Stakeholder Grievance Procedure

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Introduction

Maris Seafoods Ltd recognises its responsibility to listen and respond to concerns raised by the people and organisations affected by our business.

We are committed to providing a fair, accessible and transparent process through which stakeholders can raise concerns about our social, environmental or ethical impacts. Stakeholders should be able to raise genuine concerns safely and without fear of retaliation or other negative consequences.

All grievances raised in good faith will be taken seriously and handled with fairness, confidentiality and respect.

This procedure has been established to:

- Provide stakeholders with a clear and accessible way to raise grievances.
- Explain the types of concerns that may be accepted as grievances.
- Set out how grievances will be assessed, investigated and resolved.
- Establish target timescales for responding to grievances.
- Protect stakeholders who raise concerns in good faith from retaliation.
- Explain how Maris will communicate with stakeholders throughout the process.
- Assign responsibility for recording, investigating and resolving grievances.
- Support Maris in identifying recurring concerns and improving its practices.

Scope

This procedure is available to anyone who may be affected by, or have a legitimate interest in, the activities of Maris Seafoods Ltd or its value chain. This includes:

- Employees and workers.
- Customers and consumers.
- Suppliers and business partners.
- Workers within our supply chain.
- Contractors and service providers.
- Local communities.
- Non-governmental organisations.

- This procedure covers grievances relating to Maris Seafoods Ltd, its employees, its activities or its value chain partners where the concern is connected to Maris' business.
- Employee-specific workplace grievances should normally be raised through the **Employee Grievance Policy**.

Customer concerns relating specifically to product quality, safety, labelling or service should normally be raised through

Where a concern is submitted through the wrong process, Maris will direct it to the appropriate person or procedure wherever possible.

4. Definitions

Grievance

A grievance is a concern, complaint or claim relating to an actual or potential negative social, environmental or governance impact connected to Maris' activities, products, services or business relationships.

A grievance may be raised by an individual, a group or a representative acting on behalf of an affected stakeholder.

4.2 Stakeholder

A stakeholder is any individual or organisation that affects, or may be affected by, Maris' decisions or activities.

4.3 Grievance Officer

The Grievance Officer is the person responsible for receiving, recording, coordinating and monitoring grievances raised under this procedure.

The Grievance Officer will not have responsibility for resolving severe grievances; these will be appointed to the appropriate senior member of staff.

The appointed Grievance Officer is:

Name or role: Jodie Gibbins
Email: jgi@marisseafoods.co.uk

Accessibility

This procedure and the grievance submission form will be publicly available at Speak Up – Report a Concern - Maris Seafoods.

Principles

Maris will manage grievances according to the following principles:

- **Accessibility:** The process will be clearly available and reasonably accessible to affected stakeholders.
- **Fairness:** Each grievance will be considered fairly and without bias.
- **Impartiality:** Anyone directly involved in the subject of a grievance will not be responsible for investigating or deciding its outcome.
- **Timeliness:** Grievances will be addressed as promptly as reasonably possible.

- **Confidentiality:** Information will only be shared with people who need it to assess, investigate or resolve the grievance.
- **Transparency:** Stakeholders will be informed about the process, expected timescales and outcome, where possible or where contact information is provided.
- **Protection from retaliation:** Stakeholders raising concerns in good faith will be protected from retaliation, harassment or adverse treatment.
- **Good-faith engagement:** Maris will engage constructively with stakeholders to understand concerns and identify appropriate resolutions.
- **Legal compliance:** Grievances will be handled in accordance with applicable legal and regulatory requirements.

Grounds for Accepting a Grievance

A grievance may relate to matters including, but not limited to:

- Fraud, bribery, corruption or other financial misconduct.
- Breaches of legal or regulatory requirements.
- Human rights or labour rights concerns.
- Modern slavery forced labour or child labour.
- Discrimination, bullying, harassment or unfair treatment.
- Unsafe or unhealthy working conditions.
- Environmental damage, pollution or environmental risks.
- Animal welfare concerns.
- Irresponsible sourcing or supply chain practices.
- Misleading, unethical or irresponsible marketing such as greenwashing
- Breaches of Maris policies or supplier requirements.
- Unethical or otherwise improper business conduct.
- An actual or potential negative impact caused or contributed to by Maris or linked to its products, services or business relationships.

To help Maris assess the matter, stakeholders should provide as much relevant information as reasonably possible, including:

- A summary of the concern.
- Relevant dates and locations.
- The individuals or organisations involved.
- Any supporting information or evidence available.
- Whether the matter has previously been reported.
- The outcome or resolution being sought.

A lack of documentary evidence will not automatically prevent a grievance from being considered.

Maris may decide not to accept an issue as a formal grievance where:

- It is not connected to Maris' activities, products, services or business relationships.
- The grievance is a complaint about a product of Maris', this should be reported to support@marisseafoods.co.uk
- It is more appropriately handled under another established procedure.
- Insufficient information has been provided to allow a reasonable assessment, and Maris is unable to obtain clarification as contact details are not provided.
- The matter has already been investigated, and no significant new information has been provided.
- The submission is knowingly false, malicious or abusive.

Where a grievance is not accepted, Maris will explain the reason to the stakeholder, where contact details have been provided.

How to Raise a Grievance

A grievance can be raised through the following methods:

1. By completing the online form at Speak Up – Report a Concern - Maris Seafoods.
2. By emailing directly
3. In writing to:

Grievances may be raised anonymously via the online portal. However, providing contact details may help Maris request further information, provide updates and communicate the outcome.

Stakeholders may also ask for their identity to remain confidential. Maris will explain who may need to be informed or involved before sharing identifying information wherever reasonably possible. In many cases, the more information shared with Maris, the faster and easier the resolution is, however we understand that the option to report complete anonymously can protect the person raising the grievance.

Grievance Process

Step 1: Receipt and acknowledgement

All grievances will be passed to the Grievance Officer and recorded in the Stakeholder Grievance Register.

Where contact details have been provided, Maris will acknowledge receipt within **5 working days**, subject to grievance officers' availability

The acknowledgement will normally include:

- The grievance reference number.
- The name or role of the person handling the grievance.
- An outline of the next steps.
- The expected timescale for the initial assessment.
- Any request for further information.

Step 2: Initial assessment

The Grievance Officer will conduct an initial assessment to determine:

- Whether the concern falls within the scope of this procedure.
- Whether immediate action is required to protect people, animals or the environment.
- Whether the matter should be managed under another Maris procedure.
- Whether the grievance may be resolved informally.
- Whether a formal investigation is required.
- Whether there is any actual or potential conflict of interest.
- Whether additional measures are needed to protect the stakeholder from retaliation.

Maris will aim to communicate the outcome of the initial assessment within **5 working days** of acknowledging the grievance.

If the grievance is not accepted, Maris will explain why and, where possible, direct the stakeholder to a more appropriate process or organisation.

Step 3: Informal resolution

Where appropriate and agreed with the stakeholder, Maris may attempt to resolve the grievance informally.

This may involve:

- Providing an explanation or additional information.
- Correcting an error or misunderstanding.
- Agreeing immediate corrective action.
- Facilitating a discussion between the relevant parties.
- Referring the issue to the appropriate department, supplier or business partner.

Any agreed actions and timescales will be documented.

If the matter cannot be resolved informally, it will proceed to a formal investigation.

Step 4: Formal investigation

A formal investigation will be conducted by an impartial person with appropriate knowledge and authority.

Investigator: Investigator will be designated to an employee or other person/s that are agreed by senior leadership to be the most qualified to resolve the grievance

The investigator must declare any actual or potential conflict of interest. Where a conflict exists, another suitable person will be appointed.

The investigation may include:

- Reviewing documents, records and other available evidence.
- Speaking with the stakeholder who raised the grievance, if possible
- Speaking with the person, department or organisation against whom the grievance was raised.
- Obtaining information from suppliers or other business partners.
- Seeking specialist or independent advice where appropriate.

Maris will aim to complete the investigation within **30 working days**.

Where additional time is required, the stakeholder will be informed of the reason for the delay and provided with a revised target date.

Step 5: Outcome and resolution

Once the investigation is complete, Maris will document:

- The matters investigated.
- The evidence considered.
- The findings reached.
- Whether the grievance was upheld, partially upheld or not upheld.
- Any corrective, preventative or remedial actions agreed.
- The person responsible for each action.
- The target completion dates.

Possible actions may include:

- Correcting or stopping the activity causing the concern.
- Providing an apology, explanation or other appropriate remedy.
- Updating a policy, procedure or business practice.
- Providing additional training.
- Working with a supplier or business partner to address the issue.
- Taking disciplinary or contractual action where appropriate.
- Increasing monitoring or due diligence.
- Referring the matter to an appropriate external authority.

Where contact details have been provided, Maris will communicate the outcome in writing within **30 working days** of completing the investigation.

The information shared may be limited where necessary to protect confidentiality, personal information, legal privilege or the rights of other parties.

Step 6: Closure

A grievance will be closed when:

- The outcome has been communicated to the stakeholder, where possible.
- All immediate actions have been assigned.
- The agreed resolution has been implemented, or an action plan is in place.
- The reason for closure has been recorded.

Maris will confirm to the stakeholder when the grievance has been closed.

Step 7: Review or escalation

If the stakeholder is dissatisfied with the outcome, they may request a review within **10 working days** of receiving the outcome.

The request should explain why the stakeholder believes the outcome or process should be reviewed.

The review will be carried out by the next most appropriate person who was not responsible for the original decision.

Maris will aim to communicate the final review decision within **10 working days**.

Where the stakeholder remains dissatisfied, they may choose to seek independent advice or contact an appropriate external body.

Communication

Maris will keep the stakeholder reasonably informed throughout the grievance process where contact details have been provided.

Updates may include:

- Whether the grievance has been accepted.
- Who is responsible for handling it.
- The steps being taken to assess or investigate it.
- Expected timescales.
- Any changes to those timescales.
- Whether further information is required.

- How Maris intends to manage or resolve the concern.
- The outcome of the grievance.
- Confirmation that the grievance has been closed.

The frequency and detail of communication will depend on the nature and complexity of the grievance.

Confidentiality and Data Protection

Information relating to a grievance will be handled confidentially and only shared with people who need the information to assess, investigate, resolve or oversee the matter.

Maris will seek the stakeholder's consent before sharing their identity with additional parties wherever reasonably possible. However, there may be circumstances where information must be disclosed to investigate the concern properly, protect another person or meet a legal obligation.

Where this applies, Maris will explain the position to the stakeholder where it is safe and lawful to do so.

Personal information will be handled in accordance with Maris' UK ADM001 GDPR: Data Privacy Notice for employees, workers and contractors, ADM002 UK GDPR: Data Retention Policy and applicable data protection law.

Protection Against Retaliation

Maris will not tolerate retaliation, harassment, intimidation, threats or any other adverse treatment against a stakeholder who raises a grievance, participates in an investigation or supports another person in raising a concern in good faith.

The Grievance Officer will consider the risk of retaliation during the initial assessment and throughout the grievance process. Appropriate protective measures will be considered where a risk is identified.

Any concern about actual or potential retaliation should be reported immediately to Lw@Marisseafoods.co.uk . Allegations of retaliation will be assessed promptly agenised our Harassment and Bullying procedure and may result in corrective, disciplinary or contractual action.

This protection does not extend to anyone who knowingly provides false or malicious information.

Recording and Monitoring

The Grievance Officer will maintain a Stakeholder Grievance Register.

The register will include, where appropriate:

- A unique grievance reference.
- The date the grievance was received.
- The stakeholder category.
- The identity of the person raising the grievance, unless anonymous or confidential.
- The person, department or organisation the grievance concerns.
- The location of the grievance, where relevant and not sensitive.
- The nature and subject of the grievance.
- The status: under assessment, active or closed.
- Key communications and decisions.

- Actions agreed and responsible persons.
- Target and actual completion dates.
- The outcome and closure date.

Records will be retained for one year.

An annual summary of the status, number and subject of grievances will be prepared by the Grievance Officer and reviewed by Managing Director- Steven Tilson.

The annual review will consider:

- Whether grievances were handled within the stated timescales.
- Whether agreed actions were completed.
- Any repeated or emerging issues.
- Opportunities to improve Maris' policies and practices.
- Whether the grievance procedure remains accessible and effective.
- Whether any changes to this procedure are required.

Where no grievances have been received, the annual review will still confirm that the procedure, reporting channels and grievance register remain in place and operational, and a confirmation of frequent checks that the online Grievance form and procedure document are functioning correctly.

Roles and Responsibilities

Stakeholders

Stakeholders are responsible for always raising concerns honestly and providing accurate information to the best of their knowledge.

Grievance Officer

The Grievance Officer is responsible for:

- Receiving and acknowledging grievances.
- Maintaining the Stakeholder Grievance Register.
- Coordinating initial assessments.
- Appointing an impartial investigator/ correct department for remediation.
- Identifying potential confidentiality or retaliation risks.
- Communicating information back with stakeholders where necessary.
- Monitoring agreed actions.
- Confirming when grievances have been resolved and closed.
- Preparing the annual grievance summary.

Investigators

Investigators are responsible for:

- Declaring any actual or potential conflicts of interest.
- Conducting fair, thorough and impartial investigations.
- Protecting confidential information.
- Documenting findings and recommendations.
- Escalating urgent or serious concerns where necessary.

Senior Management

The Managing Director is responsible for:

- Providing oversight of the grievance procedure.
- Reviewing serious or unresolved grievances.
- Approving appropriate corrective or remedial actions.
- Reviewing the annual grievance summary.
- Ensuring sufficient resources are available to operate the procedure effectively.
- Monitoring the overall effectiveness of the procedure.

Approval and Review

This Procedure will be reviewed at least annually, or sooner where:

- A significant grievance identifies a weakness in the procedure.
- Relevant legal or regulatory requirements change.
- B Corp requirements change.
- Maris' business activities or stakeholder relationships materially change.
- No Grievances have been raised for a significant time, and the mechanisms accessibility and functionality need to be reviewed.

Approved By: Steve Tilson (Managing Director)

