

Grievance procedure

1. **Who can raise a concern.** Workers, customers, suppliers and community stakeholders may raise concerns about Setsail's impacts or conduct, including human rights, discrimination, marketing, environmental claims or other material harm.
2. **How to raise a concern.** Concerns are raised through the channel published on Setsail's public policies page, which is a monitored form or address, or through an accessible alternative on request. Anonymous concerns are accepted where they contain enough information to act on.
3. **Acceptance.** We accept good-faith concerns relating to Setsail's operations or relationships. A person does not need to prove misconduct before raising a reasonable concern. A finding that a concern is unsubstantiated does not by itself make it malicious. If we do not accept a concern, or refer it elsewhere, we explain why and point to the appropriate alternative route.
4. **Matters in legal proceedings.** A concern about a matter that is already the subject of active legal proceedings, collections or formal dispute resolution is referred to Setsail's legal counsel and handled through that process. We tell the person this and give them the appropriate contact.
5. **Timelines.** Where we have contact details, we acknowledge a concern within five business days, log it and assign a case owner. We assess safety, conflicts of interest and urgency, and explain how the concern will be reviewed. We aim to give an initial assessment within ten business days. If more time is needed, we explain why and give a date for the next update, and we update the person at least every ten business days while the matter is open.
6. **Resolution.** We establish the facts fairly, hear affected parties where it is safe to do so, identify appropriate remedy and prevention, and communicate the outcome and closure, or the reasons the matter could not proceed. A person who disputes how their concern was handled may ask for a review by an uninvolved reviewer. We do not promise outcomes outside Setsail's control, and nothing in this procedure restricts a person's external rights.
7. **Confidentiality.** We share details only with those who need them to handle the concern, subject to law and a fair investigation.
8. **No retaliation.** Retaliation against anyone who raises a concern in good faith or takes part in a review is prohibited, including adverse treatment at work, in access to services, commercially or in the community. Suspected retaliation is escalated urgently.
9. **Conflicts and escalation.** A concern about the case owner goes to an uninvolved executive. A concern about the Chief Executive Officer or a director goes to the independent external reviewer appointed by the directors, who is not a director, officer or shareholder of Setsail.
10. **Responsibilities.** People/HR administers intake, the case register and the annual summary. The Chief Executive Officer is accountable for resources and remedies, subject to the conflict rules above.
11. **Case register.** People/HR keeps a restricted register, separate from the public page, recording for each case: case ID, date received, stakeholder category, subject category, location of the confidential case file, acceptance or rejection reason, case owner and conflict check, acknowledgement date, next update, actions, status, resolution and closure date, remedy, follow-up, and retention date. Identifying details and sensitive allegations are kept in a separately restricted case file.

12. **Annual summary.** People/HR prepares an annual aggregate summary of case subjects, counts received, open and closed, handling times, remedies and lessons learned, with any detail that could identify people or expose confidential allegations removed. The summary is presented at the directors' annual review.
13. **Launch.** The channel is published only after People/HR has verified access and routing, made a clearly labelled test submission, confirmed backup coverage, and recorded the test separately from real cases.
14. **Related policy.** This procedure operates alongside Setsail's 2022 Whistleblower Policy, which continues to apply to workers.