



## **"GRIEVANCE" POLICY**

(Managing and Responding to Stakeholder Grievances)

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### **PREAMBLE**

Powwow is committed to the highest standards of openness, accountability, and stakeholder engagement.

An important element of our responsibility is to provide both internal and external stakeholders with a clear, transparent, and accessible process to raise grievances regarding the company and its operations.

This policy establishes the principles and procedures by which grievances can be submitted, acknowledged, assessed, and resolved in a fair and timely manner.

### **SCOPE OF POLICY**

This policy applies to all stakeholders of Powwow, including but not limited to:

- Employees and contractors
- Customers and clients
- Suppliers and business partners
- Community members and other external stakeholders

It is designed to ensure that grievances are addressed in a systematic, transparent, and fair way.

### **ACCESS TO GRIEVANCE MECHANISMS**

The Company provides a dedicated email address for submitting grievances:

[info@powwow.be](mailto:info@powwow.be)

This channel ensures that all stakeholders, both internal and external, have accessible means to submit grievances regarding the Company's operations.



## **SAFEGUARDS AND INFORMATION PROVIDED**

### **Grounds for Accepting a Grievance**

A grievance may be submitted when a stakeholder reasonably believes that an action, decision, or behavior of the Company or its representatives has caused or may cause harm, is unethical, unlawful, or otherwise contrary to the Company's values and commitments.

### **Grievance Process Steps and Timelines**

- Acknowledgement of the grievance within 5 working days.
- Initial assessment and determination of admissibility within 10 open days.
- Investigation or fact-finding process conducted within 4 to 6 weeks, depending on complexity.
- Communication of findings and proposed resolution to the stakeholder.

### **Resolution Mechanism**

The Company will facilitate resolution through open communication, corrective actions when necessary, and mediation if required. Resolutions may include corrective measures, policy updates, or other actions deemed appropriate.

## **PROCEDURE FOR HANDLING GRIEVANCES**

### **Response to Stakeholder Grievances**

For each grievance submitted, Powwow commits to:

- Regularly communicating each step of the process to the stakeholder, including updates on progress, decisions taken, and targeted timelines.
- Providing a final confirmation once the grievance has been resolved, detailing the actions taken.

### **Non-Accepted Grievances**

If the issue raised is not accepted as a grievance under this policy, Powwow will provide a written rationale to the stakeholder explaining the reasons for non-acceptance (e.g. insufficient grounds, issue outside the Company's scope).

## **INVESTIGATING PROCEDURE**

1. The Board of Directors records and acknowledges the grievance.
2. A preliminary review determines admissibility.



3. If admissible, a full investigation is conducted, with involvement of relevant managers or external experts where appropriate.
4. A written report is prepared, summarizing findings and recommendations.
5. Corrective actions or resolutions are implemented.
6. The stakeholder is informed in writing of the outcome, with supporting explanations.

### **CONFIDENTIALITY & NON-RETALIATION**

All grievances will be treated with the utmost confidentiality. Stakeholders submitting grievances will not be subject to retaliation, discrimination, or disadvantage as a result of raising their concerns.

### **PUBLICATION**

This Grievance Policy and the online Grievance Form are made publicly available on the Company's website. Stakeholders are encouraged to use this mechanism responsibly and in good faith.