

Quality Management System

Third Party Complaints Policy & Procedure

1.0 Policy

It is the policy of Maritime Asset Security & Training (MAST) (Company) to provide third parties¹ with a mechanism to report allegations of improper and/or illegal conduct to designated personnel including such acts or omissions that would violate the principles contained in the International Code of Conduct for Private Security Service Providers (ICOC)².

The Company will investigate allegations promptly, impartially and with due consideration to confidentiality.

2.0 Procedure

The procedure seeks to create a positive approach to complaints.

- (i) The procedure will be published on a publically accessible website;
- (ii) The Company will keep copies of documents generated as a result of the complaint and record of any action taken. Except where prohibited or protected by applicable law, the finding of the complaint will be made available to a Competent Authority on request;
- (iii) The Company will co-operate with any official investigations;
- (iv) The Company will take appropriate disciplinary action in the case of finding such a violation or unlawful behaviour;
- (v) The Company will ensure that any personnel working for the Company who makes a complaint is protected from any reprisals.

The procedure does not confer any contractual rights. The Policy and Procedure may be subject to revision from time to time.

2.1 How to Complain

All complaints must be made in writing directly to the Company.

Complaints should be made within six months of the Complainant becoming aware of the grounds for complaint.

¹ Third Parties include but are not limited to: External bodies, companies, clients, independent contractors such as security personnel providing services to the Company. This is not an exhaustive list.

² The Draft Charter of the Oversight Mechanism for the International Code of Conduct published on the 16th January 2012 is currently in a consultation phase. Once published and implemented the charter will provide an independent mechanism for third party complaints. This Policy therefore reflects the current position and will be reviewed in due course

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Complaints can be sent as follows via:

- Email to – icocenquires@mast-security.com
- Letter to –12 Tigne Place, M1 Mezzanine Level, Tigne Street, Sliema, Malta

Any complaint made under this procedure should include:

- Contact details of the Complainant (including postal and e mail address).
- The subject of the complaint.
- Information and evidence regarding the alleged breach.

The Company will acknowledge receipt of the complaint within ten working days and advise who will be responsible for dealing with the complaint.

Anonymous complaints will be investigated where possible and may be acted upon at the Company's discretion.

2.2 **Handling of the Complaint**

The Company is committed to ensuring that all complaints are investigated fully and impartially and with due consideration for confidentiality.

The Company will conduct an internal investigation within two months of receipt of the allegation and refer the evidence of the Complainant and the Company to an independently appointed panel of three lawyers who are registered with the International Association of Arbitrators.

The findings of the Arbitrators and their ruling along with actions taken by the Company will be made available to the Complainant.

The ruling of the Arbitrators is final.

Nothing in this policy should be interpreted to restrict any rights of redress the Complainant has in law.

The company will not reimburse any fees, expenses or cost involved in bringing a Complaint.

3.0 **Complaints not covered by the procedure:**

This complaints procedure cannot be used to deal with an issue which is part of any legal action against the Company

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This complaints procedure cannot be used by an employee. Any specific complaints made by employees should be directed through the relevant internal grievance policy and procedure.

The complaints procedure cannot be used for complaints outside of those relating to any allegations of improper and/or illegal conduct as contained in the International Code of Conduct for Private Security Service Providers (ICOC).

The company reserves the right to take any appropriate action to protect itself from any unfounded, malicious or vexatious allegations or complaints. Untrue allegations could lead to legal action for defamation.