

1. Preamble and Commitment

Sterling Oil Group is committed to providing a safe, transparent, and inclusive working environment where every individual can voice concerns without fear of reprisal. This Workforce Grievance Mechanism is a structured process that enables employees and contractors to raise issues regarding workplace conduct, rights, or conditions of work and to obtain a fair and timely remedy.

The mechanism is designed in line with globally recognised human rights principles, international labour conventions, and leading industry benchmarks, ensuring it is credible, accessible, and effective.

2. Purpose

This policy establishes Sterling Oil's formal grievance framework with the following objectives:

- Provide safe and accessible channels for raising concerns.
- Guarantee impartial review, timely resolution, and effective remedy.
- Integrate worker-welfare issues into the company's governance, health, safety, and ESG reporting systems.
- Reinforce trust and accountability between management and workforce.

3. Scope

The mechanism covers grievances relating to:

- Workplace harassment, bullying, or discrimination.
- Wage, benefits, or working hours disputes.
- Accommodation, transport, and welfare facilities.
- Health, safety, and medical issues.
- Security-related concerns.

- Ethical, compliance, or code of conduct breaches.
- Data privacy and confidentiality violations.
- Other employment-related issues that may affect dignity, safety, or fairness at work.

Exclusions: Commercial disputes with third-party vendors, community complaints (addressed separately under the Community Feedback Mechanism), and emergency incidents (handled under HSE protocols).

4. Guiding Principles

The grievance mechanism is based on the following principles:

1. **Legitimacy** – Recognised and governed at the highest level of the organisation.
2. **Accessibility** – Multiple channels available, inclusive of languages and literacy levels.
3. **Predictability** – Clear steps, timeframes, and appeal procedures.
4. **Equitability** – Equal access to information and support for all parties.
5. **Rights-Compatibility** – Outcomes aligned with international labour and human-rights standards.
6. **Confidentiality** – Information managed securely and shared only on a need-to-know basis.
7. **Non-Retaliation** – Protection of complainants and witnesses from any form of retaliation.
8. **Remedy-Focus** – Aim not only to register grievances but also to resolve them and address root causes.

5. Governance and Responsibilities

- **Board / ARC** – Oversees mechanism design and effectiveness; receives quarterly reports and ensures accountability.
- **CEO / COO** – Holds ultimate accountability; ensures resourcing and leadership commitment.
- **Head – HRSS** – Policy owner; responsible for execution, monitoring, and continuous improvement.
- **Compliance & Ethics** – Investigates cases involving fraud, corruption, or serious ethical breaches.
- **Site HR / HRBPs** – Local intake points; responsible for logging, triage, and coordination.
- **Line Managers** – Maintain open-door access but must escalate formal grievances to HR.
- **Contractor Management Teams** – Ensure the contractor workforce also has grievance access and compliance.

6. Grievance Submission Channels

Workforce members may use any of the following channels:

1. **Direct to Line Manager or Site HR.**
2. **Dedicated Email:** grievances@sterling-oil.ng.
3. **24/7 Speak-Up Helpline:** Independent provider, multilingual, anonymous option.
4. **Physical Boxes:** Locked boxes at sites and camps, collected weekly by HR.
5. **HSE/Medical Reporting Integration:** Concerns raised in safety or medical channels are routed to HR for case handling.

Assurance: Retaliation against individuals who use these channels is strictly prohibited and will result in disciplinary action.

7. Grievance Handling Process

Step 1: Intake & Logging (Day 0–1)

- Grievance recorded in central register with a unique case ID.
- Immediate screening for high-risk issues (safety/health) and escalation within 2 hours if required.

Step 2: Acknowledgement (≤ 3 business days)

- The complainant receives confirmation with the case ID and an outline of the next steps.

Step 3: Triage & Assignment (≤ 5 business days)

- Categorisation by type (harassment, wage, welfare, ethics, etc.).
- Assignment to an impartial investigator or escalation to HRSS/Compliance if sensitive.

Step 4: Investigation (≤ 30 days; ≤ 60 for complex cases)

- Fact-finding through interviews, documentation review, and evidence analysis.
- Fair-hearing principles observed at all times.

Step 5: Outcome & Remedy (≤ 10 business days after investigation)

- Findings documented and communicated to parties.
- Remedies may include reinstatement, reassignment, wage correction, training, disciplinary action, improved facilities, or systemic changes.

Step 6: Appeal (10 business days window)

- An independent review panel hears appeals.
- Final decision within 20 business days.

Step 7: Closure

- Case closed upon implementation of remedy.
- Lessons learnt documented for continuous improvement.

8. Confidentiality and Protection

- Identity of complainants protected unless legally required to disclose.
- Anonymous grievances investigated on their merit.
- Strict prohibition of retaliation, with disciplinary measures for violators.

9. Contractors and Third-Party Workforce

- Contractors must maintain their own grievance systems aligned to Sterling standards.
- Where absent or ineffective, Sterling's mechanism is open to contractor staff.
- Contractor compliance checked via audits, worker interviews, and reporting obligations.
- Persistent non-compliance may result in contract suspension or termination.

10. Communication and Awareness

- Policy explained during onboarding for all workforce members.
- Awareness through posters, toolbox talks, digital campaigns, and payslip inserts.
- Materials in English and local languages; visual guides for non-literate workers.
- Quarterly reinforcement campaigns at sites.

11. Training and Capacity Building

- Annual training for HR, managers, and investigators on grievance handling, bias awareness, and confidentiality.
- Specialised training for handling sensitive cases such as harassment or discrimination.
- Contractor site leads trained to extend awareness to all subcontracted workers.

12. Monitoring, KPIs, and Reporting

Performance tracked through:

- Number and type of grievances.
- % acknowledged within 3 days.
- % resolved within 30/60 days.
- % remedies verified as effective.
- Training and awareness coverage rates.
- Contractor grievance compliance.

Quarterly dashboards shared with the Audit & Risk Committee and Executive Committee.

Anonymised, aggregate data disclosed annually in ESG/sustainability reports.

13. Assurance and Continuous Improvement

- Annual internal audits of grievance processes.
- Peer reviews and benchmarking against international practices.
- Worker surveys to assess trust and accessibility.
- Continuous system upgrades, including digital grievance tracking tools.

14. Public Disclosure

Sterling Oil will disclose anonymised grievance trends in its ESG reports, including:

- Volume and categories of grievances.
- Examples of remedies and systemic improvements.
- Progress on contractor compliance and workforce awareness.