



External Grievance and Complaints Procedure Policy

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Power of Sultan Security Services (PSS)

Security Risk Advisory & Consultancy / Travel Risk Management and Secure Movement Services
/ Protective, Static and Site Security Operations / Crisis, Incident and Emergency Response /
ISO-Aligned Compliance and Operational Governance Frameworks

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1 Purpose

This Procedure establishes an accessible, fair, and transparent mechanism for external stakeholders to raise concerns, complaints, or grievances relating to Power of Sultan Security Services and Private Guards Ltd (PSS) operations within Iraq. PSS recognises its responsibility to provide an effective remedy mechanism consistent with internationally recognised standards and Iraqi legal obligations.

2 Scope

This procedure applies to local communities affected by PSS operations, clients, subcontractors, members of the public, Government representatives, suppliers and any third party impacted by PSS activities. Identified stakeholders shall be recorded in the Stakeholder Identification & Engagement Register *PSS-CMT-COM-REG-003-A1-Stakeholder Identification & Engagement Register* and monitored for grievance or impact risk.

It covers grievances relating to conduct of security personnel, Use of force, Human rights concerns, safety incidents, environmental impacts, operational misconduct and ethical breaches.

3 Guiding Principles

The grievance mechanism shall be:

Table 1: Guiding Principles

Principles	Explanations
Accessible	Available in Arabic and English.
Transparent	Clear process and timelines communicated.
Confidential	Protect identity where requested.
Non-Retaliatory	No retaliation against complainants.
Fair & Impartial	Investigations conducted objectively.
Remedial	Capable of providing appropriate remedy.

4 Access Channels

Grievances may be submitted through:

- Website: <https://pss217.com>
- Email: grievance@pss217.com
- 24/7 Operations Line: +964 (0) 775 021 7217
- Written submission at PSS office; Karada Street 52, District 904, Alley 80, House 1/6, Baghdad, Iraq.
- Submission through site supervisor (where applicable)
- Anonymous submission (where legally permissible)

Where operations are ongoing at a client site, grievance contact details shall be displayed visibly at security posts where appropriate.

5 Types of Grievance's

Grievances may include, but are not limited to:

Table 2: Types of Grievances

Ser	Type of Grievance	Ser	Type of Grievance
1	Allegations of excessive use of force	5	Property damage
2	Misconduct by guards	6	Community disturbance
3	Discrimination	7	Labour exploitation
4	Harassment	8	Regulatory breaches

Use-of-force complaints shall be escalated immediately to Senior Management.

6 Process Flow

Table 3: Grievance Process Flow

Steps	Actions	Implementation
1	Receipt & Logging	All grievances shall be: Logged in the Grievance & Complaints Register Assigned a reference number Acknowledged within 3 working days
2	Initial Assessment	The Compliance Manager shall assess: Nature of complaint Urgency Human rights risk Regulatory reporting requirements Requirement for MOI notification
3	Investigation	Investigation may include: Interviews Review of CCTV Incident reports Personnel records Site visits Investigations shall be impartial.
4	Outcome & Remedy	Possible outcomes: No breach identified Training required Disciplinary action Operational adjustment Financial compensation (where appropriate) Referral to authorities Remedy shall be proportionate to the findings.
5	Communication	Outcome shall be communicated to complainant unless anonymous. Where legal restrictions apply, summary outcomes may be provided.

6	Appeal	Complainant may appeal within 5 working days. Appeal shall be reviewed by senior management not involved in original investigation.
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7 Serious Incident Escalation

Immediate escalation required where grievance involves death or serious injury, Use of firearms, alleged human rights abuse, regulatory breach or criminal conduct. Such matters shall be reported to appropriate Iraqi authorities as required by law.

8 Recording and Monitoring

All grievances shall be recorded in *PSS-CMT-QAM-REG-004-A1-Stakeholder Satisfaction and Grievance Register* and managed in accordance with the *Corrective Action Procedure PSS-CMT-QAM-POL-003-A1-Corrective Action Procedure Policy*.

Register shall record:

- Case ID
- Date received
- Stakeholder type
- Nature of complaint
- Human rights flag
- Investigation lead
- Status
- Outcome
- Corrective action
- Closure date

Trends shall be reviewed during Management Review.

9 Non-Retaliation

PSS strictly prohibits retaliation against any individual raising a grievance in good faith. Retaliation shall constitute misconduct.

10 Management Review

Grievance trends shall be analysed quarterly, reviewed by Senior Management, used to improve operational practices and linked to corrective action process.

11 Public Summary

A public-facing summary of this mechanism shall be available on request, provided to clients upon request and made available in Arabic and English.

12 Continuous Improvement

Lessons learned shall inform training updates, policy revisions, risk assessment updates and updates to operational controls.