

Stakeholder Grievance Policy

Key Enviro Solutions Limited - KES HOUSE 109, Red Hill Wateringbury, KENT ME 18 5LA 01622 817 999

Purpose & Scope

Key Enviro Solutions is committed to maintaining transparent and accountable business practices through engagement with external stakeholders. This Policy establishes a formal grievance mechanism through which non-employee and non-customer stakeholders may raise substantive concerns regarding the Company's operations, environmental and social impacts, governance practices, or conduct.

The following matters fall outside the scope of this Policy:

- Employment-related grievances, which are addressed through the Employee Grievance Procedure as detailed in the Employee Handbook.
- Service-related inquiries, delivery complaints, and general customer service matters, which shall be processed through the customer enquiry form available on the Company website.
- Matters currently subject to ongoing legal proceedings or allegations of criminal conduct pending formal legal resolution.
- Reports containing allegations of illegal activity or threats of violence.
- For purposes of this Policy, eligible stakeholders comprise suppliers, communities, partners, institutional investors, environmental and advocacy organisations, and affected individuals.

Criteria for Grievance Acceptance

The Company shall accept and investigate grievances that present credible, specific concerns relating to:

- Environmental or social impacts arising from Company operations or activities
- Labour standards, human rights compliance, or ethical conduct within the Company or its supply chain
- Non-compliance with published environmental commitments, sustainability certifications, or regulatory obligations
- Misrepresentation of Company practices, governance failures, or harm to stakeholder interests
- Adverse impacts on communities, supply chain partners, or connected stakeholders

How Stakeholders Can Submit a Grievance

Stakeholders may submit grievances through the following confidential channels:

- Completion of the grievance submission form available on the Company website, or
- Written communication to office@keyenvirosolutions.co.uk with the subject line 'Confidential Grievance Submission'.
- Anonymous submissions are permitted. Anonymity may, however, limit the Company's capacity to provide case updates or confirm investigation outcomes. All information disclosed through grievance submissions is maintained in strict confidence in accordance with this Policy.

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Stakeholder Engagement Framework

Key Enviro Solutions maintains structured engagement mechanisms with all stakeholder categories. These formal and informal channels facilitate ongoing dialogue, feedback collection, and continuous involvement in Company decision-making and strategic development.

Grievance Resolution Process

Receipt and Acknowledgment:

Upon receipt, the Company shall issue written acknowledgment within 5–10 business days confirming submission, providing an assessment timeline, explaining procedural steps, and designating a point of contact responsible for case management and updates.

Scope Assessment:

Within 10–15 business days, the grievance shall be assessed for compliance with this Policy's criteria. Should the grievance fall outside the Policy's scope, written notification shall be provided explaining the determination. Where the grievance is accepted, written confirmation shall be issued with a projected investigation timeline.

Formal Investigation:

An impartial senior manager shall conduct a comprehensive investigation, including evidence gathering and stakeholder consultation where appropriate. The Company shall seek to resolve matters within 20–30 business days from initial acknowledgment. Regular progress communications shall be provided to the complainant at significant procedural milestones. Should additional time be required due to complexity or information gathering, the complainant shall be notified with a revised completion estimate.

Decision & Corrective Action:

Upon investigation completion, the Company shall reach a final determination and implement appropriate corrective measures, which may include operational modifications, staff training, remediation activities, or policy amendments. Written notification shall be sent to the complainant (where contact information has been provided) containing investigation findings, conclusions, actions undertaken, and supporting rationale. A summary of findings shall be provided to all complainants regardless of determination outcome.

Appeal Procedure:

Should the complainant be dissatisfied with the investigation outcome, a formal appeal may be requested within 10 business days of notification. The appeal shall be conducted by a senior manager not involved in the initial investigation. A final determination, including any additional actions or clarifications, shall be communicated within 20 business days of the appeal request.

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Protection Against Retaliation

Key Enviro Solutions is committed to ensuring that all stakeholders may raise concerns without fear of retaliation, harassment, or adverse treatment. Strict confidentiality is maintained throughout the grievance process. Complainants may request anonymity if they perceive risk of retaliation.

At the outset of any investigation, the Company shall communicate to all involved parties the names of personnel who require information access and shall obtain explicit consent before disclosing case details to additional parties. Investigation findings and outcomes remain confidential; information is disclosed only to those with documented operational necessity. All personnel engaged in grievance management receive enhanced training in fair investigation protocols and confidentiality requirements.

Any breach of confidentiality by Company personnel shall result in disciplinary action. Where vulnerability is identified or intimidation is suspected, the Company may engage independent third-party investigators to ensure impartiality, protect complainant safety, and maintain process integrity.

Avoiding Conflicts of Interest in Decision-Making

To ensure fair handling:

- Any individual named in or implicated by a grievance shall not participate in its investigation, assessment, or outcome determination.
- The designated Grievance Lead must formally declare any potential conflicts of interest or prior involvement with the matter.
- Grievances involving senior management or the Managing Director shall be escalated to the Managing Director for oversight or referral to qualified external investigators.

Transparency and Continuous Improvement

On an annual basis, the Company shall publish anonymised summaries of grievance submissions, investigation outcomes, and resolution actions on its website. These summaries shall identify systemic themes and trends while protecting confidentiality.

Aggregated grievance data shall be incorporated into the Company's formal sustainability reporting and B Corp recertification submissions. The Senior Leadership team shall review all upheld grievances and documented outcomes to identify operational improvements and ensure institutional learning.

Grievance information is treated as material feedback for organisational improvement and shall inform strategic priorities, policy development, and operational enhancements.

Where This Policy Is Shared

This Policy is publicly available on the Key Enviro Solutions website alongside the grievance submission form.

The Policy is referenced in annual sustainability reports and corporate governance communications.

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For anonymous submissions, any email address may be used in the submission form; verified contact details are not required for anonymous cases.

This Policy has been approved by the KES Board of Directors and shall be reviewed and updated on an annual basis.

A handwritten signature in blue ink, appearing to read "Paul Openibo".

Name: Paul Openibo

Position: Managing Director

Date: 01 Jan 2026

Revised Date: 01 Jan 2027