

Cafico International

External Grievance Policy & Procedure

Ireland

Grievance Policy

Policy Statement:

Cafico International is committed to delivering the highest standard of service to its clients and stakeholders. In recognition that grievances may arise in the course of business, Cafico International has established this External Grievance Policy and Procedure to ensure that all external grievances are addressed promptly, fairly, and transparently. This policy is designed to provide a clear framework for the resolution of grievances raised by clients, service users, suppliers, or other external parties regarding Cafico International's services, conduct, or business practices.

Scope of Policy

This policy applies to all external parties who wish to raise a grievance concerning Cafico International, its subsidiaries, or its employees, excluding grievances relating to employment matters, which are addressed under the Internal Grievance Policy.

Principles of the Grievance Policy

Through the implementation of this Policy, it is our aim to ensure the following:

- **Fairness and Impartiality:** All grievances are handled impartially and without bias.
- **Confidentiality:** Information relating to a grievance will be shared only with those directly involved in the resolution process.
- **Transparency:** Complainants will be informed about the process and progress of their grievance at each stage.
- **Non-Retaliation:** No party will face adverse consequences for raising a grievance in good faith.
- **Timeliness:** Grievances will be addressed promptly, and all parties will adhere to agreed-upon timeframes.
- **Compliance:** The process will be conducted in accordance with applicable laws, regulations, and codes of practice.

Definition of Grievance

A grievance is any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an external party regarding Cafico International's provision of, or failure to provide, a service.

Grievance Procedure

Submission of Grievance

Grievances may be submitted via telephone, email, letter, or in-person. Complainants are encouraged to provide details of the grievance in writing to ensure a full audit trail.

All grievances should include:

- The nature of the grievance;
- Relevant facts, including dates, times, and witnesses (if applicable); and
- Any actions taken to resolve the grievance informally.

Acknowledgement

- Upon receipt of a grievance, Cafico International will acknowledge the grievance in writing within five business days.
- The acknowledgement will confirm receipt and outline the next steps in the process.

Investigation

The grievance will be escalated to our Chief Legal Officer, Máiréad Lyons. An impartial investigator will then be appointed to review the grievance.

The investigator will:

- Review all relevant documentation;
- Conduct a thorough investigation, including interviews with relevant parties if necessary; and
- Maintain a timeline of events and a record of all investigations carried out.

Communication

- The complainant will be kept informed of progress as the investigation proceeds.
- A full and final response will be provided to the complainant within forty business days of receipt of the grievance.

Escalation and Appeal

- If the complainant is dissatisfied with the outcome, the grievance may be escalated to the Chief Executive Officer for further review.
- A final response letter will be issued, detailing the outcome of the appeal and the steps taken to resolve the grievance.

Record-Keeping and Tracking

- All grievances and related correspondence will be retained in accordance with Cafico International's record retention policy.
- All grievances will be forwarded to the Compliance Team for tracking via compliance@caficointernational.com.
- The Compliance Team will monitor deadlines and issue metrics on the nature and scale of grievances to identify potential training needs.

Sample Correspondence

- **Acknowledgement Letter:** Confirms receipt and outlines next steps.
- **Response Letter:** Details the investigation and proposed solution.
- **Final Response Letter:** Provides the final outcome and closes the grievance.

Responsibility

- **Complainants:** Responsible for raising grievances in a timely manner and participating in the process in good faith.
- **Managers and Compliance Team:** Responsible for addressing grievances promptly and fairly, seeking informal resolution where appropriate, and ensuring compliance with this policy.

Review and Amendment

This policy is non-contractual and may be amended from time to time in line with best practice and any changes in legislation or applicable codes of practice.

How to Express a Grievance

If you wish to raise a grievance or make a formal complaint, please direct all correspondence to our Chief Legal Officer. All grievances will be handled promptly, fairly, and in accordance with this policy. Please include your contact details and any supporting documentation to assist with the review.

What Happens if a Grievance is Not Accepted

If a grievance is not accepted, the company will notify the complainant in writing and provide a clear rationale for the decision. This ensures transparency and helps the complainant understand the reasons behind the outcome.

Contact

Máiréad Lyons

Chief Legal Officer

mlyons@caficointernational.com

+353 1 905 8579