



MERIDAS
GOLD

Grievance and Whistleblowing Policy

MERIDAS GOLD REFINERY FZC

Version 2.0 · Effective 17 September 2026 · Internal / All Stakeholders

DOCUMENT CONTROL

Grievance and Whistleblowing Policy	
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VERSION HISTORY

Version	Date	Author	Changes
1.0	08 November 2025	Shoraf Yasin Thakur	Initial policy creation establishing comprehensive grievance handling procedures for UniGold Refinery FZC (now Meridas Gold Refinery FZC)
2.0	17 September 2026	Shoraf Yasin Thakur	Entity renamed from UniGold Refinery FZC to Meridas Gold Refinery FZC (all other registration details unchanged) throughout; policy retitled to "Grievance and Whistleblowing Policy" to align with sector-standard naming and to make explicit that whistleblower reports are within scope; added a UAE whistleblower-protection legal landscape section (Section 4.3) referencing Federal Decree-Law No. 33 of 2021 (Labour Law), Article 47, and noting the absence of a comprehensive federal whistleblowing statute as of 2026; clarified that the reporting channels in Section 8 (including anonymous reporting) are the designated whistleblower channel referenced in Section 17; amended 19 September 2026 before distribution: the Ministry of Economy and Tourism (MoET) named in the external reporting table; the whistleblower-protection landscape at Section 4.3 extended to record that the ADGM Whistleblower Protection Regulations 2024 and the DIFC regime do not extend to a SAIF Zone entity, so the Company's own commitments remain the operative protection

APPROVAL

Compliance Officer	Shoraf Yasin Thakur	_____	17 September 2026
Managing Director	_____	_____	_____
Board of Directors	_____	_____	_____

POLICY STATEMENT

Meridas Gold Refinery FZC is committed to providing a fair, accessible, and effective grievance mechanism for all stakeholders—employees, contractors, suppliers, customers, and affected communities. This policy establishes a structured process for receiving, investigating, and resolving grievances in a timely, confidential, and non-retaliatory manner.

Every grievance is an opportunity for improvement. We take all concerns seriously and commit to addressing them with integrity and respect.

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1. INTRODUCTION

1.1 Background

Meridas Gold Refinery FZC recognizes that effective grievance mechanisms are essential for:

- Maintaining a positive and productive work environment
- Ensuring ethical conduct throughout our operations and supply chain
- Complying with UAE labor laws and international standards
- Protecting human rights and promoting responsible business practices
- Building trust with employees, business partners, and communities

1.2 Commitment

We are committed to:

- Providing accessible channels for raising concerns
- Handling all grievances fairly and impartially
- Protecting those who raise concerns from retaliation
- Resolving grievances promptly and effectively
- Learning from grievances to improve our practices

1.3 Importance of Speaking Up

We encourage everyone to speak up when they have concerns. Raising a grievance is not a sign of disloyalty—it is an act of responsibility that helps us become a better organization. We want to hear about problems so we can address them.

2. PURPOSE AND OBJECTIVES

2.1 Purpose

The purpose of this Grievance Policy is to:

1. **Establish Clear Procedures** – Define a structured process for grievance handling
2. **Ensure Accessibility** – Provide multiple, accessible channels for raising concerns
3. **Guarantee Fairness** – Ensure all grievances are handled impartially
4. **Protect Stakeholders** – Safeguard those who raise concerns from retaliation
5. **Enable Resolution** – Facilitate timely and effective resolution of grievances
6. **Promote Improvement** – Use grievance insights to improve operations

2.2 Objectives

Objective	Description
Accessibility	Multiple channels available to all stakeholders
Transparency	Clear procedures and communication throughout the process
Timeliness	Defined timelines for acknowledgment and resolution
Fairness	Impartial investigation and decision-making
Confidentiality	Protection of grievant identity and information
Non-Retaliation	Absolute protection against adverse actions
Effectiveness	Meaningful remedies and continuous improvement

3. SCOPE AND APPLICABILITY

3.1 Who Can File a Grievance

This policy applies to grievances from:

Category	Description
Employees	All permanent, temporary, contract, and probationary staff
Former Employees	Within 6 months of separation
Contractors	All contractors and consultants working at Meridas Gold
Suppliers	All suppliers and their employees
Customers	All customers and business partners
Communities	Members of communities affected by our operations
General Public	Any person with a legitimate concern about Meridas Gold's conduct

3.2 What Can Be Grieved

This policy covers grievances related to:

- Workplace conditions and treatment
- Discrimination and harassment
- Health and safety concerns
- Compensation and benefits
- Management decisions
- Policy violations
- Ethical concerns
- Supply chain practices
- Human rights issues
- Environmental concerns
- Any other legitimate workplace or business concern

3.3 What Is NOT Covered

The following are not covered by this policy:

Exclusion	Alternative Process
Performance Reviews	Performance management process
Disciplinary Decisions	Disciplinary appeal process
Business Decisions	Normal business channels
Matters in Litigation	Legal process
Anonymous Defamation	Not actionable

4. REGULATORY FRAMEWORK

4.1 UAE Legal Requirements

This policy complies with:

Regulation	Description
UAE Labor Law (Federal Decree-Law No. 33/2021)	Employee rights and dispute resolution
MOHRE Regulations	Ministry of Human Resources requirements
SAIF Zone Employment Regulations	Free zone labor standards
UAE Constitution	Fundamental rights protection

4.2 International Standards

This policy aligns with:

- ILO Conventions on Workers' Rights
- UN Guiding Principles on Business and Human Rights (Pillar III)
- OECD Guidelines for Multinational Enterprises
- LBMA Responsible Gold Guidance, Version 9
- ISO 26000 Social Responsibility Guidelines

4.3 UAE Whistleblower Protection Landscape

As of 2026, the UAE does not yet have a single, comprehensive federal whistleblowing statute. The Company's whistleblower protections under this policy (Sections 13 and 17) are nonetheless grounded in, and go beyond, the following:

Instrument	Relevance
Federal Decree-Law No. 33 of 2021 (UAE Labour Law), Article 47	Prohibits an employer from terminating an employee, or taking legal action against them, for filing a serious and truthful complaint with the Ministry of Human Resources and Emiratisation (MOHRE) — a binding, federally-applicable protection the Company honors and extends to all reporting channels under this policy
UAE Central Bank whistleblowing framework	Illustrates the regulatory direction of travel toward secure, confidential whistleblowing channels in regulated sectors, which the Company treats as good practice for its own program
Dubai Resolution No. 2 of 2025	A public-sector whistleblower framework (Dubai Financial Audit Authority) not directly applicable to the Company, but indicative of the UAE's continuing development of whistleblower protection standards
ADGM Whistleblower Protection Regulations 2024	Enacted July 2024 with a compliance date of 31 May 2025, and supplementary guidance issued July 2025. These Regulations apply within the Abu Dhabi Global Market and do not extend to an entity licensed in the SAIF Zone . They are recorded here as a benchmark, not as a source of protection for this Company's reporters
DIFC Regulatory Law 2004 (as amended in 2022) and the DFSA Rulebook	The Dubai International Financial Centre's whistleblowing regime. As with ADGM, it applies within that financial free zone only and does not extend to the SAIF Zone

No statutory whistleblower-protection regime applies to an entity licensed in the SAIF Zone. Because federal protection remains narrower than in some other jurisdictions, Meridas Gold Refinery FZC's own commitments in Sections 13 (Non-Retaliation) and 17 (Whistleblower Integration) are the primary source of protection for anyone reporting concerns about the Company, and are treated as a floor, not a ceiling, on statutory requirements. The Company will monitor for a federal whistleblowing law and update this policy promptly if one is enacted.

5. DEFINITIONS

Term	Definition
Grievance	A formal expression of dissatisfaction or concern regarding any matter related to Meridas Gold's operations, policies, or conduct
Grievant	The individual or group filing a grievance
Respondent	The individual or department against whom the grievance is filed
Grievance Handler	The person assigned to receive and process the grievance
Investigator	The person assigned to investigate the grievance
Resolution	The outcome or remedy provided to address the grievance
Appeal	A request to review a grievance decision
Retaliation	Any adverse action taken against a grievant for filing a grievance

6. TYPES OF GRIEVANCES

6.1 Workplace Grievances

Type	Examples
Working Conditions	Unsafe work environment, inadequate facilities, excessive workload
Treatment	Unfair treatment by supervisors, favoritism, bullying
Compensation	Salary disputes, benefits issues, overtime concerns
Career Development	Denial of training, unfair promotions, lack of opportunities

6.2 Discrimination and Harassment

Type	Examples
Discrimination	Based on race, gender, religion, nationality, age, disability
Sexual Harassment	Unwelcome advances, inappropriate comments, hostile environment
Bullying	Intimidation, verbal abuse, isolation
Retaliation	Adverse actions for reporting concerns

6.3 Ethical and Compliance Grievances

Type	Examples
Policy Violations	Violations of company policies or procedures
Legal Violations	Violations of laws or regulations
Fraud	Financial misconduct, falsification of records
Corruption	Bribery, kickbacks, conflicts of interest

6.4 Supply Chain Grievances

Type	Examples
Human Rights	Forced labor, child labor, unsafe conditions at supplier sites
Environmental	Pollution, environmental damage
Ethical Sourcing	Conflict gold, undisclosed origins
Supplier Conduct	Unfair treatment of supplier employees

6.5 External Stakeholder Grievances

Type	Examples
Community Concerns	Noise, pollution, traffic, social impact
Customer Complaints	Product quality, service issues
Public Interest	General concerns about company conduct

7. GRIEVANCE PRINCIPLES

7.1 Core Principles

Meridas Gold's grievance mechanism operates according to these principles:

GRIEVANCE PRINCIPLES
ACCESSIBLE • Multiple channels available • No barriers to filing • Support for vulnerable groups
TRANSPARENT • Clear procedures published • Regular updates to grievants • Reasons provided for decisions
FAIR • Impartial investigation • Both parties heard • Decisions based on evidence
CONFIDENTIAL • Identity protected • Information shared only as needed • Secure record keeping
TIMELY • Prompt acknowledgment • Defined timelines • No unreasonable delays
EFFECTIVE • Meaningful remedies • Root cause addressed • Continuous improvement

7.2 Rights of the Grievant

Every grievant has the right to:

- File a grievance without fear of retaliation
- Know the status of their grievance
- Be heard and have their perspective considered
- Receive a response within stated timelines
- Appeal if dissatisfied with the outcome
- Have their identity protected
- Withdraw the grievance at any time

7.3 Rights of the Respondent

Any person against whom a grievance is filed has the right to:

- Be informed of the grievance (unless it would compromise investigation)
- Respond to allegations
- Present their perspective and evidence
- Be treated fairly and without prejudgment
- Confidentiality regarding the process

8. REPORTING CHANNELS

8.1 Primary Reporting Channels

This table is the controlling list of reporting channels. Every document, form or notice that tells a person how to raise a grievance states these channels and no others. A new channel — a dedicated mailbox, a hotline, a web form — is added here first, and only then to the forms and notices that reference it.

Meridas Gold provides the following channels for filing grievances:

Channel	Contact Details	Best For
Compliance Officer	Shoraf Yasin Thakur	All grievances, especially ethical concerns
Email	compliance@meridasgold.com	Written grievances with documentation
Phone	+971 50 968 01 65	Verbal reports, urgent matters
Direct Manager	Report to immediate supervisor	Workplace issues, initial resolution
HR Department	Contact HR Representative	Employment-related grievances
Written Submission	Submit marked "Confidential Grievance"	Formal written complaints

8.2 Anonymous Reporting

Meridas Gold accepts anonymous grievances:

How to Submit Anonymously:

- Written submission without identification
- Email from anonymous address
- Phone call without identifying yourself
- Third-party submission on behalf of grievant

Important Notes:

- Anonymous grievances will be investigated to the extent possible
- Providing contact information enables better investigation and communication
- Anonymous grievants cannot receive direct updates

8.3 Third-Party Submissions

Grievances may be submitted by:

- Legal representatives on behalf of grievants
- Trade unions or worker representatives
- NGOs or civil society organizations
- Family members (with consent) in cases of vulnerability

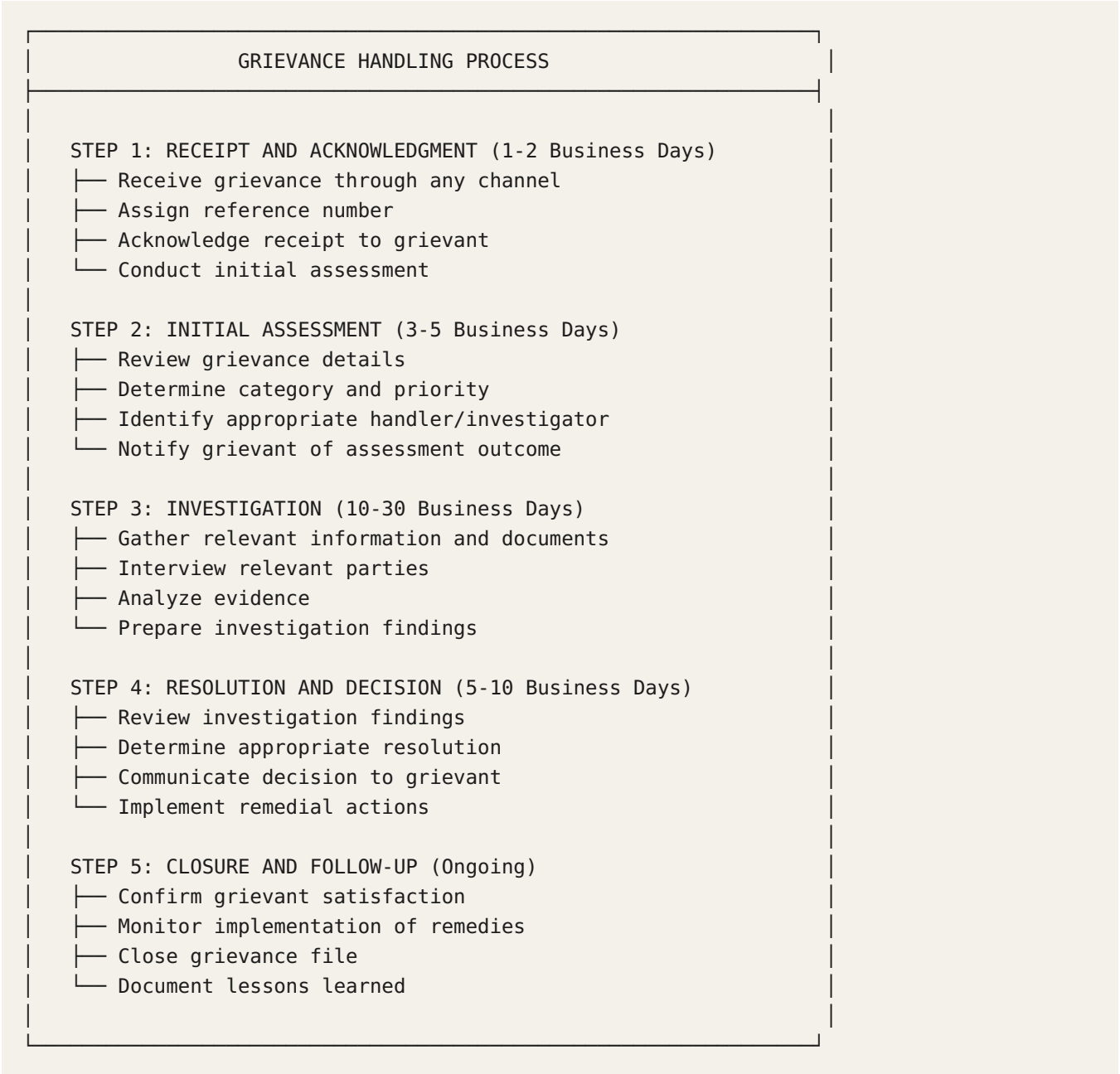
8.4 Language

Grievances may be submitted in:

- English
- Arabic
- Other languages (translation will be arranged)

9. GRIEVANCE HANDLING PROCEDURES

9.1 Process Overview



9.2 Step 1: Receipt and Acknowledgment

Actions:

1. **Receive** the grievance through any available channel
2. **Log** the grievance in the grievance register
3. **Assign** a unique reference number (format: GRV-YYYY-NNN)
4. **Acknowledge** receipt to the grievant within 1-2 business days
5. **Assess** urgency and take immediate action if required

Acknowledgment includes:

- Reference number
- Name of assigned handler
- Next steps in the process
- Expected timeline
- Contact for questions

9.3 Step 2: Initial Assessment**Actions:**

1. **Review** the grievance to understand the issues
2. **Categorize** by type and severity
3. **Prioritize** based on urgency and impact
4. **Determine** if immediate protective measures are needed
5. **Assign** to appropriate handler or investigator
6. **Notify** grievant of assessment outcome

Assessment Criteria:

Factor	Consideration
Severity	Potential harm or impact
Urgency	Time-sensitive elements
Complexity	Number of issues, parties involved
Evidence	Availability of documentation
Jurisdiction	Internal vs. external matter

9.4 Step 3: Investigation**Actions:**

1. **Plan** the investigation scope and approach
2. **Collect** relevant documents and records
3. **Interview** the grievant (with their consent)
4. **Interview** the respondent and witnesses
5. **Analyze** all evidence objectively
6. **Document** findings thoroughly
7. **Update** grievant on progress (at least weekly)

Investigation Standards:

- Impartial and objective
- Thorough and comprehensive

- Respectful of all parties
- Confidential
- Well-documented

9.5 Step 4: Resolution and Decision

Actions:

1. **Review** investigation findings
2. **Consult** relevant stakeholders as needed
3. **Determine** appropriate resolution/remedy
4. **Prepare** written decision with reasons
5. **Communicate** decision to grievant
6. **Implement** agreed remedial actions

Possible Resolutions:

Type	Examples
Corrective Action	Policy change, process improvement, training
Remedial Action	Compensation, reinstatement, apology
Disciplinary Action	Warning, suspension, termination
Mediation	Facilitated discussion between parties
No Action	Grievance not substantiated (with explanation)

9.6 Step 5: Closure and Follow-Up

Actions:

1. **Confirm** grievant has received the decision
2. **Verify** remedial actions have been implemented
3. **Check** grievant satisfaction with resolution
4. **Inform** grievant of appeal options if dissatisfied
5. **Close** the grievance file
6. **Document** lessons learned
7. **Monitor** for any retaliation

10. INVESTIGATION PROCESS

10.1 Investigation Principles

All investigations will be conducted according to these principles:

Principle	Application
Presumption of Good Faith	Assume grievant is raising genuine concerns
Impartiality	Investigator has no conflict of interest
Thoroughness	All relevant evidence is examined
Fairness	Both parties given opportunity to respond
Confidentiality	Information shared only as necessary
Timeliness	Investigation completed within stated timelines

10.2 Investigator Selection

Investigators will be selected based on:

- No personal or professional conflict of interest
- Appropriate experience and training
- Sufficient authority to conduct the investigation
- Availability to complete within required timeframe

For serious matters, external investigators may be engaged.

10.3 Evidence Collection

Types of Evidence:

- Documentary evidence (emails, records, policies)
- Witness statements (interviews, written accounts)
- Physical evidence (CCTV footage, photographs)
- Expert opinions (where relevant)

Evidence Standards:

- Chain of custody maintained
- Documents preserved in original form
- Witness statements accurately recorded
- Evidence securely stored

10.4 Interviews

Grievant Interview:

- Conducted in private, comfortable setting
- Grievant may have support person present
- Questions asked sensitively and respectfully
- Grievant given opportunity to provide full account

Respondent Interview:

- Informed of allegations (unless it would compromise investigation)
- Given opportunity to respond
- May have support person present
- Treated fairly without prejudgment

Witness Interviews:

- Conducted separately and confidentially
- No leading questions
- Witnesses reminded of confidentiality

10.5 Investigation Report

The investigation report includes:

1. **Summary** of the grievance
2. **Methodology** used in investigation
3. **Evidence** gathered and analyzed
4. **Findings** on each allegation
5. **Conclusions** and reasoning
6. **Recommendations** for resolution

11. RESOLUTION TIMELINES

11.1 Standard Timelines

Stage	Timeline
Acknowledgment	1-2 business days from receipt
Initial Assessment	3-5 business days from acknowledgment
Investigation	10-30 business days (depending on complexity)
Resolution Decision	5-10 business days from investigation completion
Implementation	As specified in resolution
Appeal Period	10 business days from decision

11.2 Priority Cases

Expedited timelines apply for:

Type	Timeline
Immediate Safety Risk	Same day response, investigation within 5 days
Ongoing Harassment	Investigation within 10 days
Discrimination	Investigation within 15 days
Financial Crime	Investigation within 15 days

11.3 Extensions

Timeline extensions may be granted when:

- Investigation is complex
- Multiple parties or locations involved
- External input required
- Grievant requests extension

Extension Process:

- Grievant notified of extension and reasons
- New timeline provided
- Regular updates continue

12. CONFIDENTIALITY

12.1 Confidentiality Commitment

Meridas Gold commits to maintaining confidentiality throughout the grievance process:

Confidential Information Includes:

- Identity of the grievant
- Details of the grievance
- Identity of the respondent
- Investigation proceedings
- Resolution outcomes

12.2 Information Sharing

Information will be shared only:

- With those who need to know for investigation purposes
- As required by law
- With grievant's consent
- To protect safety

12.3 Confidentiality Limits

Complete confidentiality cannot be guaranteed when:

- Disclosure is required by law
- Safety is at risk
- Investigation requires sharing information
- Regulatory reporting is required

In such cases, grievants will be informed to the extent possible.

12.4 Confidentiality Obligations

All persons involved in grievance handling must:

- Not disclose grievance information to unauthorized persons
- Use information only for grievance handling purposes
- Secure all grievance documents
- Sign confidentiality agreements when required

Breach of confidentiality is a serious violation subject to disciplinary action.

13. NON-RETALIATION

13.1 Zero Tolerance for Retaliation

Meridas Gold has **Zero Tolerance** for retaliation against anyone who:

- Files a grievance in good faith
- Provides information during an investigation
- Participates as a witness
- Refuses to participate in wrongdoing
- Supports someone who raised a concern

13.2 What Constitutes Retaliation

Retaliation includes any adverse action, such as:

Type	Examples
Employment Actions	Termination, demotion, suspension
Compensation	Reduction in salary, denial of bonus
Work Conditions	Unfavorable assignments, exclusion from meetings
Treatment	Harassment, bullying, isolation
Career Impact	Denial of training, negative references
Informal Actions	Gossip, social exclusion, intimidation

13.3 Retaliation Protections

Protective Measures:

- Monitoring of grievant's situation after filing
- Separation from respondent where appropriate
- Regular check-ins with grievant
- Swift action if retaliation is suspected

13.4 Reporting Retaliation

Anyone who experiences or witnesses retaliation should immediately report it to:

- **Compliance Officer:** compliance@meridasgold.com
- **Phone:** +971 50 968 01 65

13.5 Consequences for Retaliation

Retaliation will result in:

- Immediate investigation
- Disciplinary action against retaliator (up to termination)
- Remedial action for affected person
- Potential legal consequences

14. ESCALATION PROCEDURES

14.1 When to Escalate

Grievances should be escalated when:

Situation	Escalation Level
Grievance involves senior management	Compliance Officer or Board
Grievance against Compliance Officer	Managing Director or Board
Systemic issues identified	Senior Management
Legal or regulatory implications	Legal Counsel and Board
Resolution not achieved at lower level	Next management level
Safety or security concerns	Immediate senior management

14.2 Escalation Levels

Level 1: Direct Manager / HR
 ↓
 Level 2: Department Head / Compliance Officer
 ↓
 Level 3: Senior Management / Managing Director
 ↓
 Level 4: Board of Directors
 ↓
 Level 5: External (Regulatory / Legal)

14.3 Escalation Process

1. **Document** reason for escalation
2. **Transfer** complete grievance file to escalation level
3. **Brief** escalation authority on status
4. **Notify** grievant of escalation
5. **Continue** processing at escalated level

15. APPEAL PROCESS

15.1 Right to Appeal

Grievants who are dissatisfied with the resolution have the right to appeal.

15.2 Grounds for Appeal

Appeals may be filed based on:

- New evidence not previously considered
- Procedural errors in handling
- Disproportionate or inadequate resolution
- Failure to address all issues raised
- Evidence of bias or unfairness

15.3 Appeal Procedure

Step	Action	Timeline
1	Submit written appeal to Compliance Officer	Within 10 business days of decision
2	Appeal acknowledged	Within 2 business days
3	Appeal reviewed by Appeal Authority	Within 15 business days
4	Appeal decision communicated	Within 5 business days of review

15.4 Appeal Authority

Original Decision Maker	Appeal Authority
Manager	Department Head
Department Head	Compliance Officer
Compliance Officer	Managing Director
Managing Director	Board of Directors

15.5 Appeal Decision

The appeal decision is final and may:

- Uphold the original decision
- Modify the resolution
- Overturn the decision
- Order further investigation

16. RECORD KEEPING

16.1 Grievance Records

Meridas Gold maintains records of all grievances including:

Document	Retention Period
Grievance Register	Permanent
Grievance Files	7 years after closure
Investigation Reports	7 years after closure
Resolution Documents	7 years after closure
Appeal Records	7 years after closure
Anonymous Submissions	7 years after closure

16.2 Record Security

Grievance records are:

- Stored securely (physical and electronic)
- Accessible only to authorized personnel
- Protected by confidentiality protocols
- Backed up regularly

16.3 Grievance Register

The Compliance Officer maintains a Grievance Register containing:

- Reference number
- Date received
- Category/type
- Status
- Resolution date
- Outcome summary

16.4 Statistical Reporting

Aggregate statistics (without identifying information) are reported to:

- Senior Management: Monthly
- Board of Directors: Quarterly

17. WHISTLEBLOWER INTEGRATION

17.1 Relationship to Whistleblowing

This Grievance Policy works alongside Meridas Gold's commitment to whistleblower protection:

Grievance	Whistleblower Report
Personal concern or complaint	Report of wrongdoing in public interest
Seeks personal resolution	Seeks organizational change
May involve personal remedy	May not involve personal remedy

17.2 Whistleblower Protections

Reports of serious wrongdoing receive enhanced protections:

- Highest level of confidentiality
- Immediate escalation to appropriate level
- External reporting rights preserved
- Enhanced non-retaliation monitoring

17.3 When Grievances Become Whistleblower Reports

A grievance may be reclassified as a whistleblower report if it reveals:

- Financial crime or fraud
- Regulatory violations
- Safety risks to others
- Environmental violations
- Human rights abuses
- Other matters of public interest

18. EXTERNAL GRIEVANCES

18.1 Supply Chain Grievances

Meridas Gold accepts grievances from supply chain stakeholders:

Who Can File:

- Supplier employees
- Mining community members
- Artisanal miners
- Civil society organizations
- Anyone affected by supply chain activities

How to File:

- Email: compliance@meridasgold.com
- Phone: +971 50 968 01 65
- Written submission to Meridas Gold offices

18.2 Customer Grievances

Customer grievances are handled by:

- Initial contact: Customer service
- Escalation: Compliance Department
- Formal grievance: This policy applies

18.3 Community Grievances

Community members may raise concerns about:

- Environmental impact
- Social impact
- Noise or traffic
- Any other community concern

Community grievances receive:

- Respectful acknowledgment
- Good faith investigation
- Transparent communication
- Meaningful engagement

18.4 External Reporting

Grievants retain the right to report concerns to:

Authority	Jurisdiction
MOHRE	Labor disputes
SAIF Zone Authority	Free zone matters
Ministry of Economy and Tourism (MoET)	Supply chain concerns
UAE FIU	Financial crime
Police	Criminal matters

19. MONITORING AND CONTINUOUS IMPROVEMENT

19.1 Key Performance Indicators

Indicator	Target
Acknowledgment within timeline	100%
Investigation completed within timeline	90%
Grievant satisfaction with process	>80%
Retaliation incidents	Zero
Appeals as percentage of resolutions	<10%

19.2 Monitoring Activities

- Monthly review of grievance statistics
- Quarterly analysis of trends and patterns
- Annual policy review
- Periodic stakeholder feedback

19.3 Continuous Improvement

Meridas Gold uses grievance data to:

- Identify systemic issues
- Improve policies and procedures
- Enhance training programs
- Strengthen controls
- Prevent recurrence

19.4 Stakeholder Feedback

Meridas Gold periodically seeks feedback on the grievance mechanism from:

- Employees (annual survey)
 - Suppliers (periodic consultation)
 - External stakeholders (as appropriate)
-

20. RESPONSIBILITIES

20.1 Board of Directors

- Approve this Grievance Policy
- Receive quarterly grievance reports
- Hear appeals in serious matters
- Ensure adequate resources

20.2 Senior Management

- Support grievance handling
- Address systemic issues
- Enforce non-retaliation
- Model appropriate behavior

20.3 Compliance Officer

Appointed Compliance Officer (effective 05 August 2025): Shoraf Yasin Thakur

Responsibilities:

- Oversee grievance mechanism
- Receive and coordinate handling of grievances
- Investigate or assign investigators
- Report to Board
- Ensure confidentiality and non-retaliation
- Maintain grievance records
- Monitor and improve the mechanism

20.4 Human Resources

- Handle employment-related grievances
- Support investigation processes
- Implement HR-related remedies
- Maintain employee confidentiality

20.5 Managers

- Create environment where concerns can be raised
- Receive grievances professionally
- Escalate appropriately
- Prevent retaliation
- Cooperate with investigations

20.6 All Employees

- Raise concerns in good faith
- Cooperate with investigations
- Maintain confidentiality
- Refrain from retaliation

21. RELATED POLICIES

This Grievance Policy should be read in conjunction with:

Policy	Relationship
Code of Ethics and Conduct	Standards of conduct
Zero Tolerance Policy	Serious violations
Human Rights Policy	Human rights commitments
Anti-Bribery and Anti-Corruption Policy	Corruption concerns
AML/CFT/CPF Policy	Financial crime concerns
Supply Chain Due Diligence Policy	Supply chain concerns
Environment, Health and Safety Policy	Safety concerns

22. ACKNOWLEDGMENT

Employee Acknowledgment Statement

I acknowledge that I have received, read, and understood the Meridas Gold Refinery FZC Grievance and Whistleblowing Policy. I understand my rights under this policy, including how to raise a grievance or whistleblower report and the protections available to me. I commit to participating in good faith in the grievance process if required.

Field	Details
Employee Name	_____
Employee Signature	_____
Date	_____
Department	_____

23. CONTACT INFORMATION

23.1 Grievance Contacts

Channel	Details
Compliance Officer	Shoraf Yasin Thakur
Email	compliance@meridasgold.com
Phone	+971 50 968 01 65
Office Hours	Monday - Saturday, 9:00 AM - 5:00 PM

23.2 For Urgent Matters

Urgent grievances (safety risks, ongoing harassment) can be reported at any time:

- **Phone:** +971 50 968 01 65

23.3 Alternative Contacts

Contact	For
HR Department	Employment-related grievances
Direct Manager	Initial workplace concerns
Senior Management	Escalated matters

CONCLUSION

Meridas Gold Refinery FZC's Grievance Policy reflects our commitment to fairness, transparency, and continuous improvement. We want to know when things go wrong so we can make them right.

Every grievance is taken seriously. Every voice matters. Every concern deserves a fair hearing.

We encourage all stakeholders to use this mechanism with confidence. Your concerns help us become a better organization, and we are committed to handling them with integrity and respect.

Speak up. Be heard. Be protected.

END OF DOCUMENT

This document is the property of Meridas Gold Refinery FZC and should be distributed to all employees and stakeholders.