

POLICY: GRIEVANCE

BACKGROUND

The corporate Grievance policy is established to facilitate the development of controls that will ensure that roles and responsibilities are clearly defined and understood in order to secure both corporate and individual compliance for Reverside regarding Grievances. It is the intent of Reverside to promote consistent organisational behaviour by providing guidelines and assigning responsibility for the development of controls where Grievances are concerned. It should be noted that failure to comply with conduct and procedures relating to Grievances falls under Misconduct in the Disciplinary Code.

The policy's aim is to ensure that all communication channels are open and receptive, and that all employees have an adequate opportunity to express their grievances. It further aims to ensure the grievances raised are resolved timeously and fairly by adopting a problem solving approach and implementing any appropriate corrective action necessary.

The purpose of this policy is to give guidance and provide management and employees with a framework to deal with grievances raised effectively and at an early stage.

SCOPE OF POLICY

This policy applies to any irregularity, or suspected irregularity, involving employees as well as shareholders, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Reverside. Any investigative activity required will be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship to Reverside.

WHAT IS A GRIEVANCE?

A grievance is a complaint or concern which an employee (complainant) may have in relation to the conduct of a manager or another colleague towards the complainant or a working condition, issue or incident that has taken place or persists in the workplace.

PROCEDURE

Employees are entitled to raise grievances without any fear of victimisation or blame.

Assurance is provided to the employee/s affected that wherever possible grievances will be handled with discretion, protecting confidentiality and privacy of the employees concerned.

Employees may be represented by another employee who is employed by Reverside, if they wish

The company undertakes to investigate grievances without undue delay and to take reasonable steps to resolve grievances

Grievances raised should be submitted in writing to the relevant manager. In cases where the grievance is lodged against the manager, the grievance should be addressed to the Human Resources Department

When lodging a grievance:

- The employee should fill in the official Grievance Form which can be obtained from the Human Resources Department. The employee must state clearly and as concisely as possible what the issue is and the desired outcome/solution;
- Grievances should be raised as soon as possible;
- Depending on the severity of the grievance, through investigation, the resolution/outcome decision could take 2 weeks, unless otherwise determined by the parties through mutual agreement;
- In the circumstance where an employee (complainant) feels uncomfortable by raising the grievance with his/her reporting manager, it may be raised directly with the Director: Human Resources;
- If the investigation of a grievance uncovers misconduct on the part of the offending manager or employee, then the appropriate disciplinary action will be taken in terms of the company's disciplinary procedure;
- The final level to which a grievance can be raised internally is to the Director: Human Resources and the Chief Executive Officer;

- Should a grievance remain unresolved after being taken to the highest possible internal level, the complainant may refer a dispute to the CCMA in accordance with the provisions of the Labour Relations Act.
- Employees are encouraged to use the procedure, but also warned not to abuse it with false grievances

IRREGULARITIES

The Grievance policy should be taken extremely seriously by all employees. Any employee who fails to comply with the Grievance Policy, will be subject to disciplinary action.

Irregularities concerning an employee's conduct with regard to the Grievance policy should be resolved by departmental management and the Director: Human Resources before concerning the Chief Executive Officer.

If there is any question as to whether an action constitutes an irregularity, contact the Director: Human Resources for guidance. The Director: Human Resources must coordinate all investigations with all affected areas, both internal and external.

INVESTIGATION RESPONSIBILITIES

The Director: Human Resources has the primary responsibility for the investigation of all suspected misconduct with regard to the Grievance policy. If the investigation substantiates that misconduct has occurred, the Director: Human Resources together with the Chief Executive Officer will institute the appropriate disciplinary action against the employee.

CONFIDENTIALITY

The responsible parties must treat all information received confidentially. Any employee who suspects irregular conduct with regard to the Grievance policy will notify the Director: Human Resources immediately, and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected misconduct (see REPORTING PROCEDURE section below).

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations

of persons suspected but subsequently found innocent of wrongful conduct and to protect Reverside from potential civil liability.

AUTHORIZATION FOR INVESTIGATING SUSPECTED MISCONDUCT RELATING TO THE GRIEVANCE POLICY

The Director: Human Resources and his/her designated responsible parties will have:

- Free and unrestricted access to all Reverside records and premises, whether owned or rented; and
- The authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation. Such activity will be thoroughly documented and recorded.

REPORTING PROCEDURES

Great care must be taken in the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

An employee who discovers or suspects irregular conduct with regard to the Grievance policy will contact the Director: Human Resources immediately. The employee or other complainant may remain anonymous. All inquiries concerning the activity under investigation from the suspected individual, his or her attorney or representative, or any other inquirer should be directed to the Director: Human Resources. No information concerning the status of an investigation will be given out. The proper response to any inquiries is: "I am not at liberty to discuss this matter." Under no circumstances should any reference be made to "the allegation," "the crime," or any other specific reference.

The reporting individual should take cognisance of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution;

- Do not discuss the case, facts, suspicions, or allegations with anyone who is not directly involved with the investigation or the outcome of the investigation and who have no legitimate need to know. This includes any family member and/or friend.

OUTCOME

If an investigation results in a finding that irregular conduct with regard to the Grievance policy has occurred, then the appropriate disciplinary action for Misconduct must occur. The Director: Human Resources is responsible for this procedure and, if necessary, outside counsel may be sought in order to take the necessary disciplinary action.

ADMINISTRATION

The Director: Human Resources is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

APPROVAL

(Chief Executive Officer) Date