicated to the stakeholder in writing, outlining the reasons for the decision and any actions to be taken. The decision at this stage is considered final and binding.

Stage 8: Reporting and Documentation:
Records of all grievances received and their resolution will be maintained confidentially. Periodic reports on grievance trends and outcomes will be prepared for management review and continuous improvement purposes.

Stage 9: Confidentiality:
Under no circumstances must the grievant's identity be disclosed to anyone without the grievant's explicit consent. Failure to comply with this requirement may result in disciplinary action.

Stage 10: Monitoring:
This grievance procedure will be reviewed periodically to ensure its effectiveness and relevance. Feedback from stakeholders and outcomes of grievance resolution will be used to improve our processes and prevent similar grievances in the future.

6. PROTECTION AGAINST RETALIATION:

HB ensures that no disciplinary action or retaliation is taken against the grievant or any person who assisted the grievant for a report made in good faith, even if the reported facts later prove inaccurate or unfounded or do not lead to any proceedings or penalties.

Regarding external stakeholders, any act of retaliation will negatively impact their relationship with HB, which may include termination of a contract.

If anyone believes they are subject to retaliation, they must immediately inform HB's Compliance department. Those found engaging in retaliation will be appropriately disciplined.

7. ANNEXURE 1

Grievance Registration Form

Full name:	*(Please select your preferred option)* ☐ I wish to raise my grievance anonymously. ☐ I request not to disclose my identity without my consent.
Company (if applicable) :	
Date:	**Time:**
Preferred Contact Method: Telephone/Email/Correspondence (*Please provide contact details*)	
Please provide details of your grievance	
Supporting documents attached?	☐ **YES** ☐ **NO**
What outcome are you seeking?	
Additional information	
Complain status (for internal use only)	