
	REALESTATE GROUP		
	Conflict and Complaint Resolution Policy		
	Approved on 29 November 2022	Version 2.0	

APPROVAL

Date	29 November 2022 (Update)
Approved by Board Representative	Bogolo J Kenewendo
Reviewed by Executive Chairman	Guido Renato Giachetti
Reviewed by Chief Executive Officer	Jacopo Pari

KEY STAKEHOLDERS

Governing Body	Board of Directors
ESG Committee	Committee delegated to oversee, review and make recommendations for the Group's Governance
Executive Chairman	Guido R Giachetti
The Manager, The Management Company	Property and Asset Management Limited, so long as the current management agreement with RDC continues, and its successor should it be terminated, and /or its subsidiaries or outsourced service providers.
Management Team – "The Manager"	Management and Staff of the Manager

Preamble

The terms of reference of the ESG Committee include the integration and alignment of all assurance processes in the company and with regards to Corporate Governance and Behaviour it includes the corporate governance framework, business ethics, policies, code of conduct and the transparency of non-financial reporting.

1. Purpose of the Conflict and Complaint Resolution Policy

This Conflict and Complaint Resolution Policy applies to all employees, directors, and partners of the RDC Properties Group. The use of the words you, us, we, etc. throughout this document means collectively the employees, directors, and partners of the RDC Properties Group of companies.

2. General Principles of the Policy

- 2.1 The RDC Properties Group is committed to creating and maintaining a work environment characterised by constructive, productive and supportive relationships. Such relationships are often subject to contrasting styles of understanding and acting, and to different points of view. It is essential that we all recognize that human interactions are complex, often difficult, and that we all can contribute to their success.
- 2.2 All persons involved with the RDC Properties Group have an obligation to communicate openly and respectfully with one another and to provide reasons for decisions or actions. When disagreements arise, greater understanding by all is needed. The presence of conflict, if dealt with effectively, offers an opportunity for individual and organisational learning including the identification of policies and practices that need to be improved.

- 2.3 The Chief Executive Officer (CEO) is ultimately responsible for ensuring that conflicts involving staff are resolved in a satisfactory manner. He/she has a duty to inform the Environmental, Social and Corporate Governance and the Audit and Risk Committee of RDC Properties Limited of any conflicts that impinge on the organization's ability to function or may damage its reputation.
- 2.4 Conflicts should be addressed at the earliest possible opportunity as unresolved conflict can lead to a stressful, and in the worst cases, a poisoned work environment, the communication shall be made to the (1) HR Manager, (2) Line Manager, (3) CFO/CEO and (4) Chairman.

3. Conflict Resolution Reporting and Communication

In the event that any person or group is experiencing a work-related conflict or has a complaint about the actions of another person, the following guidelines will apply:

- 3.1 Communicate directly with the person or persons whose actions is the cause of the complaint. People should reasonably expect to know if their behavior or their decision is a problem for another person or group.
- 3.2 If the circumstances are such that the person with a complaint is unable or unwilling to communicate directly with the persons or persons whose actions are the cause of their complaint, either for fear of it going badly, or of reprisal, the help of one other trusted person in the organization should be sought.
- 3.3 Communication of the complaint or conflict shall first be made verbally to the respondent or Line Manager.
- 3.4 The HR Manager will resolve complaints and conflicts that cannot be resolved by those directly involved or their Line Managers, should this be impossible, then a report shall be issued to the CEO.
- 3.5 In circumstances where it is the action of the CEO that is reason for the conflict, the Chairman may address the complaint and if required this shall be brought to the attention of the relevant subcommittee Chair.
- 3.6 If this does not lead to a resolution that is satisfactory to the complainant, the nature of the complaint should then be communicated in writing. If this fails to result in a resolution the written complaint should be sent to the (1) HR Manager, (2) Line Manager, (3) CFO/CEO and (4) Chairman.
- 3.7 Third parties, acceptable to all those involved, may be of assistance in helping resolve the conflict in a (1) facilitation or mediation role where the goal is to help the parties restore a positive working relationship in the future, or (2) a decision-making /arbitration role where they investigate what happened and make a determination of who is responsible for the situation and what the consequences for the parties should be. The choice of these two approaches should be offered to the parties. If a mediated approach fails to resolve the matter, an arbitrated approach can be undertaken.
- 3.8 The parties will refrain from drawing others not directly involved into the process as a way of garnering support or gaining attention. Such actions include "copying" the written complaint by email to others.
- 3.9 Complaints and conflicts shall be dealt with in a confidential manner. Meetings to resolve a complaint shall be open only to the parties and those attempting to resolve the complaint. The parties may have an advocate or supporter present. Meetings may be with the different parties individually, together, or both. In the interest of openness, no minutes or written record of what is said in these meetings shall be recorded although, if the parties agree, the outcome of the meetings or a resulting agreement may be documented.
- 3.10 Where a sub-committee of the board is involved in a conflict resolution role, communication with it should be via the sub-committee chair not with the whole board. It is the chair's duty to inform the Chairman of the existence of the conflict. The Chairman may appoint one of the board member, or an impartial party to help resolve the matter.

- 3.11 The parties, and those helping to resolve the conflict, should avoid communicating the details of a complaint, making or responding to allegations or giving advice by e-mail. Face-to-face communication, as difficult as it is, should be relied upon. E-mail messages can be used for arranging meetings or communicating details of the resolution process.
- 3.12 Either the Chief Executive Officer or the Chairman of the Board have an obligation to act immediately in addressing a complaint if the physical and mental health and safety of any of the parties is perceived to be at risk. In doing so one of the parties may be granted a temporary leave of absence with pay until the issue has been satisfactorily resolved or for up to two weeks, whichever is shorter.
- 3.13 If threats to persons are made, or the Chief Executive Officer or Chairman of the Board perceives a possible danger to a party or to other employees, including the possibility of one party being a danger to themselves, external professional assistance must be sought immediately.

4. Enforcement

Those who violate this policy will be subject to disciplinary action, up to and including termination of employment.

5. Monitoring and Review of the Policy

Management will monitor the effectiveness of this policy on an ongoing basis, and will review its implementation every three years at a minimum, or when the environment or legislation requires changes to be made.

6. Approval Signatures



Governing Body Representative



Chief Executive Officer



Executive Chairman