

# Third Party Complaints Policy and Procedure

## 1.0 Policy

It is the policy of Maritime Asset Security & Training (MAST) (Company) to provide third parties<sup>1</sup> with a mechanism to report allegations of improper and/or illegal conduct to designated personnel including such acts or omissions that would violate the principles contained in the International Code of Conduct for Private Security Service Providers (ICOC)<sup>2</sup>.

The Company will investigate allegations promptly, impartially and with due consideration to confidentiality.

## 2.0 Procedure

The procedure seeks to create a positive approach to complaints.

- (i) The procedure will be published on a publically accessible website;
- (ii) The Company will keep copies of documents generated as a result of the complaint and record of any action taken. Except where prohibited or protected by applicable law, the finding of the complaint will be made available to a Competent Authority on request;
- (iii) The Company will co-operate with any official investigations;
- (iv) The Company will take appropriate disciplinary action in the case of finding such a violation or unlawful behaviour;
- (v) The Company will ensure that any personnel working for the Company who makes a complaint is protected from any reprisals.

The procedure does not confer any contractual rights. The Policy and Procedure may be subject to revision from time to time.

## 2.1 How to Complain

All complaints must be made in writing directly to the Company.

Complaints should be made within reasonable time of the Complainant becoming aware of the grounds for complaint.

Complaints can be sent as follows via:

- Maritime Security: Email to – [operations@mast-security.co.uk](mailto:operations@mast-security.co.uk)
- Personal and Asset Protection: Email to - [admin@mast-security.co.uk](mailto:admin@mast-security.co.uk)
- Letter to – MAST, Thremhall Park, Start Hill, Bishops Stortford, CM22 7WE, UK

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<sup>1</sup> Third Parties include but are not limited to: External bodies, companies, clients, independent contractors such as security personnel providing services to the Company. This is not an exhaustive list.



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Any complaint made under this procedure should include:

- Contact details of the Complainant (including postal and e mail address).
- The subject of the complaint.
- Information and evidence regarding the alleged breach.

The Company will acknowledge receipt of the complaint within ten working days and advise who will be responsible for dealing with the complaint.

Anonymous complaints will be investigated where possible and may be acted upon at the Company's discretion.

## **2.2 Handling of the Complaint**

The Company is committed to ensuring that all complaints are investigated fully and impartially and with due consideration for confidentiality.

MAST has a 2-stage complaints procedure. At each stage it will help us to resolve your complaint quickly if you can give us as much clear detail as possible, including any documents and correspondence and stating that you are making a complaint in line with our procedure.

### **The stages of the complaints procedure:**

#### **Stage 1**

This is the first opportunity for the department involved to resolve a complainant's dissatisfaction, and the majority of complaints will be resolved at this stage. In the first instance, we will try to get your complaint resolved by Senior Manager of the department against whom the complaint has been made. Upon receipt of your complaint the relevant Senior Manager will be contacted and asked by MAST to deal with your complaint.

#### **Stage 2**

If you are dissatisfied with this response you may request a review by the director or head of department of the relevant team. Your request should be sent to the email / postal address given above, who will forward your request to the director/head of department of the relevant team for a review.

#### **Stage 3**

If you are still dissatisfied with this response you may request a review by MAST CEO.

#### **Stage 4**

If having followed the 3 stages of our complaints procedure you still remain dissatisfied, you can ask to have your complaint reviewed externally by someone who does not work, which can include an independently appointed lawyer who is registered with the International Association of Arbitrators. The ruling of the Arbitrator is final.



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Nothing in this policy should be interpreted to restrict any rights of redress the Complainant has in law.

The company will not reimburse any fees, expenses or cost involved in bringing a Complaint.

### Extending time limits

We aim to complete all complaints within the period of 2 month; however, if a complaint is very complex it may occasionally be necessary to extend the time limit. If this is the case, we will keep the complainant informed of progress with the investigation, the reasons for the delay, and the new deadline.

### 3.0 Complaints not covered by the procedure:

This complaints procedure cannot be used to deal with an issue which is part of any legal action against the Company.

This complaints procedure cannot be used by an employee. Any specific complaints made by employees should be directed through the relevant internal grievance policy and procedure.

The complaints procedure cannot be used for complaints outside of those relating to any allegations of improper and/or illegal conduct as contained in the International Code of Conduct for Private Security Service Providers (ICOC).

The company reserves the right to take any appropriate action to protect itself from any unfounded, malicious or vexatious allegations or complaints. Untrue allegations could lead to legal action for defamation.



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