



IDG Group DMCC

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COMMENTS AND COMPLAINTS POLICY

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COMMENTS AND COMPLAINTS POLICY

1. Aim

IDG is committed to the highest standards of performance and behaviour. In so doing, we recognise that our clients, stakeholders and those with whom we interact may wish to comment, or perhaps complain, about our performance.

We welcome all feedback, both positive and negative, and seek to use this information for continuous improvement and to allow us to rapidly rectify mistakes or improve our standards.

2. Scope

The following Policy sets out the procedure by which individuals or organisations can report concerns about:

- Potentially dangerous, illegal or unethical workplace practices
- Poor standards of performance or behaviour
- Suggestions for improvement.

Additionally, this Policy is also intended to help us identify where we are performing well and to identify organisational or individual actions that deserve recognition:

- Examples of workplace practices that are especially helpful, useful, effective or otherwise welcome
- Individuals actions who go 'above and beyond' and are worthy of recognition
- General observations and comments that enable us to improve.

3. Specific areas of interest

IDG is committed to the particular sets of principles that guide of business, professional and personnel behaviour. We are particularly interested in any concerns that are covered by these:

The **International Code of Conduct**

http://icoca.ch/sites/default/files/resources/ICoC_English.pdf



The United National Global Compact

4. Anonymity

IDG welcomes all feedback, but is conscious that many prefer to submit their observations anonymously. Our system is designed to reflect this and is by default anonymous, therefore we offer contributors the ability to 'opt in'.

5. Personnel responsible for implementation of policy

The Board has overall responsibility for the Company's policy on comments and complaints, but delegate day-to-day responsibility for overseeing and implementing it to the Designated Officer (DO).

Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the organisation resulting from investigations into complaints under the policy lies with the Board.

IDG's Designated Officer is a senior manager of the parent company IDG Group DMCC, Mr Nick Alistar-ones.

6. How do I make a comment or a complaint?

IDG's website offers a 'Make a Comment' function on its 'Contact Us' page. By selecting this option, you will be given a short online form to complete. The form asks for some basic information with which to provide the context for the comment or complaint – but **submission of this information is optional**.

The core of the form is a section in which your comment or complaint can be recorded. At the end of the form there exists an option to provide your contact details should you wish to do so – but again, **submission of this information is optional**. Should you wish to provide your details, you may also select an option that requires us to respond directly to your comment or complaint using the contact details provided. Where a comment or complaint is received anonymously the actions taken by IDG in response to this will not be made available to you, nor will they be published for viewing.



6.1. Alternative

Should the website be unavailable for any reason, or not your preferred method of communicating a comment or complaint, we welcome emails to the following address:

comments@idg-security.com

This email address is monitored by IDG's Designated Officer. As the online form is not available, we would suggest that the following information may be given – but this is **entirely at your discretion**:

- Date
- Time
- Location
- Description of incident that merits the complaint/comment
- Your contact details
- A statement that you do/do not wish to receive feedback

Please state that you are using the Comments and Complaints Policy and specify whether you wish your identity to be kept confidential.

7. Investigation of a Complaint and Subsequent Actions

IDG is committed to investigating complaints fully, fairly, quickly and confidentially where circumstances permit. Following the receipt of a complaint the DO (or another individual acting in their place) will make appropriate arrangements for investigation.

The length and scope of the DO's investigation will depend on the subject matter of the disclosure. In most instances, the DO will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure can be very quickly rectified by immediate managerial direction.

If a longer investigation is necessary, the DO will conduct an internal investigation and may elect to include specialist personnel with experience of the operating workplace procedures or specialist knowledge of the subject matter under investigation.

The investigation will conclude to determine the detail of the complaint and will make recommendations for subsequent action. These recommendations may include both disciplinary actions, changes to policy and procedure, or possibly disclosure to relevant authorities or agencies



should it be required. The recommendations will be submitted to the Board for approval. The Board will then be responsible for overseeing the implementation of the actions they have authorised.

Should you have chosen to seek feedback on your comment or complaint, the DO will write, via email, to advise you on the findings of the investigation and the actions taken as a result.

8. Dealing with Comments

IDG does not anticipate 'comments' requiring an investigation, though the DO may at his discretion choose to conduct an investigation.

Where an individual has been singled out for praise, IDG is committed to ensuring recognition for that individual. A record of the positive comment will be held on their personal file, and IDG may also choose to make a financial reward (a form of discretionary bonus). Where a policy, procedure or organisational comment has been recognised, IDG will seek to ensure this is established as best practice through changes to Policy, operating procedures, training programmes, managerial direction, and other details operational areas such as Guard Post orders, etc.

9. Monitoring and review of policy

This policy reflects IDG's practice as at September 2015.

The DO, in conjunction with the Board will be responsible for reviewing this policy from a legislative and operational perspective at least annually.