



# 深港海事安保有限公司

## SINOGUARDS MARINE SECURITY LIMITED

Room 1205, Tai Sang Bank Building, 130 ~132 Des Voeux Road Center, Hong Kong  
Tel: +852 81987300 Fax: +852 30156855 Email: info@sinoguards.com

### **Complaint/Grievance Policy**

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### Resolution of Complaint/Grievance

**Sinoguards Marine Security Ltd is applied.**

Ideally the complaint should be resolved immediately and depending on its complexity within a maximum timeframe of 3 months. If the immediate resolution of the problem is not possible, then the Management Representative requests from the customer/third party a length of time (according to the magnitude of the complaint) to assess the repercussions on the customer and the company. In any case, the Management Representative is responsible to ensure that the investigation of the complaint/grievance is carried out within 2 months of receipt.

Management Representative is responsible for the following:

- **Copies of documents generated as a result of the complaint are filed and records of any action taken are kept. Except where prohibited or protected by applicable law, the finding of the complaint will be made available to a Competent Authority on request.**
- **If needed, cooperation with any official investigations.**
- **Upon decision by the Operations Director appropriate disciplinary action is taken in the case of finding such a violation or unlawful behaviour.**
- **Ensuring that any personnel working for the company who makes a complaint is protected from any reprisals.**

The Management Representative is responsible to ensure that all complaints are investigated fully and impartially and with due consideration for confidentiality.

**For allegations of improper and/or illegal conduct as contained in the International Code of Conduct for Private Security Service Providers (ICOC),** upon decision of the Operations Director, after the internal investigation occurs, the evidence of the complainant and the investigation analysis of the company is referred to an independently appointed panel of three lawyers who are registered with the International Association of Arbitrators. The findings of the Arbitrators and their ruling along with actions taken by the Company will be made available to the Complainant. The ruling of the Arbitrators is final.

In respect to complaints that arise frequently, the Management Representative may set into motion a corrective action according to procedure: "Corrective and Preventive Actions".

All cases of complaints and grievances are reviewed during annual management review meetings.

Signed:

NAME

Date: JUNE 12<sup>th</sup>, 2018