

GRIEVANCE, COMPLAINTS AND DISCIPLINARY PROCEDURES

5.1 Grievance procedure

5.1.1 The object of the grievance procedure is to enable employees, who consider they have a grievance or complaint arising from their employment with Stent International to have it dealt with at the nearest appropriate level within as short a time as possible. This include such acts or omissions that would violate the principles contained in the ICoC Code. This procedure also applies to 3rd parties.

Anyone wishing to use this procedure can do so freely and without prejudice to his/her position in the Stent International. It applies to all employees, irrespective of job or grade and is designed to help all employees take the appropriate action should they be experiencing difficulties. Any investigate allegations will be promptly, impartially and with due consideration to Confidentiality of all including 3rd parties;

Stent International encourage personnel and third parties 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 ICoC Code. Stent International procedures are fair, accessible and offer effective remedies, including recommendations for the prevention of recurrence. We facilitate reporting by persons with reason to believe that improper or illegal conduct, or a violation of the ICoCA Code, has occurred or is about to occur, of such conduct, to designated individuals within a Company and, where appropriate, to competent authorities.

Stent International will cooperate with official investigations, and will not participate in or tolerate from their Personnel, the impeding of witnesses, testimony or investigations.

5.1.2 Stent International grievance procedure is not a substitute for good day to day communication, where employees and 3rd parties are encouraged to discuss and resolve daily working issues in a national website supportive atmosphere. In the interests of good working relations, you should try to resolve any issues informally with your immediate superior or Manager. However if this informal approach does not work, then you may wish to formally raise a grievance with the management or directors of the Company. Personnel are required to participate in the following standard statutory three-step grievance procedure:

5.1.2.1 The Written Statement

You must set out your grievance in writing to your immediate superior stating the basis of your complaint. If your immediate superior is the Director the grievance can be raised with a senior member of management. If the complaint or grievance relates to your immediate superior, the grievance can be raised with another senior member of staff or the Director.

3rd Parties are invited to inform Stent International of any complaints including such acts or omissions that would violate the principles contained in the ICoC Code, via the email address



icogrievance@stentinternational.com and the appropriate complaints procedure form on their website www.stentinternational.com.

5.1.2.2 Meeting

On receiving the grievance a manager/director will invite you to a meeting as soon as is practicable to discuss the issue. You have a right to be accompanied by a fellow employee or trade union official to this meeting. Every effort will be made to convene the grievance meeting at a time that is convenient for you and your companion to attend. You must take all reasonable steps to attend the grievance meeting.

At this meeting you will be asked to explain the issue and how you think it could be settled. The manager/director can, at any time during this meeting should they think it necessary, adjourn the meeting to get advice or further information. Every opportunity will be given for your grievance to be stated and thoroughly discussed.

The Company will then endeavour to respond to your grievance in writing within a reasonable time but in any event no later than 10 working days after the meeting unless extended by mutual agreement.

On Receipt of a 3rd party complaint a director will contact the 3rd party within 10 days to discuss the complaint in detail. This can be via telephone, skype or email. If it is appropriate and agreeable to all parties a meeting can be held. Every opportunity will be given for a 3rd party to have the complaint thoroughly discussed.

After 3rd party discussions an internal investigation may be needed to be undertaken following which written decision of the investigation will be sent to the 3rd party.

5.1.2.3 Appeal

If you are not satisfied with the decision you may appeal in writing within 5 working days of receiving the written decision.

The Company will then arrange a further meeting. If it is practicable within the Company, the appeal shall be heard by a more senior manager/director than the person who heard the original grievance.

You have a right to be accompanied by a fellow employee or trade union official to this appeal meeting.

Following the appeal meeting the Company will endeavour to respond to your grievance in writing within a reasonable time but in any event no later than 10 working days after the meeting unless extended by mutual agreement.

If a 3rd party is not satisfied with the decision they may appeal in writing within 5 working days of receiving the written decision.

The Company will then arrange a further meeting. If it is practicable within the Company, the appeal shall be heard by a more senior manager/director than the person who heard the original 3rd party complaint.

Following the appeal meeting the Company will endeavour to respond to the 3rd party complaint in writing within a reasonable time but in any event no later than 10 working days after the meeting unless extended by mutual agreement.

The appeal decision is final and the grievance/3rd party complaints procedure is exhausted following this stage.

- 5.1.3 Written records of the grievance will be retained by the Company. These records will be confidential and kept in accordance with the Data Protection Act 1998. Only parties involved in the 3rd party complaint will have access to the written and electronic files apart from when prohibited or protected by applicable law, then such records should be made available to a Competent Authority on request.

5.2 Disciplinary procedure

Whilst the Company does not intend to impose unreasonable rules of conduct on its employees, certain standards of behaviour are necessary to maintain good employment relations and discipline in the interest of all employees. The Company prefers that discipline be voluntary and self-imposed and in the great majority of cases this is how it works. However, from time to time, it may be necessary for the Company to take action towards individuals whose level of behaviour or performance is unacceptable.

5.2.1 Objectives

- 5.2.1.1 To take disciplinary action in as uniform and consistent a manner as possible.
- 5.2.1.2 To take disciplinary action only after careful investigation of the facts and after the employee has had the opportunity to present his/her case.
- 5.2.1.3 To take disciplinary action with the aim of correcting the employee's behaviour wherever possible rather than simply punishing him/her.
- 5.2.1.4 To take into account the circumstances of each case giving consideration to any employees whose past record demonstrates a willingness to abide by accepted standards of conduct and fulfil the terms of their employment.
- 5.2.1.5 To apply progressively more severe penalties to those employees who show that previous disciplinary action has been ineffective in producing the desired improvement.
- 5.2.1.6 To deal sufficiently and effectively with cases of serious and gross misconduct.
- 5.2.1.7 To provide employees with a right of appeal against all disciplinary actions taken by the employer by way of written warning.

5.2.1.8 To allow personnel and third parties 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 ICoCA Code.

5.2.1.9 To investigate allegations promptly, impartially and with due consideration to confidentiality;

5.2.2 Disciplinary rules

Stent International encourage personnel and third parties 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 ICoC Code. Stent International procedures are fair, accessible and offer effective remedies, including recommendations for the prevention of recurrence. We facilitate reporting by persons with reason to believe that improper or illegal conduct, or a violation of the ICoCA Code, has occurred or is about to occur, of such conduct, to designated individuals within a Company and, where appropriate, to competent authorities.

Stent International ensure Personnel and 3rd parties who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

5.2.2.1 The Company requires good standards of discipline from its employees, together with satisfactory standards of work. These disciplinary procedures apply to any misconduct or failure to meet standards of performance or attendance.

5.2.2.2 The purpose of the procedure is to be corrective rather than punitive and it should be recognised that the existence of procedures such as these is to help and encourage you to achieve and maintain standards of conduct, attendance and job performance and to ensure consistent and fair treatment for all employees.

5.2.2.3 If your standard of work or conduct falls and, after warnings, remains below the level which is acceptable, you may be dismissed.

5.2.2.4 Summary dismissal without notice will take place if an act of gross misconduct is committed. Gross misconduct is any deliberate act by an employee that is detrimental to the good conduct of the Company's business. Examples of misconduct and gross misconduct are listed below.

5.2.3 Examples of misconduct and serious misconduct

The following is a non-exhaustive list of examples of offences which amount to misconduct falling short of gross misconduct:

- unauthorised absence from work
- lateness

- unacceptable performance
- inappropriate standard of dress
- time wasting
- contravention of minor safety regulations
- disruptive behaviour
- unauthorised use of the telephone
- minor breaches of the Money Laundering Regulations
- any clauses within this Company Handbook that state they may be construed as misconduct or serious misconduct.

5.2.4 Examples of gross misconduct

The following is a non-exhaustive list of examples of offences which amount to gross misconduct:

- dishonesty
- falsification of Company records (including clock cards/time sheets/commission claims)
- failure to comply with relevant statutory or regulatory requirements
- serious insubordination or a series of insubordinate acts.
- miss -use of the Company's sickness policy
- violent, abusive or intimidating conduct
- deliberate damage to Company property
- wilful refusal to carry out reasonable and proper requests
- sexual, racial or other harassment
- unauthorised use or disclosure of confidential information
- attending work under the influence of alcohol or non-medically prescribed drugs
- reckless or serious misuse of a Company vehicle
- rudeness to clients
- any action likely to bring the Company into disrepute
- accepting a gift which could be construed as a bribe
- sleeping on duty
- breach of Health and Safety rules which endanger the health and safety of others
- refusing to allow a search to be carried out in accordance with current legislation
- failure to disclose correct information on your application form
- conviction for any serious criminal offence while an employee of the Company. If the avoidance of doubt, this includes any offence involving violence, whether or not you are sentenced to a term of imprisonment.
- carrying out work in a private capacity for a client or competitor of the Company
- unauthorised removal of Company or customer property
- theft
- miss-use of a Company credit card
- physical assault of any member of staff or customer or member of the public
- acceptance of bribes to the detriment of the Employer or employees
- serious breaches of the Money Laundering Regulations
- using a non-hands free mobile telephone whilst driving
- any clauses within this Company Handbook that state that they may be construed as gross misconduct

- this include such acts or omissions that would violate the principles contained in the ICoC Code

5.2.5 Disciplinary hearings

5.2.5.1 No disciplinary action will be taken until the case has been fully investigated. In the event of serious or gross misconduct, an employee may be suspended while a full investigation is carried out. Such suspension will be on full basic pay. Suspension is a neutral act, which does not imply guilt or blame, and will be for as short a period as possible. Suspension is not considered a disciplinary action.

5.2.5.2 Very minor cases of misconduct or unsatisfactory performance will be dealt with informally. However if the misconduct or unsatisfactory performance is considered to be more serious, or informal action does not bring about an improvement, the Company may then take formal action against you.

5.2.5.3 Written statement

You will be informed in writing of the alleged disciplinary breach and the basis of such allegations. In this letter you will be invited to a meeting at which the alleged disciplinary breach can be discussed. Should any documentation be intended to be produced at the meeting, a copy of that documentation will be sent to you in this letter. You will be given a reasonable time, usually and if practical, two working days, to consider your response to the allegations before the meeting take place.

5.2.5.4 Meeting

At the meeting you will be given the opportunity to state your case and answer any allegations that have been made. You will be allowed to ask questions, present evidence, call witnesses and be given an opportunity to raise points about any information provided by witnesses.

You may, if you wish, be accompanied by a fellow employee or a trade union official of your choice at any disciplinary hearing.

Should you fail to attend a pre-arranged meeting without good reason, a decision may be taken in your absence.

You will be informed of the decision of the Company within a reasonable time but in any event no later than 10 working days after the meeting unless extended by mutual agreement.

5.2.5.5 Appeal

If you are dissatisfied with any disciplinary decision affecting you, you may appeal within 5 working days of receiving the written decision to the level of management immediately



above that at which the decision was taken. The Company will then arrange a further meeting.

Any appeal must be put in writing, stating the grounds for the appeal. If possible the appeal will be heard by at least one manager/director who has not been involved in the initial proceedings. The appeal with review, but cannot increase, a disciplinary penalty.

If it is practicable within the Company, the appeal shall be heard by a more senior manager/Director than the person who held the original disciplinary.

You have a right to be accompanied by a fellow employee or trade union official to this appeal meeting.

Following the appeal meeting the Company will endeavour to respond to you in writing within a reasonable time but in any event no later than 10 working days after the meeting unless extended by mutual agreement.

If the disciplinary action which is the subject of the appeal is your dismissal the decision to dismiss will stand unless it is reversed on appeal.

The decision of the Director/manager's hearing the appeal is final. There is no further right of internal appeal.

5.2.6 Written records of the disciplinary process will be retained by the Company. These records will be confidential and kept in accordance with the Data Protection Act 1998.

5.2.7 Rules for suspension of staff

In the event of suspected serious or gross misconduct an employee may be suspended while a full investigation is carried out. Such suspension does not imply guilt or blame in any way.

5.2.7.1 Suspension will be on full pay and you will be informed in writing of this at the time.

5.2.7.2 The suspension will not normally be for more than five days but the Company may, at its absolute discretion increase this time. Further periods of suspension may be unpaid.

5.2.8 Disciplinary Action

Except for acts of gross misconduct, the following procedure will normally be adopted, but the Company may, at its discretion, start at any stage in the procedure.

5.2.8.1 STAGE 1: For relatively minor breaches of discipline, or failure to achieve satisfactory standards, a WRITTEN WARNING will be given. **You will be advised of the reason for the warning, how you need to improve your conduct or performance, (if applicable) the timescale over which the improvement is to be achieved, that the warning is the first stage of the formal disciplinary procedure and the likely consequences if the terms of the warning are not complied with.** This will be removed from your personnel file after 6 months in the absence of further offences.



5.2.8.2 STAGE 2: Failure to improve performance in response to the procedure so far, a repeat of misconduct for which a warning has previously been issued, or a first instance of serious misconduct or serious poor performance, will result in a FINAL WRITTEN WARNING being issued. This will set out the nature of the misconduct or poor performance, how he or she needs to improve their conduct or performance, the timescale over which the improvement is to be achieved and warn that dismissal will probably result if the terms of the warning are not complied with. This final written warning will be recorded but nullified after twelve months, subject to satisfactory conduct and performance

5.2.8.3 STAGE 2 :In the event of any further misconduct or failure to achieve satisfactory standards or the case of misconduct not amounting to gross misconduct but warranting dismissal, DISMISSAL may result. Dismissal can be authorised only by a senior manager or a Director. You will be informed of the reason for dismissal, the appropriate period of notice, the date on which your employment will terminate and how you can appeal against the dismissal decision.

The Company reserves its rights to vary the length that warnings will be held on your personnel file.

In cases of gross misconduct, you will normally be dismissed without notice or pay in lieu of notice. In exceptional circumstances, or if there are any genuine mitigating circumstances, alternative disciplinary action may be taken such as a final written warning together with punitive sanctions such as demotion, transfer, or suspension of an increment.