

Grievance Policy

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Document owner:	Peter Howells, Technical Director
Approved by:	Peter Howells, Technical Director

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Applies to:	Positive ID Labelling Ltd and its supply chain

1. Purpose

This Grievance Policy sets out the process by which employees, supply chain workers, contractors, and other individuals connected with the business of Positive ID Labelling Ltd can raise concerns about conduct, treatment, or conditions that they consider to be unfair, harmful, or inconsistent with our stated values and policies.

We are committed to ensuring that anyone affected by our business operations can raise a concern safely, without fear of retaliation, and with confidence that it will be taken seriously. This policy applies to concerns raised by employees and by workers within our supply chain. It operates alongside, and does not replace, any statutory rights available to employees under UK employment law.

2. Scope

This policy covers concerns relating to, but not limited to:

- Unfair treatment, bullying, harassment, or discrimination.
- Concerns about working conditions, health and safety, or working hours.
- Suspected breaches of our Human Rights Policy, Modern Slavery Policy, or Ethical Trading Policy.
- Concerns about pay, benefits, or terms of employment.
- Any other matter where an individual considers they have been treated in a manner inconsistent with our values or our legal obligations.

This policy does not replace the right of employees to raise concerns through statutory whistleblowing channels where those rights apply. Employees who have concerns about serious wrongdoing are encouraged to take advice from ACAS ([acas.org.uk](https://www.acas.org.uk)) or the independent whistleblowing charity Protect ([protect-advice.org.uk](https://www.protect-advice.org.uk)) if they are unsure which route is appropriate.

3. Who Can Raise a Grievance

The following may raise a grievance under this policy:

- Current and former employees of Positive ID Labelling Ltd.

- Workers engaged directly by us on a contractor or temporary basis.
- Workers in our supply chain who have concerns connected with our procurement or business activities.
- Any individual who has been directly affected by the conduct of our business or our supply chain and who wishes to raise a concern.

We recognise that supply chain workers may face barriers to raising concerns, including language, contractual relationships with their own employers, and fear of consequences. We take these barriers seriously and will handle concerns raised on their behalf by a representative, trade union, or third party in the same way as those raised directly.

4. How to Raise a Grievance

Step 1 – Informal resolution

Where possible, we encourage individuals to raise concerns informally in the first instance, directly with the person involved or with a manager. Many concerns can be resolved quickly through open and honest dialogue. There is no obligation to follow the informal route where the matter is serious or where the individual does not feel comfortable doing so.

Step 2 – Formal grievance

If informal resolution is not possible or appropriate, the individual should submit a written grievance. This can be done by:

- Written letter to: Peter Howells, Technical Director, Positive ID Labelling Ltd, 5 Loake Court, Melbourne, Derby, DE73 8HB
- Telephone: 01332 864895 (where a written follow-up will be requested)
- Anonymous submission: concerns can be raised anonymously through any of the above channels; the individual should indicate that they wish to remain anonymous

The written grievance should describe the concern as clearly as possible, including relevant dates, names (if known), and any supporting information. We do not require a formal document – a clear description of the concern is sufficient.

5. Investigation Process

We will acknowledge receipt of a formal grievance within five working days. We will aim to complete an initial investigation within twenty working days and to communicate the outcome to the person who raised the concern. Where the matter is complex, we will provide an interim update and an expected timeframe for conclusion.

All investigations will be:

- Conducted promptly and with sensitivity.
- Handled confidentially as far as possible, consistent with the need to investigate properly.
- Conducted by a person who has not been directly involved in the matter being investigated.
- Documented so that a clear record is maintained.

Where the grievance relates to a director or senior member of staff, an independent investigation may be conducted. We will communicate who is handling the investigation to the person who raised the concern.

6. Outcomes and Actions

Following investigation, we will communicate the outcome and any actions we are taking in response. We will not always be able to share full details of any action taken regarding a third party, but we will confirm whether the concern was upheld and describe any changes or remedial steps we are implementing.

Where the investigation reveals a breach of our policies or applicable law, we will take appropriate corrective action. This may include disciplinary action, changes to working practices, supplier engagement or, in serious cases, termination of a supplier relationship.

7. Non-Retaliation

We will not tolerate retaliation against any individual who raises a concern in good faith under this policy. Retaliation – including dismissal, demotion, exclusion, or any other detrimental treatment – is a serious breach of our values and, in many circumstances, a breach of UK law. Any individual who believes they have been subjected to retaliation should raise this as a separate grievance under this policy.

8. Review

This policy is reviewed annually by the Technical Director. We monitor the number and nature of grievances raised and the time taken to resolve them as part of our management review process. The outcomes of that review are used to identify and implement improvements to our working practices and supplier management.

Peter Howells

Technical Director, Positive ID Labelling Ltd

Date: April 2026