
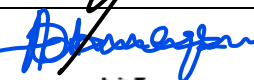
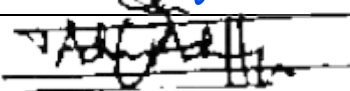


# **GRIEVANCE & DISCIPLINARY POLICY**

## Reviews & Approvals

This Grievance & Disciplinary Policy document has been reviewed and approved by the undersigned:

Designation	Signature	Date
Chairman, SATH		15/7/2022
Group Executive Director		14th July 2022
Group Head, Human Resources		13th July 2022

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## 1. INTRODUCTION & OVERVIEW

Signal Alliance Technology Holding Company Limited ("SATH" or "the Company") seeks to adopt a progressive grievance and disciplinary policy based on the organization's value systems to identify and address employee or employment related matters.

In every work situation, it is reasonable to expect a measure of disagreement between persons. These disputes are sometimes easily settled. At other times, an employee or group of employees might have a grievance against the company or its representatives, which requires to be settled by series of actions, and it is for this purpose that the following grievance procedure has been devised.

This policy outlines the procedures relating to conflict resolutions and disciplinary processes to improve good workplace relationships. The Policy encompasses all conflict resolutions and disciplinary processes within the group.

## 2. SCOPE

This policy covers grievance and disciplinary processes. It is applicable to all employees of the Holding Company as well as its subsidiary/affiliate companies, irrespective of employee categories, grade or levels.

## 3. PURPOSE

The purpose of this policy is to ensure that all employees of SATH and its affiliate companies:

- a) Maintain a satisfactory standard of conduct for good workplace relations.
- b) Always behave with integrity, honesty and professionalism.
- c) Eliminate negative and unwarranted behavior during their employment.
- d) Avoid tendencies that may potentially create chaos and confusion.
- e) Are treated fairly and consistently in relation to this policy.

## 4. GRIEVANCE PROCEDURE AND MANAGEMENT

This Policy sets out the criteria for settling conflicts between employees in the organization. Heads of Departments, Senior Management, Line Managers and individuals are enjoined to ensure that all workplace conflicts (either right or interest issues) are settled amicably (informally) before recourse to formal means.

A workplace conflict (either right or interest issue) is defined as the claim that there has been a violation, misinterpretation or misapplication of a rule, policy, or procedure in relation to people management and interpersonal relations and or conditions of employment. Employee disputes may be resolved informally between the Employees and their immediate supervisor and/or Head of Department, if within the same department or company. The Employee is therefore encouraged to attempt a resolution at this level in the first instance.

The following are the stages for reporting and settling the usual employee grievances:

**Step 1:** An employee raising a matter relating to him\herself, shall in the first instance, communicate it in writing to his/her line manager. The line manager shall address the

matter within two (2) working days from the day the grievances was made known to him/her.

**Step 2:** If the employee is not satisfied with the response given by the manager, he/she should notify the next management level in writing. A meeting should then be convened with the complainant by the manager and a management level personnel to discuss the issue within two (2) working days.

**Step 3:** If the complainant is still not satisfied, the matter discussed will be brought to the attention of the departmental head of the concerned at a meeting.

**Step 4:** If the matter remains unsettled, it may be referred to Human Resources department depending on the magnitude and the level of exigency. It should be discussed at a meeting to be attended by the concerned head or department/the head of business subsidiary and the aggrieved employee.

**Step 5:** If the matter remains unresolved, it will be referred to the Group Executive Director or the Executive Vice Chairman, who shall take a decision that will be binding on all parties.

At all steps towards settlement, both sides shall use their best endeavour to reach an amicable settlement. All facts must be presented, and full attention given to the grievance. Everybody with a complaint should be given a fair hearing. At the end of the day, it should be evident that not only has justice be done but also seen to have done.

It is against the organization's policy to suppress grievance memos and any proven case of such shall be treated as misconduct. **The grievance procedures set out in this policy does not cover grievance issues relating to performance management, disputes arising from personal agreement, or salary/compensation related matters.**

## 5. DISCIPLINARY ACTIONS

**5.1.** It is the Company's policy to be fair in the administration of discipline; however, all willful/deliberate violation of policies, SATH Core Values, Code of Business Conduct and Ethics shall be dealt with firmly and such violations shall form enough grounds for serious disciplinary action ranging from verbal reprimand, written queries, written warnings up to a termination of employment/summary dismissal, depending on the gravity of offence.

**5.2.** All cases of reprimand must be formally documented, and a copy sent to HR. Where an employee is found to have breached a process whether for minor or major offence, the employee's line manager shall first issue a query to the employee. In a situation where an employee is given a query, he/she will be given an opportunity to defend himself in writing within Twenty-Four (24) hours of receipt of the query. If the Employee's response to the query is unsatisfactory, the appropriate penalty for misconduct shall be applied in line with the provisions of this policy.

**5.3.** The disciplinary actions in this policy shall apply to all employees (full time and contract). The policy guides provide a list of common infractions, along with

approved range of consequences for each. However, it does not presume to cover all possible offenses, but the range of consequences described in the Table (1) of this policy document is intended to serve as a guide for consequences. Greater or lesser penalties than those provided may be imposed as circumstances warrant and in consideration of mitigating and aggravating factors.

- 5.4.** The line manager/supervisor may issue a verbal reprimand to the employee prior to a first warning letter.

6. **THE PROGRESSIVE STAGES OF DISCIPLINARY ACTIONS**

**6.1. Stage One – Verbal Reprimand**

If an Employee's conduct does not meet acceptable standards, the Line Manager will hold a discussion with the Employee to raise such issues.

At the discussion, the Employee will be given the opportunity to state his/her case. The employee may provide the support required from the Manager to address the situation where applicable.

At the end of the discussion, the improvements expected from the employee should be mutually agreed and the oral warning would be given for disciplinary purposes after satisfactory conduct and performance.

**6.2. Stage Two – Query and Written Warning**

The Line Manager shall issue a query highlighting the offence, previous offences (where relevant) and any previous verbal reprimand.

The employee shall be required to respond within twenty-four (24) hours. The HR department must be copied on the issuance and response of the query

The offence must be thoroughly investigated by the Head of Department within 72 hours of issuing the query and if appropriate, he/she shall make a recommendation to HR department for a warning letter. However, where the HOD is also the Line Manager, then investigations shall be conducted by Head of Human Resources as activated by the HOD's Line Manager based on the applicable reporting line.

The warning letter shall be placed in the employee's file where there is an established case of breach by the Employee.

Subject to satisfactory conduct, warning letters shall be kept in employee's file however, shall not be a reference point after a year of satisfactory conduct or performance.

**6.3. Stage Three- Suspension**

Whenever an employee is placed on suspension for committing any of the offences, such suspension shall be for a maximum duration of three (3) months and shall be without pay.

The management reserves the right to terminate or dismiss an employee where it is proven and established that an employee has grossly breached his/her terms

of employment and/or has committed a major offence resulting into a significant financial loss or a reputational damage to the business.

An employee with an alleged criminal offence shall be suspended without pay with effect from the date of suspension until the matter is finally disposed of or resolved with the organization by a court of law. Where the employee is discharged and acquitted, all outstanding entitlements shall be paid. However, if convicted of the offences, the appropriate disciplinary action shall be applied.

An employee who has been arrested or held in detention by the police on a criminal charge shall be automatically and immediately suspended from duty irrespective of the stage of investigation.

#### **6.4. Stage Four – Termination**

Any breach of rules, values and Code of Business Conduct and Ethics, which adversely affects or is detrimental to the interest of the Company, other employees or customers, may result in termination of the employment of the offending employee.

#### **6.5. Stage Five – Summary Dismissal**

An employee may be dismissed / have his appointment terminated for grave or gross misconduct

### **7. MATTERS TO NOTE**

**Without prejudice to the disciplinary stages highlighted in this policy, stages 1 to 5 are not mutually exclusive; a combination of two or more stages may be applied as consequence for an offence depending on the severity of such offence. Please refer to Table 1 of this policy document– “Basis for Disciplinary Actions”.**

All cases of dismissal/termination must pass through the Disciplinary Committee where the employee must appear to defend him/herself and the Disciplinary Committee shall make recommendations on the matter after a thorough investigation. Notwithstanding the preceding sentence, **where an offence is a proven case of misconduct, with evidence, and where the continuous employment of such employee in this circumstance may pose a serious business risk, the Company shall terminate or dismiss an employee in line Table 1 of this policy document. Since time may be of essence in this instance, the management reserves the right to take a decision on termination/dismissal without recourse to Disciplinary Committee.**

**Effect of dismissal:** An Employee who has been dismissed will forfeit all benefits and entitlements usually granted to employees on exit.

### **8. MINOR OFFENCES**

A minor offence receives a warning letter, which is a reminder to the employee that he/she is stepping out of line. Series of minor offences particularly repetition of the same offence, obviously constitute unsatisfactory behavior and may result in a more severe disciplinary sanction.

Among the minor offences are:

- a) Low quality output despite detailed instruction.
- b) Waste of materials.
- c) Tardiness, unexcused or abuse of the duration of lunch period.
- d) Spreading rumors slander gossip and\or lies thereby causing harm to employee or the organization.
- e) Sleeping in the office during office hours.
- f) Departing from the standard job methods or procedures without the supervising officer's approval resulting in minimal loss in the Organization or client's assets.
- g) Failure to conform with the dress code and personal hygiene.

It must be noted that the afore mentioned minor offences is inexhaustive and the Company reserves the right to expand acts which constitute minor offences.

## **9. MAJOR OFFENCES**

These are serious violations on the rights of employee or the orderly operation of the organization or the security of its assets. To commit any of the following major offences or related offences will lead to a warning, suspension, termination of appointment and dismissal depending on the degree of severity. Such offences include but not limited to:

- a. Proven cases of theft, fraud, dishonesty, suppression of records, and irregular practices in respect of cash, vouchers, records, or Company's or client's assets.
- b. Proven or established cases of performing assignments in a grossly negligent manner resulting in a significant loss to the organization or client's assets or significant embarrassment to the organization.
- c. Disobedience of a lawful order or gross insubordination.
- d. Supplying false, incomplete or misleading information in your application for employment.
- e. Drunkenness or taking drugs other than for medical reasons rendering the employees unfit to carry out his\her duties.
- f. Conviction of criminal offence.
- g. Unauthorized absence from work or excessive absenteeism.
- h. Failure to report promptly any serious\severe irregularity on the part of any other member of staff after having knowledge of such irregularity.
- i. Deriving any secret profit or benefit in the course of his\her official duties which places employee in such a position that his\her personal interest and duty to the organization or her clients are in conflict.
- j. Fighting, assault or behaving badly during work hours or within the office.
- k. Divulging office data, investment information, employee or client information and



other official to employees, ex-employees, clients and unauthorized persons.

- l. Using abusive or insulting language or behavior to any client and\or persons.
- m. Sexual harassment- taking undue advantage of one's position or engaging in any act that causes an employee of the opposite sex to feel uncomfortable. In the event of Sexual harassment, all affected Employees should promptly report such harassment in writing to Operations department in line with the grievance procedure in this handbook.
- n. Unauthorized use of the organization's properties.
- o. Using any of the Social Media platform in exposing individual or intellectual property of SATH.
- p. Causing or instigating abuse towards fellow employees, clients or third parties on grounds of race or ethnicity.
- q. Refusal or failure to adhere to government and or approved safety protocols or internal policy on containing pandemics or global health issues.

It must be noted that the afore mentioned major offences is inexhaustive and the Company reserves the right to expand acts which constitute major offences.

## 10. **ACTIONS & CONSEQUENCES**

Where an employee receives corrective action for an offense which falls under one range of penalties, and later commits a different offense under the same or another category of offense, the latter is considered a second offense for progressive disciplinary purposes. For the avoidance of doubt, a combination of:

**10.1.** 2 (two) consecutive warnings on the same or different misconducts (upon the second warning) within 12 (twelve) months will amount to 2 (two) weeks suspension without pay.

**10.2.** 2 (two) consecutive suspensions on the same or different misconducts (upon the second violation) within 12 (twelve) months will amount to termination/dismissal, depending on the severity.

## 11. **TABLE 1: BASIS FOR DISCIPLINARY ACTIONS**

OFFENCE	Warning	Suspension	Termination	Dismissal
Low quality output despite detailed instruction.	X	X		
Waste of materials.		X		
Tardiness, unexcused or abuse of the duration of lunch period.	X	X	X	
Spreading rumors slander gossip and\or lies thereby causing harm to employee or the organization.		X	X	

OFFENCE	Warning	Suspension	Termination	Dismissal
Sleeping during work hours.	X	X		
Departing from the standard job methods or procedures without the supervising officer's approval resulting in minimal loss in the Organization or client's assets.	X	X		
Failure to conform with the dress code and personal hygiene.	X	X		
Proven or established cases of performing assignments in a grossly negligent manner resulting in a significant loss to the organization or client's assets or significant embarrassment to the organization.				X
Disobedience of a lawful order or gross insubordination.		X		X
Supplying false, incomplete, or misleading information in your application for employment.				X
Drunkenness or taking drugs other than for medical reasons rendering the employees unfit to carry out his\her duties.				X
Conviction of criminal offence.				X
Unauthorized absence from work or excessive absenteeism.		X	X	
Failure to report promptly any serious\severe irregularity on the part of any other member of staff after having knowledge of such irregularity		X		
Deriving any secret profit or benefit in the course of his\her official duties which places employee in such a position that his\her personal interest and duty to the organization or her clients are in conflict.				X
Proven cases of theft, fraud, dishonesty, and irregular practices in respect of cash, vouchers, records, or Company's or client's assets.				X
Fighting, assault or behaving badly during work hours or within the office.		X		X
Divulging office data, investment information, employee or client information and other official or confidential information of the Company (whether or not marked				X

OFFENCE	Warning	Suspension	Termination	Dismissal
"confidential") to employees, ex-employees, clients and unauthorized persons.				
Sexual harassment - taking undue advantage of one's position or engaging in any act that causes an employee of the opposite sex to feel uncomfortable.		X		X
Unauthorized use of the organization's property				X
Using any of the Social Media platform in exposing individual or intellectual property of SATH or any of its subsidiaries.				X
Causing or instigating abuse towards fellow employees, clients or third parties on grounds of race or ethnicity.				X
Refusal or failure to adhere to government and or approved safety protocols or internal policy on containing pandemics or global health issues.			X	

## 12. **SEPARATION**

Two methods of separation have been stated as the last resort of consequences and both are defined below:

**12.1. Summary dismissal:** This is where the conduct of an employee is of grave and weighty consequence, such that it undermines the relationship of trust in the employee. In this instance, the employee is seen to constitute a serious business risk to the extent that there would be no need to continue the employment relationship. Such summary dismissal is usually without notice or payment in lieu of notice and the employee forfeits all terminal benefits in such case (refer to staff Handbook).

**12.2. Termination:** This is where either the employee or the employer do not desire to continue an employment relationship. In line with the terms and condition of employment, the employer or the employee may terminate employment relationship with agreed notice period, or payment in lieu of notice.

In all events of separation, the Exit Policy of the Company shall apply.